

MCR LABS, LLC
IL281278

ESTABLISHMENT OVERVIEW

1. Name of the Marijuana Establishment:

MCR Labs, LLC

2. Address of the Marijuana Establishment:

85 Speen Street, Framingham, MA 01701

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 28, 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 arriving at the Marijuana Establishment must enter through the front entrance of the building. A sign directs persons entering to proceed to the second floor. Upon entering the office on the second floor, a receptionist checks the identification of persons entering, ensuring that they are 21 years old or older, and has them sign a visitor log. All visitors are issued a visitor's badge. The door to the first floor laboratory is locked and a limited access area sign is posted. Persons that do not possess a key to the door cannot enter.

With the exception of the reception area, all other areas of the building occupied by the Marijuana Establishment are limited access areas. All doors were locked and could only be opened with a key. All doors had appropriate signage indicating they are limited access areas.

The Marijuana Establishment is equipped with panic alarms that are wired directly to the Framingham Police Department. A body-worn panic alarm, that is also connected to the police department, is worn by one of the employees on the laboratory floor. The establishment has two alarm companies which monitor burglary and fire alarm systems. The facility has installed motion detectors and door alarms that can be remotely monitored.

Enforcement staff inspected the cameras and monitors on site. All exits and entrances, as well as all areas of the laboratory including the room where marijuana samples are stored, and the reception area are covered by camera surveillance. 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.

- 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 has one vehicle that is used to pick up samples of marijuana and marijuana products for testing from other Marijuana Establishments. The van does not have any lettering or markings on its exterior. The lab employs three transportation agents. Samples of marijuana and marijuana products are locked in watertight Pelican-brand transport cases, and then locked in a metal storage box inside the van. The van is equipped with cameras, one of which is focused on the storage box. The van is also equipped with a GPS system that reports the location of the van at all times. Enforcement staff inspected transportation logs, manifests, policies, and procedures, and found the transportation vehicle and operational procedures to be in compliance with all sections of 935 CMR 500.

g. Laboratory Testing Operations

The Marijuana Establishment is accredited to ISO 17025:2017 for demonstrated technical competence in testing by the ANSI-ASQ National Accreditation Board (ANAB). The certification is valid until March 24, 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; and
5. 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.