



DH, MMRegulations

From: Maddy Loftus <maddyl.keystone@gmail.com>
Sent: Wednesday, March 17, 2021 12:42 PM
To: DH, MMRegulations
Subject: [External] Medical Marijuana Proposed Regulations
Attachments: State Proposal - ML.docx

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Good afternoon,

Attached is my feedback for the medical marijuana proposed regulations.

Thank you,

-Madelyn Loftus



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

1151a.25 (5) An approved laboratory technician is required to handle the samples being collected from the grower/ processor. The laboratory technician is able to collect samples that are representative of entire batch. This prevents the grower/ processor from sampling only preferred portions of the batch in question.

1171a.26- Allowing a flower sample to remain in the laboratory for twelve months is unnecessary. Currently, flower samples are tested for stability at one and three month intervals and then disposed of. No further testing is conducted on a flower sample after three months, and therefore allowing the flower samples to remain in the laboratory for an additional nine months is not needed. Process samples are tested for stability at six and twelve month intervals and do remain in the laboratory for one year.

1171a.29- Requiring growers/ processors to work with multiple laboratories will be detrimental to the quality of the product produced. If multiple laboratories complete the same testing for the same samples, growers/ processors are able to select the results they find the most satisfactory. Results vary greatly among laboratories that have passed state proficiency testing, which will allow growers/ processors to choose the most desirable results.