



Information Update Marijuana Laboratory Certification Program

March 23, 2026

Update #11

Arizona Administrative Code (“A.A.C.”) Title 9, Chapter 18 – Adult Use Marijuana Program regulations have been updated and will become effective July 1, 2026. A copy of these regulations can be found at the following link:

<https://www.azdhs.gov/documents/licensing/adult-use-marijuana/rules/9aac18-effective-7-1-26.pdf>.

Some of the significant changes affecting marijuana testing facilities and laboratories are summarized below.

A. Potency Testing Updates - Required action from the laboratories:

Table 3.1 adds the analytes Delta-8-tetrahydrocannabinol (Δ 8-THC) and Delta-10-tetrahydrocannabinol (Δ 10-THC) for potency testing. If a laboratory analyzes adult-use marijuana or marijuana products, its potency analyte list must include Δ 8-THC and Δ 10-THC. If not already approved, laboratories must submit an application to add these analytes in accordance with A.A.C. R9-17-404.07 and R9-18-411. Additionally, laboratories must calculate Total THC using the updated formula specified in R9-18-408(F)(3)(b)(i) for adult-use marijuana and marijuana products.

B. Other Chapter 18 Rule Updates related to laboratory testing are summarized below:

1. The Time Frames Table 1.1 is adding time frames for applications to increase the size of a licensed premises and to change the owner of a marijuana testing facility.
2. Δ 8-THC and Δ 10-THC will be added to Table 3.1.

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3. R9-18-408(F)(3)(b)(i):

Total THC will now be calculated as the sum of the following:

- (1) Tetrahydrocannabinolic acid (THC-A), multiplied by 0.877;
 - (2) Delta-8-tetrahydrocannabinol (Δ 8-THC);
 - (3) Delta-9-tetrahydrocannabinol (Δ 9-THC), and
 - (4) Delta-10-tetrahydrocannabinol (Δ 10-THC)
4. R9-18-401(A)(1) and (2): The owner of the laboratory will now be specified as either “*the person with controlling legal or equitable interest in and authority over the laboratory*” or an individual designated to be responsible for licensing requirements and interactions with the Department.
 5. R9-18-401(C): If there is a change in owner, the laboratory must submit, within 10 business days after the change, any information that is changing. For example: If the change in ownership results in a change to laboratory SOPs, those new SOPs must be provided. Any information or documentation that remains unchanged will not need to be provided to the Department.
 6. R9-18-402(A)(5): An initial application for a new laboratory registration certificate will now require documentation that the technical laboratory director, specified in subsection (A)(1)(e), meets the requirements in R9-18-405(A)(3), e.g., a resume.
 7. R9-18-405(A)(5)(d)(iv): The laboratory will now be required to maintain SOP revision logs.
 8. R9-18-405(A)(5)(e)(v)(1) and (2): Homogenization requirements for particle size will now be in the Rules. To be consistent with the units, the particle size requirement for the microbiology portion will now be 7 mm instead of ¼ inch. The chemistry portion will continue to have a 1 mm particle size requirement.
 9. R9-18-405(A)(5)(e)(v)(3): Products reported with a Q2 qualifier, due to difficulty in homogenizing the matrix, will now require documentation of the condition and consistency of the heterogeneous sample.
 10. R9-18-405(A)(7): The facility agents must have their license in their immediate possession on premises as well as during transportation of marijuana or marijuana products for testing.

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11. R9-18-405(A)(11) and -405(B): If there is a change in the individual designated to be responsible for licensing requirements and interactions with the Department per R9-18-408(A)(2), the laboratory must submit, within 10 business days after the change, written notice to the Department, in a Department-provided format. As per R9-18-405(B), upon receiving this notification, the Department must review the information and respond within 15 working days to confirm the update, request additional information, or inform the laboratory if requirements are not met.
12. R9-18-406(F)(2)(b): If the Department determines that a marijuana testing facility is not in compliance, it may assess a civil penalty as per A.R.S. §§ 36-2854(B)(2) and 36-2858.
13. R9-18-407(B): If a proficiency testing sample is not available for a specific parameter and analyte, a technical laboratory director shall have at least one marijuana facility agent, selected according to policies and procedures, participate in accuracy testing for the parameter.
14. R9-18-408(G): A log will be required for any parameter that does not meet the requirements in Table 3.1. Currently, Chapter 17 only requires this log for *Aspergillus*. Additionally, the Rules will now clarify that the initial laboratory may only retest when QC standards have failed or when recommended by the instrument manufacturer that meets the criteria in A.A.C. R9-17-404.03(B)(2).
15. R9-18-410(B)(1)(b), and -410(B)(3)(g)(ii): The Rules clarify that the laboratory records and final report of testing must have a picture of the sample as submitted, including the original packaging.
16. R9-18-410(B)(3)(f): The final report of testing will now require the limit of quantitation, where applicable
17. R9-18-410(B)(1)(a)(vi): If a sample is submitted for retesting at the request of a marijuana establishment or dispensary according to R9-18-311(C), the name and registry identification number of the marijuana establishment or dispensary's license number must be maintained in the retesting laboratory's records.
18. R9-18-412(C)(1)(d) and (e): Inventory control records will now require documentation of the amount of sample retained for microbiology retesting and chemistry retesting.

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19. R9-18-412(C)(2): The Rules will now describe the documentation required on the chain of custody more clearly.
 20. R9-18-412(C)(5)(b): A requirement to establish laboratory-derived control limits for expected sample loss will now be clarified.
 21. R9-18-413(C)(1)(a): A trip plan will now require the registry identification number of the facility agent or laboratory agent transporting the marijuana or marijuana product.
 22. R9-18-413(D)(2)(c) and (e): Vehicles used to transport marijuana will need to be capable of providing electronic information regarding where the vehicle has been for at least the previous 90 calendar days. The vehicle will also need a locked compartment that is attached or affixed to the vehicle.
 23. R9-18-413(E) and (F): Completed trip plans will need to be provided to the receiving laboratory and maintained by the transporting laboratory.
 24. R9-18-415(B)(1): The Department may deny an application or renewal of a marijuana testing facility license if an owner previously had ownership in a marijuana business whose license was revoked, in Arizona or any other state.
 25. R9-18-415(D)(1)(e), -415(D)(2)(c), and -415(D)(3): The Department may suspend or revoke a marijuana testing facility license if the facility or its owners, or agents have direct or indirect financial or familial relationships with marijuana establishments or dispensaries for which they test.
 26. R9-18-402(A)(1)(j), -403 (A)(1)(k), - 404 (1)(g), R9-8-411(B)(1) (h): Applications for a marijuana testing facility license, approval for testing, license renewal, and adding or removing parameters must include an attestation that the submission is authorized by the marijuana testing facility.
- C. It has come to the Department's attention that $\Delta 8$ -THCV may be coeluting with $\Delta 9$ -THCV or appearing as a shoulder peak. The Department recommends that laboratories analyzing THCV routinely run a $\Delta 8$ -THCV standard on their potency instrument to determine whether these two analytes are either coeluting or have sufficient resolution to be reported as separate analytes.

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