OCM Line Testing FAQ

The New York State Office of Cannabis Management (OCM) has recently introduced cannabis product line testing, a temporary program designed to expedite the path of compliant adult-use cannabis products navigating through OCM's mandatory laboratory testing protocols. This FAQ is meant to help conditional licensees producing final cannabis products understand the line testing process, so conditional licensees can best utilize the program for their testing needs.

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1. **Who can participate in Cannabis Line Testing?**

   Cannabis Line Testing is designed for licensees producing non-flower adult-use cannabis products who intend to enter the New York State adult-use cannabis market. The Line Testing Program is not designed for those looking to voluntarily test their cannabis or cannabis products for research and development or for informational purposes. ***Line testing is no longer permitted for flower or preroll products.***

2. **What are the advantages of OCM's Cannabis Line Testing Program?**
   OCM Cannabis Line Testing allows for a producer of adult-use cannabis products to:
   i. Bundle multiple lots of final adult-use cannabis products into a line for contaminant testing, with the ability to retest at the individual lot level if there is a failure;
   ii. Help expedite the testing process to be able to sell products that pass line testing to Conditional Adult-Use Retail Dispensaries (CAURD).

3. **Are there any prerequisites that I must meet to participate in Line Testing?**
   Yes. Line Testing requires prior approval by the OCM. The following form must be completed for each cannabis line to be tested and submitted to OCM. Additionally, the cannabis product lots included in the line must meet the requirements set forth in the guidance, which can be accessed here.

4. **Are there limits on the size or number of lots within a cannabis line that I can submit?**
   There are no limits on the size or quantity of lots within a cannabis line that a licensee can submit for Line Testing. However, Line Testing requires prior approval by the OCM as described in Question 3 above.

   A statistically representative sample of cannabis products from each lot within a cannabis line must be sent for laboratory testing in accordance with OCM Sampling Quality System Standard.

5. **What factors determine the order in which submitted cannabis products (lines or lots) are tested by a permitted laboratory?**
   The order is determined by:

   i. The size of the cannabis line that was submitted, with the largest lots (measured by the number of individual units that make up a lot) tested first;

ii. The date the cannabis line was submitted; and

iii. The date the individual cannabis lots were submitted.

Licensees should be aware that the first 35% of daily testing slot capacity at each laboratory will be reserved for the testing of medical cannabis product lots, the next 5% will be reserved for research and development testing, followed by 40% reserved for lot testing, and the remaining 20% slotted for line testing. In the event a laboratory has no backlog in a category, that lab may re-allocate testing slots to fill vacant testing slots.

6. What happens to my cannabis products after the submitted line completes all required testing?

You must review the results provided on the Certificate of Analysis (COA) from the laboratory to confirm that the line has successfully passed all contaminant testing before the cannabis products are considered to be ready for distribution to adult-use retailers licensed by the OCM.

7. What should I do after I confirm that the line passed all contaminant testing?

Once a line of cannabis products successfully passes line testing, as confirmed by the Certificate of Analysis from a permitted laboratory, all lots that compose that line are considered testing compliant.

Products tested via a line will be tested for potency and the Total THC in milligrams as reflected on the Certificate of Analysis must be labeled on the cannabis product packaging. Products that successfully passed the contaminant testing, as well as completed potency testing for the line of extracted products, and are labeled in accordance with the Packaging and Labeling Guidance are considered to be ready for distribution to adult-use retailers licensed by the OCM.

8. What should I do if my Certificate of Analysis shows a failure for contaminants for the line tested?

Any line of products that fails testing will be treated as any other failed lot and must be quarantined immediately. Those lines that fail contaminant testing must be divided into their component lots and each lot must be retested to determine the quality of each individual lot. Additionally, potency testing at the lot level will be required.

9. Which tests are required for lines being tested under line testing?

The table below includes the testing requirements. In addition, all extracted products must be tested for potency. The limits for testing can be found on OCM's website here.

Type of Testing	Currently Required	Additional Requirement after 1/1/2023	Additional Requirement after 03/01/2023
Cannabinoid Profile	X		
Pesticides	X, indole-3-butyric acid (IBA), pyrethrins (as Cinerin I, Cinerin II, Jasmolin I , Jasmolin II , Pyrethrin I , Pyrethrin II), azadiractin, and myclobutanil OR any declared pesticide used by an AUCC used during the cultivation of cannabis. +		X, expanded list
Metals	X		
Mycotoxins	X		
Microbiology	X	++	
Moisture Content		X	
Filth/Foreign Material		X	
Water Activity		X	
Residual Solvents			X
Terpenes			X

+At this time only the pesticides listed in the table require testing and any pesticide declared by a Conditional Cultivator that was used during the cultivation of cannabis.
++ Total Viable Aerobic Bacteria Count and Total Yeast and Mold Count is not required until January 1, 2023. Other Microbiology testing such as Salmonella species, Shiga toxin-producing Escherichia coli and required Aspergillus species must be tested on lots now.

10. **Does line testing allow me to distribute future lots of cannabis product from the same line without testing?**
    No. Only the specific lots that have been included in that line that passed all contaminant testing can be distributed to a licensed conditional adult-use retailer. All future lots must be tested, either as individual lots or as part of another line, with prior approval of the OCM, for any line testing.

11. **Can laboratories charge licensees based on the number or size of the lots that compose a line?**
    Yes. Laboratories can charge licensees on a lot-by-lot basis, even if those lots are being tested in composite as a line.

12. **How long will the option of line testing be available?**
    Line testing is temporary and will remain in effect until a time determined by the Office which will be communicated to all licensees and permitted laboratories.

13. **What is the longest period of time that can elapse between extracted lots submitted as part of the same line?**
    All lots within a line must be extracted within 30 days of each other.

14. **Can I test extracted products with biomass inputs from different sets of cultivators as the same line?**
    Yes, assuming that the extraction processes are the same, extracted products with different biomass inputs can be tested as a single line.

15. **Can I test extracted products with different potency profiles as a single product line?**
    No. Extracted products with differing potency profiles cannot be tested as a single product line. This includes products with differing cannabinoid contents.

    For example, a licensee cannot test a 5mg:5mg THC to CBD capsule in the same line as a capsule with a differing ratio of THC to CBD or a differing amount of THC.