

March 14, 2018

## Safety Compliance Facilities – Testing

The purpose of this technical bulletin is intended to address requests for clarification on Rule 31(6) and (7) of the Emergency Rules filed on December 4, 2017.

- For clarification purposes, the acceptable limits for heavy metals listed in subrule (6) of Rule 31 are calculated per day per kilogram (kg) body weight, using 70 kg as the adult body weight average and a maximum daily consumption of 10 grams (g) of marijuana product per day.
- The acceptable limit for finished products is calculated using the following equation:

$$X \text{ ug/kg} \times 70 \text{ kg} \times 1/10 \text{ g} = Y \text{ ug/g.}$$

Where ug = micrograms

(6) For the purposes of the heavy metal test, a sample of marijuana product is deemed to have passed if it meets the following standards:

Metal	Natural Health Products Acceptable Limits ug/kg (X)	Acceptable limits for finished products (ug/g) (Y)
Arsenic	<0.14	0.98
Cadmium	<0.09	0.63
Lead	<0.29	2.0
Mercury	<0.29	2.0

- For clarification purposes, ISO/IEC 17025:2005 standard referenced in Rules 3 and 31(7), has been revised by ISO/IEC 17025:2017 when ISO published its latest standard on 11/29/17. The department intends to reflect this change in future rules.

*This technical bulletin does not constitute legal advice and is subject to change. It is intended to provide a technical clarification only to the Department of Licensing and Regulatory Affairs' Emergency Rules which were promulgated on December 4, 2017. Licensees are encouraged to seek legal counsel to ensure their operations comply with the Medical Marijuana Facilities Licensing Act and associated Emergency Rules.*

A complete copy of the Emergency Rules can be found at:

[http://www.michigan.gov/documents/opt/Emergency\\_Rules\\_Medical\\_Marihuana\\_Facilities\\_Licensing\\_Act\\_607643\\_7.pdf](http://www.michigan.gov/documents/opt/Emergency_Rules_Medical_Marihuana_Facilities_Licensing_Act_607643_7.pdf). More information on the BMMR can be found at the bureau's website: [www.michigan.gov/bmmr](http://www.michigan.gov/bmmr).

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