

Bulletin Number: MD_IB_55	Distribution Date: 06/25/2021	Effective Date: 6/30/2021
Contact Point: Metrc® Support	Subject: Lab Testing Updates	
Reason: Testing Requirement Updates		

Greetings Metrc Users,

On June 30, all testing requirements included in the December 15, 2020 revision of the Technical Authority for Medical Cannabis Testing will take effect and be implemented in Metrc. To reiterate the requirements, registered independent testing laboratories must submit test results directly into Metrc via the COA Upload feature. Additionally, cannabis flower that exceeds 100,000 CFU/g for Total Yeast and Mold (TYMC) will be flagged for required remediation prior to transfer to a licensed dispensary. The MMCC will continue to monitor and analyze testing data over coming months. Any questions regarding testing requirements should be sent via email to scientificsupport.mmcc@maryland.gov.

Information regarding COA upload, viewing a COA, creating lab samples, and the process for documenting plant remediation is included below. A copy of The Maryland Medical Cannabis Commission's Technical Authority for Medical Cannabis Testing Revision 3.0 can be found [here](#).

The original Metrc Bulletin that covered the testing updates was Maryland Internal Bulletin 42. This is an update to that bulletin that includes the Best Practices for Remediation.

Metrc is pleased to provide a reminder on information available in the software since **June 1st, 2020**.

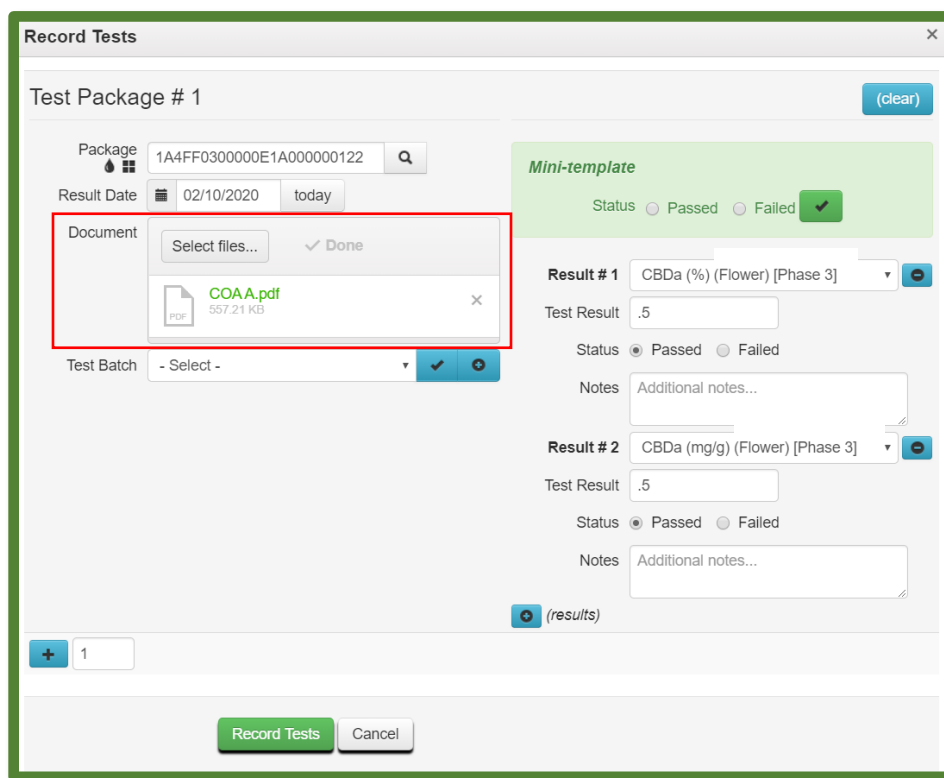
- Testing laboratories are able to upload a COA and associate it to all recorded test results on a specific sample using a button in Metrc or through the API using third party software upgraded to use the new feature.
- Once Testing Facilities have uploaded the COA, both Testing Facilities and Licensees with the proper permissions will be able to view the uploaded COA via the Lab Results Tab on Packages and Manifests.

In addition to the ability for COA uploading and viewing functionality, the MMCC will be changing the configuration of the Lab Test Batches. This change will mean that instead of multiple required lab test batches being indicated for the different required lab tests, one lab test batch will be selected based on the item type. The next lab test batches will be available:

- Hemp Concentrate
- Hemp Raw Plant Material
- Infused Non-Edible
- Inhalable/Vape Concentrate
- Non-Solvent Based Concentrate
- R&D Testing
- Raw Plant Material
- Retest
- Solvent Based Concentrate
- Stability Studies

Uploading a COA

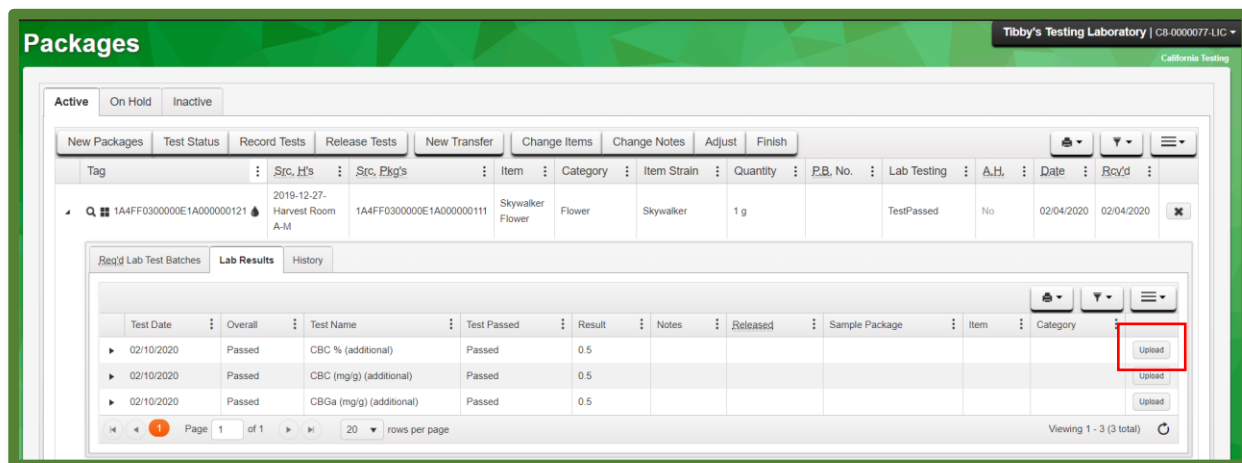
Testing laboratories are able to upload a COA while they record test results on the *Record Tests* page, as shown in **Figure 1** below.



The screenshot shows the 'Record Tests' window. On the left, under 'Test Package # 1', there is a 'Document' section. A red box highlights the 'Select files...' button and the 'COAA.pdf' file (557.21 KB). To the right, the 'Mini-template' section shows two results for 'CBDa (%) (Flower) [Phase 3]' and 'CBDa (mg/g) (Flower) [Phase 3]', both with a 'Test Result' of '.5' and 'Status' of 'Passed'. At the bottom, there are 'Record Tests' and 'Cancel' buttons.

Figure 1: Uploading a COA with Test Results

This provides the added flexibility to Testing Facilities only to upload a COA after test results have been recorded using the new *Upload* button shown in **Figure 2** below.




The screenshot shows the 'Packages' window with the 'Lab Results' tab selected. A red box highlights the 'Upload' button in the bottom right corner of the table. The table contains the following data:

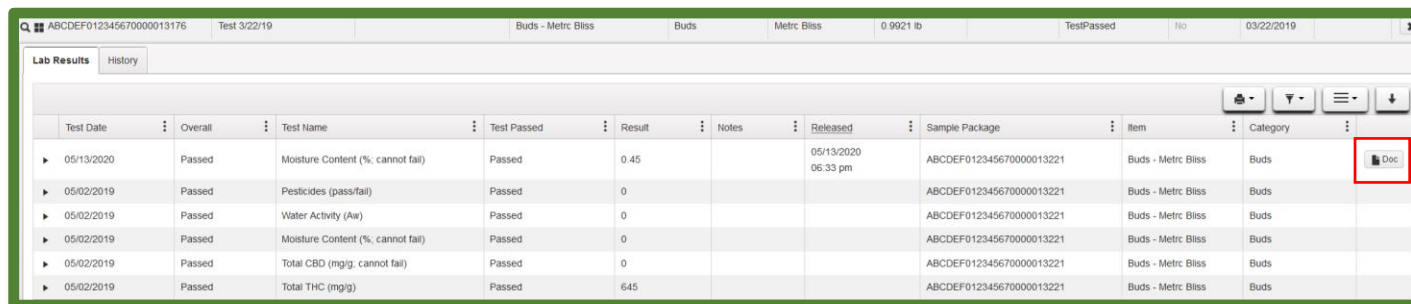
Test Date	Overall	Test Name	Test Passed	Result	Notes	Released	Sample Package	Item	Category
02/10/2020	Passed	CBC % (additional)	Passed	0.5					
02/10/2020	Passed	CBC (mg/g) (additional)	Passed	0.5					
02/10/2020	Passed	CBGa (mg/g) (additional)	Passed	0.5					

Figure 2: Upload COA Button

Also, a COA can be uploaded with test results or separately from test results through the API using third party software with this ability.

Viewing A COA from Packages Grid

Once a Testing Facility has entered, or imported test results and the COA has been uploaded into Metrc, the test results will show in the Lab Results tab. The COA can be downloaded to be viewed and/or printed by selecting the  button in the Lab Results tab.





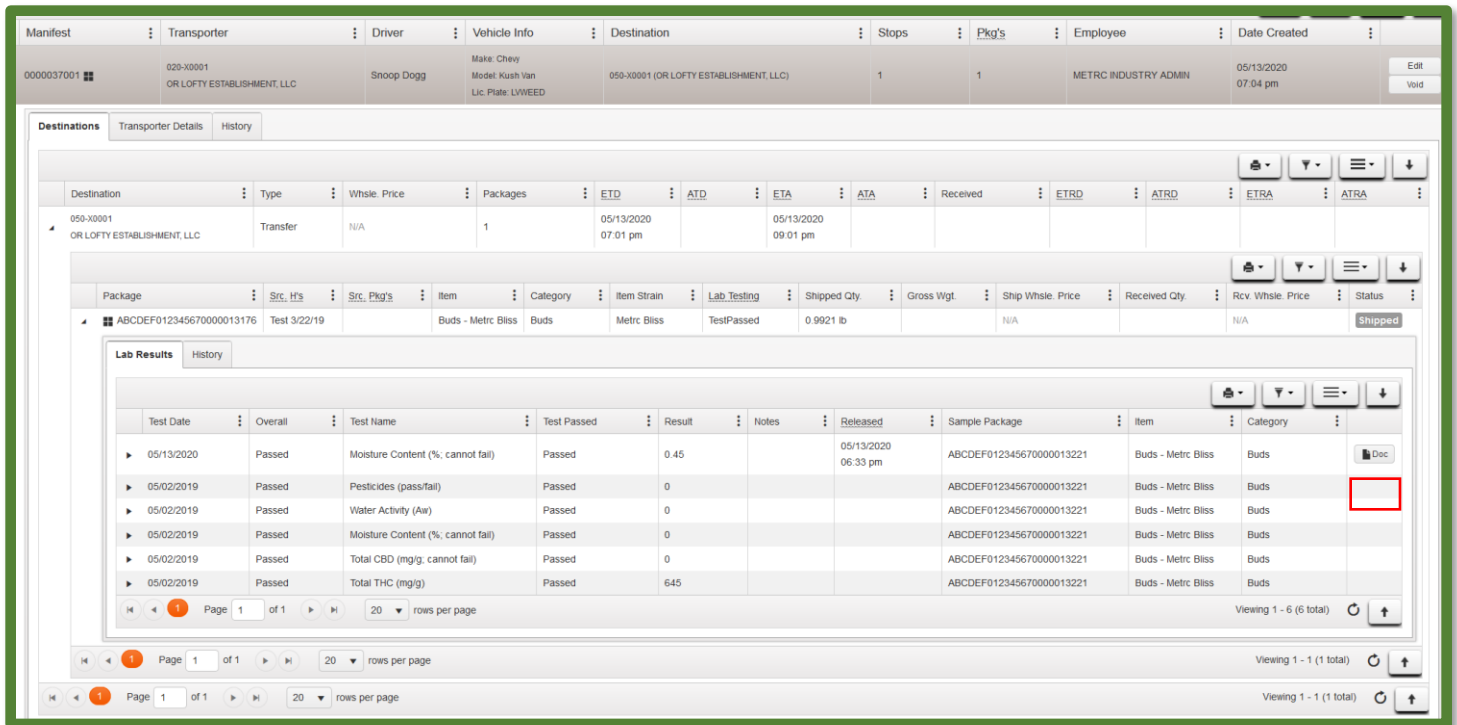
Test Date	Overall	Test Name	Test Passed	Result	Notes	Released	Sample Package	Item	Category	
05/13/2020	Passed	Moisture Content (% cannot fail)	Passed	0.45		05/13/2020 06:33 pm	ABCDEF012345670000013221	Buds - Metrc Bliss	Buds	
05/02/2019	Passed	Pesticides (pass/fail)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds	
05/02/2019	Passed	Water Activity (Aw)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds	
05/02/2019	Passed	Moisture Content (% cannot fail)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds	
05/02/2019	Passed	Total CBD (mg/g cannot fail)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds	
05/02/2019	Passed	Total THC (mg/g)	Passed	645			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds	

Figure 3: Selecting the Doc button to download COA

Viewing COA from Transfer/Manifest Grid

The COA is also able to be downloaded via the Transfer/Manifest as well. See **Figure 4** below. This document can be viewed by going to the Transfers Area and selecting Licensed Transfers. Once in the Licensed Transfers area, find the manifest desired. Once the manifest is located, click the caret (arrow) to the left of the manifest and click the Destinations tab. On the Destinations tab, click on the caret to the left of the destination licensee. To view the COA for a specific package, click the caret to the left of the package and click the Lab Results tab. In the Lab Results tab, the individual test results can be viewed as well as the Doc button at the far right of the test result(s). The  button can be clicked to download the COA to be viewed and/or printed.



Destination	Type	Whse. Price	Packages	ETD	ATD	ETA	ATA	Received	ETRD	ATRD	ETRA	ATRA
050-X0001 OR LOFTY ESTABLISHMENT, LLC	Transfer	N/A	1	05/13/2020 07:01 pm		05/13/2020 09:01 pm						

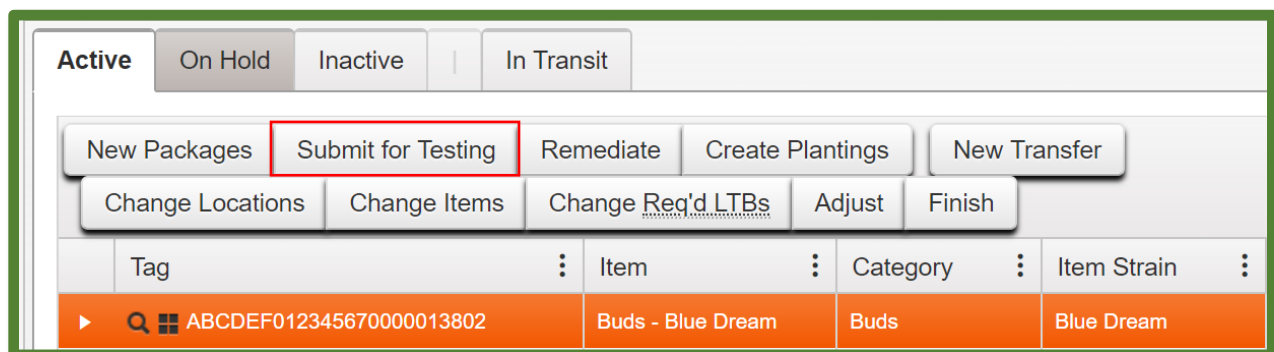
Package	Src. Hs	Src. Pkg's	Item	Category	Item Strain	Lab Testing	Shipped Qty.	Gross Wgt.	Ship Whse. Price	Received Qty.	Rcv Whse. Price	Status
ABCDEF012345670000013176	Test 3/22/19		Buds - Metrc Bliss	Buds	Metrc Bliss	TestPassed	0.9921 lb		N/A		N/A	Shipped

Test Date	Overall	Test Name	Test Passed	Result	Notes	Released	Sample Package	Item	Category
05/13/2020	Passed	Moisture Content (% cannot fail)	Passed	0.45		05/13/2020 06:33 pm	ABCDEF012345670000013221	Buds - Metrc Bliss	Buds
05/02/2019	Passed	Pesticides (pass/fail)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds
05/02/2019	Passed	Water Activity (Aw)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds
05/02/2019	Passed	Moisture Content (% cannot fail)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds
05/02/2019	Passed	Total CBD (mg/g cannot fail)	Passed	0			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds
05/02/2019	Passed	Total THC (mg/g)	Passed	645			ABCDEF012345670000013221	Buds - Metrc Bliss	Buds

Figure 4: Download COA from Transfer Manifest

Creating a Test Sample with Required Lab Test Batches

Once these system changes occur, users will be required to indicate the required lab test batches when creating sample packages for transfer to the testing facilities. First, the user will select the package that is being sampled in Metrc and select the “Submit for Testing” button, as seen in **Figure 5**.

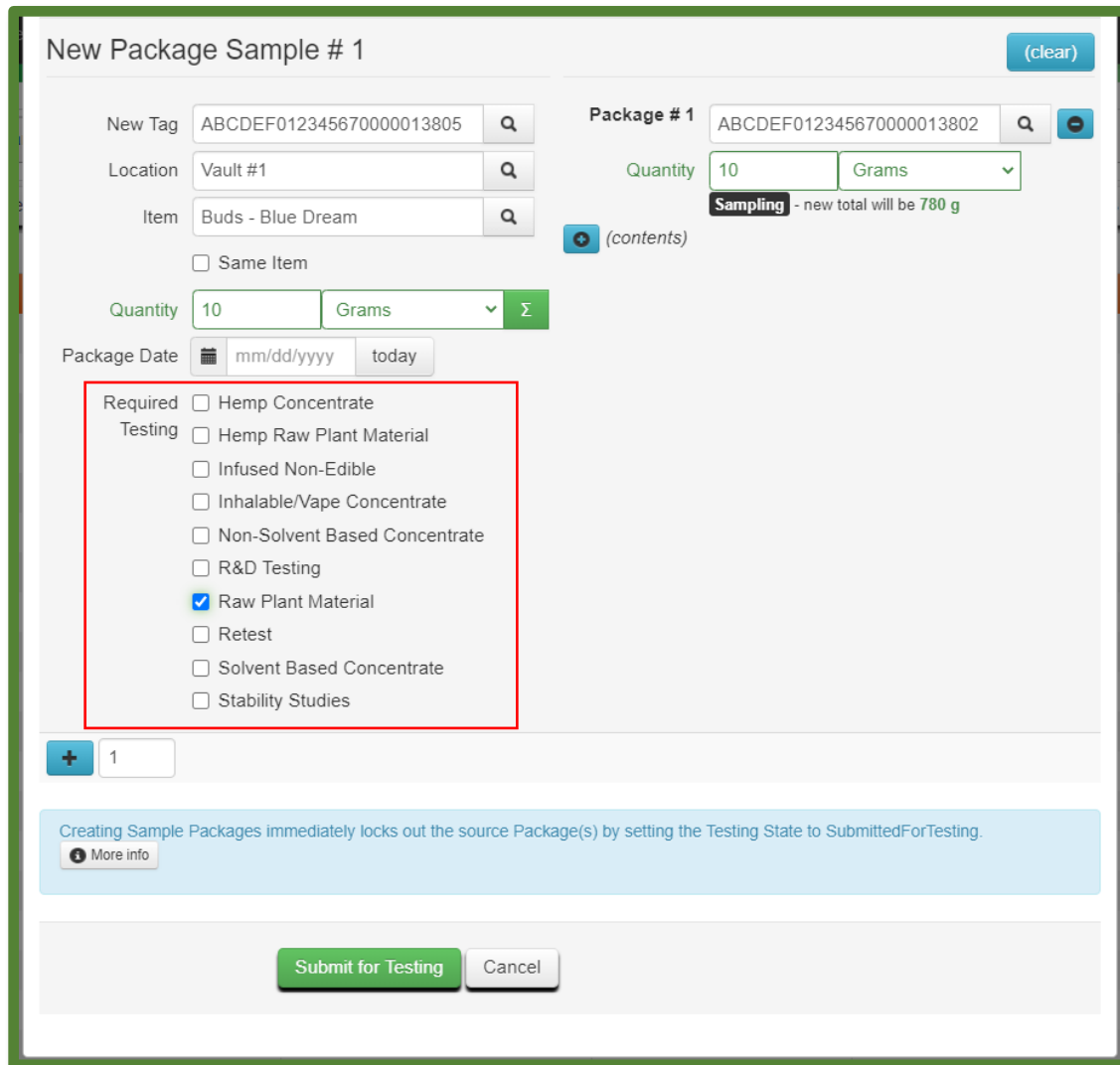


Tag	Item	Category	Item Strain
ABCDEF012345670000013802	Buds - Blue Dream	Buds	Blue Dream

Figure 5: Select Package for Test Sample

Once selected, this button will launch an action window where the user will indicate the name of the item, the quantity, location, and tag of the new package, the date packaged. The new step added to the process already in use is the selection of the “Required Testing”. In this step, the user will check the box that matches the item type of the sample, and this will indicate to

the Lab which Lab Test Types are required for the sample. In **Figure 6**, you will see that for the “Buds-Blue Dream” test sample, the “Raw Plant Material” required test was selected.



New Package Sample # 1 (clear)

New Tag: ABCDEF012345670000013805 Q

Location: Vault #1 Q

Item: Buds - Blue Dream Q

☐ Same Item

Quantity: 10 Grams Σ

Package Date: mm/dd/yyyy today

Required Testing

- ☐ Hemp Concentrate
- ☐ Hemp Raw Plant Material
- ☐ Infused Non-Edible
- ☐ Inhalable/Vape Concentrate
- ☐ Non-Solvent Based Concentrate
- ☐ R&D Testing
- ☒ Raw Plant Material
- ☐ Retest
- ☐ Solvent Based Concentrate
- ☐ Stability Studies

+ 1

Creating Sample Packages immediately locks out the source Package(s) by setting the Testing State to SubmittedForTesting. More info

Submit for Testing Cancel

Figure 6: Select Required Test for Package Based on Item Type

Remediating in Metrc

The following is a step by step guide to properly remediating failed products in Metrc.

Step 1: Navigate to the active Packages grid

Select the packages area on the top navigational bar and then select the Active tab on the Packages grid as shown in **Figure 7**.

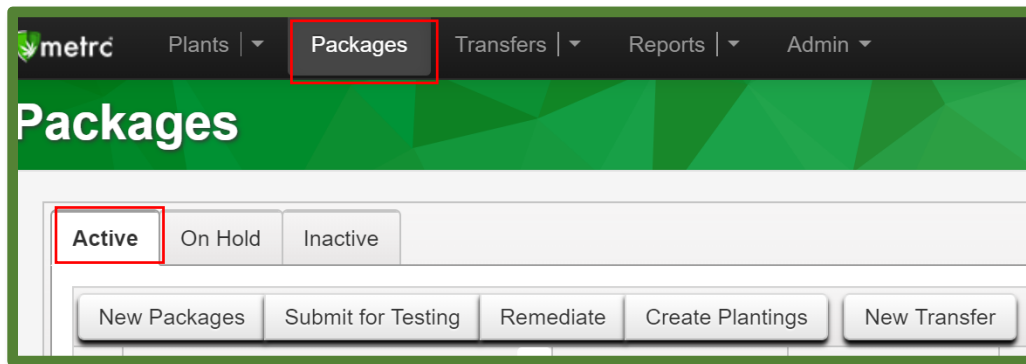


Figure 7: Navigation to Active Packages

Step 2: Identify the package that requires remediation

Identify the package with a “TestFailed” Lab Testing status that is going to be remediated. It is important to understand the reason the product failed testing and the appropriate method for remediation. In **Figure 8**, two packages are shown: a package of flower/buds that failed for water activity and a package of shake/trim that failed for microbials. Both can be remediated but will have to use different methods to do so. The available Remediation Methods are show below in (**Figure 9**).

Active											
On Hold Inactive											
New Packages Submit for Testing Remediate Create Plantings New Transfer Change Rooms Change Items Adjust Finish											
Tag	Src. H's	Src. Pkg's	Room	Item	Category	Item Strain	Quantity	P.B.	P.B. No.	Lab Testing	
ABCDEF012345670000015180	Metrc Bliss 6/13/2019		Processing Room	Buds - Metrc Bliss	Buds	Metrc Bliss	397 g	No		TestFailed	
ABCDEF012345670000015181	Metrc Bliss 6/13/2019		Processing Room	Shake/Trim - Metrc Bliss	Shake/Trim (by strain)	Metrc Bliss	477 g	No		TestFailed	

Figure 8: Two Testing Failed Package Examples

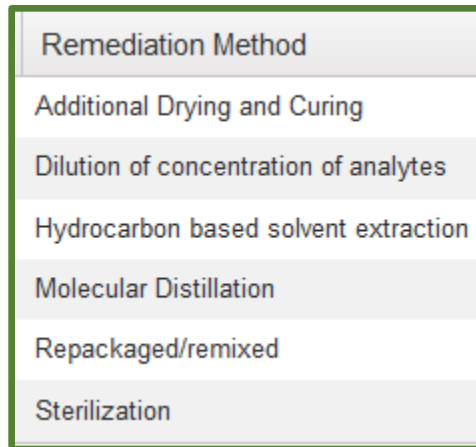


Figure 9: Remediation Methods

Step 3: Perform Remediation Actions

In the above examples, the remediation methods are as follows: For the flower/buds that failed for water activity the action required is Additional Drying and Curing, and for the shake/trim that failed for microbials a processor could use Hydrocarbon based solvent extraction.

Usable Marijuana – flower, shake/trim from harvest Example (Additional Drying and Curing):

In the flower/bud package example, the product would continue to be dried and cured. After the necessary drying has been completed, the product can now be remediated by selecting the buds package and then clicking the **Remediate** button see **Figure 10**, triggering an action window. Then record all of the required information in the action window and select “Additional Drying and Curing” as the remediation method see **Figure 11** below. Upon completely filling out the information and verifying its accuracy, select **Remediate Packages** button to complete the action.

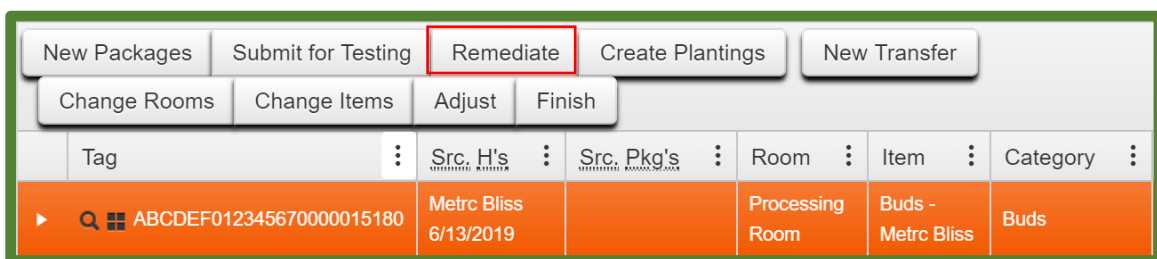
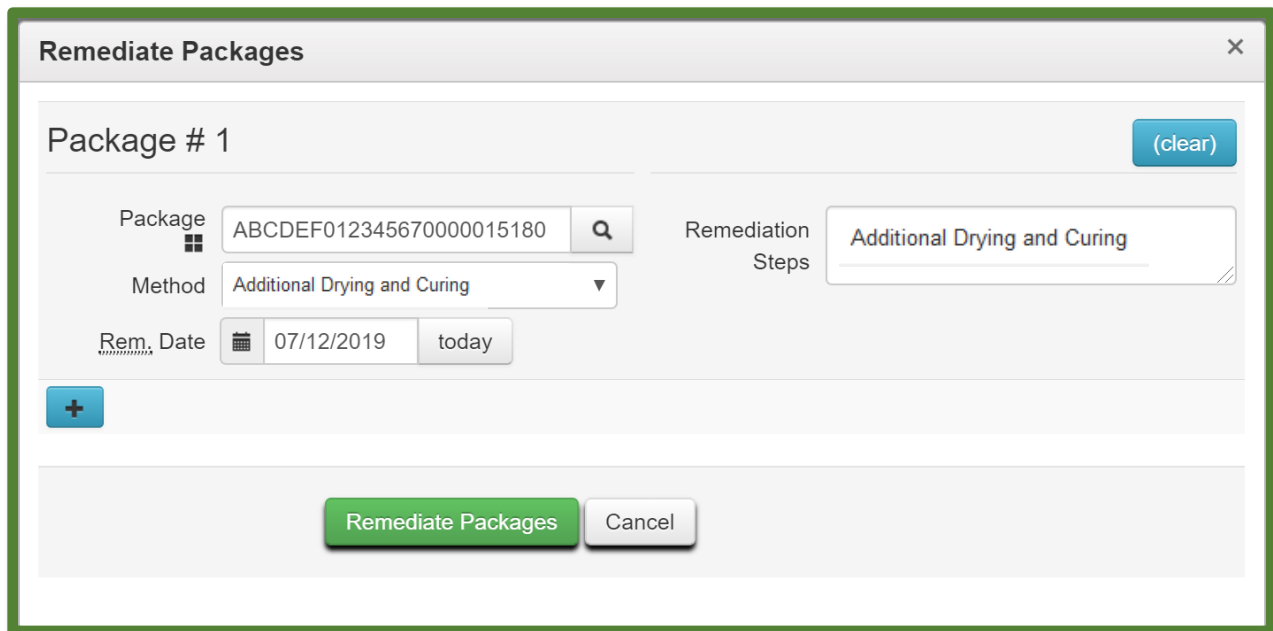


Figure 10: Select Buds Package and Remediate Button

**Please note that selecting the remediate product for any item other than “Test Failed” product will trigger an empty Remediate Package window.*



The 'Remediate Packages' window is shown with the following details:

- Package # 1** (with a '(clear)' button)
- Package**: ABCDEF012345670000015180 (with a search icon)
- Method**: Additional Drying and Curing (dropdown menu)
- Rem. Date**: 07/12/2019 (calendar icon) and 'today' button
- Remediation Steps**: Additional Drying and Curing (text area)
- Buttons**: '+', 'Remediate Packages', and 'Cancel'

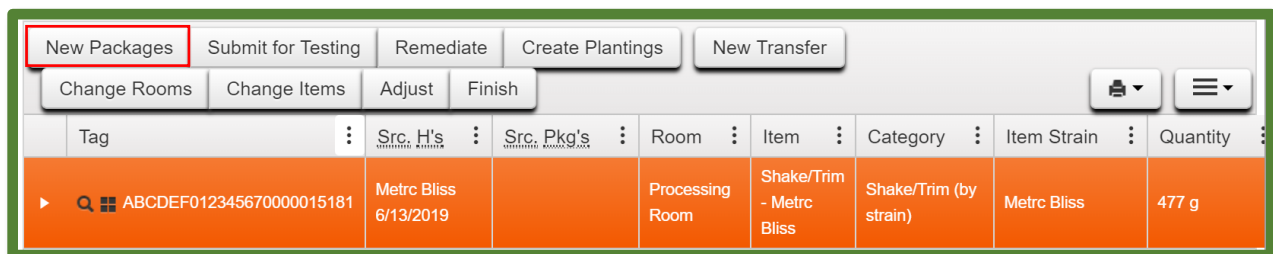
Figure 11: Remediate Buds Package by Drying and Curing Longer

Remediation via Extraction/Further Processing (High Heat and Hydrocarbon-Based Extraction)

Some products, in order to be remediated, must undergo a process changing the products physical/chemical form. These processes (extraction for example) would be recorded as a production batch in Metrc and at the same time would record that the process is an action to remediate the product. This step must be done in Metrc.

New Packages

To do this, first select the product that is intended on being extracted and then click on the button as shown in **Figure 12**. This will trigger an action window to appear.



Tag	Src. H's	Src. Pkg's	Room	Item	Category	Item Strain	Quantity
ABCDEF012345670000015181	Metrc Bliss 6/13/2019		Processing Room	Shake/Trim - Metrc Bliss	Shake/Trim (by strain)	Metrc Bliss	477 g

Figure 12: Select Package for Extraction

Once the action window appears, ensure that the “Production Batch” and “Remediate Product” boxes are checked and all the information required, including the remediation method and all steps taken to remediate the product, are completed as shown in **Figure 13**. Once the information is verified then select the **Create Packages** button to complete the process.

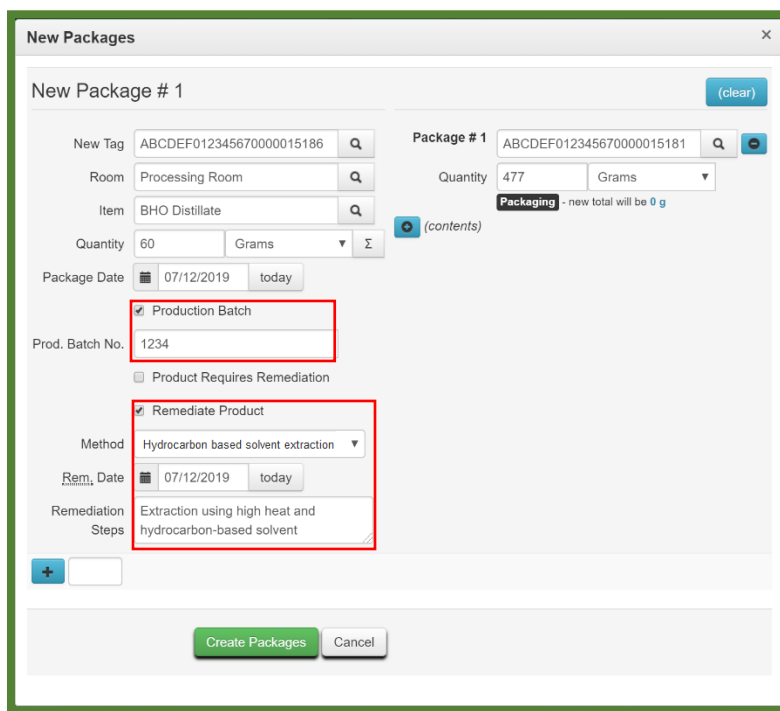


Figure 13: Creating a Production Batch Package to Remediate Product

Step 4: Verify that the Remediated Products Testing States are “Remediated”

Now the ability to check that the remediated bud package as well as the new concentrate production batch package that was remediated both can be verified and now have the Lab Testing status of “Remediated. The package(s) should also have the triangular symbol next to the tag number denoting that the package contains remediated product as shown in **Figure 14**.

Tag	Room	Item	Category	Item Strain	Quantity	P.B.	P.B. No.	Lab Testing	Date
ABCDEF012345670000015186	Processing Room	BHO Distillate	Concentrate		60 g	Yes	1234	Remediated	07/12/2019
ABCDEF012345670000015180	Processing Room	Buds - Metrc Bliss	Buds	Metrc Bliss	390 g	No		Remediated	06/13/2019

Figure 14: Verify Product is in a Remediated Testing State

Step 5: Create New Test Samples

Once the product has been remediated properly in Metrc, the product can be sampled for state required testing. **It is important that it is ensured that the product is listed as remediated prior to any new test samples being pulled.** If the samples are pulled before the product is remediated, it will be a retesting (as in a case of a suspected false-positive) situation and will require multiple samples be sent for testing.

Please feel free to contact Support at support@metrc.com or 877-566-6506 with any questions.