CONNECTICUT

Final Package Testing

November 18, 2024

WHAT IS FINAL PACKAGE TESTING?

- Testing of the product in the form as it is received by the consumer.
- Provides laboratory testing results that are most representative of what a consumer will actually use.

WHY DO FINAL PACKAGE TESTING?

- Reduces risk for:
  - Contamination, adulteration, degradation or mix-up during the packaging process.
  - Harmful interactions between the packaging and the cannabis in final form.
  - Additional manufacturing that may change the constitution or otherwise alter a batch.
  - Reporting errors.

WHAT DOES "IN FINAL PACKAGING" MEAN?

- Product is in the form it will be received by the consumer or patient.
- The inner-most layer of packaging that directly touches the product and preserves its integrity.
- Does not need to be placed in outer packaging until the licensee receives a passing COA.
- While waiting for the COA, the remainder of the batch must be stored in a manner to prevent degradation, adulteration, contamination or mix-up until such time that the additional packaging can be applied.
- **Units awaiting a COA must be kept in a safe, vault or secure location.**

WHAT DOES “IN FINAL PACKAGING” MEAN?

Example:

- Oil in vape cartridges is considered to be in final packaging for the purpose of submitting for COA testing.
- The vape cartridge does not need to be placed in an exterior package that will only be used for the purpose of meeting the standard for light-resistance.
- Vape cartridges should be stored in a light-resistant, labeled bin while awaiting testing.

WHAT DOES IN A "TIMEFRAME AND MANNER THAT ENSURES CONSISTENCY AND INTEGRITY BETWEEN THE BATCH AND THE SAMPLES TAKEN FROM SUCH BATCH" MEAN?

- Allows packaging over multiple days, provided the process, environment and resources used all result in a consistent product.
- Licensees must comply with their internal policies and procedures related to safe and sanitary production, manufacturing, handling and storage of cannabis.

HOW SHOULD MY PRODUCT IN “FINAL PACKAGING” APPEAR IN BIOTRACK?

- As soon as a cannabis product is in “final packaging”, convert it in BioTrack into units of finished product.
- It should not continue to be reflected as an intermediate product that is tracked by weight in BioTrack.
- Each unit must contain the same quantity of product as the sample selected by the laboratory for testing.
- If products tested as individual units are sold in multi-unit packages, those multi-unit packages must be entered into BioTrack as individual units.

HOW SHOULD MY PRODUCT IN “FINAL PACKAGING” APPEAR IN BIOTRACK?

Example:

- A vape product that is tested on an individual unit basis, and later sold as a 3-pack, shall be reflected as 3 vape cartridges, accounting for each individual vape cartridge included in the multi-pack.

HOW SHOULD MY PRODUCT IN “FINAL PACKAGING” APPEAR IN BIOTRACK?

Example:

HOW SHOULD TEST RESULTS BE UPLOADED TO BIOTRACK FOR EACH PACKAGED UNIT?

- Test results for any usable cannabis (flower, trim, grind, pre-rolls, and other raw cannabis products) should be entered as percent by weight.
- Test results for any extract products (i.e. concentrates, vapes, infused pre-rolls, edibles, topicals) should be entered as the total milligrams (mg) in the net weight of the sample provided.
  - Laboratories should report in BioTrack the total milligrams on a per package basis

HOW SHOULD TEST RESULTS BE UPLOADED TO BIOTRACK FOR EACH PACKAGED UNIT?

Example:

- For a package of 10 gummies, the results entered into BioTrack should include the total mg for each active ingredient in the entire package of 10 gummies, not the single dose per gummy.
- The single dose per gummy *may* also be calculated and included on the official Certificate of Analysis.
- The serving size should be accurate and clearly stated on the label.

WHAT ABOUT COAs RECEIVED BETWEEN 9/15/24 AND 11/11/24 FROM SAMPLES PULLED FOR TESTING BEFORE 9/15/24?

- COAs received for tests performed on parent batches before 9/15/24 may be applied to the derivative products provided that the product has been stored and packaged in a manner to prevent degradation, adulteration, contamination or mix-up.
- All COAs received on products submitted for testing between 9/15/24 and 11/11/24 may only be applied to the final, packaged product batch sampled by the cannabis testing laboratory.

WHAT ABOUT SAMPLES PULLED FOR TESTING BETWEEN 11/12/24 AND 12/31/24?

- Products submitted for testing between 11/12/24 and 12/31/24 are not subject to final package testing.
- Licensees may voluntarily continue to submit samples in final packaging for laboratory testing during this time period.

WHAT IF I PACK MY PRODUCT AND THEN FAIL TESTING?

- To inform batch processing and avoid unsatisfactory test results after packaging, operators are encouraged to **perform preliminary testing prior to packaging**.
- Operators may create smaller batch sizes and test the packaging itself to address concerns with test failures in final packaging.
- If a product fails testing for a COA, the product may be remediated and/or retested in accordance with Public Act 24-76 Section 3(d). Remediation may or may not require the product be removed from its final package, depending on the licensee's approved internal policies and procedures for remediation and equipment specifications.

HOW SHOULD BATCHES BE LABELED AND STORED TO PREVENT MIX-UPS WHILE AWAITING LAB RESULTS?

- This is a business decision.
- Operators are encouraged to promptly and clearly label each unit that is in final packaging to distinguish it from other like products while awaiting test results.
- All final packaged units in a batch should be stored together, in a secure storage location and segregated from all other batches.
- The physical location for the product should match the location listed in BioTrack.

QUESTIONS?