

Cannabis Testing FAQs

Marijuana or Usable Marijuana

What constitutes a harvest lot?

A harvest lot is defined as a specifically identified quantity of marijuana that is cultivated utilizing the same growing practices, harvested, and cured under uniform conditions at the same location within a seven calendar-day period.

Does a harvest lot have to be strain specific?

No. A harvest lot may consist of different strains of marijuana as long as the definition of a harvest lot is met.

How does a lab determine what date an item was harvested or manufactured on?

The laboratory will need to obtain this information from the person ordering the test. The harvest or manufacture date should be found in Metrc the summer of 2022.

If a harvest lot consists of marijuana or usable that was harvested before the date a new test takes effect and some of that same harvest lot is harvested after the new tests takes effect, is the new test required?

Yes, the new test is required. The last date of the harvest is the date that will determine the date of the harvest.

If a 50.0-pound harvest lot is submitted for testing and it fails for a required test does the whole 50.0-pound harvest lot fail?

Yes. Once a harvest lot is tested it cannot be broken out into smaller harvest lots or batches for re-analysis.

Is water activity/moisture content testing still required on marijuana or usable marijuana being made into a concentrate, extract, finished inhalable cannabinoid product?

Yes, until March 31, 2023, water activity and moisture content is required for marijuana being made into concentrate, extract, or finished inhalable cannabinoid product.

Cannabinoid Products

How are cannabinoid products sampled?

Only a primary and duplicate sample from a unit of sale are required to be taken. A laboratory must take enough samples to perform testing according to the rules.

I make edibles that come in different flavors. In rule it states I may batch edibles that consist of different flavors. How does this work?

A batch of a cannabinoid product must be produced using a standard operating procedure and result in a finished cannabinoid product that is uniform in potency,

texture, and weight. A standard operating procedure may use different flavors or colors in a batch if the different flavors or colors:

- Are substituted for one another at a 1:1 ratio; and
- Do not affect the potency, texture, or weight of the finished cannabinoid product.

For the purposes of this rule, "flavor" means:

- The essential oil or essence which contains the flavoring constituents derived from a spice, fruit, fruit juice, vegetable, vegetable juice, herb, root, leaf, or similar plant material.
- Any substance, the function of which is to impart flavor, which is not derived from a spice, fruit, fruit juice, vegetable, vegetable juice, herb, root, leaf, or similar plant material.
- Flavor does not include flavoring constituents derived from the cannabis plant.

Acceptable Example:

A processor is making a batch of two different flavored cake pops. The batter is made and split in two, one lemon flavored and one orange flavored. The flavorings are used in the same quality and the end products are consistent in texture and weight. There is no expected change in potency since the only difference is the use of a different flavoring agent. In this case, the two different flavors may be considered one batch and sampled and tested together.

Unacceptable Example:

A process is making variations of a snickerdoodle cookie. Your base recipe consists of a cinnamon sugar cookie that has a cinnamon sugar topping added. If you add lemon flavor to the cinnamon sugar cookie base that is not considered a variation of the original cookie and the two flavors need to be sampled and tested separately. This is because you are now adding weight to your cinnamon sugar cookie that wasn't there before the addition of the lemon flavoring.

A processor makes a batch of cookies. Chocolate chip cookies and peanut butter cookies could not be presented as one batch for sampling and testing since there is a texture difference. Each would need to be sampled from individually and have their own potency testing performed.

A processor makes a batch of cupcakes with frosting. A batch of frosted and unfrosted cupcakes could not be presented as one batch for sampling and testing since there is a weight difference. Each would need to be sampled from individually and have their own potency testing performed.

If I had a variation of a product approved under a control study does that variation carry forward with the new rules?

Not necessarily. Flavors must be added to an item in a 1:1 ratio and be consistent in weight, potency and texture. This is more defined than what was allowed under control studies.

Concentrates, Extracts, Finished Inhalable Cannabinoid Products, and Industrial Hemp-Derived Vapor Items

What is a finished inhalable cannabinoid product?

Examples of this category includes extracts that have been mixed with non-cannabis terpenes, moonrocks, and infused pre-rolls just to name a few. If unsure of the category an item falls under contact OMMP.labs@dhsosha.state.or.us or ommp.labs@oregon.gov

Do finished inhalable cannabinoid products need to be in their final packaging when sampling?

Infused extracts may be sampled in bulk.

Infused pre-rolls must be sampled in their finished form including the paper and crutch if that is the way they will be sold.

Will replicate samples be required to be tested along with primary and duplicate?

If a batch weight of concentrate, extract, finished inhalable cannabinoid product or industrial hemp-derived vapor item is more than 12 kilograms a replicate sample will be required to be taken and tested as an addition to the primary and duplicate samples. The number of replicate samples needed to be taken are dependent on weight. See Exhibit B, Table 7, and the sampling quick guide for additional information.

Will finished inhalable cannabinoid products with combined material produced prior to AND after the go live dates of the new rules need to follow the new rules for sampling and testing?

If an item consists of material prior to and after the go live dates of any of the rules, then the date the item was manufactured is the latest date and the item will need to comply with new rules as required.

Is a water activity test required on kief or prior to making kief?

Kief is considered a concentrate and a water activity/moisture content test is required to be performed on the marijuana or usable marijuana that will be used to make a concentrate or kief. The only exception to this is when a producer produces kief. A marijuana producer may have the kief tested for water activity per OAR 333-007-0420 if the marijuana or usable marijuana was not tested prior to making the kief. If the marijuana or usable marijuana was harvested on or after March 1, 2023, the water activity test will not be required.

What type of testing does a kief sample need if it is intended to be processed into a finished inhalable cannabinoid product?

Other than the water activity test as outlined in the FAQ above, kief does not need any other testing if it will be processed into a finished inhalable cannabinoid product. The finished inhalable cannabinoid product will receive all tests as outlined under OAR 333-007-0341. Also see the [Cannabis Testing Requirements table](#).

Research and Development Testing

Can R&D testing be performed for a new test if that test is not yet required?

Yes, but the result still needs to be tracked in Metrc.

What should I do if an R&D test fails?

While an R&D test is not considered a compliance test it does provide someone with information on what could possibly be in the item submitted for testing. An item that fails during R&D testing could be considered adulterated by the OLCC. It is recommended that OAR 333-007-0450 for failed testing be consulted to see what may happen with the item. It should be noted that dilution is never considered a form of remediation and should never be done.

Do all Research and Development (R&D) tests need to be tracked in Metrc?

Yes, when a requestor orders a R&D test it must be entered into Metrc as a R&D test upon receiving the sampling. Once the test is performed the results of the test must be entered into Metrc. This applies to all tests and item types.

Is a R&D pesticide test allowed for marijuana or usable marijuana?

No. A pesticide test on marijuana or usable marijuana is considered a compliance test.

Other

If an item passes microbiological testing but it appears there is mold or other substance present that is not supposed to be there, what should I do?

If visible mold on a marijuana item is seen the item may be considered as adulterated by the OLCC and should not be transferred.