
Bulletin – Cannabinoid Reporting by Independent Testing Laboratories

To: Independent Testing Laboratories
From: Debra Hilton-Creek, Acting Executive Director, Cannabis Control Commission
Date: November 27, 2023
Subject: Cannabinoid Reporting by Independent Testing Laboratories

This is the first in a series of Metrc Bulletins to be published by the Cannabis Control Commission (“Commission”) providing guidance to Commission-licensed Independent Testing Laboratories (“ITL”). The intent of these bulletins is to provide clarification, ensure consistency, and establish standards following the latest considerations from the United States Pharmacopeial Convention (“USP”).

This bulletin focuses on ITL reporting for total cannabinoids for product categories intended to be consumed through combustion (i.e., flower/bud/trim/shake, raw/infused pre-rolls, concentrates, and extracts). Moving forward, ITLs should report on their Certificates of Analyses (COAs) and upload both individual and total results to Metrc for Tetrahydrocannabinolic acid “THCA” (CAS# 23978-85-0), Delta 9-Tetrahydrocannabinol “ Δ -9-THC” (CAS # 1972-08-3), Cannabidiolic acid “CBDA” (CAS# 1244-58-2), and Cannabidiol “CBD” (CAS# 13956-29-1) using the following calculation:

- Total THC = Δ -9-THC + (THCA x 0.877)
- Total CBD = CBD + (CBDA x 0.877)

Further, results of cannabinoid analysis for finished plant material should be presented “as received” without applying percent moisture related to “dry-weight basis” correction. Water activity should be measured and controlled at $0.60 a_w \pm 0.05 a_w$.

For reference, USP general chapter <1112> Application of Water Activity Determination to Nonsterile Pharmaceutical Products provides information regarding control of water activity for reducing the susceptibility of formulations to microbial contamination. USP general chapter <922> Water Activity outlines recommended methods to accurately measure the water activity of raw materials and products.

Additional guidance relative to testing requirements for cannabis and cannabis products will be forthcoming as the Commission continues its review of regulations.

