



Mille Lacs Band of Ojibwe
Department of Cannabis Regulation
Cannabis Regulations

November 10, 2025

NOTICE OF ADOPTION

Pursuant to 15 MLBSA § 1203(f)(iii)(B), this serves as the official Notice of Adoption the following:

Cannabis Regulation – 11: TESTING

Summary of changes, to CR – 11: TESTING include:

This Regulation implements 15 MLBS §§ 1203(d)(3) and 1217(c), Compact Art. IV.D, and Compact Attachment A, part 9810.3100. The purpose of this Regulation is to provide a framework that ensures the safe, secure, and lawful testing of cannabis-related activities within the Tribally Regulated Land and in coordination with the State of Minnesota.

Pursuant to 15 MLBSA § 1203(f)(ii): The Department of Cannabis Regulation reviewed the comments received during the comment period, beginning September 22, 2025, and closing October 23, 2025. The Department of Cannabis Regulation hereby responds to comments below and makes changes as applicable.

Comment 1: CR 11. Changes to clarify and ensure consistent use of calendar days vs. business days, capitalization, internal reference, spacing and tab size were made.

Comment 2: Section 4.1.4- Scope of Testing. Is stability testing a one-time event per strain or perpetual?

Citation: 4.1.4- “A testing facility must test a batch sample of a regulated product for stability, except that the first batch of a regulated product may have a six-month expiration date.”

- Product stability must be evaluated in the final packaged form to establish an expiration date for the product. Product stability must be established on the first batch for each cultivation or manufacturing process. If the cultivation or manufacturing process changes, stability must be demonstrated for the new cultivation or manufacturing process.

Until data has been collected establishing evidence-based expiration dates, a cannabis product will have a six-month expiration date. If a licensee has data to support a longer expiration date on the first batch, they can submit that data to the office for evaluation on a case-by-case basis. Stability testing must be initiated within three months for any new products. Failure to demonstrate six-month stability will result in an assigned expiration date as the last demonstrated passing results for that product.

Examples: For cultivation of cannabis flower, if the first batch was sent for stability testing and the assumed six-month expiration date was accurate, that expiration date can be used



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for all flower, regardless of strain, if all building, water, nutrient, light process, etc. are the same. Should any part of the process change, a new stability test should be conducted. Manufactured final products, e.g. infused flower, edibles, hemp-derived cannabinoid products (HDCP), lower-potency hemp edibles (LPHE), etc. produced using cannabis or hemp rosin, resin or artificially derived cannabinoid concentrate that met all contaminant testing requirements at a minimum must be evaluated for stability. Stability tests should be run for each process change, including ingredient changes (e.g. strawberry-flavored edibles versus mango-flavored edibles).

Comment 3: Section 6.2.2- Mandatory Notification. We'd like to discuss what this section means and how we can comply. Is this simply about notifying the Department of tests results?

Citation: 6.2.2- "A license holder must notify the Department of all testing results of regulated products, including batches that have completed production processes and batches that have not completed production processes."

- Due to the functionality of the seed-to-sale tracking system and lack of notification capabilities based on actions, this requirement is to assist the Department in better monitoring of tests and test results. A simple email notification to the Department's general inbox with test results enclosed will meet this standard.

Effective Date: November 10, 2025.

The Department of Cannabis Regulation attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the Department of Cannabis Regulation and at [Department of Cannabis Regulation \(DCR\) | Mille Lacs Band of Ojibwe](#).

A handwritten signature in black ink, appearing to read "Krista Hg", is written over a horizontal line.

Department of Cannabis Regulation Board

November 10, 2025

Date