



TO: Producers, Cultivators, Micro-Cultivators, Product Manufacturers, Food & Beverage Manufacturers and Product Packagers

FROM: Connecticut Consumer Protection, Drug Control Division

DATE: December 11, 2024

RE: Branding & Labeling Retested Products

Additional Considerations for Compliant Labeling of Retested Cannabis Products

Please be reminded that pursuant to Sec 21a-421j-32(g)(6) of the policies and procedures:

Prior to being sold and transferred to a consumer, qualifying patient, or caregiver, a cannabis package shall clearly include the following information on an extended content label, a package insert, or using a static quick response (QR) code, which information shall also be available in-store and on the Internet web site of the cannabis establishment that sells the cannabis:

- A statement that the cannabis has been tested for microbiological contaminants, mycotoxins, heavy metals, pesticide residue, and residual solvents, as well as the date and the satisfactory or **failing** result of such testing.
- In the event that a product submitted for final COA testing fails and is later successfully remediated and/or retested, **the original failure, including the date of the test, must be disclosed on the extended label.**

Additionally, **if processing techniques are used for the purpose of remediation, they should be clearly listed on the label, separately from proactive treatments.**

Example: You include a pre-test radiation treatment as part of your regular processing techniques for preparing flower products. A product that was irradiated according to standard procedure subsequently fails for aspergillus in COA test 1. You opt to remediate and retest the product. You request the ability to follow your approved remediation plan. DCP unlocks the batch in BioTrack so that you may remediate it and send a new QA sample to the lab. Your remediation technique involves irradiating the product for a longer period of time and at a higher intensity. Upon retest, the product then passes testing in COA test 2. Your extended content label, package insert, or QR code shall include:

- *The failure of COA test 1 and the date thereof;*
- *The satisfactory result of COA test 2 and the date thereof; and*
- *A clear differentiation between irradiation for the purposes of pre-treatment and remediation when listing processing techniques.*

Upon branding, please upload **all associated COAs** as a single pdf, including initial failed results.

Should you have any questions, please contact the Department at DCP.cannabis@ct.gov.