



## DH, MMRegulations

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**From:** Anne Simcox <annes.keystone@gmail.com>  
**Sent:** Wednesday, March 17, 2021 2:39 PM  
**To:** DH, MMRegulations  
**Subject:** [External] Medical Marijuana Proposed Regulations  
**Attachments:** State Proposal - AS.docx

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Good afternoon,

Attached is my feedback for the medical marijuana proposed regulations.

Thank you,  
Anne Simcox



March 17, 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](mailto:RA-DHMMregulations@pa.gov)

#### 1141a.21 Definitions

Certificate of analysis (COA) – Limiting the definition of COA to only include state compliance samples removes the ability of the grower/processor to do research and development. A COA of only a few analytes is sometimes necessary for a baseline for the grower to move forward. Changing the definition of COA would also eliminate the ability of the grower/processor to identify the root cause of any production issues by testing samples that are not harvest batch, harvest lot, or process lots and do not need the full range of testing.

1151a.25 (5) Ensure the individual does not touch... – A laboratory sampling agent is required to physically handle the samples. Sample results can be manufactured by the grower/processor by only choosing samples that they believe would give the best results, or by altering them beforehand to give artificial results. Doing so could potentially create discrepancies in what the laboratory tests and what is placed on the shelves for patient use.

1171a.26 Stability – Finished flower products are currently tested at 1 and 3 months, and so it is unnecessary for the sample to be kept for longer than testing is required.

1171a.29 An approved laboratory other than the one that tested – Having a grower/processor work with multiple laboratories will allow for choosing a laboratory that gives satisfactory results, rather than accurate test results. Without methodologies that are enforced by the department to require laboratories are within acceptable results, this will only cause the grower/processor to choose the laboratory that gives them the best results.