



STATE OF RHODE ISLAND
DEPARTMENT OF BUSINESS REGULATION
Office of Cannabis Regulation
1511 Pontiac Avenue, Bldg. 68-1
Cranston, Rhode Island 02920

Medical Marijuana Program Bulletin 2020-7

Analytical Laboratory Testing Phase-In Process

This Bulletin is issued by the Rhode Island Department of Business Regulation (“DBR”), Office of Cannabis Regulation (“OCR”) to provide guidance regarding the mandatory testing of all products offered for sale at a compassion center. This guidance is issued in accordance with Rhode Island General Laws § 21-28.6-12 *et seq.*, and the Rules and Regulations Related to the Medical Marijuana Program Administered by the Department of Business Regulation 230-RICR-80-5-1 *et seq.*, as amended (the “Regulations”). **This document is intended to provide information and should not replace a thorough reading of the regulations found here:** <https://rules.sos.ri.gov/regulations/part/230-80-05-1>.

The Rhode Island Department of Health (RIDOH) issued the first license of a third-party analytical testing laboratory pursuant to [216-RICR-60-05-6 *Licensing Analytical Laboratories for Sampling and Testing Medical Marijuana*](#) (the “DOH Testing Regulations”). Please visit https://health.ri.gov/programs/detail.php?pgm_id=150 for information on licensed medical marijuana analytical testing laboratories. Throughout the next six (6) weeks, the Office of Cannabis Regulation (OCR) encourages all licensees to explore and begin the testing process for total THC and total CBD for flower products. Throughout this phase-in period, OCR will elicit feedback from the laboratory, cultivators, compassion centers, and the patient community regarding the process, timetables and bandwidth. OCR will consider this information in establishing the appropriate time frame by which all flower products will be required to have laboratory verified potency totals on product labels in order to be eligible and available for sale at a Compassion Center.

Lot/Batch Requirements for Flower/Trim

Please make sure all flower (not intended for pre-rolls) is in lots/batches equal to or less than 10lbs and of the same strain for sampling and testing purposes. Additionally, each lot/batch must be properly labeled. See below.

All trim/flower intended for pre-rolls should be ground prior to sampling. It is recommended that the lot/batch for sampling is less than or equal to 10lbs but there is no single strain requirement. Each lot/batch must be labeled properly. See below.

Labeling Stages for product:

Stage 1: The product HAS NOT been sampled for testing.

Each container in which plant material and/or a batch of processed concentrate or extract is stored must be affixed with a label that includes the following information:

1. The licensee's license number and tradename or business name;
2. The unique identifier generated by the Medical Marijuana Program Tracking System;
3. Date created;
4. Strain name;
5. The quantity; and
6. In bold, capital letters, no smaller than 12-point font, **"PRODUCT NOT SAMPLED FOR TESTING"**.

Stage 2: The product HAS been sampled but is awaiting passing test results.

Once the product has been sampled by the licensed analytical testing lab, the following information must be added to the label or documented in a way that is easily retrievable and trackable:

1. Name and registry identification card number of the person who took the samples;
2. Name and license number of the testing facility that will perform the tests;
3. The quantity of the product;
4. The date the samples were taken; and
5. This must be on the label and cannot be documented in an alternative way. In bold, capital letters, no smaller than 12-point font, **"PRODUCT NOT TESTED"**

Stage 3: The product has passing test results and is awaiting final retail packaging.

1. The licensee's license number and tradename or business name;
2. The unique identifier generated by the Medical Marijuana Program Tracking System;
3. Date created;
4. Strain name;
5. The quantity; and
6. In bold, capital letters, no smaller than 12-point font, **"PASSED TESTING"**.

Stage 4: The product has passed all required tests and is ready to be available for sale at a Compassion Center

For information regarding labeling requirements for retail-ready products, please carefully review Section 1.5 of the Regulations and Medical Marijuana Program Bulletin Number 2020-5, *Product Labeling Guidance*.