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To: Current and Prospective AUCP Licensees
From: Director John Hudak, Office of Cannabis Policy
Date: June 8, 2023
Subject: Guidance Regarding Infused Plant Material

Background

The Office of Cannabis Policy (OCP) has received questions from Adult Use Cannabis Program (AUCP) licensees regarding the testing requirements for infused plant material (cannabis flower and/or trim mixed with cannabis concentrate/extract) that is being sold without being manufactured into individual infused pre-rolls. The addition of this particular cannabis product to the adult use retail market has raised questions regarding the appropriate approach to testing infused plant material.

Because infused pre-rolls have a pre-determined serving/unit size and infused plant material does not, licensees have had questions regarding whether this cannabis product should be tested like infused pre-rolls or as a separate item type.

In response to these questions, in addition to the recent implementation of mandatory pesticides testing earlier this year, OCP has updated its [Guidance for Creating Test and Retest Sample Packages](#). OCP is providing this additional guidance to highlight the testing requirements for infused plant material and to make licensees aware that the Guidance for Creating Test and Retest Sample Packages has been updated to reflect those requirements and pesticides testing generally. Additionally, effective immediately, OCP will no longer require homogeneity testing for infused pre-rolls.

Guidance

Before infused plant material (that is not manufactured into an infused pre-roll) may be transferred to a retail store for sale to consumers, the transferring licensee must ensure that the following mandatory tests have been conducted on the package of infused plant material:

- Filth and foreign material
- Total yeast and mold *
- Microbials *
- Potency (concentrate)
- Water activity **
- Metals **
- Residual solvents ***

- Pesticides **

* Cannabis testing facilities should use the pass/fail limits for cannabis flower, not cannabis concentrate, when determining whether a package of infused plant material passes mandatory testing for total yeast and mold and microbial contaminants.

** Testing for water activity, metals, and pesticides must be conducted on the infused plant material in its final form unless the cannabis flower and/or trim used to make the infused plant material (including any cannabis flower or trim used to make the cannabis concentrate that is a component of the infused plant material) has already been tested for these analyte categories.

*** Testing for residual solvents must be conducted on the infused plant material in its final form unless the cannabis concentrate used to make the infused plant material has already been tested for residual solvents, or the cannabis concentrate is otherwise exempt from testing for residual solvents.

Licensees are advised to select “Potency (concentrate)” for this new item type. Selecting another potency test will result in the package being locked in Metrc.

Finally, please note, in an effort to simplify mandatory testing requirements for infused pre-rolls, OCP is also eliminating the requirement that infused pre-rolls be tested for homogeneity, effective immediately.

Conclusion

OCP has updated its Guidance for Creating Test and Retest Sample Packages to reflect the commencement of mandatory pesticides testing in January of this year, and to account for the introduction of infused plant material into the adult use market.