



COLORADO

Department of Revenue

Enforcement Division - Marijuana  
1707 Cole Blvd., Suite 300  
Lakewood, CO 80401

January 30, 2017

**INDUSTRY-WIDE BULLETIN: 17-01**

**RE: Retail Marijuana Microbial Contaminant Testing- Total Yeast and Mold**

Dear Marijuana Industry Stakeholders:

The Colorado Department of Public Health and Environment's (CDPHE) Marijuana Laboratory Inspection Program has informed the Marijuana Enforcement Division (MED) that it is requiring licensed testing facilities to uniformly update previously accepted methods for total yeast and mold testing. After careful consideration of emerging data regarding the use and effectiveness of 3M Total Yeast and Mold Rapid Petrifilms in marijuana, CDPHE has concluded that 48 hours is not a sufficient incubation period to obtain accurate results. Based upon the review of this information, marijuana/marijuana products require 60-72 hours of incubation as per the manufacturer's product instructions for human food products, animal feed and environmental products. This determination was based upon several factors, including data obtained by several testing facilities, as well as a Journal of Food Protection 2016 paper. Please see the attached letter from CDPHE for more details.

In the interest of public safety, **the MED is requiring all Retail Marijuana Cultivation Licenses (RMC) and Retail Marijuana Products Manufacturing Facility Licenses (RMPMF) that have obtained process validation according to MED Rule R 1501 (B) to submit a single Test Batch from a Harvest Batch or Production Batch so that it can be tested for total yeast and mold.** Each MED Retail Marijuana Cultivation and Product Manufacturer licensee that will transfer any Retail Marijuana or Retail Marijuana Product out of its licensed premises in the month of February 2017, must submit a Test Batch for total yeast and mold testing before March 1, 2017. If a licensee will not transfer any Retail Marijuana or Retail Marijuana Product out of their licensed premises during the month of February 2017, and they are process validated, that licensee must submit a Test Batch for total yeast and mold testing *prior* to any package leaving the licensed premises in any subsequent month. If the single test passes for total yeast and mold, the process validation remains effective. If the single test fails for total yeast and mold, the licensee must follow the procedures outlined in MED Rule R 1501 (F)(2) for failed contaminant testing re-validation as well as the procedures outlined in MED Rule R 1507 (B) for contaminated product and failed test results.

In accordance with Colorado Revised Statute 12-43.4-202 (3)(a)(IV) and MED Rules R 1502 (A) and R 1502 (B) the Division may require Retail Marijuana Establishments to submit Test Batches at any time. In light of the updated procedures outlined by CDPHE, the Division is mandating this single test for all Retail Marijuana Establishments that are currently process validated according to MED Rule R 1501 (B). The Test Batch must be submitted to a licensed



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testing facility that is certified in Microbial Contaminant Testing. The list of certified testing facilities can be found at <https://www.colorado.gov/pacific/enforcement/med-licensed-facilities>.

If there are any questions with respect to the changed Total Yeast and Mold testing procedures, please contact CDPHE's Laboratory Services at [cdphe\\_marijuana\\_labcert@state.co.us](mailto:cdphe_marijuana_labcert@state.co.us) and if you have questions about the requirement to test please contact [dor\\_medinquiry@state.co.us](mailto:dor_medinquiry@state.co.us) with "Microbial Contaminant Test" in the subject line. Thank you for your support and cooperation.

Regards,

Jim Burack  
Director  
Marijuana Enforcement Division



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Lakewood, CO 80401

January 19, 2017

Jim Burack, Director  
Marijuana Enforcement Division  
Colorado Department of Revenue  
455 Sherman Street, Suite 390  
Denver, CO 80203

RE: Recommendation for Microbial Testing for Process Validation Verification

Dear Mr. Burack:

After careful consideration of emerging data regarding the use and effectiveness of 3M Total Yeast and Mold Rapid Petrifilms in marijuana, the Colorado Department of Public Health and Environment, Marijuana Laboratory Inspection Program has concluded that 48 hours is not a sufficient incubation time to achieve accurate counts. This determination was based upon several factors, including data obtained by several testing facilities, as well as the Journal of Food Protection January 2016 paper "Comparison of New and Traditional Culture-Dependent Media for Enumerating Foodborn Yeasts and Molds," which show clear differences between rapid films and comparative methods (DRBC, ADPA) at the 48 hour vs. the 72 hour endpoint. Based upon the reviewed information, marijuana/marijuana products fall into the category of matrices which require 60-72 hours of incubation as per the manufacturer's product instructions for human food products, animal feed and environmental products. We have informed the testing facilities that a minimum 60 hour incubation and the appropriate adjustments to any laboratory procedure that requires 48 hours of incubation as the minimum time for rapid yeast and mold Petrifilms must be implemented as soon as possible.

In light of these testing change, and in the interest of protecting public health and safety because the facilities that have completed process validation do not submit samples for routine testing, the CDPHE Marijuana Laboratory Inspection Program recommends that the Department of Revenue require that any licensed marijuana cultivation or production facility that has completed process validation with a testing facility using a 48 hour incubation period with the 3M Total Yeast and Mold Rapid Petrifilms be required to submit a test batch for total yeast and mold testing using the minimum 60 hour incubation period. If the test batch passes testing, we recommend the process validation remain effective; if the test batch fails testing, the regulatory requirements for additional testing and re-validation after failed contaminant testing should be followed.

Please contact me if any additional information is needed.

Sincerely,

Heather Krug, M.S.  
Marijuana Laboratory Inspection Program Coordinator  
Laboratory Services Division  
Colorado Department of Public Health and Environment  
Email: [heather.krug@state.co.us](mailto:heather.krug@state.co.us)