

Nevada Department of Taxation Regulatory Workshop

MEETING MINUTES

Nevada Department of Taxation
1550 College Parkway, Ste. 115
Carson City, NV 89706

Nevada Department of Taxation
2550 Paseo Verde Parkway, Ste. 180
Henderson, NV 89074

Wednesday, July 26, 2017
1:30 P.M.

Meeting started at

I. Public Comment

Mona Lisa Samuelson commented that we're not finished with marijuana regulations until medical marijuana is addressed, specific to home growing.

II. The Department will hold a workshop to solicit comments from interested persons on the following general topics:

A. Regulations necessary or convenient to carry out the provisions of NRS Chapter 453D, Regulation and Taxation of Marijuana.

Scientific Director

Randy Gardner suggested changing the language of #2.

Testing Methodologies

Alec Garcia commented that AHHP have certain standards in there.

Required Quality Assurance Tests

Ben Chew suggested that they describe what the limit is. Preference to limit the batch. He also stated that shelf life testing would be very expensive for the labs.

Shanna Perry commented that she picked up product that was over 6 months; shelf life of a year is way too long on those products.

Shu Shu Tong commented that for usable marijuana we no longer test for total coliform, we should take another look at coliform. Mr. Tong also spoke on for testing for botulism with liquid products due to more potential for it and testing for yeast and mold with liquid edible products. He encourages taking another look.

Amanda Connor commented in some instances. She stated that a lot of non-marijuana product gets wasted to get a sample size. She suggested to revisit sample sizes.

Cindy Orser commented that the testing recreation and medical come to an alignment. Ms. Orser would like to see consideration made to add pesticides screening to extracts. She also stated that we've never received a definitive list of herbicide or plant growth regulators that should be added to the monitor list. She also commented that shelf life studies should be the responsibility of the cultivation and production, not the labs because it falls under in-process validation.

Alec Garcia commented that needing a limit is important. He also stated that he agrees with the extract comment, the shelf life comment and botulism testing.

Randy Gardner commented that we've added natural metal testing for no obvious reason, as well as micro toxins. If it's not a problem, why test it in the concentrate. He also stated that he has concerns regarding the qualifications it takes to become a scientific director at an AG lab. He suggests putting a science degree to be consistent with almost every environmental standard protocol.

Daryl Johnson commented being in favor of microtoxin testing for the extract.

David Grenz commented that clostridium botulism testing is going to be difficult to do with also being ISO accredited. You're supposed to use a positive control. Clostridium botulism is a federal select agent so none of the labs will be able to get the permit to have the bacteria in the lab. Most of the food we would be worried about have to have the process federally registered. He stated concern about the feasibility and edibles need this testing which wouldn't be allowed due to containing cannabis. He's only found one validated kit, but if there's only one proprietary kit the test can't be required because it is considered endorsing that company. Mr. Grenz would like to see some of the removed test reinstated for processed items.

Curtis supports the minimum sample size or a cap for the unit size, but feel botulism needs to come off.

Cannabinoid and Terpenoid Testing

Stephanie Till commented that she's looking over the listed cannabinoids and is wondering if there isn't enough isn't enough THC-V in the supply to not test for it or if it's something that hasn't been tested for before. Ms. Till also stated that it can be a selling point for consumers if it's something that can be traced.

Shanna Perry commented that labels are not having right dates on them. Package date was two months prior to testing date. Ms. Perry stated that there should be a way for people to report this.

Ben Chew commented that based on what was written he would have to send three reports within 24 hours. If the intention is for the final report, we can amend that.

Curtis would like to propose 48 hours instead of 24 hours after final certificate is issued.

Homogeneity Testing and Adulterants

Shu Shu Tong suggested modifying THC to potency. Change the language in (c), because labs just test the product.

Pesticides Use and Testing

Shu Shu Tong commented that Agriculture wouldn't agree with all the language. Mr. Tong suggested changing batch to lot.

Mona Lisa Samuelson commented that we need a system with failed testing.

Sample Testing

Mona Lisa Samuelson commented that when something fails, we should keep track of it.

Shu Shu Tong recommends changing the language.

Alec Garcia suggested more clarification. Mr. Garcia commented that it would be nice to integrate the fails through Leaf.

Marla McDade Williams encourages that the Department will use the data and analyze it for a public process to move forward.

Certification Program

Randy Gardner commented that he is worried about having 4 certifications.

Proficiency Testing Programs

Cindy Orser commented that under ISO accreditation these labs are required, so hopefully it will satisfy the requirement.

Shu Shu Tong commented that line 5 of page 18 is an Independent Testing Lab.

Alec Garcia suggested doing a Round Robin in Matrix. Mr. Garcia suggested doing a proficiency testing all at once.

II. Public Comment

Shanna Perry commented that there is a miss communication between shelf life and testing. Coconut oil can get mold, Ms. Perry advocates for research and development.

Stephanie Till thanked everyone for being understanding.

Mona Lisa Samuelson commented that medical marijuana patients are still here and would like to have their rights heard and be allowed them to grow plants at their homes.

Cindy Orser commented that when should they be expecting these testing guide lines? Ms. Orser said as the labs start the accreditation process and introducing new aniline changes what is validated.

Curtis commented that they can test patient medicine as long as they have a valid medical card. Curtis added that he thinks they should be able to test any consumer's product as long as it's a licensed cannabis laboratory, with or without a medical card.

Meeting adjourned at 3:01 p.m.