

Proficiency Testing Workgroup 1/21 Meeting Report

Presented at 1/30/2020 CSTF Steering Committee Meeting

Attendance

Ryan Zboralski, Ecology
Sara Sekerak, Ecology
Alyssa Peter, Ecology
Qingfen Gu, WSDA (via phone)
Steve LaCroix, DOH (via phone)
Nick Poolman, WSLCB
Jay Burns, Treeline Analytics (via phone)
Steve Loague, Integrity Labs

Personnel update and Progress Summary

The meeting began by introducing the two new members: Ryan Zboralski from Ecology and Qingfen Gu from Department of Agriculture. After, Sara gave a recap of the 1/17 Steering Committee meeting and an update on the legislative report.

PT program/provider requirements

Ryan and Sara led off the discussion by addressing the need to start nailing-down requirements of the Proficiency Testing (PT) program. They introduced the idea of a “Gold Standard.” The “Gold Standard” is what a PT program would look like if we were in a perfect world: if Marijuana products were federally legal, PTs and or reference material could cross state lines, etc. This would consist of a PT for all designated matrices (the medium being tested, such as cannabis flower or concentrate) and parameter (the method and analyte for which the matrix is being tested). The goal is to have a model as close to the “Gold Standard” as we can, but we understand that there are challenges along the way that might prohibit us from reaching that lofty goal. To address some of these, the group needed a quick recap of the Ecology and WSDA PT programs.

Representatives from both Ecology and WSDA gave a brief run-through of their PT programs. This led to the idea of requiring ISO/IEC accreditation. The group agreed, no matter what the rest of the PT program looks like, that a PT provider, regardless of who it is, needed to be ISO 17043 compliant. ISO standard 17043 gives general requirements for proficiency test providers, regardless if they are also the producer of the Reference Material (RM) used for the PT study or if it is sourced from another party. The group also agreed that if a PT provider is also the manufacturer of the RM used in the PT study, they must be ISO 17034 compliant as well. ISO standard 17034 gives general requirements for the producers of reference material. Both of these standards are available to read on the ISO webpage, www.iso.org.

Compliance with these standards would give both the laboratories and accreditation/regulatory bodies a level of confidence in the PT provider’s ability to deliver a quality product, regardless if they are only the manufacturer of the PT material, distributor of the material and responsible for running the PT study, or both. This motion will be presented to the Steering Committee. The language of the motion will be flexible enough that a PT provider will not also be required to be a reference material producer.

The discussion shifted to the idea of bringing Phenova in as the PT provider. Ryan mentioned that the RCW/WAC language of doing so would need to be flexible enough to where the state was not committed to Phenova. This would allow the labs the opportunity to use another provider if one was available and met the applicable criteria.

The group's next question on this matter was frequency of testing. Ryan mentioned that typically an environmental lab runs two PTs per method and parameter per year. There are some exceptions to this and Ryan outlined those. Steve Loague followed up with the question of, "If we adopt that schedule into the state's program, what happens when you fail a PT?" There was not a clear answer in Ty Garber's presentation of how labs have handled a PT failure. Ryan has reached out to Ty to answer this question and hopes to hear back soon. The group tabled discussion of possibly bringing Phenova on board as the PT provider until there is clarity on how to address PT failures.

CR-102

Nick Mentioned that CR-102 (when approved) would require pesticides and heavy metals testing on all products. There would be a 6-month period after approval before pesticides would be required and a 12-month period before heavy metals would be required.

CRM challenge and Matrix definitions

After a brief break, the next discussion focused onto Certified Reference Materials (CRMs) and matrix definitions. To move towards the "Gold Standard" program, much discussion would be required in the months ahead about defining appropriate matrices.

Jay mentioned that flower and concentrates are likely to be able to lump together into one matrix, but it will not likely work that way for topicals and edibles. Nick mentioned that matrix definition tends to rely on what test the lab is performing. The group began discussion what matrix definitions should be, but did not come to any clear consensus. Due to the time remaining in the meeting, this discussion will be re-addressed in following meetings.

Steve and Jay both mentioned that CRMs are limited at this point.

Action Items

1. The motion of requiring PT providers and Reference Material providers be compliant with the respective ISO will be drafted, shared across the workgroup and proposed to the Steering Committee.
2. Ryan will reach out to Ty Garber of Phenova with the group's questions about dealing with PT failures.
3. The next PT workgroup meeting will be Tuesday 2/11.