

# MICIL

## MICHIGAN COALITION OF INDEPENDENT CANNABIS TESTING LABORATORIES

August 15, 2018

Department of Licensing and Regulatory Affairs  
Bureau of Medical Marihuana Regulation  
Medical Marihuana Facility Licensing

**SENT VIA EMAIL ONLY**

**Re:**

**MICIL Recommendations for Changes to “Safety Compliance Facility Information” Document (August 15, 2018)**

Dear Sir or Madam,

MICIL has a few recommendations in response to this morning's email, and the subsequent guide published this afternoon.

Our suggestions, for your consideration:

### **Residual Solvent Testing**

- Petroleum Ether should be removed from the list
  - PE is a mixture of several tentatively identified compounds, including mostly hexane isomers that aren't currently on the residual solvent list, but also compounds that are on the list like n-pentane.
- "Marihuana Concentrate (CO2)" should be tested for Residual Solvents
  - CO2 extracts tend to have high ethanol content. It's often added after the initial processing as a clean up, winterization process to remove the large amount of fats that accumulate in CO2 extracts.
  - Another concern is that processors will declare concentrates as CO2 extracts when in fact, additional solvents have been used after the initial extraction.
  - Further, cleaning glassware and other instruments in processing labs can add solvents to any extract regardless of how they are made.

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- Heptane and all isomers – remove “all isomers”
- Marijuana-Infused Product Testing - remove hydrocarbon-based solvent qualifier
  - It may be more helpful to have a specification that marijuana-infused products cannot be made from any oil or extract that hasn't been tested for metals, chemical residues and residual solvents.

### Moisture Testing

- Moisture should not be a pass/fail test, as moisture will dissipate over time. METRC allows adjusting a sample's weight for moisture loss. Moisture should be recorded and reported, but a sample should not be failed based on moisture.

### Mycotoxin Testing

- Aflatoxin testing should be removed
  - MICIL's unanimous suggestion is to remove Aflatoxin in its entirety.
  - Please find attached papers from the Cannabis Safety Institute (summary of recommendations begin on page 35), the OR Technical Report (page 2) and the World Health Organization (highlighted on page 98).
  - At a minimum, remove the level of detection for Aflatoxin B1 (<5 PPB) seems unnecessarily low and burdensome, given the low occurrence of Aflatoxin in cannabis samples.
  - We suggest that, if the state is unwilling to remove Aflatoxin testing entirely, to remove the individual Aflatoxin B1 test.

Respectfully submitted,



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