



DH, MMRegulations

From: Walter Gray <walterg.keystone@gmail.com>
Sent: Wednesday, March 17, 2021 12:39 PM
To: DH, MMRegulations
Subject: [External] Medical Marijuana Proposed Regulations
Attachments: State Proposal - WG (1).docx

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Good afternoon,

Attached is my feedback for the medical marijuana proposed regulations.

Thank you,

-Walter Gray



March 16, 2021

To: John J Collins, Director
Office of Medical Marijuana
Department of Health, Room 628
Health and Welfare Building,
628 Forster Street
Harrisburg PA 17120
(717)547-3047
RA-DHMMregulations@pa.gov

1141a.21 Definitions

Certificate of analysis (COA) – Changing the definition of COA to only include state compliance samples eliminates COAs for research testing (i.e., potency, terpenes, etc.) A COA is sometimes necessary for a grower to set a baseline and determine where they are at prior to moving forward with the samples, without having to do a full compliance test.

1151a.25 (5) – Without having a laboratory field tech collect the samples, it can allow for discrepancy and manufactured results. The grower could then choose which samples they want to send to the lab and potentially alter them beforehand. This would not allow for accurate representation of the entire lot.

1171a.26 Stability – Finished flower is currently tested at the 1-month and 3-month marks. After that, it is properly disposed of. Keeping the flower in the vault for an entire year is unnecessary. It would be sitting on the shelf taking up room. It would make the vault fill up quicker and add extra items to the inventory. No further testing is required after 3 months, therefore is it unnecessary to hold flower samples for that duration.