

**CDX ANALYTICS, LLC**  
IL281275

**ESTABLISHMENT OVERVIEW**

1. Name of the Marijuana Establishment:

CDX Analytics, LLC

2. Address of the Marijuana Establishment:

39 Norman Street, Salem, MA 01970

3. Type of final license sought (if cultivation, its tier level and outside/inside operation):

Independent Testing Laboratory

**LICENSING OVERVIEW**

4. The licensee was granted a provisional license by the Commission on August 23, 2018.
5. The licensee has paid all applicable license fees.
6. No new information has been reported to Commission staff regarding the organizational structure of the entity since the issuance of the provisional license.
7. No new information has been discovered by Commission staff regarding the suitability of the licensee or the individuals and entities previously disclosed since the issuance of the provisional license.

**INSPECTION OVERVIEW**

8. The initial inspection took place at the facility on September 26, 2018.
9. The licensee's Marijuana Establishment was inspected by Commission staff and found to be in full compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable.

10. No evidence was discovered during the inspection(s) that indicated the Marijuana Establishment was not in compliance with all applicable state and local codes, bylaws, ordinances, and regulations.
11. Specific information from Commission staff's inspection is highlighted below:

- a. Security

All persons entering the Marijuana Establishment's building must first enter through the reception area, where they must sign in with the receptionist. Once properly signed into the visitors' log and issued a visitor badge, the receptionist will call down for an escort to usher persons around the building.

All entrances and exits to the building are secured with either key pad or proxy card access, limiting the general public's access. All doors were locked and could only be opened with a proxy card. Access to the actual testing lab requires card access as well. All limited access areas had appropriate signage.

The lab facility is equipped with emergency exit buttons in all lab areas which allow for immediate egress. The Marijuana Establishment has a security company that provides back-up communication and monitoring services. The security company performs quarterly checks on all security equipment it provides.

A security consultant company performs a yearly security audit at the Marijuana Establishment. As part of the annual audit, the company inspects CDX's Emergency Action Plans, Chemical Hygiene Plans, and Biological Safety Manual & Exposure Control Plan. These plans are current as of November 2017.

Security cameras are monitored by the building manager. Video images are stored for 90 days. Access to local video storage and video surveillance room is for executive staff as needed. Commission Enforcement staff verified the camera system produces high-quality images. Enforcement staff tested the system and ensured that time and date stamps are accurate, that clear video images are displayed in real time, and that a still photo can be printed from a video file.

A generator is provided to the Marijuana Establishment that will immediately start in the event of a power outage to provide power to security systems.

- b. Inventory and Storage

The room where marijuana samples are stored was clean with no visible evidence of pests. Marijuana samples are stored in locked metal cabinets inside the laboratory. The Marijuana Establishment only tests samples of marijuana and marijuana products submitted from other marijuana establishments, and therefore does not maintain a regular inventory of marijuana or marijuana products for sale.

c. Cultivation Operation (if applicable)

Not applicable.

d. Product Manufacturing Operation (if applicable)

Not applicable.

e. Retail Operation (if applicable)

Not applicable.

f. Transportation

The Marijuana Establishment provides transportation for testing samples it receives from other Marijuana Establishments. The transportation vehicle used is not conspicuous and is properly registered in the state of Massachusetts. During transportation, all vehicles are monitored via GPS. The vehicles possess interior surveillance cameras. When samples are picked up, they are locked in a secure bag and locked inside the vehicles. All routes are randomized, and all stops are recorded in a vehicle stop log that was inspected by Enforcement staff.

g. Laboratory Testing Operations

The Marijuana Establishment is accredited to ISO 17025:2005 for demonstrated technical competence in Chemical and Microbiological testing Perry Johnson Laboratory Accreditation Board (PJLA). The certification is valid until January 30, 2020. The lab is certified to test samples of marijuana and marijuana products for cannabinoids, heavy metals, residual solvents, pesticides, mycotoxins, bacteria, yeast, and molds.

Testing procedures are in compliance with *Protocol for Sampling and Analysis of Finished Medical Marijuana Products and Marijuana-infused Products*, as amended in November 2016 by the Department of Public Health.

## **RECOMMENDATION**

Commission staff recommends issuing a final license for the above Marijuana Establishment with the following conditions:

1. The licensee may possess and otherwise acquire marijuana, but shall not test marijuana or marijuana products, until after inspection, receiving permission from the Commission to commence full operations;

2. The licensee is subject to inspection and audit to ascertain compliance with the requirements listed in 935 CMR 500.105 through 935 CMR 500.160 as applicable;
3. The licensee remains suitable for licensure pursuant to 935 CMR 500.102(1)(a)(2);
4. The licensee shall cooperate with and provide information to Commission investigators, agents, and employees upon request;
5. The licensee shall obtain ISO 17025:2017 certification prior to commencing operations; and, if it is unable to obtain such certification, seek a waiver of this condition; and
6. The licensee shall demonstrate that it is in compliance with or has obtained applicable waivers or approvals from the Department of Public Health, as necessary, and provide documents as the Commission may request prior to commencing operations.

This recommendation was based on the licensee's demonstrated compliance with the laws and regulations of the Commonwealth, suitability for licensure, and upon the inspection(s) of the licensee's Marijuana Establishment.

Commission staff certify that a due diligence review of the licensee's Marijuana Establishment was performed. As of this date, the licensee has demonstrated compliance with the laws and regulations of the Commonwealth and suitability for licensure. Accordingly, the licensee is recommended for final licensure for the Marijuana Establishment with the previously mentioned conditions.

As part of the approval of this final license, the Commission authorizes staff to take all necessary actions to review compliance with the above-referenced conditions and to approve the commencement of operations.