# American Herbal Pharmacopoela

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Cannabis Inflorescence
Cannabis spp.

Standards of Identity, Analysis, and
Quality Control



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The following Standards of Identity Analysis, and Quality Control of *Cannabis* are intended to provide scientifically valid methods for the analysis of cannabis and its preparations that can be used to comply with state and federal regulations and policies. The analytical methods were obtained from peer reviewed literature, have been used as part of international or federal monitoring programs for cannabis, and have been verified for their scientific validity. Methods other than those presented in this monograph may be scientifically valid and provide reliable results. However, all methods must be verified as being scientifically valid prior to use for regulatory compliance.

In the United States, rumabis is a Schedule I controlled substance under federal law; therefore, any use or possession of cannabis and its preparations is illegal except pursuant to the compassionate use Investigational New Drug exemption. These standards are not intended to support, encourage or promote the illegal cultivation, use, trade, or commerce of cannabis. Individuals, entities and institutions intending to possess or utilize cannabis and its preparations should consult with legal counsel prior to engaging in any such activity.

The citing of any commercial names or products does not and should not be construed as constituting an endorsement by the American Herbal Pharmacopoeia. Additionally, the reliability, and therefore ability to comply with state or federal regulations, of any conclusions drawn from the analysis of a sample is dependent upon the test sample accurately representing the entire batch. Therefore, when performing all analytical tests, a formal sampling program must be employed.

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#### Medical Disclaimer

The information contained in this monograph represents a synthesis of the authoritative scientific and traditional data. All efforts have been made to ensure the accuracy of the information and findings presented. Those seeking to utilize botanicals as part of a health care program should do so under the guidance of a qualified health care professional.

#### Statement of Nonendorsement

Reporting on the use of proprietary products reflects studies conducted with them and is not meant to be a product endorsement.

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#### Cover Photograph

Cannabis cultivated under the Compassionate Investigational New Drug program at the University of Mississippi administered by the National Institute on Drug Abuse (NIDA). Photograph courtesy of: University of Mississippi.



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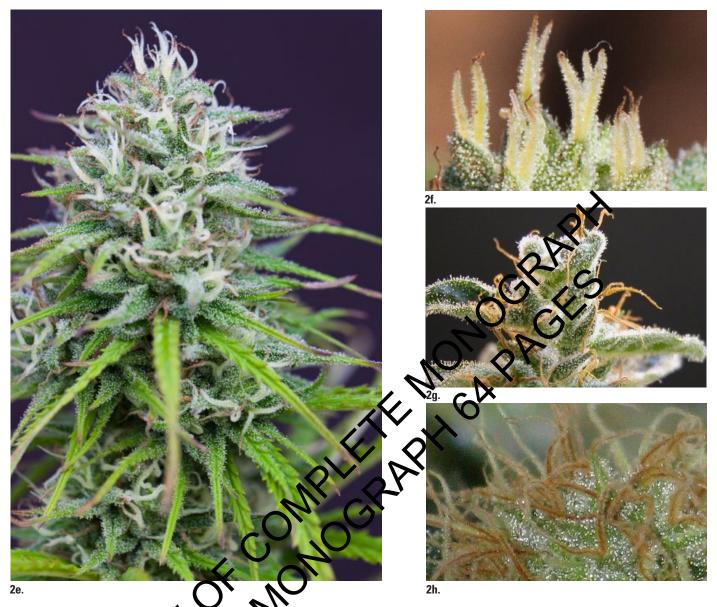


Figure 2 (continued) Botanical characteristics of canabis inflorescences

- 2e. Maturing female inflorest once showing young yellow styles and stigmas (often referred to as "pistils").
- 2f. Close-up of maturing seriale inflorescence showing young yellow styles and stigmas senescing brown and shriveling and an abundance of glanduar archomes.
- 2g. Female inflorescence with senescial reddish-brown styles and stigmas, an indicator of inflorescence maturity.
- 2h. Close-up of tenale inflorescent with senesced reddish-brown styles and stigmas.

hemp, nerrow-lead drug, etc. to account for the plasticity represented in the genus.

Cannabis a member of the Cannabaceae family, together with another well-known member of the family, hops (Humulus). The family has recently been expanded to contain 9 other genera (Stevens 2001). The following describes the published range of morphological diversity within plants recognized as Cannabis spp.

#### Morphological Characterization of Cannabis L.

Herbaceous annual, taprooted (taproot not developed on vegetatively propagated/cloned plants). Plants dioecious

(male and female flowers occur on separate plants) and rarely monoecious (male and female flowers occur on the same plant). Monoecious plants are often referred to as "hermaphrodites." True hermaphrodites bear bisexual flowers and are less common, whereas monoecious plants bear unisexual male and female flowers at different locations on the plant. Staminate (male) plants tend to be taller but less robust than pistillate (female) plants. Height and degree of branching depends on both genetic and environmental factors (UNODC 2009). Stem: Erect, furrowed, often hollow, 0.2–6 m (usually 1–3 m) tall, simple to well branched; branchlets densely pubescent; staminate (male) plants usually taller and less robust, compared with pistillate (female)



Figure 6 Macros aracteristics of cannabis inflorescence

- Dried, untriamed pistillate inflorescences of morphological type "sativa." 6a.
- 6b. Dried pistillate inflorescences of morphological type "sativa" (bottom - untrimmed; top - trimmed).
- Storage effects on color of cannabis material (left 1-year-old; right new harvest).
- Dried pistillate inflorescences of morphological type "indica" (bottom untrimmed; middle and top trimmed). 6d.
- 6e. Close-up of a dried pistillate inflorescence (note the visible glandular trichomes).
- Powdered dry cannabis material (leaves and pistillate inflorescences).

Photographs courtesy of: (6a-e) WAMM, Santa Cruz, CA; (6f) University of Mississippi, University, MS.

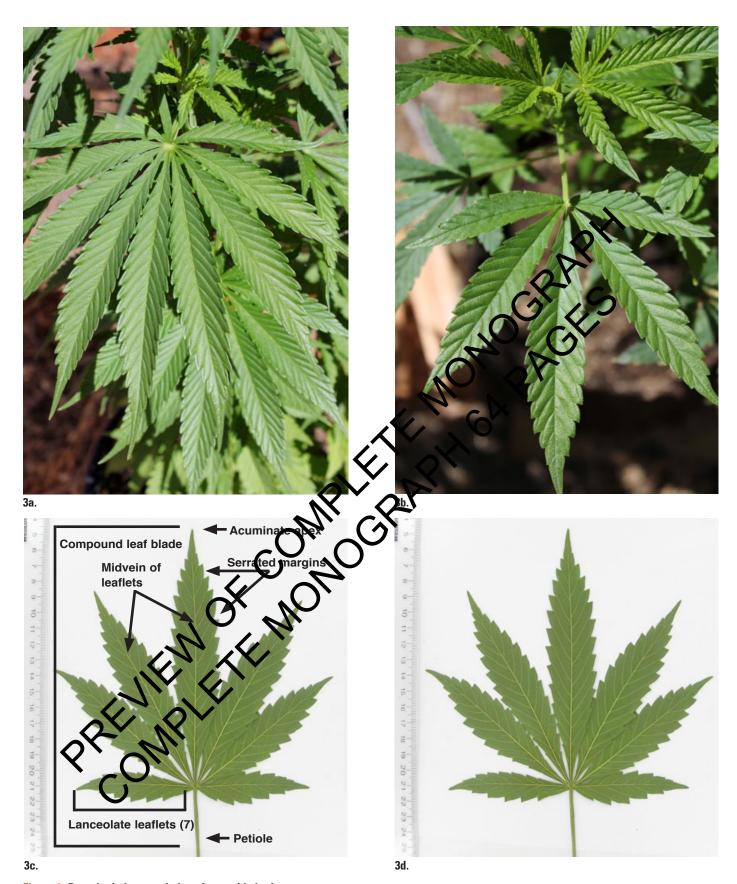


Figure 3 Botanical characteristics of cannabis leaf

- 3a. Adaxial (upper) surface of a typical cannabis leaf (9 leaflets).
- 3b. Adaxial (upper) surface of a typical cannabis leaf (5 leaflets).
- **3c.** Adaxial (upper) surface of a typical cannabis leaf with morphological characteristics highlighted.
- 3d. Abaxial (lower) surface of a typical cannabis leaf.

#### **Natural Contaminants and Adulterants**

Due to its widespread cultivation, there is little concern for adulteration of the plant itself. However, the large economic potential and illicit aspect of cannabis has given rise to a number of reported potentially hazardous natural contaminants or artificial adulterants in crude cannabis and cannabis preparations.

Natural contaminants: Several plant species have morphological characteristics comparable to Cannabis sativa, e.g., Hibiscus cannabinus (kenaf), Acer palmatum (Japanese maple), Urtica cannabina (a Asian species of nettle), Dizygotheca elegantissima (false aralia), Potentilla recta (sulphur cinquefoil, rough-fruited cinquefoil), and Datisca cannabina (false hemp), leading to occasional contamination of cannabis internationally (UNODC 2009). However, these plants can be readily differentiated from cannabis by inspection of their macroscopic and microscopic characteristics. More commonly, natural contaminants consist of degradation products, microbial (fungi and bacteria) contamination, and heavy metals. These contaminants are usually introduced during cultivation and storage (McLaren et al. 2008; McPartland 2002).

Adulterants: Growth enhancers and pest control chemicals, introduced during cultivation and storage, are possible risks to the producer and the consumer. There are anecdots reports of the use of banned substances such as daming (Alar), the degradation product of which is the highl hydrazine. Cannabis can also be contaminated for ing purposes. This usually entails adding substant tiny glass beads, to increase the weight product, or adding psychotropic substance calamus (Acorus calamus), and other choline pounds, to enhance the efficacy of low alleviate the side effects of cannable McPartland 2008).

In the Netherland lve been used to make cannabis quality, the sand giving the appear In the UK, similar adulterations dding glass beads with a similar resin heads to cannabis (Randerso y, lead has intentionally been added t ncrease its weight. Lead is readily absorbed upon inhalat on and this adulteration resulted in lead intoxication in at least 29 users (Busse et al. 2008). Additionally, in the Netherlands, two chemical analogs of sildenafil (Viagra) were found in cannabis samples. In the UK, other contaminants including turpentine, tranquilizers, boot polish, and henna, among others, have been reported (Newcombe 2006).

In recent years, various products laced with synthetic cannabinoids have appeared on the market. These are believed to mimic the effects of cannabis. These products are known by various names (e.g., "Spice" and "K2") and can be sold as "incense" or "natural smoking blends".

Like cannabis, these synthetic cannabinoids are schedule 1 restricted substances. The Spice blend is reported to contain synthetic cannabinoids with a mixture of otherwise legal, safe, and non-psychotropic herbal dietary supplement ingredients including: damina (Turnera diffusa), Chinese motherwort (Leonurus sibirica), and water lily (Nymphaea caerulea). According to the National Institute on Drug Abuse (NIDA 2012), those using some of these various blends have been admitted to Poison Control Centers and report "rapid heart rate, vomiting, agitation, confusion, and hallucinations. Spice can also raise blood pressure and cause reduced blood supply to the hear (hyvocardial ischemia), and in a few cases it has been assignated with heart attacks. Regular users may experience withdrawal and addiction symptoms."

#### Qualitative D

Cannabis th ed for medicinal purposes should matter as practically possible nal material should be free of have a high likelihood of pathoillus, E. coli (O157:H7), visible mold nt, material should be free of stems greater only subtending leaves should be present, bould be free of metals to the degree allowed by rally occurring growing substrate, and free of pestiand fungicides that can present a health hazard to the sumer. Microbial standards should be adopted based on those required for non-sterile pharmaceutical preparations for use by inhalation (see European Pharmacopoeia 5.1.4). Color should be consistent throughout each sample and should not show signs of grey or black, which are indicators of fungal infection.

For medical users of crude cannabis, there is a balance sought between organoleptic qualities (taste and aroma) and medicinal effect, as well as a balance between THC- and CBD-yielding cultivars. Many cultivators select, breed, and process for these varying qualities. For medicinal purposes an optimal ratio between total THC, Δ9-THC, and/or CBD has not been definitively determined. Different health conditions may respond differently to plants containing different ratios of the two primary cannabinoids. For example, there is evidence to suggest that CBD is responsible for some of the putative anxiolytic effects (Mechoulam et al. 2002; Zuardi et al. 2002) of the plant, while  $\Delta^9$ -THC has been associated with appetite stimulation (Dejesus et al. 2007; Nelson et al. 1994). The process of trimming is done both for yielding higher concentrations of  $\Delta^9$ -THC and for yielding more desirable, organoleptic qualities, since the leaves possess a sharp and bitter organoleptic characteristic. A better organoleptic profile may enhance compliance.

Dispensaries should maintain strict quality control practices to ensure the purity and quality of their material by contracting for testing with independent labs that apply independently verified testing methodologies and transparent testing standards. Individual growers and care givers producing medical cannabis for personal use should employ good agricultural practices (GAPs) to the extent possible in all aspects of growing, harvesting, drying, and storage.

#### Sustainability and Environmental Impact

As all cannabis is derived from cultivated sources, there is little risk of the plant becoming environmentally threatened unless aggressive eradication programs are implemented worldwide. However, without development, implementation, and enforcement of Good Agricultural Practices (GAPs), both the indoor and outdoor production of cannabis can have significant negative environmental and social impacts. Environmentally, the illegal diversion of water, clear cutting of trees, dumping of chemicals, misappropriation of state and federal lands, and disruption of sensitive ecosystems are associated with outdoor cultivation, while high carbon emissions are associated with indoor production. In North America, especially with crops grown indoors, part of this environmental impact is driven by the illegality of cannabis cultivation that requires growers to hide crops. Others may choose indoor growing for greater control over crops and higher yields. The high-energy intensive processes associated with controlling all aspects of the indoors growing environment has been estimated to consume 1% of the national electricity use. Whether by regulation or choice, growers should apply GAPs to cannabis cultivation.

In addition to the impacts of cannabis cultivation, the manufacture of butane extracts poses significant risks. A number of explosions and fires associated with kern cannabis extract production have been reported, somethat have included injury. Some butane contains compounds that may not be desirable in finished product. Extraction with Co2 (sub- or super-critical) is preferred by some and home environmentally safe extracting option.

# **Documentation of Supply**

For cannabis that is to be used in medicinal preparations, every aspect of cultivation, harvest, processing, and storage should be documented to the fullest extent possible. Various county and state ordinances require adherence to specific regulations that didfer between recations for trade of cannabis among groven, dispensaries, and collectives. The Dutch OMC provides the following guidelines for documentation.

# Security (modified from OMC 2003)

- a. The buildings in which cannabis is cultivated, processed, packaged and stored must be sufficiently secured, only allowing authorized personnel access to the buildings.
- b. Personnel involved in the production process of cannabis must be authorized for that purpose by the employer.
- c. Waste must be stored in such a way that the potential for theft is minimized.

#### **Growing and Harvesting Guidelines (OMC 2003)**

- **a.** Location of cultivation and the name of the supervising cultivator.
- b. Details on crops previously grown at that location.
- c. Nature, origin and quantity of the herbal starting materials.
- d. Chemicals and other substances used during cultivation, such as fertilizers, pesticides, and herbicides.
- e. Standard cultivation conditions, if applicable.
- f. Particular circumstances which occurred during cultivation, harvesting, and production that may affect the chemical composition, such as plant diseases or emporary departure from standard cultivation conditions particularly during the harvesting period
- g. Nature and quantity of the yield
- h. Date or dates and time or times of day wher harvesting occurred.
- i. Drying condition
- j. Measures for pest contr

### Sappliers and Dispensaries

ied by dispensaries should be as fully charpossible with traceability and a verifiable chain to type of material, whether the plants were cultinventionally or organically, or was indoor or outdoor ivated. Procedures should be implemented to ensure the sence of pesticides and raw material and finished product should be characterized as to its basic chemical profile (e.g.,  $\Delta^9$ -THC and/or CBD content). This information should be made available to patients upon request. Dispensary personnel should be appropriately trained in how to process and handle cannabis to ensure purity, maintain quality, and to morphologically identify material. The cannabis committee of the American Herbal Products Association (AHPA) has developed a set of draft guidelines outlining recommended practices for dispensaries and cultivators to follow (AHPA 2013a), and Americans for Safe Access (ASA) has developed a industry certification program for dispensaries and cultivators (ASA PFC).

#### CONSTITUENTS

To date, more than 750 different secondary metabolites have been identified in cannabis. The diversity of cannabis constituents encompasses numerous phytochemical classes, notably, cannabinoids, and a host of other secondary metabolites. These other compound classes include terpenoids, non-cannabinoid phenols, nitrogenous compounds, as well as other more common plant compounds, all of which are non-psychotropic. Cannabinoids are the most studied

Table 6 Structure and activity of primary phytocannabinoids

Table 6 Structure and activity of primary phytocanna  Compound	Putative Medicinal Action
Compound	
Δ <sup>9</sup> -Tetrahydrocannabinol (Δ <sup>9</sup> -THC)	Primary psychotropic cannabinoid  Activates PPAR-y and TRPA1 at nano- and micromolar concentrations, respectively (Pertwee 2008).  Analgesic via CB <sub>1</sub> and CB <sub>2</sub> agonism (active at ~20–40 nM) (Rahn and Hohmann 2009).  Antiemetic (Haney et al. 2007; Hollister 1971; Machado et al. 2008).  Anti-inflammatory, antioxidant (Hampson et al. 1998).  Antipruritic, cholestatic jaundice (Neff et al. 2002).  Benefits duodenal ulcers (Douthwaite 1947).  Bronchodilatory (Williams et al. 1976).  Muscle relaxant (Kavia et al. 2010).  Reduces Alzheimer symptoms (Eubanks et al. 2006; Volko ret al. 1957).
Cannabidiol (CBD)	Non-psychotropic cannabinoid  Anandamide (AEA) reuptake inhibitor (De Pérco ell's et al. 2014)  Analgesic (Davis and Hatoum 1983).  Anticonvulsant (Jones et al. 2010).  Antidepressant in rodents (Deyo anti-Viresty 2003).  Anti-emetic (5HT1A agonist; 5 mg/kg/p) (Rocklet al. 2010).  Antifungal (ElSohly et al. 1982).  Anti-inflammatory (Book et al. 2011).  Antagonizes effects of THA in humans (Portwee 2008).  Antioxidant (Hampson et al. 1984).  Anxiolytic via FNT1A-agonists (Canapos and Guimaraes 2008; Resstel et al. 2009; Russo et al. 2061)  Decreases sebum/sebocktes proliferation (Biro et al. 2009).  Effective against method lin-resistant Staphylococcus aureus (MRSA) (Appendino et al. 2008).  Increases at enaside A2A signaling (Carrier et al. 2006).  Treadment of addiction (Xi et al. 2010).  Treadment of psychosis (Russo et al. 2007).
Cannabichromene (BØ)	Analgesic (weak) (Turner et al. 1980b).  Anandamide reuptake inhibitor (weak) (De Petrocellis et al. 2008; Ligresti et al. 2006).  Anti-inflammatory (Davis and Hatoum 1983).  Antimicrobial (Turner and ElSohly 1981).  TRPA1 agonist (De Petrocellis et al. 2008; Ligresti et al. 2006).
S.COM.	

#### Standards Preparations

Cannabinoid standards are dissolved in methanol at a concentration of 1 mg/mL.

Note: All cannabinoid standards utilized in the development of this method were isolated at the University of Mississippi. There is limited availability of commercially prepared cannabinoid standards.

#### **Standards Solution Stability**

CBD, CBG, and CBN are stable in methanol, both at room temperature and with freezing.  $\Delta^9$ -THC, THCV, and CBC methanolic solutions are stable only when frozen and acid compounds are only stable in a freezer. Due to their instability, acid compounds should be prepared cool and stored and shipped frozen.

#### Reagent Preparation

Fast Blue reagent: Dissolve 0.5 g Fast Blue B salt (MP Biochemicals, LLS) in 100 mL distilled water.

Vanillin/H2SO4: Dissolve 6 g vanillin in 90 mL ethanol (95%). Add 10 mL of 98% H<sub>2</sub>SO<sub>4</sub>. This reagent is relatively unstable and is best to use fresh each time.

#### **Chromatographic Conditions**

#### **Stationary Phase:**

C18 (UV 254) TLC plates 150  $\mu m,\,10~cm\times10~cm$  (Sorbent Technologies).

#### Mobile Phase:

75:25 (v:v) methanol/water with 0.1% glacial acetic

#### Sample Application

Apply 5 µL of the sample preparations and 2 µL of the standards preparations on the plate as 5 mm kapds 2 mm apart from each other. The application position should be a material from the lower edge of the plate and at least 15 ms. from the left and right edges of the plate. For issualization using both reagents, separate plates should be prepared.

#### Development

Line a flat bottom chamber (1/2 mx 14 cm x 8 cm) with a filter paper of thrematography paper. Add a sufficient amount (~25 mX) of the storie Phase solution to ensure that the filter paper is covered with at least 5 mm of the solution, and let saturate for 15 min. Measure and mark on the plate the developing distance 60 mm from the application position. Introduce the plate into the chamber, and allow the developing solvent to reach the mark. Remove the plate and dry for 2 min at 70 °C in an oven.

#### Detection

Visualize the plates under UV 254 nm, then spray one set of the plates with the Fast Blue reagent and the other set of plates with the vanillin/H<sub>2</sub>SO<sub>4</sub> reagent, followed by visu-

Table 7 R, values for cannabinoid standards

Phytocannabinoid	$R_{\rm f}$
СВС	0.21
Δ <sup>9</sup> -THC	0.26
CBN	0.29
CBG	0.33
CBD	0.40
THCV	0.42
Δ <sup>9</sup> -THCA	0.61
CBDA	0.7

Note: Due to its relatively high concertration in drug type samples,  $\Delta^9$ -THC can overlap with CBN. CBN is a degradation company of  $\Delta^9$ -THC.

alization under white light. For pasic identification of the primary cannabire it be either reasent can be used.

#### Result

See Table and refer to the chromatograms provided (Figure 1).

# High-Periormance Liquid Chromatography APLO for the Determination of Major Phytocannabinoids in Cannabis

The LC method was adopted from Swift et al. (2013) and can be used for quantitation of THCA-A,  $\Delta^9$ -THC, CBDA, CBD, CBGA, CBG, and CBN in cannabis preparations. The method was adapted from an earlier method developed by DeBacker et al. (2009), which also quantified  $\Delta^8$ -THC. The original method of DeBacker et al. (2009) was validated for cannabis raw material and fully validated using total error approach in accordance with ISO17025 and the guidelines of the French Society of Pharmaceutical Sciences and Techniques (SFSTP). This modified and optimized method of Swift et al. (2013) was subjected to validation for selectivity, linearity, accuracy, precision, and recovery according to the US Food and Drug Administration (FDA) guidance for bioanalytical method validation (FDA 2001).

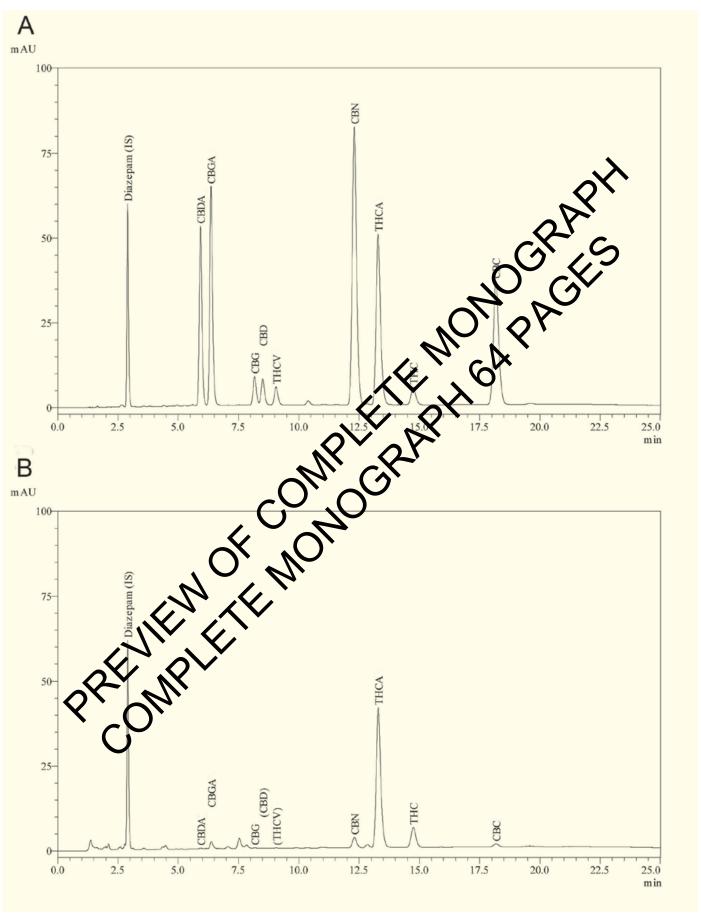
With appropriate modifications in sample preparations, the same chromatography can be used for the analysis of other cannabis materials (i.e. concentrates, extracts, foods). However, the robustness of this chromatography when applied to various matrices requires further validation (e.g., recovery, spiking experiments).

#### Sample Preparation

#### Crude Cannabis

Test samples are dried for 24 h in a 35 °C forced ventilation oven. Dried samples are ground to a fine powder. 200 mg of the sample is weighed in a glass vial and extracted with 10 mL of a mixture of methanol/chloroform (v/v: 9:1)

Figure 18 Representative HPLC chromatograms of cannabinoid standards (A at 11 μg/mL) and cannabis raw material (B)



diode array detector. For routine use, a standard UV detector is suitable.

Run time:

30 min.

Post-run time:

6 min.

Note: CBD and CBG peaks may slightly overlap if present in high concentrations (> 10%).

#### Quantitation

Inject each standard preparation and generate a standard curve based on the peak area vs. concentration, as a ratio of standard to internal standard.

Cannabinoid contents in the sample are quantified using the linear equation based on least squares regression for each cannabinoid compound: (y = mx + c)

#### where:

= concentration of the individual cannabinoid in the sample (μg/mL);

= peak area of the invidivual cannabinoid;

= calculated y-intercept of the calibration curve;

m = calculated slope of the calibration curve.

Using the concentration from the equation (y = c), total content (C<sub>CRXT</sub>) in the sample can be calcu a sum of the concentrations of the neutral (C acidic  $(C_{CBXA})$  components. A conversion fac used for adjustment of the molar masses CBDA; a conversion factor of 0.878 is used after decarboxylation. These convergor apply for other cannabinoids:

$$C_{CBXT} = C_{CBX} + C_{CBXA} \times 0.877$$

The individual cann then calculated acco

$$W_{CBX}(\zeta) = \frac{C_{ABX(T)} \times V_{samp} \times D}{m_{Sobe} \times 10^6} \times 100\%$$

pinoid content in the material (%

 $\boldsymbol{C}_{CBX(T)}$  = (total) cannabinoid content in the sample (µg/

 $V_{\text{sample}} = \text{sample volume (mL)};$ 

D = dilution factor:

 $m_{sample} = sample mass (g).$ 

#### Calibration Range

Linear from 2 μg/mL to 100 μg/mL. Extrapolations from this curve should not be made; however, cannabinoid concentrations in samples greater than 100 µg/mL can be appropriately diluted, or the curve can be extended out to 1000 µg/ mL (with seven or more points in the curve) to ensure the reading is within the calibration range.

## Gas Chromatography with Flame Ionization Detection (GC-FID) for the Quantitation of Phytocannabinoids

The following GC-FID method for the quantitation of the major phytocannabin f confiscated cannabis material submitted to the ersity of Mississippi by the DEA and other United inforcement agencies as part of NIDA's Ma Ionitoring Program (ElSohly et al. al. 2010). Due to the high temperatu r port, in situ decarboxyloccurs upon injection. This es total cannabinoids (acidic and . If quantitation of free (neutral) and s required for a specific cannabinoid, method, e.g., HPLC, or derivatization, formation of the alkylboronates, should be

#### Preparation

de cannabis and hashish: To 100 mg of dried, powdered cannabis material with seeds and stems removed, add 3 mL of the internal standard solution (see below on the preparation instructions). Macerate for 1 hour at room temperature. Sonicate for 5 min. Filter the extract into GC vials, and cap the vials.

Hash oil: To 100 mg of hash oil, add 4 mL of hash oil extraction solution (see below). Macerate for a minimum of 2 h at room temperature. Sonicate for 5 min. Add 20 mL of absolute ethanol, and sonicate again for 5 min. Filter the extract into GC vials, and cap the vials.

#### Internal Standard Preparation (use for extraction of cannabis and hashish)

Dissolve 100 mg of 4-androstene-3,17-dione in 100 mL of 1:9 v/v chloroform/methanol mixture.

Hash Oil Extraction Solution: Dissolve 50 mg of 4-androstene-3,17-dione in 50 mL of absolute ethanol.

#### **Chromatographic Conditions**

#### Column:

DB-1: 15 m x 0.25 mm id x 0.25 µm film (J&W Scientific, Inc, US).

Table 10 Pesticides commonly used in cannabis cultivation

Pesticide	Use	Residue Analytical Methods (RAM) Environmental
resticite	ose	Protection Agency (EPA)¹ or Literature²
Abamectin	Insecticide/acaricide	LC-FLD <sup>1</sup> ; LC-MS/MS <sup>2</sup>
(Avermectins B1a and		
B1b)		
Acequinocyl	Insecticide/acaricide	LC/MS/MS <sup>1</sup>
Bifenazate	Acaricide	LC <sup>1</sup> ; LC-MS/MS <sup>2</sup>
Bifenthrin	Insecticide	GC-ECD <sup>1</sup> ; GC-MS/MS <sup>2</sup>
(synthetic pyrethroid)		
Chlormequat chloride	Plant growth regulator (PGR)	IC, LC-MS/MS <sup>2</sup>
Cyfluthrin (synthetic	Insecticide	LC <sup>2</sup> (WHO 2004); GC-MS/MS <sup>2</sup>
pyrethroid)		
Daminozide (Alar)	Plant growth regulator (PGR)	UV Spectroscopy <sup>1</sup> ; LC-MS/MS <sup>2</sup>
Etoxazole	Acaricide	GC-MS(/MS) <sup>1</sup>
Fenoxycarb	Insecticide	LC/UV <sup>1</sup> ; LC-MS/MS <sup>2</sup>
lmazalil	Fungicide	GC-ECD <sup>1</sup> ; LC-MS/MS <sup>2</sup>
lmidacloprid	Insecticide	LC-MS/MS <sup>2</sup>
Myclobutanil	Fungicide	GC-ECD; GC-NPD <sup>1</sup> ; GL WS/MS) <sup>2</sup> ; LC-MS/MS <sup>2</sup>
Paclobutrazol	Plant growth regulator (PGR); fungicide	LC-MS/MS <sup>2</sup>
Pyrethrins*	Insecticide	GC-ECD <sup>1</sup>
Spinosad	Insecticide	LC-MS/MS immunoassa
Spiromesifen	Insecticide	GC-MS/LC-MS/MS
Spirotetramat	Insecticide	LS/LC-MS/MS*
Trifloxystrobin	Fungicide	GC-NPD <sup>1</sup> /G0-MS/MS <sup>2</sup> ; LC-MS/MS <sup>2</sup>

ECD = Electron capture detector; FLD = Fluorescence detector; GC < Sas chromatography, HPLC = Liquid chromatography; IR = Infrared spectroscopy; MS = Mass spectrometry; NMR = Nuclear magnetic resonance; NPD = Nitronen p osphorous detector.

Analytical Methods [RAM]) or those of the rood and Drug Administration (FDA Pesticide Analytical Manual [RAM]), should be employed when appropriate. However, as these tests were developed for commonly food products, the amount of sample needed may be prohibitive to apply to the cannabis industry. Afternatively, The food testing QuEChERS screen uses smaller quantities and may be more applicable to a variety, though not all, of cannabis products (Schoer, 2013, personal communication to AHP, unreferenced).

In the calnabis in lusty today, the most commonly used screening technology for organophosphates, organochlorines, carbamates, and ethylenediaminetetraacetic acid (EDTA) are immunoassays (e.g., enzyme-linked immunosorbent assays [ELISA]) and broad spectrum field tests that may or may not be validated for use on cannabis. Similarly, immunoassays for a broad range of PGRs and fungicides commonly used in cannabis cultivation are not available. Because of their relative inexpense, immunoassays are routinely used by analytical labs specializing in cannabis testing and are at high risk of not detecting pesticide residues and reporting samples to be "pesticide-free" or "non-detected".

Before commercial use, any immunoassay should be validated against a standard testing methodology.

Table 10 provides a list of the most common pesticides (including acaricide, insecticides, fungicides, and plant growth regulators) used in cannabis production.

#### Solvent Residues

Limits on solvents used in the manufacture of botanical products are established by the International Conference on Harmonization (ICH) (ICH 2011), with exceptions made for ethanol and acetic acid in products formulated to contain these substances (e.g., tinctures and vinegars). According to the ICH guideline, solvents are categorized in three classes. Class 1 includes known carcinogens, toxic substances, and environmental hazards such as benzene, carbon tetrachloride, 1,2-dichloroethane, 1,1-dichloroethene, and 1,1,1-trichloroethane. These are to be avoided in the manufacture of herbal and/or pharmaceutical products. Class 2 and 3 solvents (Table 12) are distinguished based on their relative toxicity level. Limits established for permissible daily exposures (PDE) are determined individually for Class 2 solvents. Limits for Class 3 solvents are set at a

<sup>\*</sup> Natural pyrethrins are tolerance exempt; synthetic pyrethrins are put

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