

Chapter [WAC 246-70](#) Medical Cannabis Product Compliance
March 13, 2025 Department of Health Rulemaking Workshop
Summary of Feedback from Participants

If you have additional feedback, please send to Annie.Kause@doh.wa.gov.

WAC 246-70-050 Quality assurance and quality control testing (Version 2)

Testing interval

- **Discussion:**
 - Clarity between vape cart hardware or just oil being tested for “delivery devices.” It is oil extracted from the cart in final form being tested.

Sample size

- **Concerns:**
 - Rolled cannabis does not align with other concentrates for inhalables, as the large batch sizes and testing requirements are not compatible with how most producer/processors operate.
 - Caution against overloading testing requirements, while also emphasizing the need for stronger consequences for products that fail testing but still make it to the shelf.
 - If small or medium-sized producer processors can't roll large batches of 1-gram joints, they will face more frequent testing, leading to higher costs and potential harm to smaller farms.
- **Ideas:**
 - Consider off the shelf testing.

Heavy metal testing

- **Discussion:**
 - Support for going with USP inhaled standards.

Terpene testing

- **Discussion:**
 - Other states go for the top 3 terpenes vs a set list; Compared Nevada and Oklahoma.
 - LOQ for most terpenes is 50ppm or .005%
 - In Nevada, cannabis packaging includes a list of the top three terpenes and a testing grid for at least 10 terpenes, which helps consumers make more informed choices, as terpenes are considered more reliable than strain names.
 - Support the idea of listing the top three terpenes on the packaging for space efficiency, while also considering that patients would prefer to see the full testing results on the COA if available.

Pesticide, mycotoxin, microbiological, solvent testing

- **Ideas:**
 - DOH products should have lower limits for pesticides, mycotoxins, microbiological and solvents. Suggest leaving that up to the labs to present.

Quality Assurance and Labeling (V2) – Summary of Feedback

- Suggestion to align solvent limits with stricter standards from states like California, as most producers would pass lower limits, which could be beneficial if state borders open up in the future and help ensure consistency with FDA standards.

WAC 246-70-060 Labeling

Label requirements

- **Discussion:**
 - Patients may value the harvest date for understanding how factors like terpene profiles and cannabinoid content change over time, especially for medical use.
 - Including the date of harvest on cannabis labels is important because consumers have no way to verify post-processing practices, and the chemical composition, especially cannabinoid levels, which can change over time, with some multi-year-old products occasionally reaching the market.
- **Concerns:**
 - The harvest date isn't necessary on labels, as it can create unfair bias against properly cured cannabis and instead emphasized the importance of off-the-shelf testing to ensure product quality.

Label restrictions

- **Discussion:**
 - Support for prohibiting additional logos/labels claiming medical grade onto DOH product outside of [WAC 246-70-090](#):