



**STATE OF RHODE ISLAND
DEPARTMENT OF BUSINESS REGULATION
Office of Cannabis Regulation
560 Jefferson Blvd. Ste. 204
Warwick, Rhode Island 02886**

Information Testing Session FAQs

1. At what point do marijuana products undergo enforced required testing?

Flower

If the marijuana will not be processed or altered further, including processing into pre-rolls, it must be sampled and tested at the 10lb strain specific batch level for all required and enforced tests.

If the marijuana will be processed into pre-rolls it can either be sampled and tested once it has been rolled or the marijuana can be ground, then sampled and tested prior to being rolled into its final form.

If the pre-roll will be infused with extract/resin/concentrate, the product must be sampled and tested in its final form. This is required even if all components of the product were tested prior to it being combined into its final form.

Extracts/resins/concentrates

A licensee may have the extract/resin/concentrate sampled at the end stage or they may have the concentrate sampled and tested from a homogenized batch in its final state.

A final state means that no other processing of the extract/resin/concentrate will occur including but not limited to winterization, addition of compliant terpenes, or other cannabinoids.

2. If a concentrate is not tested after it is put into the cartridge intended to be used for inhalation, how does the OCR ensure that those cartridges are safe for use?

Pursuant to § 1.5.2(F) of the Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation (230-RICR-80-05-1), cartridges and any other devices, as determined by DBR, shall receive a product safety certificate which is subject to DBR review.

3. Why is petri dish testing required vs qPCR DNA for microbiological contaminants?

Microbiological culture-based tests are required to assay a broader range of potentially harmful microbes which is more protective of public health. PCR and qPCR methodology are not approved for these broader assays because the variety of DNA primer and probe markers required total aerobic microbes and total yeast and mold are not readily available. In addition, qPCR and PCR require complex algorithms to account for the variety of responses among species and the effects of matrix interferences in the final calculated result. The algorithms (some are proprietary) are developed by the manufacturer specifically for their instrument's design and performance. Laboratories must rely on their instrument's algorithm to convert qPCR and PCR replications into estimated colony forming units (CFU). These differences can lead to variation among testing laboratories.

4. Can I remediate my product prior to enforced required testing?

Yes, so long as the marijuana in its final state passes all required testing.

5. What if my marijuana product fails testing and I want to remediate it prior to retesting?

If a sample fails a required enforced test, a licensee may remediate the failed batch. OCR requests that the licensee notify OCR of the remediation via email.

The licensee must include the below information and the COA issued by the lab.

- *Subject Line: Cultivator Trade Name- Request for Remediation*
- *Cultivator/Compassion Center Tradename requesting the remediation*
- *Cultivator/Compassion Center Tradename performing the remediation*
- *Batch#*
- *Lab that performed the test*
- *Remediation process to be used*
- *Failed Test:*

When a product is remediated it must go through the entire process of sample collection and testing for all parameters and pass all required testing before it can be made available for sale to a Compassion Center.

6. What is the retesting process?

If a sample fails a required test, the licensee may request to retest the failed batch in writing from the OCR.

Licensee must include the below information and the COA issued by the lab.

- *Subject Line: Cultivator Trade Name- Request for Remediation*
- *Cultivator/Compassion Center Tradename requesting the remediation*
- *Cultivator/Compassion Center Tradename performing the remediation*
- *Batch#*
- *Lab that performed the test*
- *Remediation process used*
- *Failed Test:*

The Department will review the request and approve/deny it.

A licensee is required to retest with the same lab who performed the initial analysis.

Some previous FAQs have been archived as they are no longer applicable. If you want access to a previous version, please email to DBR.MMPCCompliance@dbr.ri.gov

Any questions regarding testing should be submitted in writing to DBR.MMPCCompliance@dbr.ri.gov. The Office of Cannabis Regulation and the Rhode Island Department of Health will continue to update this document with any relevant questions and responses.