



Missouri Department of Health and Senior Services

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Paula F. Nickelson
Director

Michael L. Parson
Governor

December 27, 2023

Missouri Facility Licensees

RE: Department-initiated variance and waiver extension for vitamin E acetate screening

Licensees,

Pursuant to 19 CSR 100-1.020(1)(A), the Division of Cannabis Regulation (DCR) is granting a variance by modifying the provisions of 19 CSR 100-1.110(7)(G)2 regarding the Chemical Abstract Services (CAS) Registry number, action limit, and final marijuana product required to be tested for **vitamin E acetate**. Specifically, DCR is waiving this requirement for vitamin E acetate testing until **February 29, 2024**. **After February 29, 2024**, DCR is varying from 19 CSR 100-1.110(7)(G)2 as follows:

The current requirement in 19 CSR 100-1.110(7)(G)2 provides a test will fail if it shows:

Banned Analytes	Chemical Abstract Services (CAS) Registry Number	Action Limit (ppm)
Vitamin E Acetate**	58-95-7	≥ 0.2

**Only for inhalables and concentrates.

DCR is modifying this provision to provide:

Banned Analytes	Chemical Abstract Services (CAS) Registry Number	Action Limit (ppm)
Vitamin E Acetate**	7695-91-2	≥ 5

**Only for Mandatory - Vapes & Concentrates and Mandatory - Infused Plant Material & Prerolls.

DCR determined the good cause for granting this variance is that it provides accurate standardization of the method reference material for testing licensees, reduces the risk for false failures, and to ensure vitamin E acetate is not added to marijuana product.

After February 29, 2024, DCR expects all final marijuana product in the form of vapes, concentrates, infused plant material, and infused prerolls to be screened for vitamin E acetate using the perimeters listed above.

For additional information regarding the examples of products within Mandatory – Vapes & Concentrates and Mandatory – Infused Plant Material & Prerolls, please see Metrc Support Bulletin [MO_IB_28](#).

Please reach out to your compliance officer or TestingandResearchUnit@health.mo.gov if you have any questions.

Andrea Balkenbush, Deputy Director
Division of Cannabis Regulation
Department of Health & Senior Services

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The Missouri Department of Health and Senior Services' vision is optimal health and safety for all Missourians, in all communities, for life.