



## Effective Dates for Updated Testing Requirements

**Linthicum, MD (February 10, 2025)** – The Maryland Cannabis Administration (MCA) is assigning the effective dates listed below for all non-technical and technical updates to the Technical Authority for Cannabis Testing which was published by MCA on February 10, 2025.

All non-technical updates will be effective **April 1, 2025**. Specifically, the non-technical updates include the following:

- Added the mass in grams to the usable cannabis sampling table.
- Added the minimum compliance sample size and the retention sample size for usable cannabis products in the sampling section.
- Added the following cannabinoids as required to be tested: Cannabigerolic acid (CBGA); Cannabichromene (CBC); Tetrahydrocannabivarin (THCV); Tetrahydrocannabivarinic acid (THCVA); and Cannabidivarin (CBDV). Additionally, any cannabinoids if labeled on a usable cannabis product must be reported.
- Removed the requirement to moisture adjustment of potency values in raw plant material. Moisture content will still be reported, but potency values will be reported “as is”.
- Added a statement to indicate that cannabis infused products that do not meet marketed label amounts, but still meet COMAR regulations may have the labels updated to reflect the actual cannabinoid amount.
- Added a statement requiring ITLs to contact MCA within 24 hours of a failed result for pesticides, for all microbiology except TYMC and TAMC, and vitamin E acetate.
- Increased the ethanol action limit for tinctures from <5000 ppm to <100000 ppm based on 21 CFR 328. Removed the action limit of <5000 ppm for infused non-edibles to align with federal requirements for these products. Ethanol testing is still required for infused non-edibles.
- Added the language from COMAR 14.17.13.08 to the excipients section.
- Added unit reporting requirements per product category for each compliance test and how values should be reported on the certificate of analysis to Appendix A.
- Removed the requirement for ITLs to submit stability testing results through a supplementary excel spreadsheet in Appendix C-E. All results are to be reported in Metrc.
- Removed the example results worksheet from Appendix F.
- Added Appendix J to provide guidance for product remediation and testing requirements. This includes directions on how to request a retest to validate the results of a failed test.

All technical updates will be effective **July 1, 2025**. Technical updates include the following:

- Added limit of quantitation (LOQ) requirements for pesticides, residual solvents, mycotoxins, and heavy metal testing based on the American Council of Independent Laboratory “Guide to Harmonizing Cannabis Laboratory Quality and Testing Practices”.
- Reduced the action limit for vitamin E acetate testing from <7000 ppm to <100 ppm.
- Added quality control requirements for all assays to Appendix I based on the American Council of Independent Laboratory “Guide to Harmonizing Cannabis Laboratory Quality and Testing Practices”.

The Maryland Cannabis Administration's Technical Authority for Cannabis Testing is available on the MCA website. Please direct any questions regarding this bulletin or the Technical Authority to the Office of Laboratory Services at [mca.labs@maryland.gov](mailto:mca.labs@maryland.gov).

---