



Quality Division Use Only

Scientific Area Committee (SAC): Subcommittee:

Standard/Guidelines Title

Date added to OSAC Registry

Can the Standard/Guidelines be followed in totality?

Please explain if the Standard/Guidelines and the applicable clauses that cannot be followed in their totality:

The Seized Drugs section cannot follow clause 6.1.2 specific for cannabis identification.

On June 10, 2019, the passage of Texas House Bill 1325 relating to the production and regulation of hemp changed the definition of marihuana in the Texas Health and Safety Code Section 481.002 (26). The definition of marihuana, although defined to mean the plant Cannabis Sativa L., excludes hemp as defined by the Texas Agriculture Code Section 121.001. The Agriculture Code and HB 1325 define hemp as the plant Cannabis Sativa L. with a delta-9 tetrahydrocannabinol (delta-9-THC) of no more than 0.3%. Since the Seized Drugs section is not currently capable of quantitating the concentration of delta-9-THC in plant substance material, it is now being reported as Cannabis Sativa L.

The section's procedure was updated to encompass the passage of this bill and a report statement is now included when reporting Cannabis Sativa L. to notify stakeholders that the laboratory does not currently perform testing that can distinguish between marihuana and hemp. The section is currently working on a contract to be able to outsource samples on a request basis for quantitative analysis. This is a temporary project until further instrumentation can be acquired and validated by the section. During this validation timeframe, the section will not be able to meet and fulfill E2329 for the identification of cannabis samples.

Compliance plan to achieve conformance to Standard/Guidelines:

In December of 2018, the Board of Directors voted to voluntarily adopt and incorporate the Organization of Scientific Area Committees (OSAC) registry standards. The adoption of the OSAC registry standards was incorporated into the Quality Manual's February 11, 2019 revision. Since this standard was added to the OSAC registry prior to HFSC's voluntary adoption, the section was given a year after the Quality manual revision to incorporate this standard into their procedures.

Declaration of Compliance to OSAC Registry Standard/Guidelines:

As of September 9, 2019, the Seized Drugs section is compliant with all other requirements listed in "E2329 - Standard Practice for Identification of Seized Drugs".



Quality
OSAC Registry Compliance Form
Quality Division

Technical Leader: N/A
Section Manager: James T. Miller
Division Director: _____
Quality Director: _____

Date: N/A
Date: January 21, 2020
Date: _____
Date: _____