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

Sampling and Testing Guidance for Metrc Implementation

Amended Date: February 17, 2023

Previous versions of this Guidance Document related to the implementation of sampling and testing issued by the Office of Cannabis Regulation are superseded by this Guidance Document.

Infused Marijuana Products

- The concentrate/extract/distillate that will infuse the marijuana edible or ingestible product intended to be consumed must pass all required testing for concentrates, including pesticides, heavy metals, and cannabinoids, as was previously required.
- The final product will then need to be tested for THC, THCa, CBD and CBDa to ensure that each serving is equal to or less than 10mgs of THC and that the licensee is labeling the product with the correct values pursuant to the labeling rules in Section 1.5 of the Regulation.
- There is a 10% allowable variance for THC cannabinoid results for infused marijuana products.

Pre-Rolls

- Raw plant material pre-rolls may be tested in their final form.
    - Cannabis intended to be manufactured into raw plant material pre-rolls can also be ground, then sampled and tested prior to being rolled into its final form.
- Infused pre-rolls with extract/resin/concentrate must be sampled and tested in their final form for all enforced tests. This is required even if all components of the product were tested prior to it being combined into its final form.

Concentrates intended to be inhaled

- A licensee may have the extract/resin/concentrate sampled and tested in the final package (cartridge/container) or they may have the extract/resin/concentrate sampled and tested from a homogenized batch immediately prior to being put into its final package.
- Enforced compliance testing is required when no further processing of the extract/resin/concentrate will occur including but not limited to winterization, addition of compliant terpenes, or other cannabinoids.

Retesting

- A licensee is required to request permission for a retest in writing from OCR pursuant to 230-RICR-80-05-1.11(D)(2). For failed heavy metals, microbiological, water activity and residual solvent failures, no request is required at this time. All retests must be accurately and timely tracked in Metrc. OCR does require a retest request from a licensee to retest a sample or batch that failed for pesticides. Please submit the request to DBR.MMPCompliance@dbr.ri.gov.

- For approved retests in accordance with the above requirements, the following protocol shall be followed pursuant to 230-RICR-80-05-1.11(E):
    1. If there is enough remaining material from the initial sample to retest, the testing facility will

use that sample material.

2. If there is not enough material from the initial sample, the laboratory sample collector will collect another sample from the same batch using the same collection process.

*If the collected sample was potentially contaminated, OCR requires an email from the licensed lab in order for a new sample to be collected in order to perform the retest.

Remediation

- A licensee is required to request permission for a remediation in writing from OCR pursuant to 1.11(F)(1). For remediation methods already in use for microbiological contaminants, water activity and residual solvent failures, no request is required at this time. All remediation activity must be accurately and timely tracked in Metrc. OCR does require a remediation request from a licensee to remediate a batch that failed for pesticides or heavy metals. Please submit the request to DBR.MMPCompliance@dbr.ri.gov.

  * OCR has not approved a remediation request for pesticides or heavy metals.

*Please note that Metrc FAQs not involving testing have been removed from this document and will be published in their own document.

Thank you,

The Office of Cannabis Regulation