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Subject: Public Comment - Lab Testing
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Attachments: [image001.png](#)
[info-update-2.pdf](#)

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Hello,

Please find comments for the CAC:

The standardized cannabinoids method for flower and uninfused prerolls (SB544) requires analyzing the initial extract, which essentially ends up requiring the lab to run an additional dilution, since thca will never be in calibration range. Having to run two vials for one sample is an increased cost for the lab in terms of labor and resources.

- We urge the DCC to update standard to allow only running the diluted extract.
 - If this requirement is in place for auditing purposes, then auditing should be done by pulling lab samples instead.
 - If this requirement is in place to match the prep/analysis of the LCS, then the standard should be updated to allow single analyte spiking as representative of the entire analyte list. This would still prove recovery is adequate and is in use in other states such as AZ. Single analyte spikes would also reduce the cost to the lab per LCS from ~\$80 to ~\$10.
- Referenced Arizona regulation (also attached):
 2. Effective immediately, ADHS will allow the laboratory control sample (LCS) and matrix spike (MS) for potency only, as stated in A.A.C. R9-17-404.03(K)(2)(a)(iii) and R9-17-404.03(K)(4)(a) to be comprised of at least one cannabinoid at the mid-level standard. This can be any single cannabinoid which must be taken through the entire sample preparation and analysis procedure.

Recent audits for the standardized potency method suggest that DCC targeted pulling high THC flower and/or outliers.

- We urge the DCC to sample a wide range of concentrations (low and mid-range included).

- Since the implementation of the standardized method, we continue to receive complaints about our results being low, more commonly on the mid-range flower.
- If other labs are inflating numbers, there would be more pressure on the low to mid-range flower.

Best regards,



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ARIZONA DEPARTMENT OF HEALTH SERVICES

PREPAREDNESS

Information Update Medical Marijuana Laboratory Certification Program

October 16, 2020

Information Update #2

1. Yesterday, ADHS filed with the Office of the Secretary of State an amendment to the Medical Marijuana Laboratory Certification regulations. This amendment removed Methyl Parathion and MGK-264 from the required testing analytes in Table 3.1. In addition, the LOQs for Chlorfenapyr, Cyfluthrin and Cypermethrin were changed to the Maximum Allowable Concentration in Table 3.1. These changes are effective immediately.
2. Effective immediately, ADHS will allow the laboratory control sample (LCS) and matrix spike (MS) for potency only, as stated in A.A.C. R9-17-404.03(K)(2)(a)(iii) and R9-17-404.03(K)(4)(a) to be comprised of at least one cannabinoid at the mid-level standard. This can be any single cannabinoid which must be taken through the entire sample preparation and analysis procedure.
3. ADHS has found during its inspections that labs were requesting clients to submit a separate sample for microbiology testing. We understand the idea by the laboratories that this second sample would not be contaminated by any homogenization of the sample that may occur for the chemistry parameter testing. Pursuant to A.A.C. R9-17-317.01(B)(2), "Only one sample of each batch of medical marijuana or marijuana product is collected..." ADHS will allow the microbiology sample portions (with retest portion) to be taken first before the remainder of the sample is homogenized, if needed. If upon completion of all testing, a parameter has failed and a dispensary chooses to have a retest, the whole remainder of the sample will go to the second laboratory.
4. On August 28, 2020, ADHS sent an email with Information Update #1. In this Update were hints for getting better recoveries for the residual solvents. The following is a repeat of that information:

Some labs recently have brought to ADHS's attention that propane, butane and isobutane testing may not be able to meet the requirement in the rules for a $\pm 30\%$ recovery. While we acknowledge that these 3 analytes are tough to analyze, labs are meeting the criteria utilizing some of the following techniques:

- A. Adding a saline solution may help with recoveries. See this Agilent study for sample prep using salt. Please note the study's challenges with the exothermic reaction produced by the salt. You may need to let the reaction sit for up to an hour.
<https://www.agilent.com/cs/library/applications/application-cannabis-testing-agilent-headspace-gcms-5994-1926en-agilent.pdf>
- B. Crimp caps may improve residual solvent recoveries. Crimp caps may also help preserve the stock standard if transferred carefully.
<https://blog.restek.com/which-headspace-vial-cap-is-right-for-me/comment-page-1/>

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- C. This study suggests propane is not stable in DMA and recommends calibrating propane separately in methanol.
https://cdn.shopify.com/s/files/1/0355/4493/files/091616_Protocol_for_Cannabis_Residual_Solvents_Analysis.pdf
- 5. Below are some common issues we've seen with the initial application and inspection process. Labs that have not already applied and are planning to do so should take the following into consideration:
 - A. The laboratory must submit a Certificate of Occupancy, or something from the city stating that you do not need one, for ADHS to approve your application. It has taken some laboratories months to obtain a C of O so you should start working towards one now if you haven't already.
 - B. For the initial inspection, the laboratory will need to set the panic button to test mode as ADHS will be testing the security system. Arranging this ahead of time with your security provider will save time during the onsite inspection.
 - C. The "Fingerprint Submission Information" page is no longer required to be submitted with the fingerprints.
- 6. Calibration training is required for all laboratory agents per A.A.C. R9-17-404.06(A)(7)(i)(i) through (iii). ADHS has provided calibration training for its licensed environmental laboratories. This information may also be useful for medical marijuana laboratories.
<https://azdhs.gov/preparedness/state-laboratory/lab-licensure-certification/index.php#technical-resources-calibration-training>

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