



**NEVADA STATE DIVISION OF PUBLIC AND
BEHAVIORAL HEALTH
Policy**

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1.0 POLICY

All Independent Laboratories shall adhere to the testing standards pertaining to heavy metal limits as set forth in Table 11 of *The American Herbal Pharmacopoeia Cannabis Inflorescence, Standards of Identity, Analysis, and Quality Control* pursuant to NAC 453A.652(5)(a) which states:

5. *The Division hereby adopts by reference:*
 (a) *The Cannabis Inflorescence: Standards of Identity, Analysis, and Quality Control monograph published by the American Herbal Pharmacopoeia. A copy of that publication may be obtained from the American Herbal Pharmacopoeia, P.O. Box 66809, Scotts Valley, California 95067, or at the Internet address <http://www.herbal-ahp.org/>, for the price of \$44.95.*

A clerical error in the regulations adopted by the Division of Public and Behavior Health (DPBH or the Division), which was later codified in NAC 453A, resulted in the establishment of two conflicting standards pertaining to heavy metals limits for Medical Marijuana. Because of the inadvertent omission of the units BW/Day (body weight/day), NAC 453A.658(8) incorrectly states the following acceptable heavy metal limits:

8. *For the purposes of the heavy metal test, a sample of marijuana shall be deemed to have passed if it meets the following standards:*

<u>Metal</u>	<u>Natural Health Products Acceptable limits uG/KG</u>
Arsenic.....	<0.14
Cadmium.....	<0.09
Lead.....	<0.29
Mercury.....	<0.29

2.0 PURPOSE

The purpose of this policy is to identify the two conflicting heavy metal limits standards given in NAC 453A, and to clarify that the standards set forth in the *American Herbal Pharmacopoeia Cannabis Inflorescence Standards of Identity, Analysis, and Quality Control* are the correct



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heavy metals limits that Independent Laboratories will utilize in the testing of Medical Marijuana in Nevada.

3.0 SCOPE

This policy applies to all MMEs and DPBH MMP Staff.

4.0 PROCEDURES

- 4.1 All Nevada Independent Laboratory MMEs will immediately adopt the standards for heavy metals limits as set forth in the *American Herbal Pharmacopoeia Cannabis Inflorescence Standards of Identity, Analysis, and Quality Control*, Table 11.
- 4.2 All Nevada Independent Laboratory MMEs will have the understanding the standards for heavy metals limits as set forth in the *American Herbal Pharmacopoeia Cannabis Inflorescence Standards of Identity, Analysis, and Quality Control*, Table 11, take precedence over the heavy metals limits set forth in NAC 453A.658(8).
- 4.3 Upon approval, DPBH MMP will:
 - 4.3.1 Immediately publish this policy to all applicable ListServ groups.
 - 4.3.2 Publish the policy to the public website.
 - 4.3.3 Make discussion of the policy an agenda item on the next Independent Laboratory Advisory Committee meeting.
- 4.4 The Division will make permanent changes to the regulations/NAC at the next available opportunity to do so.