



## DH, MMRegulations

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**From:** Tara Musser <taram.keystone@gmail.com>  
**Sent:** Wednesday, March 17, 2021 12:44 PM  
**To:** DH, MMRegulations  
**Subject:** [External] Medical Marijuana Proposed Regulations  
**Attachments:** State Proposal - TM.docx

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Good afternoon,

Attached is my feedback for the medical marijuana proposed regulations.

Thank you,

-Tara Musser



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March 16, 2021 - TM

To: John J Collins, Director  
Office of Medical Marijuana  
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628 Forster Street  
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[RA-DHMMregulations@pa.gov](mailto:RA-DHMMregulations@pa.gov)

#### 1141a.21 Definitions

1151a.25 (5) Ensure the individual does not touch... – A field technician from the sampling laboratory is required to handle samples. Without the technician sampling in the field, the grower/processor would be able to only provide samples with bias. The field technician can collect a sample that is representative of a sample lot, whereas a sampler from the grower/processor would have the opportunity to only sample from preferred locations. Also, the field technician would eliminate any bias that would be present when a grower/processor provides already collected samples.

1171a.26 Stability – The shelf-life of final flower product is 3-months. Keeping this product for 12 months would cause an abundance of unnecessary samples in the vault. If testing is not required past the 3-month mark, it should not be necessary to hold the samples for an additional 9 months past the stability testing.

1171a.29 – An approved laboratory other than the one that tested. – This would allow growers/processors to pick and choose results that fit what they want to report for their products. Different laboratories have different methodologies, and this will create variation between results for the same samples.