

24. Adopt resolution requesting the Governor and the Department of Cannabis Control to declare contaminated cannabis in the regulated market a public health emergency, and take related actions (Board of Supervisors - First District) ()



County of Santa Cruz Board of Supervisors

Agenda Item Submittal

From: Board of Supervisors - First District and Third District

Subject: Resolution Urging Statewide Improvements to Cannabis Testing

Meeting Date: February 25, 2025

Formal Title: Adopt resolution requesting the Governor and the Department of Cannabis Control to declare contaminated cannabis in the regulated market a public health emergency, and take related actions

Recommended Actions

1. Adopt the attached resolution requesting the Governor and the Department of Cannabis Control to declare contaminated cannabis in the regulated market a public health emergency; and
2. Direct staff to transmit the resolution to the Governor, the Department of Cannabis Control, the Department of Pesticide Regulation, the State Water Resources Control Board; the California State Assembly Committees on agriculture, environmental safety and toxic materials, health, and human services; the California State Senate Committees on agriculture, environmental quality, health, human services, and natural resources and water; and Santa Cruz County's delegation to the California State Legislature; and
3. Direct the Chair of the Board write letters to the executive director and president of the California State Association of Counties and the League of California Cities urging them to share this information with other Cities and Counties to grow collective action; and
4. Direct the Santa Cruz County Board of Supervisors representative on the California State Association of Counties to raise this as a priority with CSAC.

Executive Summary

The contamination of cannabis products within the regulated market poses a significant public health threat. An LA Times investigation uncovered alarming levels of pesticides in products sold at dispensaries statewide, highlighting critical failures in the state's testing protocols. The proposed resolution advocates for immediate State-level action to address the issue, including enhanced testing requirements and a proposed shift in regulatory oversight.

Discussion

The promise of legal cannabis was threefold: providing safe products to consumers, eliminating illicit grows and the associated environmental harm, and removing organized crime from the market. At the County level, we've been able to effectively address the last two points but when it comes to ensuring people have access to safe cannabis, that is the State's responsibility.

An investigation by The Los Angeles Times uncovered alarming levels of pesticides in cannabis products available at dispensaries statewide (Attachment A). This means that consumers are potentially unknowingly inhaling harmful gases through the combustion

of pesticides on the cannabis that should not be present at any level. These findings highlight a need for increased regulation in the state's current testing system to prevent contaminated products from reaching consumers and exposing them to serious health risks.

Currently, the Department of Cannabis Control (DCC) is responsible for cannabis testing-related matters, however as research shows, their protocols are inadequate. Six years into legalization, the DCC still lacks the capability to test cannabis for pesticide contamination effectively, and therefore allows contaminated products to reach the market.

To reduce cannabis pesticide contamination, the authors of this item recommend that the board propose two straightforward solutions for state elected officials to consider that can significantly improve consumer safety while bolstering public health:

1. *Transfer Pesticide Regulation to the Department of Pesticide Regulation* - The Department of Pesticide Regulation (DPR) has the technical expertise to enforce pesticide regulations and conduct reliable testing using proven quality assurance methods already employed in other states.
2. *Transfer Lab Accreditation to ELAP* - The State Water Resources Control Board's Environmental Laboratory Accreditation Program (ELAP) already certifies labs for testing drinking water, food, soil, and hazardous waste through a rigorous process. Transferring analytical testing lab accreditation from the DCC to ELAP would leverage existing infrastructure, reduce duplication, and allow the DCC to focus its resources on other critical responsibilities.

By strengthening cannabis testing standards, this policy enhances self-sufficiency, supports the local economy, and helps safeguard consumers from the risks of contaminated products in the broader market. To immediately protect the health of cannabis consumers in our community, we urge residents to prioritize their safety and consider the environmental benefits of purchasing locally grown and produced cannabis products. Until stronger safeguards are in place to ensure a safer cannabis supply chain, the best way for consumers to minimize risk is to buy from well-regulated local businesses. With locally sourced cannabis readily available at retailers throughout the County, this policy will not disrupt the local retail market.

Additional Key Provisions of the Resolution:

- *Laboratory Standards* - Mandate that all cannabis testing laboratories achieve accreditation through ELAP by March 1, 2026.
- *Enhanced Testing Protocols* - Introduce stricter analytic testing requirements to detect harmful contaminants like pesticides and residual chemicals.
- *Delegated Authority* - Empower DPR to oversee cannabis pesticide testing and enforcement.

To expedite the implementation of these changes a ~~strikeout~~-underline version of the California Code of Regulations Title 4 Division 19 15717 through 15735 and a ~~strikeout~~-underline version of Sections 26001 and 26100-26104 of the Business and Professions Code are included for consideration.

For the reasons listed above, the authors recommend adoption of a resolution requesting the Governor and the Department of Cannabis Control to declare contaminated cannabis within the regulated market a public health emergency and utilize the emergency rule making process to require additional analytes be added to the cannabis regulatory testing and require cannabis testing labs to obtain accreditation through the State Water Resources Control Board's environmental lab accreditation program. Additionally, the authors recommend the State Legislature provide regulatory authority to revise the contaminant testing requirements to the Department of Pesticide Regulation, via the proposed changes to the Business and Professions code provided.

Financial Impact

The recommended action does not have a financial impact.

Strategic Initiatives

Operational Plan - Comprehensive Health & Safety

Operational Plan – Sustainable Environment

Submitted By:

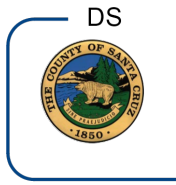
Manu Koenig, First District Supervisor and Justin Cummings, Third District Supervisor

Recommended By:

Carlos J. Palacios, County Administrative Officer

Artificial Intelligence Acknowledgment:

Artificial Intelligence (AI) did not significantly contribute to the development of this agenda item.



BEFORE THE BOARD OF SUPERVISORS
OF THE COUNTY OF SANTA CRUZ, STATE OF CALIFORNIA

RESOLUTION NO. 33-2025

On the motion of Supervisor De Serpa:
Duly seconded by Supervisor Koenig:

The following resolution is adopted:

RESOLUTION REQUESTING THE GOVERNOR AND THE DEPARTMENT OF CANNABIS CONTROL TO DECLARE CONTAMINATED CANNABIS WITHIN THE REGULATED MARKET A PUBLIC HEALTH EMERGENCY AND UTILIZE THE EMERGENCY RULEMAKING PROCESS TO REVISE THE CONTAMINANT TESTING REQUIREMENTS TO INCLUDE ADDITIONAL PESTICIDES TO PROTECT HUMAN HEALTH AND SAFETY, AND REQUIRE CANNABIS TESTING LABS TO OBTAIN ACCREDITATION THROUGH THE STATE WATER RESOURCES CONTROL BOARD'S ENVIRONMENTAL LAB ACCREDITATION PROGRAM, AND REQUEST THE STATE LEGISLATURE TO CONSIDER CHANGES TO STATE LAW TO PROVIDE REGULATORY AUTHORITY TO THE DEPARTMENT OF PESTICIDE REGULATION

WHEREAS, widespread contamination of cannabis products within the regulated market has been documented and detailed through extensive reporting; and

WHEREAS, the Board of Supervisors has determined contamination to be an emergency which must be addressed for the immediate preservation of public health; and

WHEREAS, the Department of Cannabis Control has statutory authority to adopt emergency regulations to implement additional testing requirements where such regulations are deemed to be an emergency and necessary for the immediate preservation of the public health, as defined in Section 26013 of the Business and Professions Code; and

WHEREAS, reporting has detailed inconsistency in cannabis testing results, which is increasing health risks to consumers by allowing contaminated cannabis products to enter the market; and

WHEREAS, reporting has identified contaminated cannabis products and several of those contaminated cannabis products are for sale and have been sold at local retailers; and

WHEREAS, the State Water Resources Control Board is responsible for the Environmental Laboratory Accreditation Program (ELAP); and

Resolution 33-2025

WHEREAS, the ELAP's mission is to implement a sustainable accreditation program that ensures laboratories generate environmental and public health data of known, consistent, and documented quality to meet stakeholder needs; and

WHEREAS, the ELAP provides evaluation and accreditation of environmental testing laboratories to ensure the quality of analytical data used for regulatory purposes to meet the requirements of the State's drinking water, wastewater, shellfish, food, and hazardous waste programs; and

WHEREAS, the ELAP evaluation and accreditation program can be readily modified to incorporate the State cannabis program; and

WHEREAS, by providing the State Water Resources Control Board these regulatory responsibilities, via emergency rulemaking, the duplicative work currently done by the Department of Cannabis Control can be eliminated; and

WHEREAS, the State Legislature has the authority to modify laws and the Department of Pesticide Regulation's mission is to protect human health and the environment by regulating pesticide sales and use, and by fostering reduced-risk pest management; and

WHEREAS, the Department of Pesticide Regulation has the technical skills and resources necessary to be the lead agency for determining what if any levels of residual pesticides may be safe for human consumption in the cannabis market; and

WHEREAS, the Department of Pesticide Regulation is required to provide guidance to the Department of Cannabis Control on testing for pesticides; and

WHEREAS, the Department of Pesticide Regulation is responsible for requiring that pesticides being applied to cannabis comply with food and agriculture standards; and

WHEREAS, the promise of legal cannabis was that people would have access to safe cannabis products, the illicit grows and the environmental degradation associated with them would be eliminated, and organized crime would be eliminated from the market; and

WHEREAS, our Sheriff's Office and Cannabis Licensing Office have addressed illicit cultivation activities through enforcement and civil penalties, while illegal operators and organized crime have been pushed out of our county; and

WHEREAS, ensuring safe, clean cannabis products are being sold at retailers is the responsibility of the State;

NOW, THEREFORE, BE IT RESOLVED by the Board of Supervisors of the County of Santa Cruz that:

1) The Governor and the Department of Cannabis Control are hereby requested to amend California Code of Regulations, Title 4, Division 19, section 15719, and take

Resolution 33-2025

all available actions under the emergency rulemaking process, to expand analyte testing of cannabis.

2) The Governor and the Department of Cannabis Control are hereby requested to take all available actions under the emergency rulemaking process to require analytical testing labs be accredited by the State Water Resources Control Board's Environmental Laboratory Accreditation Program by March 1, 2026.

3) It is hereby requested that the Environmental Laboratory Accreditation Program develop quality control and quality assurance minimum standards for cannabis testing laboratories.

4) It is hereby requested that the Environmental Laboratory Accreditation Program define the minimum requirements for test method validation.

5) It is hereby requested that the Department of Cannabis Control immediately adopt new requirements for cannabis testing to, at a minimum, include the following analytes in cannabis testing and the associated maximum contaminant levels: Azadirachtin, Buprofezin, Biphenyl, Cyprodinil, Dacthal (DCPA), Diphenylamine, Fenvalerate, tua-Fluvalinate, Fluopyram, Flutriafol, Isoprocarb, p,p'-DDE, p,p'-DDT, Methoprene, Methamidophos (*Monitor*), Methoxyfenozide, Metolachlor, Pendamethalin, 2-Phenylphenol, Pentachloroanisole, Propargite, Propyzamide, Pymetrozine, and Pyrimethanil.

6) It is hereby requested that the Department of Cannabis Control implement a randomized quality control system for sampling and testing cannabis products stored at distribution facilities as well as on retail shelves.

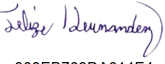
BE IT FURTHER RESOLVED that the Board of Supervisors of the County of Santa Cruz finds that contamination of cannabis products in the legal market is a public health emergency. To facilitate necessary amendments to State regulations the Board of Supervisors requests that the Governor and the Department of Cannabis Control adopt changes to California Code of Regulations, Title 4, Division 19, sections 15717 through 15735, as outlined in the attached strike-out/underline version of those regulations (Exhibit 1); and

BE IT FURTHER RESOLVED that the Board of Supervisors of the County of Santa Cruz requests that the State Legislature make changes to State law that would allow the Department of Pesticide Regulation to have regulatory authority over cannabis analyte testing requirements as well as permanent changes to provide the State Water Resources Control Board regulatory authority over analytical laboratory accreditation. To facilitate the amendments to State law the Board of Supervisors requests that the State Legislature adopt the changes outlined in the attached strike-out/underline version of relevant sections of the Business and Professions Code (Exhibit 2).

PASSED AND ADOPTED by the Board of Supervisors of the County of Santa Cruz, State of California, this 25th day of February 2025, by the following vote:

Resolution 33-2025

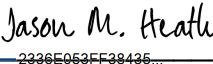
AYES: Supervisors Koenig, De Serpa, Cummings, Martinez and Hernandez
NOES: None
ABSENT: None
ABSTAIN: None

DocuSigned by:

3/7/2025
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Felipe Hernandez
Chair of the Board of Supervisors

Signed by:

3/7/2025
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ATTEST: Juliette Rezzato
Clerk of the Board

Approved as to Form:

Signed by:

2/18/2025
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Jason M. Heath (02/18/2025, 25-1202)
Office of the County Counsel

Attachments: Exhibit 1
Exhibit 2

EXHIBIT 1

California Code of Regulations

Title 4. Business Regulations

Division 19 Department of Cannabis Control

Chapter 6. Testing Laboratories

Article 5 through 7

Article 5 of Chapter 1 shall be revised prior to January 1, 2026 to reflect the requirements that all laboratories testing cannabis for regulatory standards must be accredited by the State Water Resources Control Board Environmental Laboratory Accreditation Program.

The remainder of Article 5 shall remain valid until March 1, 2026 when all laboratories testing cannabis for regulatory standards must be accredited by the State Water Resources Control Board Environmental Laboratory Accreditation Program. The State Water Resources Control Board shall develop all applicable regulatory standards for analytical testing of cannabis and cannabis goods by January 1, 2026.

§15714. Required Testing.

- (a) All sample increments collected must be homogenized prior to sample analyses, notwithstanding foreign material testing.
- (b) The licensed laboratory shall test each representative sample for the following:
- (1) Cannabinoids;
 - (2) Foreign material;
 - (3) Heavy metals;
 - (4) Microbial impurities;
 - (5) Mycotoxins;
 - (6) Moisture content and water activity;
 - (7) Residual pesticides;
 - (8) Residual solvents and processing chemicals; and
 - (9) If applicable, terpenoids.

(c) The licensed laboratory shall report the results of each analysis performed by the laboratory on the certificate of analysis.

(d) The licensed laboratory that obtained the representative sample shall complete all required testing for each representative sample for regulatory compliance testing.

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15717. Moisture Content and Water Activity Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

(a) The licensed laboratory shall analyze at minimum 0.5 grams of the representative sample of dried flower to determine the level of water activity and the percentage of moisture content.

(1) The dried flower sample, including pre-rolls, shall be deemed to have passed water activity testing if the water activity does not exceed 0.65 Aw. The laboratory shall report the result of the water activity test on the certificate of analysis (COA) and indicate “pass” or “fail” on the COA.

(2) The licensed laboratory shall report the result of the moisture content test on the COA as a percentage.

(b) The licensed laboratory shall analyze at least 0.5 grams of the representative sample of solid edible cannabis products to determine the level of water activity. A solid edible cannabis product shall be deemed to have passed water activity testing if the water activity does not exceed 0.85 Aw. The laboratory shall report the result of the water activity test on the COA and indicate “pass” or “fail” on the COA.

(c) If the sample fails water activity testing, the batch from which the sample was collected fails water activity testing and shall not be released for retail sale.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15718. Residual Solvents and Processing Chemicals Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

(a) The licensed laboratory shall analyze at minimum 0.25 grams of the representative sample of cannabis product or pre-rolls to determine whether residual solvents or processing chemicals are present.

(b) The licensed laboratory shall report the result of the residual solvents and processing chemicals testing in unit micrograms per gram (µg/g) on the COA and indicate “pass” or “fail” on the COA.

(c) The sample shall be deemed to have passed the residual solvents and processing chemicals testing if the presence of any residual solvent or processing chemical listed in the following tables in Category I and Category II does not exceed the indicated action levels.

(1) Notwithstanding subsection (c), the limit for ethanol does not apply to cannabis products that are tinctures.

(2) Notwithstanding subsection (c), the limit for ethanol or isopropyl alcohol does not apply to cannabis products that are topical cannabis products.

Category I Residual Solvent or Processing Chemical	CAS No.	Cannabis Product or Pre-Roll Action Level (µg/g)
1,2-Dichloroethane	107-06-2	1.0
Benzene	71-43-2	1.0
Chloroform	67-66-3	1.0
Ethylene oxide	75-21-8	1.0
Methylene chloride	75-09-2	1.0
Trichloroethylene	79-01-6	1.0

Category II Residual Solvent or Processing Chemical	CAS No.	Cannabis Product or Pre-roll Action Level (µg/g)
Acetone	67-64-1	5000
Acetonitrile	75-05-8	410
Butane	106-97-8	5000
Ethanol	64-17-5	5000
Ethyl acetate	141-78-6	5000
Ethyl ether	60-29-7	5000
Heptane	142-82-5	5000
Hexane	110-54-3	290
Isopropyl alcohol	67-63-0	5000
Methanol	67-56-1	3000
Pentane	109-66-0	5000
Propane	74-98-6	5000

Toluene	108-88-3	890
Total xylenes (ortho-, meta-, para-)	1330-20-7	2170

(d) If the sample fails residual solvents and processing chemicals testing, the batch from which the sample was collected fails residual solvents and processing chemicals testing and shall not be released for retail sale.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15719. Residual Pesticides Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

(a) The licensed laboratory shall analyze at minimum 0.5 grams of the representative sample of cannabis and cannabis products to determine whether residual pesticides are present.

(b) The licensed laboratory shall report whether any Category I Residual Pesticides are detected above the limit of detection (LOD) and shall report the result of the Category II Residual Pesticides testing in unit micrograms per gram (µg/g) on the COA. The laboratory shall indicate “pass” or “fail” on the COA.

(c) The licensed laboratory shall establish a limit of quantitation (LOQ) of 0.10 µg/g or lower for all Category I Residual Pesticides.

(d) The sample shall be deemed to have passed the residual pesticides testing if both of the following conditions are met:

(1) The presence of any residual pesticide listed in the following tables in Category I are not detected, and

(2) The presence of any residual pesticide listed in the following tables in Category II and III does not exceed the indicated action levels.

Category I Residual Pesticide	CAS No.
Aldicarb	116-06-3
Carbofuran	1563-66-2
Chlordane	57-74-9
Chlorfenapyr	122453-73-0
Chlorpyrifos	2921-88-2
Coumaphos	56-72-4
Daminozide	1596-84-5

DDVP (Dichlorvos)	62-73-7
Dimethoate	60-51-5
Ethoprop(hos)	13194-48-4
Etofenprox	80844-07-1
Category I Residual Pesticide	CAS No.
Fenoxycarb	72490-01-8
Fipronil	120068-37-3
Imazalil	35554-44-0
Methiocarb	2032-65-7
Methyl parathion	298-00-0
Mevinphos	7786-34-7
Paclobutrazol	76738-62-0
Propoxur	114-26-1
Spiroxamine	118134-30-8
Thiacloprid	111988-49-9
<u>Isoprocab</u>	<u>2631-40-5</u>
<u>Methamidophos</u>	<u>10265-92-6</u>
<u>2-Phenylphenol</u>	<u>90-43-7</u>
<u>p,p'-DDE</u>	<u>3424-81-5</u>
<u>p,p'-DDT</u>	<u>50-29-3</u>

Category II Residual Pesticide	CAS No.	Action Level (µg/g) for Inhalable Cannabis and Cannabis Products	Action Level (µg/g) for Non-Inhalable Cannabis Products
Abamectin	71751-41-2	0.1	0.3
Acephate	30560-19-1	0.1	5
Acequinocyl	57960-19-7	0.1	4
Acetamiprid	135410-20-7	0.1	5
Azoxystrobin	131860-33-8	0.1	40
Bifenazate	149877-41-8	0.1	5

Bifenthrin	82657-04-3	3	0.5
Boscalid	188425-85-6	0.1	10
Captan	133-06-2	0.7	5
Carbaryl	63-25-2	0.5	0.5
Category II Residual Pesticide	CAS No.	Action Level (µg/g) for Inhalable Cannabis and Cannabis Products	Action Level (µg/g) for Non-Inhalable Cannabis Products
Chlorantraniliprole	500008-45-7	10	40
Clofentezine	74115-24-5	0.1	0.5
Cyfluthrin	68359-37-5	2	1
Cypermethrin	52315-07-8	1	1
Diazinon	333-41-5	0.1	0.2
Dimethomorph	110488-70-5	2	20
Etoxazole	153233-91-1	0.1	1.5
Fenhexamid	126833-17-8	0.1	10
Fenpyroximate	111812-58-9	0.1	2
Flonicamid	158062-67-0	0.1	2
Fludioxonil	131341-86-1	0.1	30
Hexythiazox	78587-05-0	0.1	2
Imidacloprid	138261-41-3	5	3
Kresoxim-methyl	143390-89-0	0.1	1
Malathion	121-75-5	0.5	5
Metalaxyl	57837-19-1	2	15
Methomyl	16752-77-5	1	0.1
Myclobutanil	88671-89-0	0.1	9
Naled	300-76-5	0.1	0.5
Oxamyl	23135-22-0	0.5	0.2
Pentachloronitrobenz ene	82-68-8	0.1	0.2
Permethrin	52645-53-1	0.5	20
Phosmet	732-11-6	0.1	0.2

Piperonylbutoxide	51-03-6	3	8
Prallethrin	23031-36-9	0.1	0.4
Propiconazole	60207-90-1	0.1	20
Pyrethrins	8003-34-7	0.5	1
Category II Residual Pesticide	CAS No.	Action Level (µg/g) for Inhalable Cannabis and Cannabis Products	Action Level (µg/g) for Non-Inhalable Cannabis Products
Pyridaben	96489-71-3	0.1	3
Spinetoram	187166-15-0, 187166-40-1	0.1	3
Spinosad	131929-60-7, 131929-63-0	0.1	3
Spiromesifen	283594-90-1	0.1	12
Spirotetramat	203313-25-1	0.1	13
Tebuconazole	107534-96-3	0.1	2
Thiamethoxam	153719-23-4	5	4.5
Trifloxystrobin	141517-21-7	0.1	30

<u>Category III Residual Pesticide</u>	<u>CAS No.</u>	<u>Action Level (µg/g) for Inhalable Cannabis and Cannabis Products</u>	<u>Action Level (µg/g) for Non-Inhalable Cannabis Products</u>
<u>Azadirachtin</u>	<u>11141-17-6</u>	<u>3</u>	<u>Not Applicable</u>
<u>Buprofezin</u>	<u>69327-76-0</u>	<u>0.1</u>	<u>Not Applicable</u>
<u>Biphenyl</u>	<u>92-52-4</u>	<u>0.1</u>	<u>Not Applicable</u>
<u>Cyprodinil</u>	<u>121552-61-2</u>	<u>0.1</u>	<u>Not Applicable</u>
<u>Dacthal (DCPA)</u>	<u>1864-32-1</u>	<u>0.1</u>	<u>Not Applicable</u>
<u>Diphenylamine</u>	<u>91-57-6</u>	<u>0.2</u>	<u>Not Applicable</u>
<u>Fenvalerate</u>	<u>51630-58-1</u>	<u>0.1</u>	<u>Not Applicable</u>
<u>Tua-Fluvalinate</u>	<u>102851-06-9</u>	<u>0.9</u>	<u>Not Applicable</u>
<u>Fluopyram</u>	<u>658066-35-4</u>	<u>0.5</u>	<u>Not Applicable</u>
<u>Flutriafol</u>	<u>76674-21-0</u>	<u>0.2</u>	<u>Not Applicable</u>
<u>Methoprene</u>	<u>40596-69-8</u>	<u>1</u>	<u>Not Applicable</u>
<u>Methoxyfenozide</u>	<u>161050-58-4</u>	<u>0.2</u>	<u>Not Applicable</u>

<u>Metolachlor</u>	<u>51218-45-2</u>	<u>0.1</u>	<u>Not Applicable</u>
<u>Pendimethalin</u>	<u>40487-42-1</u>	<u>0.2</u>	<u>Not Applicable</u>
<u>Pentachloroanisole</u>	<u>131-63-7</u>	<u>0.2</u>	<u>Not Applicable</u>
<u>Category III Residual Pesticide</u>	<u>CAS No.</u>	<u>Action Level (µg/g) for Inhalable Cannabis and Cannabis Products</u>	<u>Action Level (µg/g) for Non-Inhalable Cannabis Products</u>
<u>Propargite</u>	<u>2312-35-8</u>	<u>0.2</u>	<u>Not Applicable</u>
<u>Propyzamide</u>	<u>23950-58-5</u>	<u>0.2</u>	<u>Not Applicable</u>
<u>Pymetrozine</u>	<u>123312-89-0</u>	<u>0.2</u>	<u>Not Applicable</u>
<u>Pyrimethanil</u>	<u>53112-28-0</u>	<u>0.1</u>	<u>Not Applicable</u>

REVISED BUPROFEZIN / Cyprodinil / Pyrimethanil PER DPR GUIDELINES

ADDED

(e) If the sample fails residual pesticides testing, the batch from which the sample was collected fails residual pesticides testing and shall not be released for retail sale.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15720. Microbial Impurities Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

(a) The licensed laboratory shall analyze at minimum 1.0 grams of the representative sample of cannabis or cannabis products to determine whether microbial impurities are present.

(b) The licensed laboratory shall report the result of the microbial impurities testing by indicating “pass” or “fail” on the COA.

(c) The sample of inhalable cannabis and cannabis products shall be deemed to have passed the microbial impurities testing if all of the following conditions are met:

(1) Shiga toxin-producing Escherichia coli is not detected in 1 gram;

(2) Salmonella spp. is not detected in 1 gram; and

(3) Pathogenic Aspergillus species A. fumigatus, A. flavus, A. niger, and A. terreus are not detected in 1 gram.

(d) The sample of non-inhalable cannabis and cannabis products shall be deemed to have passed the microbial impurities testing if both the following conditions are met:

(1) Shiga toxin-producing Escherichia coli is not detected in 1 gram, and

(2) Salmonella spp. is not detected in 1 gram.

(e) If the sample fails microbial impurities testing, the batch from which the sample was collected fails microbial impurities testing and shall not be released for retail sale.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15721. Mycotoxin Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

(a) The licensed laboratory shall analyze at minimum 0.5 grams of the representative sample of cannabis and cannabis products to determine whether mycotoxins are present.

(b) The licensed laboratory shall report the result of the mycotoxins testing in unit micrograms per kilograms ($\mu\text{g/kg}$) on the COA and indicate “pass” or “fail” on the COA.

(c) The sample shall be deemed to have passed mycotoxin testing if both the following conditions are met:

(1) Total of aflatoxin B1, B2, G1, and G2 does not exceed 20 $\mu\text{g/kg}$ of substance, and

(2) Ochratoxin A does not exceed 20 $\mu\text{g/kg}$ of substance.

(d) If the sample fails mycotoxin testing, the batch from which the sample was collected fails mycotoxin testing and shall not be released for retail sale.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15722. Foreign Material Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

(a) The licensed laboratory shall analyze the representative sample of cannabis and cannabis products to determine whether foreign material is present.

(b) The licensed laboratory shall report the result of the foreign material test by indicating “pass” or “fail” on the COA.

(c) The licensed laboratory shall perform foreign material testing on the total representative sample prior to sample homogenization.

(d) When the licensed laboratory performs foreign material testing, at minimum, the laboratory shall do all of the following:

(1) Examine both the exterior and interior of the dried flower sample, and

(2) Examine the exterior of the cannabis product sample.

- (e) The sample shall be deemed to have passed the foreign material testing if the presence of foreign material does not exceed:
- (1) 1/4 of the total sample area covered by sand, soil, cinders, or dirt;
 - (2) 1/4 of the total sample area covered by mold;
 - (3) 1 insect fragment, 1 hair, or 1 count mammalian excreta per 3.0 grams; or
 - (4) 1/4 of the total sample area covered by an imbedded foreign material.
- (f) If the sample fails foreign material testing, the batch from which the sample was collected fails foreign material testing and shall not be released for retail sale.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15723. Heavy Metals Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

- (a) The licensed laboratory shall analyze at minimum 0.5 grams of the representative sample of cannabis and cannabis products to determine whether heavy metals are present.
- (b) The licensed laboratory shall report the result of the heavy metals test in unit micrograms per gram (µg/g) on the COA and indicate “pass” or “fail” on the COA.
- (c) The sample shall be deemed to have passed the heavy metals testing if the presence of heavy metals does not exceed the action levels listed in the following table.

Heavy Metal	Action Level (µg/g) for Inhalable Cannabis and Cannabis Products	Action Level (µg/g) for Non-Inhalable Cannabis and Cannabis Products
Cadmium	0.2	0.5
Lead	0.5	0.5
Arsenic	0.2	1.5
Mercury	0.1	3.0

- (d) If the sample fails heavy metals testing, the batch from which the sample was collected fails heavy metals testing and shall not be released for retail sale.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15724. Cannabinoid Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation or test method standards.

(a) The licensed laboratory shall analyze at minimum 0.5 grams of the representative sample of cannabis and cannabis products to determine the cannabinoid profile such as THC; THCA; CBD; CBDA; CBG; and CBN.

(b) The licensed laboratory shall establish a limit of quantitation (LOQ) of 1.0 mg/g or lower for all cannabinoids analyzed and reported.

(c) The licensed laboratory shall report the result of the cannabinoid testing on the COA, including, at minimum:

(1) A percentage for THC, THCA, CBD, and CBDA;

(A) When the licensed laboratory reports the result of the cannabinoid testing for harvest batch representative samples on the COA in dry-weight percent, they shall use the following equation:

Dry-weight percent cannabinoid = wet-weight percent cannabinoid / (1 – percent moisture / 100)

(2) A percentage for Total THC and Total CBD, if applicable;

(3) Milligrams per gram (mg/g) if by dry-weight or milligrams per milliliter (mg/mL) if by volume for THC, THCA, CBD, and CBDA.

(4) Milligrams per gram (mg/g) if by dry-weight or milligrams per milliliter (mg/mL) if by volume for Total THC and Total CBD, if applicable;

(A) The licensed laboratory shall calculate the total cannabinoid concentration as follows:

(i) For concentration expressed in weight:

Total cannabinoid concentration (mg/g) = (cannabinoid acid form concentration (mg/g) x 0.877) + cannabinoid concentration (mg/g)

(ii) For concentration expressed in volume:

Total cannabinoid concentration (mg/mL) = (cannabinoid acid form concentration (mg/mL) x 0.877) + cannabinoid concentration (mg/mL)

(5) Milligrams per package for THC and CBD;

(6) Milligrams per package for Total THC and Total CBD, if applicable;

(7) Milligrams per serving for THC and CBD, if any;

(8) Milligrams per serving for Total THC and Total CBD, if any and if applicable; and

(9) The licensed laboratory shall report the results of all other cannabinoids analyzed on the COA both as a percentage and in either milligrams per gram (mg/g) if by weight or milligrams per milliliter (mg/mL) if by volume.

- (d) The sample shall be deemed to have passed the cannabinoid testing if the amount of THC does not exceed the limits established in section 17304.
- (e) The licensed laboratory shall report the test results and indicate an overall “pass” or “fail” for the cannabinoid testing on the COA.
- (f) Any cannabinoids found to be less than the LOQ shall be reported on the COA as <1 mg/g” if by dry-weight or “<1 mg/mL” if by volume.
- (g) If the sample fails cannabinoid testing, the batch from which the sample was collected fails cannabinoid testing and shall not be released for retail sale.
- (h) For purposes of this division, any one cannabinoid, Total THC, and/or Total CBD claimed to be present on a label shall not be considered inaccurate if the difference in percentage on the certificate of analysis is plus or minus 10.0%.

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15725. Terpenoid Testing.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026.

- (a) If requested, the licensed laboratory shall analyze at minimum 0.5 grams of the representative sample of cannabis or cannabis products to determine the terpenoid profile of the sample.
- (b) The licensed laboratory shall report the result of the terpenoid testing on the COA both as a percentage and in either milligrams per gram (mg/g) if by weight or milligrams per milliliter (mg/mL) if by volume.

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15726. Certificate of Analysis (COA).

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026, if they determine that revisions are necessary to comply with accreditation standards.

- (a) The licensed laboratory shall generate a COA for each representative sample that the laboratory analyzes.
- (b) The licensed laboratory shall ensure that the COA contains the results of all required analyses performed for the representative sample.
- (c) The licensed laboratory shall, within 1 business day of completing all analyses of a sample, both upload the COA into the track and trace system and simultaneously provide a copy of the COA to the Department via email at testinglabs@cannabis.ca.gov with a file name of “METRC UID Number and Test Sample ID” and “Passed” or “Failed” in the subject heading of the email.

(d) The licensed laboratory shall not release to any person any cumulative or individual test results prior to completing all analyses and providing the COA to the Department.

(e) The COA shall contain, at minimum, the following information:

(1) The term "Regulatory Compliance Testing" in font no smaller than 14-point, which shall appear in the upper-right corner of each page of the COA. No text or images shall appear above the term "Regulatory Compliance Testing" on any page of the COA.

(2) Laboratory's name, licensed premises address, and license number;

(3) Licensed distributor's or licensed microbusiness authorized to engage in distribution's name, licensed premises address, and license number;

(4) Licensed cultivator's, licensed manufacturer's, or licensed microbusiness' name, licensed premises address, and license number;

(5) Batch number of the batch from which the sample was obtained. For cannabis and cannabis products that are already packaged at the time of sampling, the labeled batch number on the packaged cannabis and cannabis products shall match the batch number on the COA;

(6) Sample identifying information, including matrix type and unique sample identifiers;

(7) Sample history, including the date collected, the date received by the laboratory, and the date(s) of sample analyses and corresponding testing results;

(8) A picture of the sample of cannabis and cannabis products. If the sample is prepackaged, the picture must include an unobstructed image of the packaging;

(9) For dried flower samples, the total weight of the batch, in grams or pounds, and the total weight, of the representative sample in grams;

(10) For cannabis product or pre-rolls samples, the total unit count of both the representative sample and the total batch size;

(11) Measured density of the cannabis and cannabis products;

(12) The analytical methods, analytical instrumentation used, and corresponding Limits of Detection (LOD) and Limits of Quantitation (LOQ);

(13) An attestation on the COA from the laboratory supervisory or management employee that all LQC samples required by section 15730 were performed and met the acceptance criteria; and

(14) Analytes detected during the analyses of the sample that are unknown, unidentified, or injurious to human health if consumed, if any.

(f) The licensed laboratory shall report test results for each representative sample on the COA as follows:

(1) Indicate an overall "pass" or "fail" for the entire batch;

(2) When reporting qualitative results for each analyte, the licensed laboratory shall indicate "pass" or "fail";

- (3) When reporting quantitative results for each analyte, the licensed laboratory shall use the appropriate units of measurement as required under this chapter;
- (4) When reporting results for each test method, the licensed laboratory shall indicate “pass” or “fail”;
- (5) When reporting results for any analytes that were detected below the analytical method LOQ, indicate “<LOQ”, notwithstanding cannabinoid results;
- (6) When reporting results for any analytes that were not detected or detected below the LOD, indicate “ND”; and
- (7) Indicate “NT” for any test that the licensed laboratory did not perform.
- (g) The licensed laboratory supervisory or management employee shall validate the accuracy of the information contained on the COA and sign and date the COA.
- (h) The laboratory supervisory or management employee may request to amend a COA to correct minor errors. Requests must be emailed to the Department at testinglabs@cannabis.ca.gov for approval prior to making any corrections. Errors in results required to be reported pursuant to subsection (f) are not minor errors.

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

Article 6. Post Testing Procedures

§15727. Remediation and Retesting.

- (a) A cannabis or cannabis product batch that has been additionally processed after failed regulatory compliance testing pursuant to section 17305 must be retested and successfully pass all the analyses required under this chapter.
- (b) A cannabis or cannabis product batch may only be remediated twice. If the batch fails after the second remediation attempt and the second retesting, the entire batch shall be destroyed.
- (c) Within one business day of completing the required analyses of a representative sample obtained from a remediated cannabis or cannabis product batch, the laboratory shall upload the COA information into the track and trace system, or if the licensee does not yet have access to the track and trace system, it shall be emailed to the Department.

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15728. Post Testing Sample Retention.

- (a) The licensed laboratory shall retain the reserve sample, consisting of any portion of a sample that was not used in the testing process. The reserve sample shall be kept, at minimum, for 45 business days after the analyses, after which time it may be destroyed and denatured to the point the material is rendered unrecognizable and unusable.

(b) The licensed laboratory shall securely store the reserve sample in a manner that prohibits sample degradation, contamination, and tampering.

(c) The licensed laboratory shall provide the reserve sample to the Department or the State Water Resources Control Board Environmental Laboratory Accreditation Program upon request.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

Article 7. Laboratory Quality Assurance and Quality Control

§15729. Laboratory Quality Assurance (LQA) Program.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026.

(a) The licensed laboratory shall develop and implement a LQA program to assure the reliability and validity of the analytical data produced by the laboratory. The LQA program shall, at minimum, include a written LQA manual that addresses the following:

- (1) Quality control procedures;
- (2) Laboratory organization and employee training and responsibilities, including good laboratory practice (GLP);
- (3) LQA objectives for measurement data;
- (4) Traceability of data and analytical results;
- (5) Instrument maintenance, calibration procedures, and frequency;
- (6) Performance and system audits;
- (7) Corrective action procedures;
- (8) Steps to change processes when necessary;
- (9) Record retention and document control;
- (10) Test procedure standardization; and
- (11) Method validation.

(b) The supervisory or management laboratory employee shall annually review, amend if necessary, and approve the LQA program and manual both when they are created and when there is a change in methods, laboratory equipment, or the supervisory or management laboratory employee.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15730. Laboratory Quality Control (LQC) Samples.

The licensed laboratory shall use LQC samples and adhere to good laboratory practice (GLP) in the performance of each analysis according to the following specifications. The State Water

Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026.

- (a) The licensed laboratory shall analyze LQC samples in the same manner as the laboratory analyzes cannabis and cannabis products samples.
- (b) The licensed laboratory shall use at least one negative control, one positive control, and one laboratory replicate sample in each analytical batch for each target organism during microbial testing. If one of the controls produces unexpected results, the samples shall be re-prepped and reanalyzed with a new set of controls.
- (c) If the result of the microbial analyses is outside the specified acceptance criteria in the following table, the licensed laboratory shall determine the cause and take steps to remedy the problem until the result is within the specified acceptance criteria.

Laboratory Quality Control Sample	Acceptance Criteria	Corrective Action
Positive control	Produces expected result, positive result	Re-prep and reanalyze the entire analytical batch, once. If problem persists, locate and remedy the source of unexpected result, then re-prep samples and reanalyze with a new set of controls.
Negative control	Produces expected result, negative result	Re-prep and reanalyze the entire analytical batch, once. If problem persists, locate and remedy the source of unexpected result, then re-prep samples and reanalyze with a new set of controls.
Laboratory replicate sample	Sample results must concur	Reanalyze sample and associated replicate sample once. If problem persists, re-prep samples and reanalyze.

- (d) The licensed laboratory shall prepare and analyze at least one of each of the following LQC samples for each analytical batch:
- (1) Method blank;
- (2) Laboratory control sample (LCS); and
- (3) Laboratory replicate sample or matrix spike sample.
- (e) The laboratory shall analyze, at minimum, a continuing calibration verification (CCV) sample at the beginning of each analytical sequence and every 10 samples thereafter.
- (f) If the result of the chemical analyses is outside the specified acceptance criteria in the following table, the laboratory shall determine the cause and take steps to remedy the problem until the result is within the specified acceptance criteria.

Laboratory Quality Control Sample	Acceptance Criteria	Corrective Action
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Method Blank sample	Not to exceed LOQ	Reanalyze entire analytical batch once. If method blank is still greater than the LOQ for any analyte, locate the source of contamination then re-prepare samples and reanalyze.
LCS	Percent recovery 70% to 130%	Reanalyze the entire analytical batch, once. If problem persists, re-prepare samples and reanalyze or re-run the initial calibration curve.
Laboratory replicate sample	RPD $\leq 30\%$	Reanalyze sample and associated replicate sample once. If problem persists, re-prepare samples and reanalyze.
Matrix spike sample	Percent recovery between 70% to 130%	Reanalyze sample and associated matrix spike sample once. If problem persists, re-prepare samples and reanalyze.
CCV	Percent recovery between 70% to 130%	Reanalyze all samples that followed the last CCV that met the acceptance criteria. If CCV still fails, re-run the initial calibration curve and all samples in the analytical sequence.

(g) If any analyte is detected above any action level, as described in this chapter, the sample shall be re-prepped and reanalyzed in replicate within another analytical batch.

(1) For quantitative analyses, the re-prepped sample and its associated replicate must meet the acceptance criteria of RPD $\leq 30\%$.

(2) For qualitative analyses, the re-prepped sample and its associated replicate results must concur.

(h) If any LQC sample produces a result outside of the acceptance criteria, the laboratory cannot report the result and the entire batch cannot be released for retail sale. The laboratory shall determine the cause and take steps to remedy the problem until the result is within the specified acceptance criteria.

(i) If the licensed laboratory determines that the result is a false-positive or a false-negative, the Department may ask for the laboratory to re-sample or retest.

(j) The licensed laboratory shall compile and generate one LQC sample report for each analytical batch that includes LQC acceptance criteria, measurements, analysis date, and matrix.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15731. Limits of Detection (LOD) and Limits of Quantitation (LOQ) for Quantitative Analyses.

The State Water Resources Control Board Environmental Laboratory Accreditation Program shall provide revisions by January 31, 2026.

(a) The licensed laboratory shall calculate the LOD for chemical method analyses according to any of the following methods:

- (1) Signal-to-noise ratio of between 3:1 and 2:1;
- (2) Standard deviation of the response and the slope of calibration curve using a minimum of 7 spiked blank samples calculated as follows; $LOD = (3.3 \times \text{standard deviation of the response}) / \text{slope of the calibration curve}$; or
- (3) A method published by the United States Food and Drug Administration (USFDA) or the United States Environmental Protection Agency (USEPA).

(b) The licensed laboratory shall calculate the LOQ for chemical method analyses according to any of the following methods:

- (1) Signal-to-noise ratio of 10:1, at minimum;
- (2) Standard deviation of the response and the slope using a minimum of 7 spiked blank samples calculated as follows:

$LOQ = (10 \times \text{standard deviation of the response}) / \text{slope of the calibration curve}$; or

- (3) A method published by the USFDA or the USEPA.

Authority cited: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104 and 26110, Business and Professions Code.

§15732. Data Package.

(a) The licensed laboratory shall compile and generate one data package for each representative sample that the laboratory analyzes.

(b) The licensed laboratory shall create a data package and use the Data Package Cover Page and Checklist Form, DCC-LIC-024 (Amended 2/22), which is incorporated herein by reference. The data package and form DCC-LIC-024 (Amended 2/22) shall be provided to the Department and / or the distributor or microbusiness engaged in distribution immediately upon request.

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100, 26104, 26110 and 26160, Business and Professions Code.

§15733. Required Proficiency Testing.

(a) The licensed laboratory shall be accredited by the State Water Resources Control Board Environmental Laboratory Accreditation Program (ELAP). ELAP shall publish accreditation standards for cannabis testing labs on or before January 31, 2026. participate in a proficiency testing program provided by an organization that operates in conformance with the requirements of ISO/IEC 17043, at least once every six months.

~~(b) The licensed laboratory shall annually, successfully participate in a proficiency testing program for each of the following test methods:~~

~~(1) Cannabinoids;~~

~~(2) Heavy metals;~~

~~(3) Microbial impurities;~~

~~(4) Mycotoxins;~~

~~(5) Residual pesticides;~~

~~(6) Residual solvents and processing chemicals; and~~

~~(7) If tested, terpenoids.~~

~~(c) The licensed laboratory shall report all analytes available by the proficiency testing program provider and for which the licensee is required to test as required under this chapter.~~

~~(d) The licensed laboratory shall participate in the proficiency testing program by following the laboratory's existing SOPs for testing cannabis and cannabis products.~~

~~(e) The licensed laboratory shall rotate the proficiency testing program among the laboratory employees who perform the test methods.~~

~~(f) Laboratory employees who participate in a proficiency testing program shall sign the corresponding analytical reports or attestation statements to certify that the proficiency testing program was conducted in the same manner as the laboratory tests of cannabis and cannabis products.~~

~~(g) A supervisory or management laboratory employee shall review and verify the accuracy of results reported for all proficiency testing program samples analyzed.~~

~~(h) The licensed laboratory shall request the proficiency testing program provider to send results concurrently to the Department, if available, or the laboratory shall provide the proficiency testing program results to the Department within 3 business days after the laboratory receives notification of their test results from the proficiency testing program provider. Any results shall be reported by submitting the Licensee Notification and Request Form, Notifications and Requests Regarding Testing Laboratories, DCC-LIC029 (New 2/22), which is incorporated herein by reference.~~

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100 and 26110, Business and Professions Code.

~~§15734. Satisfactory and Unsatisfactory Proficiency Test Performance.~~

~~(a) The licensed laboratory shall be deemed to have successfully participated in a proficiency testing program for an analyte tested in a specific method if the test results demonstrate a "satisfactory" or otherwise proficient performance determination by the proficiency testing program provider.~~

~~(b) The licensed laboratory may not report test results for analytes that are deemed by the proficiency testing program provider as "unacceptable," "questionable," "unsatisfactory," or otherwise deficient.~~

~~(c) The licensed laboratory may resume reporting test results for analytes that were deemed “unacceptable,” “questionable,” “unsatisfactory,” or otherwise deficient, only if both of the following conditions are met:~~

~~(1) The licensed laboratory satisfactorily remedies the cause of the failure for each analyte; and~~

~~(2) The licensed laboratory submits, to the Department, a written corrective action report demonstrating how the laboratory has fixed the cause of the failure.~~

§15735. Laboratory Audits.

(a) The licensed laboratory shall conduct an internal audit at least once per year or more frequently as defined by ELAP. ~~in accordance with the ISO/IEC 17025 accrediting body's requirement, whichever is more frequent.~~

(b) The internal audit must include all of the components required by the ~~ISO/IEC 17025~~ internal audit ELAP standards.

(c) Audit results must be submitted to ELAP as defined by their standards. ELAP standards for cannabis testing labs shall be published on or before January 31, 2026. ~~Within 3 business days of completing the internal audit, the licensed laboratory shall submit the results of the internal audit to the Department.~~

~~(d) Within 3 business days of receiving the accrediting body onsite audit findings, the licensed laboratory shall submit the results to the Department.~~

~~(e) The licensed laboratory shall submit any audit results to the Department, accompanied by the Licensee Notification and Request Form, Notifications and Requests Regarding Testing Laboratories, DCC-LIC-029 (New 2/22), which is incorporated herein by reference.~~

Authority: Section 26013, Business and Professions Code. Reference: Sections 26100 and 26104, Business and Professions Code.

EXHIBIT 2

Business and Professions Code - BPC

DIVISION 10. Cannabis [26000 - 26325]

CHAPTER 1. General Provisions and Definitions [26000 - 26002]

Revisions to Chapter 1 shall be effective March 1, 2026.

26001. For purposes of this division, the following definitions apply:

(az) "Testing laboratory" means a laboratory, facility, or entity in the state that offers or performs tests of cannabis or cannabis products and that is both of the following:

(1) Accredited by the State Water Resources Control Board Environmental Laboratory Accreditation Program ~~an accrediting body that is independent from all other persons involved in commercial cannabis activity in the state.~~

(2) Licensed by the department.

CHAPTER 10. Testing Laboratories [26100 - 26104]

26100.

(a) Except as otherwise provided by law, cannabis or cannabis products shall not be sold pursuant to a license provided for under this division unless a representative sample of the cannabis or cannabis products has been tested by an accredited ~~licensed~~ testing laboratory.

(b) Testing laboratories shall be accredited by the State Water Resources Control Board Environmental Laboratory Accreditation Program by March 1, 2026.

~~(c)~~ The Department of Pesticide Regulation ~~department~~ shall develop criteria to determine which batches shall be tested. All testing of the samples shall be performed on the final form in which the cannabis or cannabis product will be consumed or used.

~~(d)~~ Testing of batches to meet the requirements of this division shall only be conducted by an accredited ~~licensed~~ testing laboratory.

~~(e)~~ For each batch tested, the testing laboratory shall issue a certificate of analysis for selected lots at a frequency determined by the Department of Pesticide Regulation ~~department~~ with supporting data, to report both of the following:

(1) Whether the chemical profile of the sample conforms to the labeled content of compounds, including, but not limited to, all of the following, unless limited through regulation by the department:

- (A) Tetrahydrocannabinol (THC).
- (B) Tetrahydrocannabinolic Acid (THCA).
- (C) Cannabidiol (CBD).
- (D) Cannabidiolic Acid (CBDA).
- (E) The terpenes required by the department in regulation.
- (F) Cannabigerol (CBG).
- (G) Cannabinol (CBN).
- (H) Other compounds or contaminants required by the Department of Pesticide Regulation~~department~~.

(2) That the presence of contaminants does not exceed the levels established by the ~~department~~Department of Pesticide Regulation. In establishing the levels, the department shall consider the American Herbal Pharmacopoeia monograph, guidelines set by the Department of Pesticide Regulation pursuant to subdivision (c) of Section 26060, and any other relevant sources. For purposes of this paragraph, "contaminants" includes, but is not limited to, all of the following:

- (A) Residual solvent or processing chemicals.
- (B) Foreign material, including, but not limited to, hair, insects, or similar or related adulterant.
- (C) Microbiological impurities as identified by the ~~department~~Department of Pesticide Regulation~~in regulation~~.

(3) For edible cannabis products, that the milligrams per serving of THC does not exceed 10 milligrams per serving, plus or minus 10~~2~~ percent. ~~After January 1, 2022, the milligrams of THC per serving shall not deviate from 10 milligrams by more than 10 percent.~~

(4) Notwithstanding paragraph (3), the department shall establish regulations to adjust testing variances for edible cannabis products that include less than five milligrams of THC in total.

(e) A testing laboratory may amend a certificate of analysis to correct minor errors, as defined by the department until March 1, 2026 when all amendments must be approved by the State Water Resources Control Board Environmental Laboratory Accreditation Program.

(f) (1) Standards for residual levels of volatile organic compounds shall be established by the Department of Regulation~~department~~.

(2) On or before March~~January 1, 2026~~³, the State Water Resources Control Board Environmental Laboratory Accreditation Program~~department~~ shall establish a standard cannabinoids test method, including standardized operating procedures, that shall be utilized by all accredited testing laboratories. ~~The department and~~ may establish more than one method for use by testing laboratories and these standards may be developed through a reference laboratory.

(g) The testing laboratory shall conduct all testing required by this section in a manner consistent with general requirements for the competence of testing and calibrations activities, including sampling and using verified methods.

(h) All testing laboratories performing tests pursuant to this section shall obtain and maintain ~~ISO/IEC 17025~~-accreditation as required by the State Water Resources Control Board Environmental Laboratory Accreditation Program and any other accreditation they determine to be necessary to protect human health and safety~~department in regulation~~.

(i) (1) If a test result falls outside the specifications authorized by law or regulation, the testing laboratory shall follow a standard operating procedure to confirm or refute the original result.

(2) If a test result falls outside the specifications authorized by law or regulation, the licensee whose products are being tested may request another laboratory to retest the sample as defined by regulation and the original testing laboratory may retest the sample if both of the following occur:

(A) The testing laboratory notifies the Environmental Laboratory Accreditation Program~~department~~, in writing, that the test was compromised due to equipment malfunction, staff error, or other circumstances which contributed to failure of their quality control and/or quality assurance program~~allowed by the department~~.

~~(B) The department authorizes the testing laboratory to retest the sample.~~

(j) A testing laboratory shall destroy the remains of the sample of cannabis or cannabis product 30 days after ~~upon~~ completion of the analysis, or as determined by the Environmental Laboratory Accreditation Program~~department~~ through regulations.

(k) Presale inspection, testing transfer, or transportation of cannabis or cannabis products pursuant to this section shall conform to a specified chain of custody protocol and any other requirements imposed under this division.

(l) This division does not prohibit a licensee from performing testing on the licensee's premises for the purposes of quality control of the product in conjunction with

reasonable business operations. This division also does not prohibit a licensee from performing testing on the licensee's premises of cannabis or cannabis products obtained from another licensee. Onsite testing by the licensee shall not be certified by the department and does not exempt the licensee from the requirements of compliance testing at a testing laboratory pursuant to this section.

(Amended by Stats. 2023, Ch. 267, Sec. 1. (AB 623) Effective January 1, 2024. Note: This section was added (as Section 26101) on Nov. 8, 2016, by initiative Prop. 64.)

26102.

A testing laboratory shall not be ~~licensed~~accredited by the ~~department~~ Environmental Laboratory Accreditation Program unless the laboratory meets all of the following:

- (a) Complies with any other requirements specified by the State Water Resources Control Board~~department~~.
- (b) Notifies the department within one business day after the receipt of notice of any kind that its accreditation has been denied, suspended, or revoked.
- (c) Has established standard operating procedures that provide for adequate chain of custody controls for samples transferred to the testing laboratory for testing.

(Amended by Stats. 2021, Ch. 70, Sec. 61. (AB 141) Effective July 12, 2021.)

26104.

(a) An ~~accredited~~licensed testing laboratory shall, in performing activities concerning cannabis and cannabis products, comply with the requirements and restrictions set forth in applicable law and regulations.

(b) The department shall develop procedures to do all of the following:

(1) Ensure that testing of cannabis and cannabis products occurs prior to distribution to retailers, microbusinesses, or nonprofits licensed under Section 26070.5.

~~(2) Specify how often licensees shall test cannabis and cannabis products, and that the cost of testing cannabis shall be borne by the licensed cultivators and the cost of testing cannabis products shall be borne by the licensed manufacturer, and that the costs of testing cannabis and cannabis products shall be borne by a nonprofit licensed under Section 26070.5.~~

~~(3)~~ Require destruction of harvested batches whose testing samples indicate noncompliance with health and safety standards ~~required by the department~~, unless remedial measures can bring the cannabis or cannabis products into

compliance with quality assurance standards as specified by law and implemented by the department.

(43) Ensure that a testing laboratory employee takes the sample of cannabis or cannabis products from the distributor's premises for testing required by this division and that the testing laboratory employee transports the sample to the testing laboratory. The driver transporting the sample pursuant to this requirement shall be directly employed by the testing laboratory.

(c) The Department of Pesticide Regulation shall specify how often licensees shall test cannabis and cannabis products.

(de) (1) Except as provided in this division, a testing laboratory shall not acquire or receive cannabis or cannabis products except from a licensee in accordance with this division, and shall not distribute, sell, or dispense cannabis or cannabis products, from the licensed premises from which the cannabis or cannabis products were acquired or received. All transfer or transportation shall be performed pursuant to a specified chain of custody protocol.

(2) A testing laboratory may receive and test samples of cannabis or cannabis products from a state or local law enforcement, or a prosecuting or regulatory agency in order to test the cannabis or cannabis products. For purposes of this section, testing conducted by a testing laboratory for state or local law enforcement, a prosecuting agency, or a regulatory agency is not commercial cannabis activity and shall not be arranged or overseen by the department.

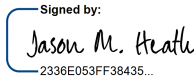
(ed) A testing laboratory may receive and test samples of cannabis or cannabis products from a licensed manufacturer or licensed cultivator for quality control purposes. A testing laboratory shall not certify samples from a licensed manufacturer or licensed cultivator for retail sale. All tests performed by a testing laboratory for a licensed manufacturer or licensed cultivator shall be recorded with the name of the licensee and the amount of cannabis or cannabis product received.

(fe) A testing laboratory may receive and test samples of cannabis or cannabis products from a qualified patient or primary caregiver with a valid physician's recommendation for cannabis for medicinal purposes. A testing laboratory shall not certify samples from a qualified patient or primary caregiver for resale or transfer to another person or licensee. All tests performed by a testing laboratory for a qualified patient or primary caregiver shall be recorded with the name of the qualified patient or primary caregiver and the amount of cannabis or cannabis product received.

(gf) A testing laboratory may receive and test samples of cannabis or cannabis products from a person over 21 years of age when the cannabis has been grown by that person and will be used solely for that person's use, as authorized pursuant to Section 11362.1 of the Health and Safety Code. A testing laboratory shall not certify samples from the

person over 21 years of age for resale or transfer to another person or licensee. All tests recorded pursuant to this subdivision shall be recorded with the name of the person submitting the sample and the amount of cannabis or cannabis product received



Certificate Of Completion		
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Subject: Complete with Docusign: Resolution_Cannabis Testing Reform_FINAL.pdf		
Source Envelope:		
Document Pages: 30	Signatures: 1	Envelope Originator:
Certificate Pages: 4	Initials: 0	Caitlin Smith
AutoNav: Enabled		701 Ocean Street
Envelopeld Stamping: Enabled		Santa Cruz, CA 95060
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		Caitlin.Smith@santacruzcountyca.gov
		IP Address: 63.194.190.100
Record Tracking		
Status: Original	Holder: Caitlin Smith	Location: DocuSign
2/18/2025 11:29:58 AM	Caitlin.Smith@santacruzcountyca.gov	
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Storage Appliance Status: Connected	Pool: County of Santa Cruz	Location: Docusign
Signer Events	Signature	Timestamp
Jason M. Heath	<div>Signed by:  2336E053FF38435...</div>	Sent: 2/18/2025 11:33:59 AM
jason.heath@santacruzcountyca.gov		Viewed: 2/18/2025 12:18:39 PM
County Counsel		Signed: 2/18/2025 3:15:49 PM
Security Level: Email, Account Authentication (None)		
		Signature Adoption: Pre-selected Style
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In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	2/18/2025 11:33:59 AM
Envelope Updated	Security Checked	2/18/2025 2:41:11 PM
Envelope Updated	Security Checked	2/18/2025 2:41:11 PM
Certified Delivered	Security Checked	2/18/2025 12:18:39 PM
Signing Complete	Security Checked	2/18/2025 3:15:49 PM
Completed	Security Checked	2/18/2025 3:15:49 PM
Payment Events	Status	Timestamps
Electronic Record and Signature Disclosure		

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If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

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Unless you tell us otherwise in accordance with the procedures described herein, we will provide electronically to you through the DocuSign system all required notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you during the course of our relationship with you. To reduce the chance of you inadvertently not receiving any notice or disclosure, we prefer to provide all of the required notices and disclosures to you by the same method and to the same address that you have given us. Thus, you can receive all the disclosures and notices electronically or in paper format through the paper mail delivery system. If you do not agree with this process, please let us know as described below. Please also see the paragraph immediately above that describes the consequences of your electing not to receive delivery of the notices and disclosures electronically from us.

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- Until or unless you notify County of Santa Cruz as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by County of Santa Cruz during the course of your relationship with County of Santa Cruz.

Certificate Of Completion

Envelope Id: BAADDA2C-85BD-4A3E-B9DF-1CB1B0C71862		Status: Completed
Subject: Complete with Docusign: Resolution 33-2025 Requesting Dept of Cannabis Control to declare conta...		
Source Envelope:		
Document Pages: 34	Signatures: 2	Envelope Originator:
Certificate Pages: 5	Initials: 0	CBD eSignature
AutoNav: Enabled	Stamps: 1	701 Ocean Street
Envelopeld Stamping: Enabled		Santa Cruz, CA 95060
Time Zone: (UTC-08:00) Pacific Time (US & Canada)		cbd.esignature@santacruzcountyca.gov
		IP Address: 63.194.190.100

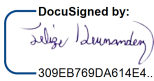
Record Tracking

Status: Original	Holder: CBD eSignature	Location: DocuSign
3/6/2025 11:28:36 AM	cbd.esignature@santacruzcountyca.gov	
Security Appliance Status: Connected	Pool: FedRamp	
Storage Appliance Status: Connected	Pool: County of Santa Cruz	Location: Docusign

Signer Events

Felipe Hernandez
Felipe.Hernandez@santacruzcountyca.gov
Security Level: Email, Account Authentication (None)

Signature



Signature Adoption: Uploaded Signature Image
Using IP Address: 63.194.190.100

Timestamp

Sent: 3/6/2025 11:30:16 AM
Resent: 3/7/2025 4:04:02 PM
Resent: 3/7/2025 4:06:04 PM
Viewed: 3/7/2025 4:11:28 PM
Signed: 3/7/2025 4:11:53 PM

Electronic Record and Signature Disclosure:

Accepted: 7/17/2023 11:30:46 AM
ID: 2a2f0d4d-8f3b-4197-9c0c-4b7e9be9c82a

Juliette Rezzato
juliettemburke@gmail.com
Security Level: Email, Account Authentication (None)



Signature Adoption: Pre-selected Style
Using IP Address: 174.194.199.159
Signed using mobile

Sent: 3/7/2025 4:11:54 PM
Resent: 3/7/2025 4:20:55 PM
Viewed: 3/7/2025 4:21:24 PM
Signed: 3/7/2025 4:21:40 PM

Electronic Record and Signature Disclosure:

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ID: a9d3764d-3f1a-4d9c-9ce3-ffe35bdac4fd

CBD eSignature
cbd.esignature@santacruzcountyca.gov
County of Santa Cruz
Security Level: Email, Account Authentication (None)



Using IP Address: 63.194.190.100

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Signed: 3/7/2025 4:23:24 PM
Freeform Signing

Electronic Record and Signature Disclosure:

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In Person Signer Events

Signature

Timestamp

Editor Delivery Events

Status

Timestamp

Agent Delivery Events

Status

Timestamp

Intermediary Delivery Events

Status

Timestamp

Certified Delivery Events	Status	Timestamp
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Carbon Copy Events	Status	Timestamp
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Sam LoForti Sam.LoForti@santacruzcountyca.gov Cannabis Licensing Manager County of Santa Cruz Security Level: Email, Account Authentication (None) Electronic Record and Signature Disclosure: Accepted: 3/1/2022 3:08:32 PM ID: b821828f-0fa2-440c-9b60-600891d419f2	<div>COPIED</div>	Sent: 3/7/2025 4:23:25 PM
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Witness Events	Signature	Timestamp
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Notary Events	Signature	Timestamp
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Envelope Summary Events	Status	Timestamps
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Completed	Security Checked	3/7/2025 4:23:26 PM

Payment Events	Status	Timestamps
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Electronic Record and Signature Disclosure
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- ii. send us an email to nada.algharib@santacruzcounty.us and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

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Lab test results

Private lab tests show frequent pesticide contamination in cannabis, as well as the presence of synthetic THC and harmful dilution oils ●. Most products listed are vapes bought on the legal market. Pre-rolls, edibles and products bought outside legal venues are noted. Findings are based on California residue limits, including zero-tolerance chemicals. Where no state limit exists (off-list), the U.S. Environmental Protection Agency threshold for evaluating pesticides on tobacco is used. **For more detail about a product, click the finding icon.**

Finding




Exceeded California limit



Pesticides detected



Pesticides not quantifiable or detected

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
ABX Bread Stix <i>WOA1416</i>				
ABX Bread Stix <i>WOA1416</i>				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
ABX Cherry Biscotti <i>WOA1211</i>				
ABX Cherry Biscotti <i>WOA1211</i>				
ABX Garlic Fritter <i>WOA1253</i>				
ABX Garlic Fritter <i>WOA1253</i>				
ABX Grease Bucket <i>WOA1407</i>				
ABX Grease Bucket <i>WOA1407</i>				
ABX Sugar Biscuits <i>WOA1260</i>				
ABX Sugar Biscuits <i>WOA1260</i>				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Alien Labs Atomic Apple CR-62124-AA				
Alien Labs Biskante CART-041524-BSK				
Alien Labs Gemini AIO ICART-121523-GEM				
Alien Labs OZ Kush CART-021324-OZK				
Alien Labs OZ Kush CART-021324-OZK				
Alien Labs OZ Kush CR-062823-OZK				
Alien Labs Planet Red CR-21924-PR			•	
Alien Labs Y2K CART-041524-Y2K				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Alien Labs ZedBand CART-011524-ZB				
Alien Labs ZedBand CART-011524-ZB			•	
Alive and Well Cheetah Piss CHEET-1209			•	
Ape OG ACA01119				
Astro Eight* Skywalker OG pre-roll A8-THCA-2G-PR-3 (Tobacco store)		•		
BBrand Apple Fritter AIO 092523BBFAFAIO				
BBrand Apple Fritter AIO 092523BBFAFAIO				









Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
BBrand Apricot Helix AIO 032824BBAHAIO			•	
BBrand Apricot Helix AIO 032824BBAHAIO			•	
BBrand Lime Sorbet AIO 090623BBLSAIO				
BBrand Pineapple Express AIO 030324BBPEDUO			•	
BBrand Raspberry Parfait AIO 030424BBRPDUO			•	
BBrand Vanilla Cake AIO 090723BBVCAIO				
BBrand Vanilla Cake AIO 090723BBVCAIO				
Backpack Boyz* Black Cherry Gelato 091323BC		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Backpack Boyz* Black Cherry Gelato 091323BC		•		
Backpack Boyz Blue Guava Gelato 021924BL		•	•	
Backpack Boyz* Blue Guava Gelato 091323BL		•		
Backpack Boyz* Blue Guava Gelato 091323BL		•		
Backpack Boyz* Bubblegum Gelato 091323BG		•		
Backpack Boyz Lemon Cherry Gelato 021924LC		•	•	
Backpack Boyz* Lemon Cherry Gelato 091223LC		•		
Backpack Boyz* Lemon Cherry Gelato 091323LC		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Backpack Boyz* Lemon Cherry Gelato 091323LC		•		
Backpack Boyz* Lemon Cherry Gelato 091323LC		•		
Backpack Boyz Lemon Cherry Gelato 091323LC		•	•	
Backpack Boyz Lemon Cherry Gelato 091323LC		•	•	
Backpack Boyz* White Cherry Gelato 091323WC		•		
Backpack Boyz* White Cherry Gelato 091323WC		•		
Backpack Boyz Za'Hiti 021924ZA		•	•	
Backpack Boyz* Za'Hiti 050123ZA		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Backpack Boyz* Za'Hiti 091323ZA		•		
Backpack Boyz* Zerbert 091323ZE		•		
Backpack Boyz* Zerbert 50123ZE		•		
Backpack Boyz* Zuper Bubble 091323BG		•		
Backpack Boyz* Zuper Bubble 091323ZB		•		
Backpack Boyz* Zuper Bubble 102723ZBB				
Backpack Boyz* Zuper Bubble 102723ZBB				
Backpack Boyz Zuper Bubble 102723ZBB		•		






Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Backpack Boyz Zuper Bubble 102723ZBB		•		
Bbrand Strawberry Cough AIO 03274BBSCAIO			•	
Buddies Banana Hanks 052024LRVSBH				
Buddies Banana Hanks 052024LRVSBH			•	
Buddies Blueberry Cupcake 010424LRDBC			•	
Buddies Chilled Cherries 042024LRVSCCDUO				
Buddies Chilled Cherries 042024LRVSCCDUO				
Buddies GMO 041924LRVSGMODUO				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Buddies GMO 041924LRVSGMODUO				
Buddies Lemon Gelato 110623LGLRVSDUO				
Buddies Lemon Gelato 110623LGLRVSDUO				
Buddies Punch Pop 022224LRVSPP				
Buddies Punch Pop 022224LRVSPP				
CAKE Blueberry Bliss A.D6.BLUE.D22.D26				
CAKE Jack Diesel D.A1.JDIE.E15.E28			•	
CAKE Mangolicious D.A1.MLIC.E15.E24			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
CAKE Nectarine Lips D.A1.NLPS.E15.E24			•	
CAKE Nectarine Lips D.A1.NLPS.E15.E24			•	
CAKE Strawberry Mochi D.A1.SCHL.E15.E23			•	
CAKE Wild Cherry Zkittlez a.e1.wcz.e14.e20			•	
CAKE Wild Cherry Zkittlez a.e1.wcz.e14.e20			•	
CAKE Wild Cherry Zkittlez a.e1.wcz.e14.e20			•	
CLSICS Blue Crack AIO DISP-BC-5				
CLSICS Blue Crack AIO DISP-BC-5				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
CLSICS Clockwork Lemon AIO DISP-CL-3				
CLSICS Clockwork Lemon AIO DISP-CL-3				
CLSICS Dark Side of The Berry DISP-DB-4				
CLSICS Dark Side of The Berry DISP-DB-4				
CLSICS Ghost Vapor AIO DISP-GV-4				
CLSICS Ghost Vapor AIO DISP-GV-4				
CLSICS Pink Lemon Up AIO DISP=PL-3				
CLSICS Pink Lemon Up AIO DISP=PL-3				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
CLSICS Tropicana Punch AIO DISP=TP-5				
CLSICS Tropicana Punch AIO DISP=TP-5				
Cactus HHC Gushers (Tobacco store)			•	•
Cake Cosmic Cookies A.D10.CCK.F11.F18			•	
Cali Heights* AF Gooney CY24LCAR032403		•		
Cali Heights AF Gooney CY24LCAR032403		•		
Cali Heights* Banana OG CY24MCAR022603				
Cali Heights* Banana X CY24LCAR032402				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Cali Heights Banana X CY24LCAR032402		•	•	
Cali Heights* Cali Runtz CY24MCAR022602				
Cali Heights* Chem Dawg CH-1345-SSHVC-5000-20		•		
Cali Heights* Guava CY24LCAR032401				
Cali Heights Guava CY24LCAR032401				
Cali Heights* Lavender Diesel CH-T-S-Vape-5000-16				
Cali Heights* Lavender Spritzer CH-1429-LSLRV-3696-20				
Cali Heights* Lusy's Gift CH-LG-CBD-CaliVape-3000-16				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Cali Heights Mendo Purps CY24LCAR041102		•		
Cali Heights Mendo Purps CY24LCAR041102		•		
Cali Heights Mojito CY24LCAR032404				
Cali Heights NYSD CY24LCAR041101		•		
Cali Heights NYSD CY24LCAR041101		•		
Cali Heights* Panama Red CY24MCAR022601				
Cali Heights* Platinum OG CH-PO-I-Vape-5000-16				
Cali Heights* Superboof CH-S-H-Vape-5000-16				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Cali Heights* Tangie CH-T-S-Vape-5000-16				
Cannaboss pre-roll (Illicit store)		•	•	
Caring Kind GovernMint Oasis flower GO124				
Circles* Forbidden Fruit 030824FFH				
Circles Forbidden Fruit 240513ff		•	•	•
Circles* Forbidden Fruit 91323FF		•		
Circles* Gelatti 030824GE		•		•
Circles* Ghost Train Haze 91323GT		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Circles* Pink Runtz 030824PR		•		•
Circles* Pink Runtz 120723PRH				
Circles* Sour Diesel 012924SDH				•
Circles* Sour Diesel 012924SDH		•		•
CleanAF CBD Citrus Splash 1087 (Tobacco store)				•
CleanAF CBD Citrus Splash 1087 (Tobacco store)				
Cloud* Gelato 012924GE				•

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Cloud* Super Lemon Haze 012924SL				•
Cloud* Super Lemon Haze 80123SL				
Cloud* Watermelon Z 80123WA				
Cold Fire Astro Mints Juice J-CFAM-052024				
Cold Fire Astro Mints Juice J-CFAM-052024				
Cold Fire JHB Juice J-CFJHB-061924				
Cold Fire JHB Juice J-CFJHB-061924				
Cold Fire Jealousy Juice J-CFJY-062024				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Cold Fire Jealousy Juice J-CFJY-062024				
Cold Fire Lemon-Glazed Cookie Dough J-CFLXD-051524				
Cold Fire Slush Juice J-CFSL-061924				
Cold Fire Slush Juice J-CFSL-061924				
Cold Fire ZeClair Juice J-CFZR-051424				
Cold Fire ZeClair Juice J-CFZR-051424				
Connected Bad Apple CART-021324-BA				
Connected Biscotti CR-071123-BIS				






Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Connected Gelonade AIO ICART-021524-GEL				
Connected Gelonade AIO ICART-021524-GEL				
Connected Highrise CART-021324-HR				
Connected Highrise CART-021324-HR				
Connected NightshadeAIO ICART-011524-NS				
Connected Permanent Marker CR-42424-PM				
Connected Permanent Marker CR-42424-PM				
Connected Rainbow Sherbert #11 AIO ICART-121523-RS11				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Connected Super Dog CR-010224-SD				
Cosmic Fog Cannabis Co Apple Butter Gelato 3294			•	
Country Lemon Zest pre-roll LZCRTY-0032v2			•	
Cream of the Crop Strawberry Cough 24051021-1			•	
Cru* Apple Gelato P-CRU-LDAA-X		•		
Cru Blue Dream P-CRU-LDNA P			•	
Cru Blueberry Kush P-CRU-TDRA-Z			•	
Cru Cru Blue PR-CRUG-RCNA-Y			•	





Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Cru* Forbidden Fruit P-CRU-XCOA-Z				
Cru* Ghost OG P-CRU-PAAA-S		•		
Cru* Mai Tai P-CRU-LDAA-Z		•		
Cru* Tropicana Cookies P-CRU-PAAA-Q		•		
Cru* Tropicana Cookies P-CRU-PAAA-Q		•		
Cruisers SFV OG 230111SFV				
Dabwoods Watermelon Z DW-D40-POD-WTZ121923			•	
Delighted* Devil's Soap 010524-2				







Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Delighted Devil's Soap 010524-2				
Dime* Dime OG DI-DOG-1000-102723				
Dime Dime OG DI-DOG-1000-102723			•	
Dozo THC-a Watermelon Zkittlez (Tobacco store)				
Ember Valley Orange Peels EV0657				
Eureka Vapor* Blackberry Kush ICC021224BBK				
Everyday* Berry Runtz 91323BR				
Everyday* Blackberry Kush 91323BK				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Flav* Blackberry Kush BKB-T07-092923				•
Flav Blue Dream BLD-T07-240229				
Flav* Blue Milk Haze BMH-t07-092923		•		
Flav* Cactus Cooler Haze TTW-T07-092923				•
Flav* Flav OG FLV-T07-092923		•		•
Flav Flav OG FLV-T07-240229				
Flav Gushers HTE AIO THE-GSH-091323			•	
Flav Gushers HTE AIO THE-GSH-091323				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Flav Lemon Cherry Gelato HTE AIO THE-LCG-091923				
Flav Lemon Cherry Gelato HTE AIO THE-LCG-091923				
Flav NYC Sourd NYC-T07-240229				
Flav NYC Sourd NYC-T07-240229			•	
Flav Papaya AIO PAP-LR-091423				
Flav Papaya AIO PAP-LR-091423				
Flav Rainbow Beltz HTE AIO THE-RBZ-091323				
Flav Rainbow Beltz HTE AIO THE-RBZ-091323				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Flav Wedding Bomb AIO WDB-LR-091423				
Flav Wedding Bomb AIO WDB-LR-091423				
Flav Wedding Cake AIO WED-LR-091323				
Flav Wedding Cake AIO WED-LR-091323				
Flavorade* Biscotti x Sherb FA-BS-VC-11/16		•		
Flavorade* Chef (Blueprint) FA-CHF-VC-11/20		•		
Flavorade* Chef (Blueprint) FA-CHF-VC-11/20		•		
Flavorade Chef (Blueprint) FA-CHF-VC-11/20		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Flavorade Cherry Gushers HCCG227				
Flavorade* Cream 'n Sugar FA-CNS-VC-01/22				
Flavorade* Cream 'n Sugar FA-CNS-VC-01/22				
Flavorade Cream 'n Sugar FA-CNS-VC-01/22				
Flavorade Cream 'n Sugar FA-CNS-VC-01/22				
Flavorade* High Octane x Jealousy FA-HOJ-VC-11/16		•		
Flavorade Lazer Znack FA-LAZ-VC-04/05				
Flavorade Puree FA-PUR-VC-03/12				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Flavorade* Rainbow Sherbet FA-RS11-VC-11/14		•		
Flavorade Rainboz FA-RAI-VC-02/26				
Flavorade Rainboz FA-RAI-VC-02/26				
Flavorade Sin Mint Cookies FA-SMC-VC-04/01				
Flavorade* Snowman FA-SM-VC-11/13		•		
Flavorade* The Answer (Blueprint) FA-TA-VC-11/13		•		
Flavorade* The Answer V.2 (Blueprint) FA-TA-VC-11/16				
Flavorade* The Answer V.2 (Blueprint) FA-TA-VC-11/16				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Flavorade The Answer V.2 (Blueprint) FA-TA-VC-11/16		•		
Flavorade Zoap FA-ZP-VC-03/19				
Flavorade Zoap FA-ZP-VC-03/19				
Flavorade Zruntz FA-ZRZ-VC-03/28				
Flower Co Tropicana Cookies 022b24fcdetc			•	
Fog City Pacific Chemistry Shark Bite pre-roll 509303			•	
Fog City* Pacific Chemistry Shark Bite pre-roll 628301		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Friendly Berry Gelato CL-00032724-BG				
Friendly Blast Off AIO SA-00012224-BO				
Friendly Carbon Fiber CL-00041524-CF				
Friendly Carbon Fiber CL-00041524-CF				
Friendly Cranberry Kush Liquid AIO FD-00110823-CK				
Friendly Sour Diesel CL-00051024-SD			•	
Friendly Sour Lemons Liquid AIO LA-00011524-SL				
Friendly Sour Lemons Liquid AIO LA-00011524-SL				



Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Friendly Toasted Marshmallows Liquid AIO SA-00031824-TM				
Fryd Extracts Wild Baja Blast scratch code M8566452 (Illicit store)		•		
Fryd Extracts Wild Baja Blast scratch codes M7361340/M7362013 (Illicit store)		•		•
Gelato Dragon Fruit GC-1950			•	
Gelato* Orangeade GF-308				
Goldrop Durban Poison GDDP100623				
Grizzly Peak Farms* Zoap flower ZP2242		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Half Pipe Super Lemon Haze SLH240422				
Heavy Hitters Acapulco Gold 1A40603000067F6000030377			•	
Heavy Hitters Acapulco Gold 1A40603000067F6000030377			•	
Heavy Hitters Banana Punch 1A40603000067F6000031493			•	
Heavy Hitters Big Apple 1A40603000067F6000031427			•	
Heavy Hitters Cannalope Haze 1A40603000067F6000030887				
Heavy Hitters Cannalope Haze 1A40603000067F6000030887			•	
Heavy Hitters Cereal Milk 1A40603000067F6000031494			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Heavy Hitters Cloudberry 1A40603000067F6000030355			•	
Heavy Hitters Cloudberry 1A40603000067F6000030355			•	
Heavy Hitters Durban Poison 1A40603000067F6000032196			•	
Heavy Hitters God's Gift 1A40603000067F6000030452			•	
Heavy Hitters God's Gift 1A40603000067F6000030452			•	
Heavy Hitters Granddaddy Purple 1A40603000067F6000030885			•	
Heavy Hitters* Midnight Cherry edible 1A40603000067F6000027590				
Heavy Hitters Northern Lights 1A40603000067F6000030856			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Heavy Hitters Northern Lights 1A40603000067F6000030387			•	
Heavy Hitters Northern Lights 1A40603000067F6000030387			•	
Heavy Hitters SFV OG 1A40603000067F6000031492			•	
Heavy Hitters Screaming Orange 1A40603000067F6000030864			•	
Heavy Hitters Tangie 1A40603000067F6000030348			•	
Heavy Hitters Tangie 1A40603000067F6000030348			•	
Heavy Hitters Trop Cherry 1A40603000067F6000031744				
Heavy Hitters Watermelon OG 1A40603000067F6000030416			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Himalaya 1:1 CBD 345-C1			•	
Himalaya 1:1 CBD 345-C1			•	
Himalaya Jiffy Cake Live Sauce 357-S642			•	
Himalaya Jiffy Cake Live Sauce 357-S642			•	
Himalaya Orange 76 Live Sauce 344-S607			•	
Himalaya Orange 76 Live Sauce 344-S607			•	
Himalaya Oreoz 354-S646			•	
Himalaya Oreoz 354-S646			•	




Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Himalaya Oreoz 354-S646			•	
Himalaya Peach Ringz Live 362-R635				
Himalaya Peach Ringz Live 362-R635				
Holy Water Pineapple Pez Vape HW-PP-0201-V				
Hush Strawberry Cough 20240617			•	
Hype Train Jetfuel Gelato HT-JF-52584				
Hype Train Mochiland flower 240125MLAND				
Jeeter Blueberry Kush JJLD-BLUKUS-042424				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Jeeter Blueberry Kush JJLD-BLUKUS-042424				
Jeeter Cherry On Top RES-COT-051524				
Jeeter GMO 41 AIO RES-GMO41-041724				
Jeeter GMO 41 AIO RES-GMO41-041724				
Jeeter Holy Gorilla RES-HOLGOR-043024				
Jeeter Liquid Diamonds SFV OG JJLD-SFVOG-050523				
Jeeter Prickly Pear Premium Diamonds JJLD-PRIP EA-052124				
Jeeter Prickly Pear Premium Diamonds JJLD-PRIP EA-052124				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Jeeter Whipped Citrus AIO RES-WHICIT-043024				
Jeeter Whipped Citrus AIO RES-WHICIT-043024				
Jetty Fire OG TO1455FOG			•	
Jetty GSC T01446GSC			•	
Jetty GSC TO1421GSC			•	
Jetty Northern Lights TO1361NL			•	
Jetty Trainwreck TO1450TW			•	
Joost Cereal Milk AIO 240405J0CMA0493				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Joost Grapes & Cream AIO 030124JOGCA5969				
Joost Paris OG AIO 240529J0POBA1982				
Joost Purple Cadillac AIO 240501J0PCA2595				
Joost Satellite OG AIO 240530J0SOGA2052				
Joost Satellite OG AIO 240530J0SOGA2052				
Joost Zerealz AIO 030124J0ZRA5971				
Kind Republic Ice Cream Cake CICC021324		•	•	
Kind Republic Pineapple Express CPE1G-30			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Kingpen Fire OG 309KP160FOG-V1			•	
Koi Balance Bar CBD Cola Ice KDCI-001 (Tobacco store)				
Kolas Cares Concord Crush T080822-1		•		
Kolas Cares* Raspberry Sorbet NFKBH-1A		•		
Kolas Cares* Raspberry Sorbet NFKBH-1A		•		
Kolas Kicks* Zoap flower KHZoap-A1		•		
Kolas Kicks Zoap flower KHZoap-A1		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Kurvana Headband Originals HEAD-CDH16-00324-3				
Kurvana Headband Originals HEAD-CDH16-00324-3				
Kurvana Jack Herer Originals JACH-BBSPA-12124				
Kurvana Jack Herer Originals JACH-BBSPA-12124				
Kurvana Jetfuel JETF-BBSPA-12124				
Kurvana Mimosa MIMO-BBSPA-09324				
Kurvana Mimosa ASCND MIMO-B1013-16624			•	
Kurvana Mimosa ASCND MIMO-B1013-16624			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Kurvana Orange Cookies ASCND ORAC-FDH16-03024-1				
Kurvana Orange Cookies ASCND ORAC-FDH16-03024-1			•	
Kurvana Tangie Dream ASCND TAND-BBSPA-07824			•	
Kurvana Tangie Dream ASCND				
Kurvana True OG Originals TRUO-CDH16-00324-1				
Kurvana True OG Originals TRUO-CDH16-00324-1			•	
Kushy Punch Fresh Lemonade AIO VAR2401B-VFL			•	
Kushy Punch Gorilla Z AIO VAR2408D-VGZ			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Kushy Punch Kushy OG VAR2401D-VKOG			•	
Kushy Punch Kushy OG AIO VAR2407E-VKOG			•	
Kushy Punch Lemon Cherry Gelato AIO VAR2423D-VLCG			•	
Kushy Punch Punched Jealousy AIO VAR2403D-VPJ			•	
Kushy Punch Strawnana Smoothie AIO VAR2430E-VSS			•	
LemonNade by Cookies Medellin/Cake Mix 230609LMMCMDC9007-9008 (Illicit store)				•
LemonNade by Cookies Medellin/Cake Mix 230720LMMCMD0487-0488				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Lolo Purple Zoap G091123BZP-LL				
Loud + Clear Honey Mango WOA988				
Maven Apples & Diamonds pre-roll AD-PR-5PK-F00306			•	
Maven Apples & Diamonds pre-roll (without wrapper) AD-PR-5PK-F00306			•	
Maven FKaFL single pre-roll (without wrapper) FKaFL-PR-1G-F00313			•	
Maven* Orange Truffle Souffle MVN-OTS-GBC-F02148				
Maven Orange Truffle Souffle MVN-OTS-GBC-F02148			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Maven Prizm pre-roll PZ-PR-5PK-F00288			•	
Maven Prizm pre-roll PZ-PR-5PK-F00299			•	
Maven Shangra-LA preroll SL-PR-5PK-F00296			•	
Maven Shangra-LA preroll SL-PR-5PK-F00297			•	
Maven Ube Creme pre-roll UC-PR-5PK-F00295			•	
Maven Umami Butter pre-roll (without wrapper) UB-PR-5PK-F00310			•	
Maven rolling papers various			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Melt A.M.F. Blend THC-a Mimosa (Tobacco store)				
Modus Knock out HXC Blend (Tobacco store)				•
Modus Knock out HXC Blend (Tobacco store)				
Muha Meds Pineapple Express pe-dd-62424				
Muha Meds 2024 Blueberry Haze (Illicit store)			•	•
Nug Lime Vine LR Nug0411LVAP NID 041109692			•	
Ocean Cannabis Cereal Milk OCN_CMV_1015				
Packman White Gummy Bears (Illicit store)				•

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Papa's Herb Lemon Cherry Gelato PHC3040LCG-H			•	
Phat Panda* Dutch Treat DUT-T07-040623		•		
Phat Panda* Dutch Treat DUT-T07-040623		•		
Phat Panda* Dutch Treat DUT-T07-040623		•		
Phat Panda* Dutch Treat DUT-T07-040623		•		
Phat Panda Dutch Treat DUT-T07-040623		•		
Phat Panda* Grand Daddy Purple GDP-T07-041023		•		
Phat Panda* Original Glue OGL-T07-041023		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Phat Panda* Original Glue OGL-T07-041023		•		
Phat Panda* Raspberry x Skywalker RSK-T07-040623		•		
Phat Panda* Strawberry Cough STR-T07--71923				•
Phat Panda* Tropical Trainwreck TTW-T07-040623		•		
Phat Panda* Washington Apple WAP-T07-040623		•		
Phire Cranberry Crush PHICRACRUDVC002734		•		
Phire* Cranberry Crush PHICRACRUDVC002823		•		
Phire* Cranberry Crush PhiCraCruDVC002823		•		







Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Phire Cranberry Crush PhiCraCruDVC002823		•		
Phire Cranberry Crush PhiCraCruDVC002823		•		
Phire* Peppermint Chill PHIPEPCHIDVC002856		•		
Phire* Pineapple Gelato PHIPINGELDVC002855		•		
Platinum Banana Munson 240219PVLBM			•	
Platinum Trainwreck 221205pvd.tw		•	•	
PlugPlay Animal Mintz CW830PPAM				
PlugPlay Berry Gang CW903PPBG			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
PlugPlay Berry Gang CW903PPBG			•	
PlugPlay Blue Dream CW843PPBD			•	
PlugPlay Blue Dream CW908PPBD			•	
PlugPlay King Louie CW838PPKL				
PlugPlay Pineapple Express CW837PPPE				
PlugPlay Strawberry Champagne CW889PPSC				
Punch Florida's Finest PEDVFLRFN005			•	
Punch Island Breeze PEDVISLBRZ004			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Punch Platunum OG PEDVPLATOG011			•	
Punch Rainbow Sherbert PEDVRNSHB013			•	
Punch Super Sour Diesel PEDVSSRD014			•	
Punch The Z PEDVZKIT016			•	
Punch Trop Cherry PERCTRPCHR001				
Pure* Gorilla Glue syringe (Tobacco store)		•		
Purist Fire Stick PAR Soft PE01757				
Quality over Quantity Grandi Candi flower 240530GC				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Raw Garden Blue Dream 240000804				
Raw Garden Guava Breeze 230001788				
Raw Garden Hazed & Confused 240000721				
Raw Garden Heavy Haze 240000759			•	
Raw Garden Hella Blueberry 240000736				
Raw Garden Kosher Kush #10 240000772				
Raw Garden Lemon Meringue Pie 240000827			•	
Raw Garden Pink Pegasus 240000769				





Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Raw Garden Runtz 240000737				
Raw Garden Sleeroy 240000722				
Raw Garden Slurmy Temple 240000810			•	
Raw Garden Space Station OG 240000767				
Rove Blue Dream 24052006DS				
Rove Blue Dream 24052006DS				
Rove Cherry Gelato 24052008DS				
Rove Cherry Gelato 24052008DS				








Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Rove Fruit Punch 24062404DS			•	
Rove Fruit Punch 24062404DS			•	
Rove Kush 24040802FO			•	
Rove Maui Wau 24041503DS				
Rove Maui Wau 24041503DS			•	
Rove Maui Wau 24051303DS				
Rove Pineapple Express 24061005DS			•	
Rove Pineapple Express 24061005DS			•	



Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Rove Skywalker OG 24061702DS			•	
Rove Skywalker OG 24061702DS			•	
Rove Sweet Gas 24030435PLR			•	
Runtz Blueberry Razz (Illicit store)			•	•
Sauce Blue Dream 1A4060300009BE3000000788			•	
Sauce* Blueberry Kush 1A406030000A432000003134				
Sauce Northern Lights 1A4060300009BE3000000783			•	
Sauce Purple Haze 1A4060300009BE3000000787			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Sauce Skywalker OG 1A4060300009BE3000000965		•		
Sauce Skywalker OG 1A4060300009BE3000000965			•	
Sauce* Strawberry Cough 1A406030000A432000003156				
Sauce Sunset Gelato 1A4060300009BE3000000961				
Sauce Super Sour Apple 1A4060300009BE3000000959				
Sauce Super Sour Apple 1A4060300009BE3000000959				
Seed Junky* Red Eye SJRE-45259				
Seed Junky Red Eye SJRE-45259				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Selfies Super Glue 231215SG				
Smartweed Mota Cookies joint MC010424				
Smartweed Mota Cookies joint MC010424				
Solis Purple Urkle PU-061523				
Stiiizy Apple Fritter AIO ST-ORG-APF-A2424			•	
Stiiizy Apple Fritter AIO ST-ORG-APF-A2424			•	
Stiiizy Do-Si-Dos ST-ORG-DSD-D0524				
Stiiizy Gelato .5 gram ST-ORG-GEL-K3024				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Stiiizy Lemon Cherry Gelato ST-LQD-LCG-E0624			•	
Stiiizy* Pink Acai ST-ORG-SPA-H3123				
Stiiizy Pink Acai ST-ORG-SPA-H3123			•	
Stiiizy Pink Acai Pod ST-ORG-SPA-E2324				
Stiiizy Pink Acai Pod ST-ORG-SPA-E2324			•	
Stiiizy Premium Jack ST-ORG-PRJ-D2424			•	
Stiiizy Purple Zlushie ST-LQD-PPZ-E1624				
Stiiizy Purple Zlushie ST-LQD-PPZ-E1624			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Stiiizy Skywalker OG ST-ORG-SOD-A3024				
Stiiizy Sour Diesel st-org-sod-A3024			•	
Stiiizy Sour Diesel AIO ST-ORG-SOD-P1323			•	
Stiiizy Sour Diesel AIO ST-ORG-SOD-P1323			•	
Stiiizy Sour Tangie ST-ORG-STG-A1124			•	
Stiiizy Sour Tangie AIO ST-ORG-STG-P1323			•	
Stiiizy Sour Tangie AIO ST-ORG-STG-P1323			•	
Stiiizy Strawberry Shortcake ST-LQD-SWS-F0524				


Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Stiiizy Strawberry Shortcake ST-LQD-SWS-F0524				
Stiiizy Strawberry shortcake ST-LQD-SWS-E2124			•	
Stiiizy hemp Delta 8 OG Kush (Tobacco store)			•	
Supherb Melted Diamonds Slurricane 040523-SSLC				
Timeless 12 Parsecs HV602-TL-031224			•	
Timeless 12 Parsecs HV602-TL-031224			•	
Timeless Grand Daddy Purp HV622-TL-041024				
Timeless Grand Daddy Purp HV622-TL-041024			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Timeless Maui Wowie HV631-TL-042324			•	
Timeless Maui Wowie HV631-TL-042324			•	
Timeless Peach Dreams HV571-TL-021224			•	
Timeless Peach Dreams HV571-TL-021224			•	
Timeless Sweet Island Skunk HV623-TL-041024			•	
Timeless Sweet Island Skunk HV623-TL-041024			•	
Timeless Sweet Tooth HV636-TL-042324			•	
Timeless Sweet Tooth HV636-TL-042324			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Turn Blue Dream TBB-BD-04.10.24			•	
Turn Blue Dream TBB-BD-05.22.24				
Turn Gone Bananas AIO TBB-GBAN-06.11.24			•	
Turn Grand Daddy Purp TBB-GDP-05.30.24			•	
Turn Kiwi Spiked Punch AIO TBB-KSP-03.13.24				
Turn Nightshade GMO TURNPPNS0424				
Turn Peaches n Cream AIO TBB-PNC-04.22.24			•	
Turn White Gummy Bear AIO TBB-WGB-04.18.24			•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
Tutti Cart Sour Diesel BID t-v-1g-s-sd-0402			•	
UP!* Pinepple Express CG-UP-PMDA-Y		•		
UP!* Strawberry Cough CG-UP-PMDA-V		•		
UP!* Watermelon Z CG-UP-PMDA-W		•		
West Coast Cure* Apple Burst VPPL234448		•		
West Coast Cure* Apple Burst VPPL234448		•		
West Coast Cure Apple Burst VPPL234448		•	•	
West Coast Cure Banana OG VRES234814			•	









Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
West Coast Cure Banana Smoothie VPPL234398		•		
West Coast Cure* Birthday Cake VPPL234382		•		
West Coast Cure* Birthday Cake VPPL234420		•		
West Coast Cure* Birthday Cake VPPL234420		•		
West Coast Cure* Biscotti VDSP234348		•		
West Coast Cure* Biscotti VPPL234414		•		
West Coast Cure* Blackberry Kush VPPL234677				
West Coast Cure Blue Dream VPLL234848				


Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
West Coast Cure* Blue Dream VPPL234439		•		
West Coast Cure* Blue Dream VPPL234450				
West Coast Cure* Blue Dream VPPL234465		•		
West Coast Cure* Bubba Kush VPPL234441		•		
West Coast Cure Bubba Kush VPPL234441		•	•	
West Coast Cure* Gas OG VPPL234446		•		
West Coast Cure Gas OG VPPL234791			•	
West Coast Cure Gas OG VPPL234806		•	•	

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
West Coast Cure* Gelato VPPL234377		•		
West Coast Cure Grape Ape VPPL234488?		•	•	
West Coast Cure* Jack Herer VPPL234378		•		
West Coast Cure* Jack Herer VPPL234378		•		
West Coast Cure* Jack Herer VPPL234416		•		
West Coast Cure* Jack Herer VPPL234416		•		
West Coast Cure* Jack Herer VPPL234492		•		
West Coast Cure* Lemon Cooler VPPL234379		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
West Coast Cure Lucky Charmz VBAR234762			•	
West Coast Cure* Lucky Charmz VPPL234429		•		
West Coast Cure* Lucky Charmz VPPL234429		•		
West Coast Cure* Maui Wauī VPPL234460		•		
West Coast Cure Maui Wauī VPPL234460		•	•	
West Coast Cure* Orange Cookies VPPL234457		•		
West Coast Cure Orange Cookies VPPL234457		•	•	
West Coast Cure Skywalker OG VPPL234399				

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
West Coast Cure* Strawberry Cream VPPL234444		•		
West Coast Cure Strawberry Shortcake VPPL234808			•	
West Coast Cure Strawberry Shortcake VPPL234808			•	
West Coast Cure Super Glue VPPL234403		•	•	
West Coast Cure* Super Glue VPPL234570				
West Coast Cure Tangie joint MFLJT232247			•	
West Coast Cure* Watermelon Sorbet VPPL		•		
West Coast Cure* Watermelon Sorbet VPPL234381		•		

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
West Coast Cure* Watermelon Sorbet VPPL234381		•		
West Coast Cure Watermelon Sorbet VPPL234381		•	•	
West Coast Cure Wild Berries AIO VBAR234741		•	•	
West Coast Cure* Zkittles VPPL234458		•		
West Coast Cure* Zkittles VPPL234568				
West Coast Trading Co XJ-13 sugar 24040407-1				
Whole Melt Extracts* Banana Creamsicle (Tobacco store)				
Wild Hemp ICE by SMOK CBD pen Gelato Ice				•

Product	Finding	Exceeds state limits	Off-list pesticides	Other risks
(Tobacco store)				
Wyld* Marionberry edible MB-246				

Search your stash: 538 cannabis pesticide tests show what's in your weed



Some of the 80 cannabis brands included in more than 500 pesticide tests.
(Dania Maxwell / Los Angeles Times)

By Paige St. John, Sean Greene and Lorena Iñiguez Elebee
Dec. 19, 2024 3 AM PT

California's testing requirements for [cannabis products contain major gaps](#). To understand what's being missed and what consumers are exposed to, the Los Angeles Times bought more than 150 products from licensed stores, as well as from tobacco shops and illicit vendors, and had them tested at three state-licensed labs, Anresco Laboratories, SC Labs and Infinite Chemical Analysis Labs.

Those tests were conducted without the labs knowing what brand they tested.

Where available, the tests included expanded screening for more than 290 pesticides and checks for other hazardous materials, such as vitamin E acetate or synthetic cannabinoids.

The Times also obtained data from private market tests conducted on behalf of vape manufacturer Raw Garden and the March and Ash dispensary chain as well as participating labs.

Pesticides [pose a particular threat in inhaled cannabis products](#) such as vapes or prerolls, because toxicants enter the lungs and travel through the bloodstream to internal organs, including the

brain. In addition, heat from combustion causes some pesticides to degrade into harmful gases such as hydrogen cyanide.

In small concentrations, the risks from one-time use are minimal, but increase with repeated exposure over time.

Hidden chemicals in cannabis

Independent lab tests found 79 toxic chemicals in California cannabis products, including 44 that state regulators don't monitor. Those below are listed in order of the greatest concentration found, with the degree to which they exceed state limits or the federal threshold used to evaluate tobacco pesticides, and the known health effects.

Number of times over permitted residue level or EPA criteria		
<div><div><1 below threshold</div><div>>1-10</div><div>11-</div><div>50</div><div>51-100</div><div>200+</div><div>400+</div><div>700+</div><div>2,000+</div></div>		
Pesticide	Peak	About and effects
Chlorfenapyr	2,060.6	Insecticide not permitted on any food products; no amount is allowed in California cannabis. Exposure symptoms include nausea, vomiting, headache, difficulty breathing, wheezing, chest tightness and short-term memory loss; combustion (pyrolysis) releases hydrogen cyanide and other toxic gases. In rats, it concentrated in breast milk, causing increased death of offspring.
Pymetrozine	839.4	Insecticide prohibited in the European Union, Canada and Norway and only for restricted use in the United States on food crops. It is a reproductive toxin and carcinogen and in rat studies caused damage to endocrine organs. ⚠ Not screened for in California cannabis.
Trifloxystrobin	488.4	Fungicide used on agricultural crops and as a seed treatment. Endocrine disruptor and developmental toxin. Exposure symptoms include headache, dizziness, nausea, vomiting and irritated eyes. Pyrolysis creates hydrogen cyanide. Rat studies showed fused bones.
2-Phenylphenol	268	Disinfectant and permitted fungicide on pears and citrus. It is a carcinogen and might also affect the body's natural hormones. ⚠ Not screened for in California cannabis.
Bifenazate	237	Restricted-use miticide used on a large variety of crops. Questionable developmental and reproductive toxin and endocrine disruptor.

Page 1 of 16 >

Source/Reference - [Search your stash: 538 cannabis pesticide tests show what's in your weed - Los Angeles Times](#)

For the reasons listed above, the authors recommend adoption of a resolution requesting the Governor and the Department of Cannabis Control to declare contaminated cannabis within the regulated market a public health emergency and utilize the emergency rule making process to require additional analytes be added to the cannabis regulatory testing and require cannabis testing labs to obtain accreditation through the State Water Resources Control Board's environmental lab accreditation program. Funds for the State Water Resources Control Board should be reallocated from the Department of Cannabis Control for this activity. Additionally, the authors recommend the State Legislature provide regulatory authority to revise the contaminant testing requirements to the Department of Pesticide Regulation, via the proposed changes to the Business and Professions code provided and reallocate funds from the DCC to the Department of Pesticide Regulations for this activity.

Financial Impact

The recommended action does not have a financial impact.

Strategic Initiatives

Operational Plan - Comprehensive Health & Safety

Operational Plan – Sustainable Environment

Submitted By:

Manu Koenig, First District Supervisor and Justin Cummings, Third District Supervisor

Recommended By:

Carlos J. Palacios, County Administrative Officer

Artificial Intelligence Acknowledgment:

Artificial Intelligence (AI) did not significantly contribute to the development of this agenda item.

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Replaces

Packet Page 973

Juliette Rezzato

From: Board Of Supervisors
Sent: Tuesday, February 25, 2025 2:25 PM
To: Agenda Management Support
Subject: #24 comment_Berryessa, B

From: Bryce Berryessa <bberryessa@gmail.com>
Sent: Monday, February 24, 2025 10:22 PM
To: Board Of Supervisors <boardofsupervisors@santacruzcountyca.gov>
Subject: Item #24 for February 25, 2025

******CAUTION:**This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear Members of the Board of Supervisors,

I am writing to express my support for Item #24 on the agenda for February 25, 2025, regarding the resolution in support of statewide cannabis testing reform. I commend the Board's leadership in addressing critical public health and safety concerns within the cannabis industry, both locally and statewide.

The inclusion of additional analytes in required cannabis testing is a necessary step toward ensuring that cannabis products meet the highest safety standards. Expanding the list of pesticides and contaminants subject to testing will help close existing regulatory gaps and protect consumers from exposure to harmful substances. This measure not only prioritizes public health but also strengthens confidence in the regulated cannabis market, which is essential for its continued growth and success.

I also appreciate the Board's recognition of Santa Cruz County's leadership in fostering a safe and responsible cannabis industry. By supporting this resolution, you are helping to solidify our county's commitment to advancing public health while maintaining a thriving local cannabis economy.

Thank you for your dedication to these important issues.

Sincerely,

Bryce Berryessa

Treehouse | The Hook