

# Proficiency Testing Workgroup 7/30 and 8/11 Meetings Report

Presented at 8/20/2020 CSTF Steering Committee Meeting

## Attendance

Ryan Zboralski, Ecology  
Sara Sekerak, Ecology  
Anastacia Green, Ecology  
Qingfen Gu, WSDA  
Steve LaCroix, DOH  
Nick Poolman, WSLCB  
Bonnie Luntzel, Praxis  
Jay Burns, Treeline Analytics  
Steve Loague, Integrity Labs  
Kyle Shelton, Medicine Creek Analytics

## 7/30 Meeting

### *Trial Study Update and Moving Forward*

Since the last Proficiency Workgroup meeting the Washington State Liquor and Cannabis investigated what avenues were necessary to allow the trial study to carry forward. Unfortunately, there were two significant hurdles uncovered that could not be overcome. The primary hurdle is licensing; by RCW Ty is required to have a license to carry out this trial study in retail marijuana. The other issue is traceability of the marijuana used for this study. Currently Marijuana leaves the traceability system once purchased from a retail store. At some point in Ty's process, the material would have to re-enter the traceability system. This lapse in traceability is easiest to overcome by Ty having a license.

Although this is discouraging news, the group has the determination to carry-on with the trial study in a Hemp matrix. Although we are not going to get lessons learned from how the process works for acquiring marijuana prior to processing at the host lab, we believe that there is still plenty of information to gain. Using the gained information from the trial coupled with the recommendations for matrix matching- to replicate other regulatory programs requirements (EPA, USDA), we will present the case for the necessity for the in-matrix PT testing for a cannabis. This may include the request for RCW to change to allow out of state PT providers to operate in our state to facilitate an in-matrix PT program, e.g. new license types or allowances. There are concerns from most of the members in the group that we might be going through all of these motions and then the Legislature does not make the necessary changes. If we do not give our best effort, we are even more unlikely to see the changes we need.

### *Matrix Discussion*

The conversation transitioned to constructing a working definition of matrix for our forthcoming matrix matching requirements. Without a strong, agreed-upon definition for matrix, our matrix matching requirements do not have enough foundation to continue our push to the Legislature. These matrix definitions would also function as the categories of cannabis accreditation; equivalent to the Environmental model's matrices.

Ryan mentioned that Ecology is going to draft a separate manual for Cannabis accreditation, so that we do not find ourselves trying to force a model that does not fit for cannabis. However, the overall functionality of the Cannabis model will be very similar to the robust Environmental model.

There was a lot of discussion between the members of the workgroup on how specific we need to make these categories. There were two main arguments for having a more specific definition for these matrix categories. The samples seen by the laboratory are very diverse, especially those termed, “End Products” by WSLCB. The other major hurdle that exists is there are no Standard Reference Materials present for labs to use to help distinguish between dissimilar products that both qualify as “End Products.” The largest support for having a more broad definition would be making the definitions more flexible to accommodate novel products and allowing a PT to be available in all of the broad matrices. The group had a split opinion on this topic. The group decided to table until the next meeting. Each member will put together a list of Pros and Cons to having a more specific matrix definition.

#### *Review of Ecology WACs and Procedural Manual*

Ryan transitioned to the next item for discussion: a discussion of the Ecology WACs and LAU Procedural Manual. Ryan provided the workgroup with 2 pieces of context before this discussion. First, Ecology will be creating a separate, but similar, Procedural Manual for Cannabis accreditation. Second, Ecology will not deviate from the “Accreditation to the Parameter” model of accreditation. Although there was some discussion from the workgroup about this change, this is non-negotiable for Ecology’s Lab Accreditation Unit to take over Cannabis Accreditation. Outside of those 2 items, Ryan mentioned that since nobody currently working for the LAU has experience in the cannabis industry, therefore he would like to give the labs the opportunity to provide feedback on the current model for the LAU to consider down the line to incorporate Cannabis.

The section of the manual that had the most significant discussion was the proficiency testing section. Jay brought up the question of how the LAU chooses its PT providers. As far as Ryan knew, it was purely at the discretion of the LAU supervisor. This allows the unit to make quick and sudden changes if a PT provider has issues that require the provider to be added to, or dropped from, the approved list. For environmental, there has not been a need to drop a PT provider in some time and approval of a few PT providers have been done, but on a case-by-case basis. Jay asked what the review process entails, and Ryan said he does not know, but that he will check with the LAU supervisor and have an answer by our next meeting.

There were some other minor discussions relating to use of 3rd party accreditation, specific definitions of labs based on size, and the fee structure. Most of these items were minor points that currently cannot be set into stone due to lack of complete context from the rest of the work of the taskforce. Due to lack of remaining time, the group decided to circle-back to these, or other missed topics, at our next meeting on August 11<sup>th</sup>.

## 8/11 Meeting

### *IAA update and NIST CannQAP*

Since the last meeting, a couple of items have come up that Ryan felt he should share with the workgroup. First is that the IAA between Ecology and WSDA was in the final stages and should be complete in the near future. The second item was the news that the National Institute of Standards and Technology (NIST) is registering participants for the CannQAP. This project is to help develop Standard Reference Materials for the Cannabis industry. Currently in phase 1, this is an optional program where labs analyze and report a provided hemp sample for up to 17 Cannabinoids and report it back to NIST. Ryan mentioned that this program is free to participants (labs do pay shipping and handling) and is a great opportunity to help move this industry forward, not only in Washington, but also nationally. The lack of SRMs has been an item discussed both on, and off, the record of the taskforce and workgroups as a major problem that is critical to moving the industry forward. Bonnie and Kyle both mentioned that they are participating and encouraged others on the workgroup to participate as well.

### *Matrix Definition Discussion*

The focus of the remainder of the meeting was discussing what matrices cannabis labs will be accredited to and analyze PTs. This conversation was primarily about how loosely we are going to define what we ended up calling: End Products. Each member of the group discussed the pros and cons they came up with, with pros or cons coming up frequently. After deliberation of the presented pros and cons, the group put together a list that the group could agree with. After presenting all the pros and cons, the group agreed that a more broad definition for these accreditation/PT matrices was appropriate.

Ryan mentioned that with this broad definition, one goal should be that there is a PT for all the chosen matrices. Jay agreed and mentioned that it would be difficult to convince PT providers to create PTs in complex matrices. Jay followed up asking how the food industry handles novel items when it comes to PTs? Sara mentioned that we might have a contact in Ecology that could have an answer for that and we will attempt to gain an answer to Jay's question.

The group thought a great starting point for these broad categories could come by combining the pesticide workgroup's commodity groups and WAC 314-55. This presents us with:

- Flower:
  - Cannabis sp. plant material. Not altered or extracted.
- Intermediate Products:
  - Cannabis concentrate or cannabis-infused product that must be or are intended to be converted further to an end product.
- End Products:
  - Any cannabis product not covered by Flower or Intermediate Product categories.

The group believes that having these definitions allow the matrix component of "accreditation to the parameter" to be both reflective of the analytical differences between these products while without making PTs excessively burdensome.

Unfortunately, Nick had technical difficulties when the workgroup was finalizing these definitions, so he was unable to vote on the definitions with the rest of the group. When Ryan contacted him, he mentioned that the definition of End Products should be able to stand on its own, apart from the other categories. Ryan edited the definition to this:

- End Products:
  - A refined Cannabis product that must not or is not intended to receive further processing prior to retail sale.

After making this change, Ryan sent it back out to the group, and all were in agreement with the updated definitions to be presented in the motion.

### Action Items

1. Propose our Motion to the Steering Committee for review.
2. Look for review of our matrix matching recommendation from the Potency Workgroup.
3. Ryan/Sara to look into how food labs handle PTs for novel products.