

MEMBERS

December 2, 2015

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Dear Mr. Westom,

The Nevada Cannabis Laboratory Association (NVCLA) was formed to ensure the uniformity, consistency, reliability, reproducibility, quality, and integrity of scientific testing according to the Nevada state regulations. On behalf of member laboratories, the NVCLA would like to comment about the proposal to remove testing requirements on cannabis grown specifically for extraction purposes.

In general, the NVCLA supports the proposal to only test the extract instead of the material going into the extract as long as all required testing for usable marijuana is applied to these extractions, including heavy metals, pesticides, and microbial screening. Appropriate passing limits (based on concentration, not dosage or daily limits) also need to be set for the extractions.

Because extraction methods may concentrate pesticides, heavy metals, and other harmful species, the allowable limits for these species should be higher than for pure plant material assuming patients will use the same amount of cannabinoids. If cannabis flowers contain approximately 20% cannabinoids, and the goal of an extraction is to have > 95% cannabinoids, this is a five-fold increase. We would like to suggest setting the limits for pesticides and heavy metals to be five times the level set for flower. Microbial limits for extracts are already set in the AHP *Cannabis Inflorescence*.

We would also like to point out that pesticides in particular must be screened prior to the extract being added to edibles or other matrices. The complex nature of food and other products makes it extremely difficult to separate out the pesticides, and so the extracted product is the ideal material to perform this test.

Extraction batch sizes should be based on the amount of starting material – either 5 lbs of flower or 15 lbs of leaf and trim, as defined in NAC 453A.061:

**NAC 453A.061 “Lot” defined.** ([NRS 453A.370](#)) “Lot” means:

1. The flowers from one or more marijuana plants of the same strain, in a quantity that weighs 5 pounds or less; or
2. The leaves or other plant matter from one or more marijuana plants, other than full female flowers, in a quantity that weighs 15 pounds or less.

The minimum amount required of an extract to perform all required tests is 4 grams.

An MME (cultivator or producer) should have the option to submit the cannabis plants being used for an extraction to a laboratory for optional R&D testing to screen ahead of time. However, any non-passing parameters should not mean an automatic failure for extraction purposes as the extraction process could rectify the situation. Producers should also have the option to submit R&D samples to help optimize their process.

For patient safety, it is critical that all products be screened for all safety tests (pesticides, heavy metals, microbiology, residual solvents, etc.) at some point in the chain between the cultivator and the final customer. If a lot of flower initially intended for extraction is subsequently changed to be for sale, then it must be fully screened under the requirements for usable cannabis.

Sincerely,



James Dean Leavitt

President, NVCLA