

November 15, 2016

INFORMATION BULLETIN 2016-29

Subject: Interpreting Test Results

All Oregon Medical Marijuana Program (OMMP) growers and processors that take their marijuana or marijuana products in for testing are required to review test results and ensure that the marijuana or marijuana products have passed all required testing before making any transfers. The following bulletin provides guidance on how to interpret test results and what needs to be done if the marijuana item fails testing.

When reviewing test results received from a laboratory, registrants should reference two tables in the division 7 testing rules that list specific pesticides, solvents, and their action limits. OAR 333-007-0400 Standards for Testing Pesticides, and 333-007-0410 Standards for Testing Solvents, reference Exhibit A of the testing rules that contains both these lists as [Table 3 and 4](#), respectively.

Each lab's test data sheet must include a column that states the results for each of these specific pesticides and solvents. Look for the column that displays the result for each test. If you are having trouble figuring out your test results, ask the laboratory for assistance.

Labs generally **do not** include a number in the results column if the test passes, and instead you may see <LOQ listed. LOQ stands for limit of quantitation and is the minimum level for which the lab is able to test.

A passing test will typically be stated as "<LOQ"

If you see a number in the results column, the item more than likely failed for that particular test. You should reference Table 3, for pesticides, and Table 4, for solvents, to verify that the test did indeed fail.

A number value in the results column on the test data sheet, over the action limit in either table in rule, means that item failed.

A number value in the results column on the test data sheet, under the action limit in either table in rules, means the item was detected but did not fail.

Labs must show that they are able to detect levels of pesticides or solvents below the action limit. If you see a number below the action limits for a pesticide or solvent, then the marijuana item may be transferred but OMMP may still contact you.

Any marijuana item tested that has results over the action limits may not be transferred. Staff from the OMMP will contact you with next steps that may be taken.

I have a failed test result. Now what?

A new testing webpage on the OMMP site outlines the requirements for testing and what the options are when an item fails a test. The webpage is located here:

<http://healthoregon.org/marijuanatesting>

- If a grower or processor has a marijuana item that failed an initial test, the laboratory is required to notify OMMP.
- The OMMP will follow up with the grower or processor to ensure appropriate steps are taken to address the failed test result.
- A grower or processor may choose to retest a sample that failed an initial test.
- If the sample passes the retest, a separate accredited and licensed laboratory must also resample the batch and confirm the result in order for the batch to pass testing.
- A testing laboratory must be notified by the grower and processor if it will be retesting any sample that has failed previous testing.
- Marijuana and marijuana products that fail testing may be subject to destruction that must be witnessed and recorded by the OMMP.
- When a medical marijuana item must be destroyed, the registrant must contact the OMMP and arrange for witness of the destruction of the batch. The OMMP may be contacted at: OMMP.Labs@state.or.us

A medical marijuana registrant that fails to comply with any of the testing rules will be subject to enforcement action which may include civil penalties or having their registration suspended or revoked.

Testing Requirements

Anyone receiving a transfer of marijuana or marijuana product needs to review test results and ensure they pass before they accept the transfer.

All marijuana and marijuana items must be tested to standards outlined in [division 7](#) and [division 64](#) rules. All marijuana ingredients (like a concentrate, extract, canna butter, etcetera) used in a finished marijuana product, such as an edible, topical or similar product, must be tested to division 7 testing standards.

Marijuana and marijuana products that were not tested under division 7 and division 64 standards may not be transferred to a dispensary or processor. Growers or processors that transfer marijuana items to dispensaries or processors should always provide a copy of the test results.

Testing rules may be found at: healthoregon.org/ommprules