
FW: Micro questions from discussion

Ehrlich, Trecia (AGR) <TEhrlich@agr.wa.gov>

Fri, Jun 30, 2023 at 9:20 AM

To: "amber@medicinecreekanalytics.com" <amber@medicinecreekanalytics.com>, "kyle.shelton@medicinecreekanalytics.com" <kyle.shelton@medicinecreekanalytics.com>, "drjamie@capitolanalysis.com" <drjamie@capitolanalysis.com>, "jeff@capitolanalysis.com" <jeff@capitolanalysis.com>, "bowman@capitolanalysis.com" <bowman@capitolanalysis.com>, "info@conflabs.com" <info@conflabs.com>, "Nick (LCB External)" <nick@conflabs.com>, "beth@conflabs.com" <beth@conflabs.com>, "pat@conflabs.com" <pat@conflabs.com>, "info@tnwlab.com" <info@tnwlab.com>, "jamie@tnwlab.com" <jamie@tnwlab.com>, "lab@treelineanalytics.com" <lab@treelineanalytics.com>, "jay@treelineanalytics.com" <jay@treelineanalytics.com>, "integritylabsllc@gmail.com" <integritylabsllc@gmail.com>, "holy@integritylabsolympia.com" <holy@integritylabsolympia.com>, "marilyn@integritylabsolympia.com" <marilyn@integritylabsolympia.com>, "steve@integritylabsolympia.com" <steve@integritylabsolympia.com>, "greengrowerlabs@gmail.com" <greengrowerlabs@gmail.com>, "benhart@testing-technologies.net" <benhart@testing-technologies.net>, Gregory Foster <greg@cannabis.observer>, "LaraKaminsky (LCB External)" <lara.kaminsky@thecannabisalliance.us>, "Poolman, Nicholas (AGR)" <Nicholas.Poolman@agr.wa.gov>, "Michaelsen, Dave (AGR)" <David.Michaelsen@agr.wa.gov>, "Christiansen, Lauren (AGR)" <Lauren.Christiansen@agr.wa.gov>

Helo all,

We had some micro questions that went unanswered in our discussion, so I am passing along the responses below. Feel free to follow up with Lauren Christiansen at lauren.christiansen@agr.wa.gov

Trecia (Tree-sha) Ehrlich, MPH

Cannabis Programs Manager

Commodity Inspection Division, Washington State Department of Agriculture

360-584-3711

From: Christiansen, Lauren (AGR) <Lauren.Christiansen@agr.wa.gov>

Sent: Thursday, June 29, 2023 4:14 PM

To: Michaelsen, Dave (AGR) <David.Michaelsen@agr.wa.gov>; Ehrlich, Trecia (AGR) <TEhrlich@agr.wa.gov>

Cc: Poolman, Nicholas (AGR) <Nicholas.Poolman@agr.wa.gov>

Subject: RE: Micro questions from discussion

Just to follow up on that FDA BAM question – The Bacteriological Analytical Manual is an excellent resource for microbiological methods, and laboratories may wish to design their microbial screening methods using BAM as a reference, but there's no requirement to use those methods. Microbiological screening does not have any requirements to use specific methods like cannabinoid concentration does. The current language in our draft rules does not require confirmation of presumptive positive microbial samples by secondary method, so that's also something to keep in mind.

Lauren Christiansen Lead Microbiologist

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From: Michaelsen, Dave (AGR) <David.Michaelsen@agr.wa.gov>
Sent: Thursday, June 29, 2023 12:33 PM
To: Ehrlich, Trecia (AGR) <TEhrlich@agr.wa.gov>; Christiansen, Lauren (AGR) <Lauren.Christiansen@agr.wa.gov>
Cc: Poolman, Nicholas (AGR) <Nicholas.Poolman@agr.wa.gov>
Subject: RE: Micro questions from discussion

I talked with Lauren today and have included the answers below:

Dave

From: Ehrlich, Trecia (AGR) <TEhrlich@agr.wa.gov>
Sent: Wednesday, June 28, 2023 3:21 PM
To: Christiansen, Lauren (AGR) <Lauren.Christiansen@agr.wa.gov>
Cc: Michaelsen, Dave (AGR) <David.Michaelsen@agr.wa.gov>; Poolman, Nicholas (AGR) <Nicholas.Poolman@agr.wa.gov>
Subject: Micro questions from discussion

Hi Lauren,

We received the following micro questions while you were gone:

What level of microbiological detections are you looking into? If going toward FDA-BAM like protocols then what level of dedications towards molecular or ELISA, confirmations etc.? All of this adds extra cost and it is not easy to guesstimate cost without knowing more details. Thanks

The analytes and the decision point concentrations are staying the same.

There was also a question as to if PCR would be required.

There was some confusion in our draft rules if PCR was required. PCR is not required as long as there are other valid methods with the specificity and sensitivity to meet current rules. We are making edits to clarify the issue.

Dave and Nick – feel free to add if there were any micro questions so far that I missed here.

Thanks,

Trecia

Trecia (Tree-sha) Ehrlich, MPH

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