

<b>Bulletin Number:</b> MN_IB_0053	<b>Distribution Date:</b> 11/24/2025	<b>Effective Date:</b> 11/24/2025
<b>Contact Point:</b> Metrc Support	<b>Subject:</b> OCM Stability Testing Requirements	
<b>Reason:</b> To update the industry on Minnesota’s OCM stability testing requirements.		

Greetings,

Cannabis and Hemp products in Minnesota must be labeled with a best if used by date for flower an expiration date for concentrates and infused products. The [Cannabis Technical Authority](#) (page 14) defines the stability testing requirements used to determine the best if used by or expiration date for each product. A cannabis or hemp business is required to demonstrate product stability by submitting a portion of sample material from the first batch of a manufacturing or cultivation process for shelf-life stability analysis by a licensed testing facility.

The business:

- Will prepare the representative sample for transfer to a testing facility, stability samples for each time point for the study, and assign both the required compliance testing and the test “Stability Study T0” to the lab sample package.
- Must communicate with the testing facility to ensure that they send sufficient test material for the required compliance testing and the stability analysis as agreed upon between the testing facility and business.
- Must agree with the testing facility which option for storing stability testing material (listed below) works best for the business and the testing facility.
- Will not assign any stability testing to the stability time point packages other than “Stability Study T0” on the initial lab sample package. Doing so will potentially freeze the entire batch of products until the completion of the stability study.

The testing facility:

- Will report the results for the batch compliance testing and “Stability Study T0” - on the initial lab sample package. Compliant results will release the batch.
- Will test the stability time point packages at the timepoints agreed upon between the testing facility and the business and upload the results using the tests “Stability Study T1”, “Stability Study T2” etc. These results will be evaluated to determine the product shelf-life stability.

The Business and Testing facility:

- Will communicate outside of Metrc to define the appropriate storage conditions (either testing facility or business storage) for the product during stability

analysis and to define when stability test timepoints will be transported to the testing facility and evaluated.

Once the stability study is complete, each product will have a demonstrated stability lifetime. The business must communicate to the office that they have completed the stability study and state the shelf life demonstrated for each product. The business will submit the completed study to OCM through the [Stability Testing form](#).

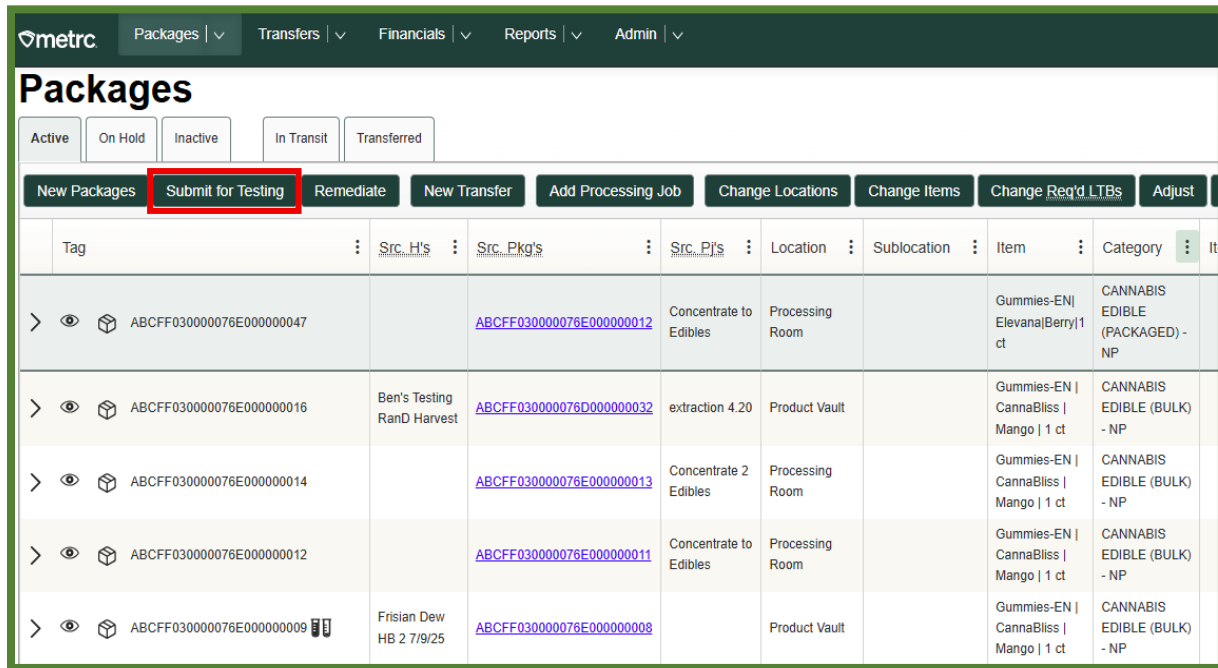
The product stability lifetime is defined by the last passing result for stability testing for that product. For example, if the product met the criteria for stability testing at 9 months, but failed at 12 months, it would be assigned a 9-month stability lifetime. The business will calculate the expiration date by adding the demonstrated stability lifetime to the date of product batch release testing. Refer to [Metrc Bulletin 37](#) for how to enter the item expiration date information. For example, the stability lifetime was demonstrated as 372 days on the first batch of a product. The compliance testing was completed on July 1<sup>st</sup> for the next batch of product. Thus, the product expiration date for the new batch of product would be April 1<sup>st</sup>.

Please see further details of this on the following pages.

### **Creating Test Samples**

Please refer to [Metrc Bulletin 54](#) for how to create a lab sample package and the individual packages for each timepoint in a stability study.

## Preparing Test Samples



**Figure 1: Submit for Testing button**

To prepare a test sample for a gummy (for example) using the test type of “Stability Study T0,” navigate to the Packages area of Metrc, select the lab sample package that needs to be tested and click the “Submit for Testing” button – **see Figure 1**.

Fill out the Submit for Testing action window as is usual; however for this gummy example, both “Infused Edible” and “Stability Test T0 (Infused Product)” options should be selected under Required Testing – **see Figure 2 below**. Any additional testing such as “Additional Terpenes (mg/g)” can also be selected if needed.

### Submit for Testing ✕

New Package Sample # 1 (clear)

New Tag: ABCFF030000076E000000050 🔍

Location: Product Vault 🔍

Sublocation (optional): Type part of the Sublocation nam 🔍

Same Item

Quantity: ex. 100.23 - Select - Σ

Note:

Package Date: mm/dd/yyyy 📅 today

Package # 1: ABCFF030000076E000000047 🔍 —

Item: Gummies-EN| Elevana|Berry|1 ct

Current Lab Testing State: Submitted For Testing

Quantity: ex. 100.23 Each ▼ Max Max

Please enter a non-zero quantity.

Quick Entry: Quick entry packages OFF

+ (contents)

**Required Testing**

- Additional - Terpenes (mg/g)
- Additional - THC Purity
- Full Panel (Finished Products)
- Homogeneity
- Infused Edible
- R&D Testing - Moisture Content
- Stability Study T0 (Infused Products)
- Stability Study T1 (Infused Products)
- Stability Study T2 (Infused Products)
- Stability Study T3 (Infused Products)
- Stability Study T4 (Infused Products)
- Stability Study T5 (Infused Products)
- Stability Study T6 (Infused Products)
- Stability Study T7 (Infused Products)

+ 1

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

Cancel Submit for Testing

**Figure 2: Required Testing Selections**

Additional stability timepoints will not be requested by the business but will be reported by the testing facilities at agreed upon time intervals. The test results will be entered for each stability study by the testing facility in the same test sample that was originally sent at T0. Based on the stability test results the testing status of that batch may be affected depending on if the product fails the stability study at a specific interval. If the product fails a stability testing timepoint, the testing status could be updated to Test Failed, which could affect child packages from the original batch.

Once the product no longer passes compliance testing and the stability study is complete, each product will have a demonstrated stability lifetime. The business must submit the completed study to OCM through the [Stability Testing form](#).

*Note:* If a stability study is completed on a batch package and test results are entered (passing or failing), those test results may also be populated on any child or derived package that has been created. If any of those child or derived packages have been finished, when the test results are entered it may unfinish those packages. A business that notices a suddenly unfinished product can use the “Finish” button to finish that package again.

*Note:* The stability testing test types are only available for the packaged product categories since stability must be demonstrated for products in their final packaged form.

## **Storage of Test Samples**

### **Option 1: Licensed business holds & stores stability packages**

Once the stability test packages are created for each timepoint per Metrc Bulletin 54, the license holder will store the packages until each testing timepoint. It is recommended that the license holders create a sublocation for these samples called “Stability Sample” in Metrc. At the next testing timepoint, the business will create a transfer manifest and in the notes for the package, the business must include the source package number and timepoint this package will be tested for.

When reporting the results, the testing facility will upload the results using the tests “Stability Study T1”, “Stability Study T2” etc. to the package tag that was tested. Note, the package will not be a lab sample package and will not have any testing requested. If stability T1 is requested, it may lock the source package and any child packages created from that source package.

### **Option 2: Testing facility holds & stores packages**

Once the stability test packages are created for each timepoint per Metrc Bulletin 54, the license holder will include these packages on the manifest when sending the lab sample package for testing. On the manifest, the license holder must include a note on which package is for what timepoints will be evaluated for the product. The testing facility will then store the packages until the pre-determined testing timepoints.

When reporting the results, the testing facility will upload the results using the tests “Stability Study T1”, “Stability Study T2” etc. to the package tag that was tested. Note, the package will not be a lab sample package and will not have any testing requested. If stability T1 is requested, it may lock the source package and any child packages created from the source package.

### Metrc resources

If you have any questions, or need additional support, the following resources are available:

**Contact Metrc Support** by navigating to [Support.Metrc.com](https://support.metrc.com), or from the Metrc System, click the Support area dropdown on the navigational toolbar and click [support.metrc.com](https://support.metrc.com) to redirect to the portal.

*Please note:* If accessing the portal for the first time, a username (which is established when logging in), the respective state and “Facility license number”, and a valid email to set a password are required.

**Metrc Learn:** Metrc Learn is designed to offer interactive educational opportunities to enhance Metrc system users’ skills and provide various training options based on experience level.

In addition, the learning system is organized into facility-specific programs made up of various courses. To login or register for an account, visit [Metrc Learn](#).

**Access additional resources:** In the Metrc system, click on the Support area dropdown on the navigational toolbar and select the appropriate resource, including educational guides, manuals, and more.

Thank you for your continued partnership.