VIRGIN ISLANDS CANNABIS TESTING STANDARDS
RECOMMENDED PUBLIC HEALTH FRAMEWORK FOR MEDICAL, ADULT-USE, AND SACRAMENTAL USE CANNABIS

Policy Title	VIRGIN ISLANDS CANNABIS TESTING STANDARDS
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1. Overview

It is the policy of the Office of Cannabis Regulation (OCR), pursuant to the Virgin Islands Cannabis Use Act (Title 19 Chapter 34A) and applicable Rules and Regulations, to establish standardized cannabis testing requirements for all cannabis and cannabis products produced, distributed, sold, or otherwise made available within the United States Virgin Islands (the "Territory"). These testing standards are intended to protect public health and safety by ensuring that cannabis products are accurately labeled and free from harmful contaminants within established regulatory limits and compliant applicable public health and safety standards.

All cannabis and cannabis products intended for inhalation, ingestion, topical use, or other human or animal use shall undergo mandatory testing by a licensed laboratory approved by the OCR prior to transfer to a dispensary or release to consumers.

Testing requirements established under this policy apply to Medical, Adult-Use, and Sacramental Cannabis products regulated under the Virgin Islands Cannabis Use Act (Title 19 Chapter 34A) and the Virgin Islands Cannabis Rules and Regulations.

The OCR retains authority, consistent with the Virgin Islands Cannabis Use Act and applicable Rules and Regulations, to establish testing thresholds, approve methodologies, impose corrective actions, require recalls, quarantine products, suspend transfers, and take enforcement action where products fail to meet required safety standards.

Nothing in this policy shall be construed to authorize the manufacture, distribution, sale, or marketing of cannabis or cannabinoid products for animal use except as may be expressly permitted under applicable law or regulations adopted by the Office of Cannabis Regulation.

2. Purpose

The purpose of this policy is to:

- Protect consumers from contaminated or unsafe cannabis products.
- Establish minimum laboratory testing standards within the Territory.
- Promote consistency, transparency, and product integrity within the regulated cannabis industry.
- Ensure accurate cannabinoid potency reporting and product labeling.
- Establish procedures for failed testing, remediation, retesting, and product recalls.
- Align laboratory testing requirements with nationally recognized scientific and public health standards.

These standards may be updated, supplemented, or modified by the Office of Cannabis Regulation as necessary to address emerging public health concerns, evolving scientific evidence, novel cannabinoid products, or changes in applicable law or regulatory requirements.

3. Scope

This policy applies to:

- Cannabis cultivators
- Cannabis manufacturers
- Cannabis dispensaries
- Independent cannabis testing laboratories
- Any cannabis or cannabis product intended for sale, transfer, manufacture, distribution, or consumption within the territory

Cannabis items including but not limited to:

- Cannabis flower
- Trim and biomass
- Cannabis concentrates
- Vape cartridges
- Edible cannabis products
- Tinctures
- Topicals
- Pre-rolls
- Infused Products

All products shall undergo:

- A mandatory Core Testing Panel; and
- Product-specific testing based on product category and method of consumption

4. Definitions

Action Limit

The maximum allowable concentration of a contaminant, analyte, residual solvent, pesticide, microorganism, mycotoxin, heavy metal, or other substance established by the OCR for determining compliance with this policy.

Batch

A specifically identified quantity of cannabis or cannabis product, as determined by the OCR, that is intended to have substantially uniform characteristics, including consistency in strain, cultivation conditions, processing, and production.

Cannabis Concentrate

A cannabis product produced by extracting cannabinoids, terpenes, or other compounds from cannabis plant material through extraction, mechanical separation, or other processing methods.

Cannabis Product

A product containing cannabis or cannabis-derived ingredients intended for inhalation, ingestion, topical application, or other human use, and any other cannabis-derived product subject to regulation by the OCR.

Certificate of Analysis (COA)

An official laboratory document reporting the analytical testing results for a cannabis batch or product.

Core Testing Panel

The mandatory group of contaminant and safety tests required for all cannabis products regardless of product type.

Failed Batch

A batch of cannabis or cannabis products that does not meet the testing requirements, action limits, contaminant standards, or other safety requirements established by the OCR.

Intoxicating Cannabinoids

Cannabinoids reasonably capable of producing intoxication, impairment, or psychoactive effects, including but not limited to Δ9-THC, Δ8-THC, THCA (following decarboxylation), HHC, THC-O acetate, THC-P, and other cannabinoids designated by the OCR.

Laboratory

An independent cannabis testing laboratory licensed or approved by the OCR and maintaining ISO/IEC 17025 accreditation.

Limit of Quantitation (LOQ)

The lowest concentration of an analyte that can be reliably quantified by a testing method.

Not Detected

Not detected above the validated method detection limit (MDL) unless otherwise specified.

Potency

The concentration or measurable quantity of cannabinoids within a cannabis product, including THC, CBD, and other cannabinoids required for testing or labeling by the OCR.

Remediation

A validated remediation process approved by the OCR used to remove contaminants or otherwise bring a failed batch into compliance.

Retest

A subsequent laboratory analysis conducted on a batch following a failed result or remediation.

Total Active Cannabinoids

The aggregate concentration of cannabinoids determined by the OCR to be biologically active or pharmacologically relevant for labeling, public health, or regulatory purposes.

Total CBD

Total CBD = CBD + (CBDA x 0.877)

Total THC

Total THC = Delta-9 THC + (THCA x 0.877)

**Note: Delta-9 THC may also be written as Δ9-THC.*

5. Laboratory Requirements

A. Laboratory Accreditation

All cannabis testing laboratories conducting compliance testing within the Territory must:

- Maintain current ISO/IEC 17025 accreditation.
- Utilize validated analytical testing methodologies.
- Participate in proficiency testing programs.
- Maintain chain-of-custody documentation.
- Maintain calibration and quality assurance records.
- Be approved or licensed by the OCR.

B. Laboratory Independence

Testing laboratories shall operate independently from cannabis cultivation, manufacturing, or dispensary operations to prevent conflicts of interest and maintain testing integrity, consistent with the Virgin Islands Cannabis Use Act and applicable OCR Rules and Regulations.

C. No **laboratory** may:

- Alter testing results
- Issue false Certificates of Analysis
- Accept compensation in exchange for manipulating results.
- Test products in which the laboratory has a direct ownership interest.

D. Reporting Requirements

Laboratories shall directly enter all compliance testing results into the OCR-approved Inventory Tracking System, including Metrc, in accordance with OCR requirements.

All Certificates of Analysis must include:

- Laboratory name and license number
- Sample Collection Date
- Testing Date
- Batch or package identification
- Unique COA identification number
- Testing methodologies used
- Pass/fail determinations including action limits or thresholds
- All analytes tested, corresponding analytical results, and applicable units of measurement
- Authorized laboratory analyst or laboratory director signature, including electronic signatures where permitted by the OCR

6. Mandatory Testing Requirements

A. Core Testing Panel (Required for all Cannabis Products)

All Cannabis products shall undergo testing for:

i. **Cannabinoid Potency**

Required analytes and reportable cannabinoids (at minimum):

- Δ9-THC
- Δ8-THC
- THCA
- THCV
- CBD
- CBDA
- CBG
- CBGA
- CBN
- CBC

Note: Additional cannabinoids, intoxicating cannabinoids, cannabinoid analogues, synthetic cannabinoids, semi-synthetic cannabinoids, or other cannabinoid-derived compounds may be required for testing, identification, quantification, or reporting by the Office of Cannabis Regulation as necessary to protect public health, ensure accurate labeling, or address evolving scientific and regulatory standards.

Standard:

- Label accuracy required (±10% variance)
- Report in mg/g or mg/unit (edibles)

ii. **Microbiological Standards**

Testing shall include screening for:

a. **Pathogens (ALL INHALABLE + MEDICAL PRODUCTS)**

Organism	Limit
Escherichia coli	Not detected in 1g
Salmonella spp.	Not detected in 1g
Aspergillus fumigatus	Not detected in 1g
Aspergillus flavus	Not detected in 1g
Aspergillus niger	Not detected in 1g
Aspergillus terreus	Not detected in 1g

b. **Quantitative Microbial Limits**

Test	Flower / Raw	Extracts / Inhalables
Total Yeast & Mold (TYM)	$\leq 10^4$ CFU/g	$\leq 10^3$ CFU/g
Total Aerobic Bacteria (TVAB)	$\leq 10^5$ CFU/g	$\leq 10^4$ CFU/g
Total Coliforms	$\leq 10^3$ CFU/g	$\leq 10^2$ CFU/g
Bile-Tolerant Gram-Negative Bacteria	$\leq 10^3$ CFU/g	$\leq 10^2$ CFU/g

iii. **Heavy Metals (STRICT LIMITS)**

Analyte	Action Limit
Arsenic (As)	≤ 0.2 ppm
Cadmium (Cd)	≤ 0.2 ppm
Lead (Pb)	≤ 0.5 ppm
Mercury (Hg)	≤ 0.1 ppm

iv. **Mycotoxins**

Analyte	Action Limit
Total Aflatoxins (B1, B2, G1, G2)	≤ 20 ppb
Ochratoxin A	≤ 20 ppb

Note: Mycotoxin testing shall be required for all inhalable cannabis products,

raw plant material, and any cannabis-derived product intended for ingestion or inhalation.

v. **Pesticides (See #8 for full listing)**

- Full multi-residue panel required (minimum 60 analytes)
- Individual action limits: generally, 10–100 ppb depending on compound
- Any non-approved pesticide: Not Detected

vi. **Foreign / Extraneous Material**

Cannabis products shall be free from visible:

- Mold
- Mildew
- Hair
- Insects
- Insect fragments
- Metal
- Plastic
- Packaging debris
- Fecal matter
- Or any other foreign material reasonably capable of causing contamination or consumer harm

B. Moisture and Water Activity

Water activity testing shall be required for all flower, pre-roll, kief, hash, and other inhalable plant material products.

i. **Water Activity (Primary Control)**

Product Type	Limit
Flower / Pre-roll / Kief / Hash	≤ 0.65 aw
Solid/Semi-solid products	≤ 0.85 aw

Target Range (Operational):

Flower: 0.55 – 0.65 aw

Any flower or inhalable plant material exceeding 0.65 aw shall constitute a failed test result.

ii. **Moisture Content**

Product	Acceptable Range
Dry Flower	5.0% – 13.0%

Recommended Target: 8% - 12%

7. Product- Specific Requirements

A. Flower / Pre-Roll / Kief

Must Include:

- Core Testing Panel requirements
- Microbiological panel requirements
- Water activity testing
- Moisture content testing
- Foreign material screening

B. Extracts / Concentrates / Inhalables

Must Include:

- Core Testing Panel
- Residual solvent testing, where applicable
- Inhalable additive screening, where applicable
- Additional microbiological, mycotoxin, heavy metal, water activity, foreign material, or other testing requirements as determined by the OCR based on product type, manufacturing method, formulation, or public health risk

i. Residual Solvents (see #9)

Concentrates and extracts shall additionally undergo testing for:

(selected limits)

Solvent	Limit
Benzene	≤ 1 ppm
Methanol	≤ 250 ppm
Butane	≤ 800 ppm
Propane	≤ 2,100 ppm
Hexane	≤ 60 ppm
Toluene	≤ 150 ppm

Any unapproved solvent: Not detected

ii. Inhalable Additives (PROHIBITED)

The following substances are prohibited in products intended for inhalation, including products intended for smoking, vaporization, or aerosolization:

- Vitamin E acetate
- Polyethylene glycol (PEG)
- Medium-chain triglycerides (MCT oil)
- Synthetic terpenes
- Benzoic acid
- Diketones, including diacetyl, acetyl propionyl, and acetoin

This subsection shall not prohibit naturally occurring cannabinoids or naturally occurring cannabis-derived terpene fractions inherent to the cannabis plant.

iii. Terpene Limit

Added or introduced terpenes in inhalable products shall not exceed 10% by weight.

iv. Homogeneity

Products shall demonstrate reasonable cannabinoid and additive homogeneity throughout the manufactured batch.

C. **Edibles**

Edible products shall additionally undergo testing for:

- Core testing panel requirements
- Homogeneity standards:
  - ≤ 15% relative standard deviation
  - ≤ 15% potency variance
- Additional microbiological, residual solvent, water activity, or other testing requirements as determined by the OCR based on product composition, manufacturing process, or public health risk

D. **Topicals / Tinctures**

- Core Testing Panel requirements
- Microbiological testing requirements for water-based products, where applicable
- Residual solvent testing for extracted products, where applicable

- Additional testing requirements as determined by the OCR based on formulation, manufacturing process, product type, or public health risk

8. Pesticides

A. Allowed Active Ingredients and Residual Limits

Only the pesticide active ingredients listed in this section may be used. All are subject to residual limits in finished products.

i. Microbial and Biological Controls

Active Ingredient	Residual Limit
Bacillus thuringiensis (Bt)	≤ 1×10^5 CFU/g*
Bacillus amyloliquefaciens	≤ 1×10^5 CFU/g*
Bacillus mycoides	≤ 1×10^5 CFU/g*
Beauveria bassiana	≤ 1×10^4 CFU/g*
Isaria fumosorosea	≤ 1×10^4 CFU/g*
Trichoderma asperellum	≤ 1×10^4 CFU/g*
Helicoverpa armigera NPV	Not detected
Helicoverpa zea NPV	Not detected

*** Counts included within total microbial limits**

ii. Botanical and Biochemical Controls

(Subject to EPA/FIFRA, label, and minimum-risk eligibility requirements)

Active Ingredient	Inhalable Products	Non-Inhalable Products
Azadirachtin	≤ 100 ppb	≤ 100 ppb
Neem oil	≤ 100 ppm	≤ 100 ppm
Potassium bicarbonate	≤ 500 ppm	≤ 500 ppm
Potassium silicate	≤ 500 ppm	≤ 500 ppm
Mono-/dipotassium phosphates	≤ 500 ppm	≤ 500 ppm
Reynoutria sachalinensis extract	≤ 50 ppm	≤ 250 ppm
Acetic acid (vinegar)*	Not detected above LOQ	≤ 1,000 ppm
Chitosan	≤ 500 ppm	≤ 500 ppm

Note: *For acetic acid, the non-inhalable product limit is intended to align with published residual solvent reference points, while inhalable products remain subject to a stricter, not-detected-above-LOQ standard due to inhalation exposure risk. "LOQ" means the validated laboratory limit of quantification established pursuant to ISO/IEC 17025-accredited analytical methods.*

iii. **Inhalable Product Standards**

For products intended for inhalation, including products intended for smoking, vaporization, aerosolization, or other pulmonary delivery methods, including flower, pre-rolls, vape products, concentrates, aerosolized cannabinoid products, and other inhalable cannabis products:

- Residual pesticide compounds shall be minimized to the greatest extent reasonably achievable;
- Residues of allowed pesticide active ingredients shall not exceed inhalable-product action limits established in this section;
- The Office of Cannabis Regulation may impose stricter enforcement thresholds for inhalable products where necessary to protect public health.

B. Pesticide Use Restrictions

- No pesticide application directly to harvestable flower after onset of flowering for products intended for inhalation, unless expressly approved by the Office of Cannabis Regulation based on product label, method of application, and public-health review.
- No pesticide use during drying, curing, or storage.
- No fumigation, fogging, or combustion-based pesticide delivery.
- Only products labeled for food crops, hemp, or minimum-risk use may be used**.**

C. Prohibited Pesticides

The following active ingredients are prohibited:

i. Organophosphates

- Acephate
- Chlorpyrifos
- Dichlorvos (DDVP)
- Diazinon
- Dimethoate
- Ethoprophos
- Malathion
- Methyl parathion
- Mevinphos
- Naled
- Phosmet
- Coumaphos

ii. Carbamates

- Aldicarb
- Carbaryl
- Carbofuran
- Methiocarb
- Methomyl
- Oxamyl
- Propoxur

iii. **Pyrethroids and Synergists**

- Bifenthrin
- Cyfluthrin
- Cypermethrin
- Permethrin
- Prallethrin
- Pyrethrins
- Piperonyl butoxide
- MGK-264

iv. Neonicotinoids

- Acetamiprid
- Imidacloprid
- Thiacloprid
- Thiamethoxam

v. Other Insecticides and Miticides

- Abamectin
- Fipronil
- Chlorfenapyr
- Acequinocyl
- Bifenazate
- Clofentezine
- Etofenprox
- Etoxazole
- Fenpyroximate
- Hexythiazox
- Pyridaben
- Spiromesifen
- Spirotetramat
- Spiroxamine
- Flonicamid
- Imazalil
- Paclobutrazol

vi. Fungicides and Growth Regulators

- Azoxystrobin
- Boscalid
- Dimethomorph
- Fenhexamid
- Fenoxycarb
- Fludioxonil
- Kresoxim-methyl
- Metalaxyl
- Myclobutanil
- Pentachloronitrobenzene (PCNB)
- Propiconazole
- Tebuconazole
- Trifloxystrobin
- Daminozide

vii. Additional Prohibited Substances

- Chlorantraniliprole
- Spinosad
- Any pesticide not listed in this section

9. Residual Solvents

A. Residual Solvent Limits

i. High Toxicity

Benzene	≤ 1 ppm
1,2-Dichloroethane	≤ 2 ppm
Chloroform	≤ 2 ppm
Ethylene oxide	≤ 5 ppm
Trichloroethylene	≤ 25 ppm

ii. Moderate Toxicity

Methanol	≤ 250 ppm
Hexane	≤ 60 ppm
Toluene	≤ 150 ppm
Methylene Chloride	≤ 125 ppm
Acetonitrile	≤ 60 ppm
Xylenes	≤ 60 ppm

iii. Lower Toxicity

Acetone	≤ 750 ppm
Butane	≤ 800 ppm
Propane	≤ 2,100 ppm
Pentane	≤ 750 ppm
Heptane	≤ 500 ppm
Ethyl Acetate	≤ 400 ppm
Ethyl Ether	≤ 500 ppm
Isopropyl Alcohol	≤ 500 ppm
Ethanol	≤ 1,000 ppm

B. Applicability

Product	Requirement
Flower	Not required unless processed
Extracts / Vapes	Required
Edibles	Required
Tinctures	Required
Topicals	If solvent used

10. Quality Assurance and Reporting

- Laboratories shall maintain ISO/IEC 17025 accreditation.
- Chain-of-custody documentation shall be maintained for all samples.
- Laboratories shall utilize validated analytical methods.
- Validated analytical methods shall achieve method detection limits (MDLs) or limits of quantitation (LOQs) at or below one-tenth (1/10) of the applicable action limit, where feasible and scientifically appropriate.
- Certificates of Analysis (COA) shall be accessible to consumers through QR-code access.
- Sampling procedures shall be documented and conducted in accordance with Office of Cannabis Regulation requirements and validated laboratory protocols

11. Failure and Reporting

- Any exceedance of an applicable action limit shall constitute a failed test result.
- Any unidentified contaminant reasonably determined by the Office of Cannabis Regulation to pose a risk to public health or consumer safety shall constitute a failed test result.
- No remediation process may be used to conceal, dilute, or otherwise mask microbial contamination, pesticide contamination, heavy metals, mycotoxins, or other failed contaminant results without express approval by the OCR and validated remediation protocols.

- Results meeting or exceeding seventy-five percent (75%) of an applicable action limit shall be subject to mandatory reporting requirements.

12. Action Limits and Pass/Fail Standards

The Office of Cannabis Regulation may establish and amend contaminant action limits, analyte thresholds, and pass/fail standards based on:

- Testing requirements.
- Public health guidance.
- Scientific literature.
- Emerging safety concerns.
- National and international best practices.
- Recommendations from public health authorities.

Products exceeding OCR-established action limits or failing applicable testing standards shall be deemed failed and may not be transferred, sold, or otherwise distributed.

Results meeting or exceeding seventy-five percent (75%) of an applicable action limit shall be reported to the OCR.

13. Sampling Procedures

A. **Sampling Requirements**
Compliance samples shall:

- Be collected using statistically valid sampling methodologies approved by the Office of Cannabis Regulation.
- Be representative of the entire batch.
- Be collected by authorized personnel.
- Be documented through chain-of-custody procedures.

B. **Batch Identification**

Each batch submitted for testing must:

- Possess a unique batch identifier.
- Be traceable within the Inventory Tracking System.
- Remain segregated and unavailable for transfer or sale until final test results are received.

C. **Hold Status**

Cannabis products shall remain on testing hold and may not be transferred, distributed, sold, or otherwise released from quarantine until passing test results are received.

14. Failed Testing and Remediation

A. **Failed Batches**

Any batch failing mandatory testing requirements shall be immediately placed under quarantine.

The licensee shall:

- Cease transfer or sale of the affected batch.
- Notify the Office of Cannabis Regulation of failed test results in accordance with OCR requirements.
- Follow all remediation or destruction directives issued by the OCR.

B. **Remediation**

Where permitted by the OCR, failed batches may undergo remediation.

Remediated batches must:

- Be fully documented.
- Undergo retesting.
- Pass all required testing requirements and panels prior to release from quarantine.

Products contaminated with prohibited substances or contaminants deemed unsafe by the OCR may be ordered destroyed and may not be remediated.

C. **Retesting**

A failed batch may only be retested in accordance with OCR-approved procedures.

Retesting shall not be used to invalidate, replace, or selectively disregard failed compliance test results except as authorized by the Office of Cannabis Regulation.

Failed batches may not be subdivided, relabeled, diluted, or combined with other batches for the purpose of avoiding failed test results unless expressly authorized by the Office of Cannabis Regulation.

15. Implementation Guidance

Licensees shall prioritize:

- Integrated Pest Management (IPM)
- Environmental controls, including humidity and airflow management
- Preventative cultivation practices
- Sanitation and contamination prevention procedures
- Proper storage, handling, and post-harvest controls designed to minimize contamination risks.

16. Enforcement and Compliance

A. Failure Criteria

i. A cannabis product shall be deemed to have failed if:

- Any contaminant exceeds an applicable action limit.
- Any prohibited substance is detected.
- Any unapproved pesticide or solvent is detected.
- Any unidentified contaminant reasonably determined by the Office of Cannabis Regulation to pose a risk to public health or consumer safety is detected.

ii. No remediation process may be used to conceal, dilute, or otherwise mask microbial contamination, pesticide contamination, heavy metals, mycotoxins, or other failed contaminant results without express approval by the OCR and validated remediation protocols.

B. Enforcement Authority

The OCR may conduct inspections, audits, sampling reviews, and investigations to verify compliance with this policy.

Violations may result in administrative, civil, criminal, or other enforcement action authorized by law, including:

- Notices of violation.
- Administrative penalties.
- Product embargo or quarantine.

- Product destruction orders.
- Mandatory recalls.
- Suspension or revocation of permits or licenses.
- Referral for civil or criminal enforcement.