



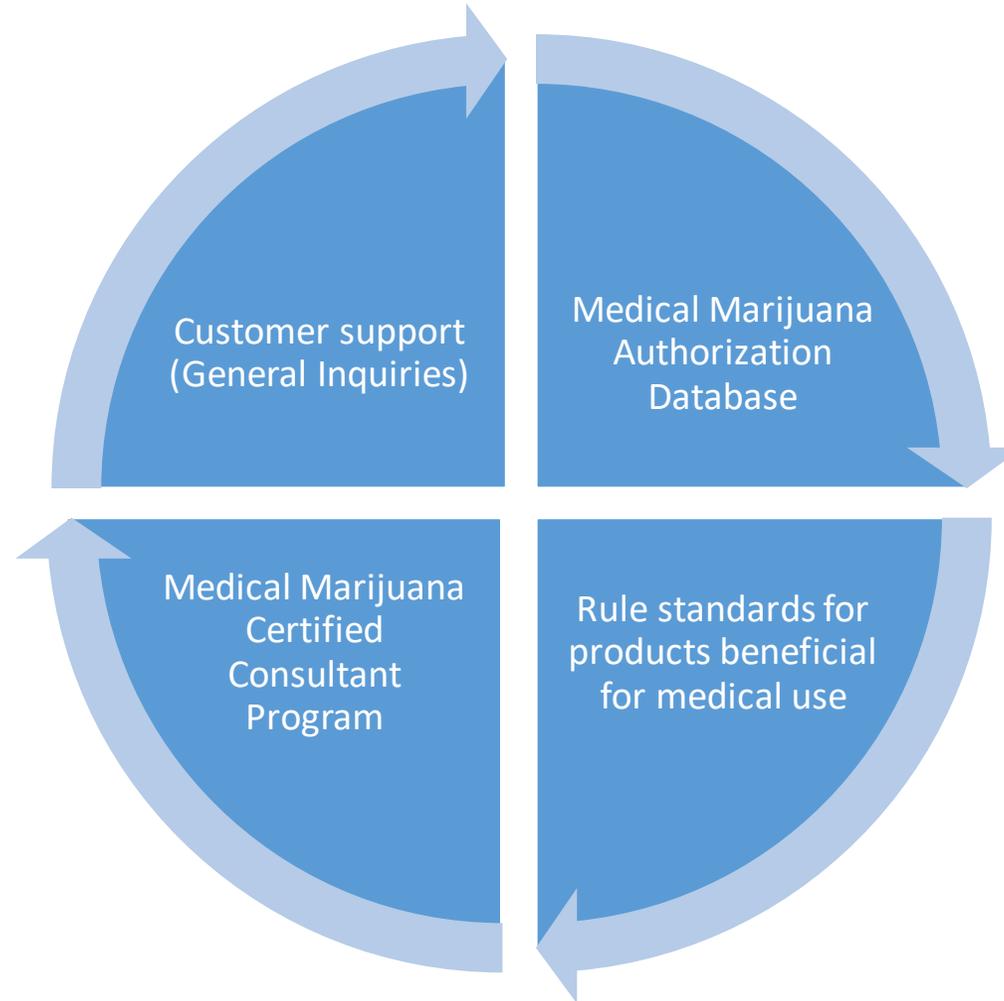
WASHINGTON'S MEDICAL MARIJUANA PROGRAM

Cannabis Science Task Force – Steering Committee Meeting - 10/18/2019

Department of Health

- Health Systems
 - Medical Marijuana
- Environmental Public Health
 - Food Safety
 - Contaminants and toxics exposure
- Prevention
 - Marijuana Prevention & Education Program

Medical Marijuana Program Scope



Goals

Within the scope of the Medical Marijuana program, the goal is to:

- Protect access for patients with qualifying conditions
- Ensure safe, quality tested and accurately labeled products for patients

DOH Role in Marijuana Product Regulations

As a **consultative** agency under RCW [69.50.345](#):

- (8) states that **LCB establishes classes of marijuana**, marijuana concentrates, useable marijuana, and marijuana-infused products according to grade, condition, cannabinoid profile, THC concentration, CBD concentration, or other qualitative measurements LCB deems appropriate ***in consultation with WSDA and DOH***
- (11) of that same statute has DOH and WSDA also serving in a consulting role for LCB's **establishment of accreditation requirements for testing labs and prescribing methods of producing, processing, and packaging marijuana**, marijuana concentrates, useable marijuana, and marijuana-infused products, conditions of sanitation and standards of ingredients, quality, and identity of all those products produced, processed, packaged or sold by licensees.

DOH Role in Marijuana Product Regulations

Established authority to adopt rules:

- RCW 69.50.375 (4) gives DOH authority to adopt rules, **in conjunction with LCB**, on requirements for marijuana concentrates, useable marijuana, and marijuana-infused products that may be sold to qualifying patients or designated providers at a medically endorsed retail store.
- This section is where DOH has the specific rule-making authority for the High THC, Low THC, High CBD labeling and testing

Compliant Products – WAC 246-70

- All products required to meet LCB standards
- DOH rules extend those standards to address patient concerns (heavy metals, pesticides, safe handling, etc.)
- Three categories (General Use, High THC and High CBD) and identified by these logos
- May be sold by any licensed retail store and purchased by any consumer, with the exception of High THC (cardholders only)





Any marijuana product type and meets both WSLCB and DOH requirements



Any marijuana product, except smokeable.
Lower THC and 5x times more CBD



Contains up to 50 mg of active THC per serving (500 mg per unit).
Limited to capsules, tablets, tinctures, transdermal patches, and suppositories.

Quality Assurance Standards:

- Standards are voluntary and in addition to the tests required under WAC [314-55-102](#)
- Testing performed by a third-party testing lab certified by the WSLCB.
- Uses sampling protocols in chapter [314-55](#) WAC
- Failed harvests, lots, or batches are destroyed according to WSLCB rules under chapter [314-55](#) WAC
- WSLCB may authorize retest to validate a failed test result on case-by-case basis.

Fields of Testing:

WSLCB (WAC 314-55)	DOH (WAC 246-70)
Potency Analysis	Prohibited Pesticides (DOH List)
Moisture Analysis	Heavy Metals
Foreign Matter Screening	Mycotoxin Screening
Microbiological Screening	Terpene Analysis (only required if listed on package)
Mycotoxin Screening	
Residual Solvent Screening	

When and How much:

- An imported cannabinoid must be screened prior to adding to any marijuana product.
- Marijuana flowers, trim, leaves, or other plant matter, intended for retail sale **without extraction**, at the time of harvest or when placed into lots;
- All products intended for retail sale as concentrates, extracts, or for use as an intermediate product, screening is only required after extraction.
- Options:
 - **Three grams for every three pounds** of harvested product
 - **Three grams per lot** (5 lbs).
 - **Two grams per batch** (finished concentrates, extracts, or intermediate products)
 - Imported cannabinoids - **one percent** of the product as packaged by the manufacturer (**not less than two grams**).

DOH Standards for Pesticide Testing

DOH standards require testing for **prohibited pesticides** on list maintained by DOH (periodically updated in consultation with WSDA and WSLCB).

- Allowed pesticides list maintained by WSDA
- Uses pesticide action levels set by WSLCB rules in chapter [314-55](#) WAC. Pesticides not listed in the table, action level is 0.1 ppm.
- Certified third-party labs may also screen for additional pesticides.
- Samples failed if detected above the action level for that pesticide and is destroyed according to LCB rules under chapter [314-55](#) WAC.

DOH Standards for Heavy Metal Testing

Sample passes testing if it meets the following standards (same as LCB rule):

Metal	Limit, $\mu\text{g}/\text{daily dose}$ (5 grams)
Inorganic arsenic	10.0
Cadmium	4.1
Lead	6.0
Mercury	2.0

DOH Standards for Pyrethrins and PBO

Labs must also screen for pyrethrins and piperonyl butoxide (PBO) in **samples of concentrates, extracts, intermediate products, and imported cannabinoids.**

Mycotoxins

Mycotoxin screening is required whenever microbial testing for any marijuana product is required by the WSLCB.

Questions?

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