

Laboratory Rulemaking Recommendations – LeafLine Labs

Current:

Subp. 33a. **Primary Cannabinoid:** “Primary Cannabinoid” means a component in the cannabinoid profile that comprises more than 5 percent of the Total Cannabinoid Content.

Subp. 39a. **Secondary Cannabinoid:** “Secondary Cannabinoid” means a component in the cannabinoid profile that comprises between 1 percent and 5 percent of a Finished Good’s total cannabinoid content.

Subp. 41. **Total Cannabinoid Content:** “Total Cannabinoid Content” means for oral suspensions and tinctures, the total amount of THC and CBD, by weight, in the product. “Total Cannabinoid Content” means for vaporizable or topical finished goods, the total amount of THC, THCa, CBD, and CBDa.

Subp. 42. **Trace Amount:** “Trace amount” means a component that comprises less than one percent of the Total Cannabinoid Content.

D. Potency variance limits are +/- 10% for primary and for secondary components. Trace amounts are exempt from potency testing requirements. (measured by mg of cannabinoid/product weight).

E. Cannabinoids in trace amounts are exempt from the testing variance. Trace amounts must be listed on the final testing report required in paragraph G as follows

Proposed:

Subp. 33a. **Primary Cannabinoid:** “Primary Cannabinoid” means a component in the cannabinoid profile that is equal or more than 30 percent of the final product’s total cannabinoid content.

Subp. 39a. **Secondary Cannabinoid:** “Secondary Cannabinoid” means a component in the cannabinoid profile that comprises between 2 percent and 30 percent of a final product’s total cannabinoid content.

Subp. 41. **Total Cannabinoid Content:** “Total Cannabinoid Content” is defined as the combined target values by weight of THC, THCa, CBD and CBDA in the final product but not including cannabinoids present in Trace Amounts.

Example: Heather Oral Suspension-Unflavored, 60 mL – 5 mg/mL THC and 5 mg/mL CBD

60 mL x 5 mg/mL THC = 300 mg THC

60 mL x 5 mg/mL CBD = 300 mg CBD

Total Cannabinoid Content = 600 mg

Subp. 42. **Trace Amount:** “Trace Amount” means a component that comprises 2 percent or less of a final product’s Primary Cannabinoid.

D. Potency variance limits are +/- 10% for primary and +/- 25% for secondary components. Trace amounts are exempt from potency testing requirements. (reported as weight %).