Pre-roll guidance



Who can make pre-rolls?

A <u>licensed cannabis cultivator</u>, <u>wholesaler</u>, <u>or retailer</u> may process and package a pre-rolled joint if it is made from flower only and not infused.

An infused pre-roll **must be produced by a licensed cannabis manufacturer**.

Neither cultivators, wholesalers, nor manufacturers may sell directly to the public. Public sales of cannabis flower and products may only be sold by a licensed retailer.

Who can <u>package</u> pre-rolls?

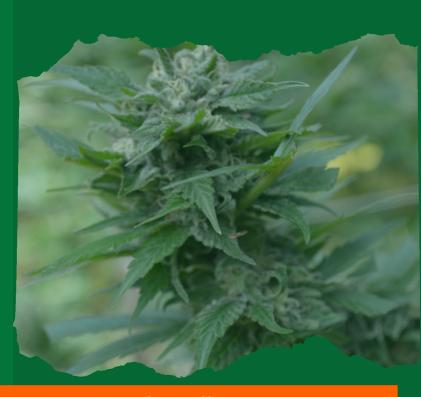
Standard (flower-only) pre-rolls can be packaged by **cultivators**, **retailers** and **wholesalers**.

An **infused pre-roll** is considered a cannabis product. After being produced by a manufacturer, it can be **packaged either by that manufacturer or by a licensed wholesaler.**

Pre-roll packaging requirements

Standard pre-rolls (flower only) must be in **child-deterrent** packaging (tear-resistant and difficult enough to open that it would discourage a child under five to access its contents).

Infused pre-rolls must be in **child-resistant** packaging (This is a federally-defined term. Must be significantly difficult for a child under five to access contents).





Testing Requirements

Testing requirements change depending on the product.

Potency: required on infused finished products. For standard pre-rolls, potency testing required on individual components (per process lot/cultivar/strain).

<u>**Pathogens:**</u> Individual components or finished product

<u>Pesticides:</u> Individual components or finished product

<u>Residual Solvents:</u> if infused with solvent based concentrate - Individual components

<u>Heavy Metals:</u> if infused with solvent based concentrate - Individual components

Moisture and water activity: Required on infused products. Should be reported on dry weight basis.

Terpene testing required for:

- 1. Concentrates intended for inhalation or vaporization.
- 2. Any product in which terpenes have been removed and reintroduced.
- 3. Any product with added terpenes.
- 4. Any product that indicates terpene content on the label.



What about kief-infused pre-rolls?

Kief-infused pre-rolls can be considered a standard pre-roll, but <u>cultivators cannot</u> <u>obtain kief from another licensee</u>, they must use their own.

