

2018 Legislative Report Recommendations for Cannabis Lab Accreditation

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REPORT:

<https://fortress.wa.gov/ecy/publications/documents/1903004.pdf>

CANNABIS LAB ACCREDITATION:

<https://ecology.wa.gov/About-us/How-we-operate/Scientific-services/Lab-accreditation/Cannabis-lab-accreditation>

ACCREDITATION & ECOLOGY'S ROLE

What is accreditation?

- Accreditation is the formal recognition that a laboratory has the technical competence and the systems in place to perform an identified scope of work, defined by regulation, and is therefore capable of producing accurate and defensible analytical data.



Ecology's current role in accreditation



- Accredits ~500 laboratories
- Provides initial and continuing accreditation
- Accredits to the parameter
- Ecology grants, revokes, or suspends accreditation



DEFINITIONS

Product Standards

- Product standards are regulatory requirements that define the acceptable content of consumer products.
- Where compliant products have specified compositions and are to be free of specified contaminants.
- Current cannabis product standards include potency levels, pesticides limits, mycotoxin limits, packaging requirements, and others.



Laboratory Quality Standards

- Designed to evaluate a product's compliance with established product standards
- Defined methods, validation and performance criteria
- Give accreditation providers critical elements to assess during the accreditation process



Accreditation Standards

- Accreditation standards are criteria to evaluate a laboratory's capability to provide accurate, defensible data.
- Accreditation standards typically assess a lab's ability to meet previously established laboratory quality standards





Product Standards

define acceptable product content



Laboratory Quality Standards

test whether products meet the product standards



Accreditation Standards

assess a lab's ability to meet laboratory quality standards



2018 REPORT

Report scope and initial research

Scope

In July 2018, Ecology began conducting research to provide preliminary recommendations for protocols and accreditation standards for cannabis testing laboratories.



Research



- Gathered accreditation data
- Reviewed current policies and practices
- Looked to other states
- Developed preliminary recommendations



CRITICAL GAPS & CHALLENGES IDENTIFIED

Critical gaps and challenges

- Current laboratory quality standards (methods, method validation protocols, and performance criteria) are insufficient to support a robust, science based cannabis laboratory accreditation program.
- Widely accepted laboratory quality standards for testing cannabis and cannabis products do not yet exist.



No federal framework

	Environmental Samples	Drinking Water	Recreational Cannabis	Medical Use Cannabis	Report Focus Areas
Federal Policy	✓	✓	Illegal - schedule I drug	Restricted - schedule I drug; limited Fed. approved research-use only purposes	
Federal Program Oversight	✓	✓	DEA*	DEA, FDA, DINA (Natl. Institute on Drug Abuse)*	
State Regulatory Authority	✓	✓	✓	✓	✓
State Accreditation Program	✓	✓	✓	✓	✓
Federal Accreditation Std	✓	✓			
State Accreditation Std	✓	✓	✓	✓	✓
Other Accred. Authorities	✓	✓	Not currently used in WA	Not currently used in WA	✓
State Program Meets Federal Std.	✓	✓			
Validated Methods	✓	✓	User discretion AHP C&L monograph doc. Monograph cites some validated methods.		Recommendations for next steps only.
Analyte /Matrix Specific Methods Available	✓	✓	Limited, varies by analyte and matrix		Recommendations for next steps only.
Method Validation	✓	✓	User discretion, some validation protocols attached to specific validated methods		Recommendations for next steps only.
Proficiency testing	✓	✓	Limited availability, some surrogate types avail.		Recommendations for next steps only.



WAC recommended guidance is insufficient

- American Herbal Pharmacopoeia Monograph (WAC 314-55-0995)



Proficiency testing

- Appropriate PT samples are not currently available to laboratories for cannabis testing in Washington State
- Proficiency Testing is integral part of accreditation



Accreditation to the Good Laboratory Practices (GLP) checklist

- Evaluate to weak and insufficient quality standards
- Labs accredited to criteria in SOPs that they wrote themselves.
- Labs not required to implement specific QA/QC due to weak WAC quality standards.
- Not an effective accreditation mechanism



Additional gap and challenges

- Sampling procedures
- Sample homogenization



MODELS

Models conceptualized and evaluated

- Does the model provide a plan for comprehensive accreditation?
- Does the model provide essential technical assistance for both specific subjects and broad topics?



RECOMMENDATIONS

Model 1

- A Cannabis Science Task Force is formed to collaborate on development of science-based laboratory quality standards
- WAC updates to ensure a robust, scientifically sound laboratory accreditation program
- Ecology's Laboratory Accreditation Unit (LAU) assumes the role of accrediting body



(1) Assemble a Cannabis Science Task Force

- Task Force to consist of experts in chemistry, microbiology, and food and agricultural testing methods, and include representatives from DOH, WSDA, WSLCB, and Ecology.



(2) Establish new laboratory quality standards.

- The Task Force recommends science-based analytical methods, method validation protocols, performance criteria, proficiency testing, and homogenization procedures for testing cannabis and cannabis products



(3) Policy and rule updates

- WSLCB adopts new laboratory quality standards (Chapter 314-55 WAC)
- Ecology Accreditation Rule updated as necessary (Chapter 173-50 WAC)



(4) Maintain current provider

- The current private accreditation provider is held in place until the new laboratory quality standards are in place



(5) Adopt a new accreditation provider

- Designate Ecology's Laboratory Accreditation Unit as the accreditation provider for Washington cannabis testing laboratories.



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Questions?