

# Cannabis Control Division

February 14, 2025

## INDUSTRY BULLETIN: 25-01

### Bluebonnet Labs, LLC Administrative Hold

Pursuant to an Order issued on February 12, 2025, by the Bernalillo County District Court, the Cannabis Control Division (CCD) of the New Mexico Regulation and Licensing Department is implementing a product hold on all cannabis products tested by Bluebonnet Labs, LLC License Number: TSTL-2024-0004-PRM-0001.

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### Actions Required for Administrative Hold Process

#### Step 1: Segregation of Affected Products

**All licensees in possession of products tested by Bluebonnet Labs LLC must segregate these products from other inventory immediately.** Affected products must be clearly identified and stored separately to avoid inadvertent sales or distribution. All product SKUs tested by Bluebonnet Labs, LLC will be locked in BioTrack effective February 14, 2025, and cannot be sold until the affected product undergoes a secondary lab test and receives a clean Certificate of Analysis (“COA”) or until the CCD notifies you that the products may be released from this administrative hold.

All licensees with impacted products will receive a communication from the CCD with a list of impacted products associated with their BioTrack inventory account.

If you wish to destroy your product under your standard destruction procedure you may do so however you will need to email the CCD at [administrativehold@rld.nm.gov](mailto:administrativehold@rld.nm.gov) indicating that you wish to have your Bluebonnet Labs-tested product released from this hold for immediate destruction, set the item for destruction and then provide the CCD evidence of your destruction within 72 hours.

#### Step 2: Mandatory Retesting

Affected products must undergo a secondary lab test for the following and only the following:

- microbials
- pesticides
- residual solvents

**A clean COA must be obtained for each product before the administrative hold is released.**

Testing must take place at a licensed testing laboratory other than Bluebonnet Labs, LLC. For a list of approved licensed testing laboratories please visit:

[www.rld.nm.gov/cannabis/licensing/approved-testing-labs](http://www.rld.nm.gov/cannabis/licensing/approved-testing-labs)

**NOTE:** This retest may be classified as an R&D test to expedite getting cleared products released from this hold.

## Retesting Instructions

### Retesting Instructions for Producers and Manufacturers:

- If you were the last licensee to transfer a product to a retailer, you will be responsible for retesting the product including payment for the secondary test and providing a clean COA to each retailer that requests one.
- If you have impacted products, immediately submit a sample of that product to a licensed testing lab (other than Bluebonnet Labs, LLC), ensure when submitting your sample to the new testing lab that you identify that this is a “*Bluebonnet Labs Administrative Hold Retest.*” This sample may be submitted as an R&D sample.
- Ensure you notify the downstream licensees that have purchased your products that you have submitted the product(s) for retest.

If you are no longer in possession of impacted product material to submit for a retest, you may designate the retail licensee in possession of the **largest volume of your product as the sample sender**. They will not be required to send that sample back to you, that sample may go directly from the retailer to the secondary testing lab. Retailers should ensure that when submitting your sample to the new testing lab you identify that this is a “*Bluebonnet Labs Administrative Hold Retest.*”

### Retesting Instructions for Retailers:

If you have products on your shelves that were tested by Bluebonnet Labs, LLC, immediately reach out to the licensed producer or manufacturer that transferred that product to you regarding obtaining a new clean COA for your products.

**NOTE:** It is imperative that retailers do not submit duplicate samples of products already sent for retesting by producers or manufacturers, unless the retailer has been designated by a producer or manufacturer as the remaining product holder. (If you are a licensed retailer experiencing difficulty contacting a producer or manufacturer of products currently under administrative hold, please reach out via email to [administrativehold@rld.nm.gov](mailto:administrativehold@rld.nm.gov) for additional guidance on alternative testing options.)

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## Releasing Products from Hold

The testing lab will submit copies of the COA’s directly to the CCD. Once a clean COA is obtained from the secondary testing lab, the CCD will notify BioTrack to release the product from the administrative hold.

If you have a non-Bluebonnet Labs clean COA dating prior to February 1, 2025, but no older than 90 days for a product on hold due to this administrative hold, you may submit a PDF copy of that document to the CCD via email at [administrativehold@rld.nm.gov](mailto:administrativehold@rld.nm.gov) with the title “*Alternative Bluebonnet Labs Test COA for SKU [insert the product SKU for the product on hold]*”. The CCD will review the information provided and determine if release is appropriate.

## Retailer Responsibilities

All retailers are required to maintain copies of the retest COA for any product tested by Bluebonnet Labs, LLC. These COAs must be readily available to provide to customers upon request. The CCD will be auditing retailers to ensure copies of clean COA's are on hand for all Bluebonnet Labs, LLC tested products that are not in quarantine.

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## Compliance Deadline

All licensees are expected to quarantine all Bluebonnet Labs, LLC tested products immediately.

**Any licensees that have products set for "sales time specify" must ensure their system is receiving information in real time to ensure compliance with this administrative hold.**

Licensees must complete the product segregation and retesting as soon as possible. Failure to comply with these requirements may result in enforcement actions.

The Cannabis Control Division is committed to maintaining the highest standards of product safety and compliance. We appreciate your prompt attention and cooperation in addressing this matter. The CCD encourages you to contact us if you have questions or need additional guidance related to this matter, please contact the CCD at 505-476-4995 or [administrativehold@rld.nm.gov](mailto:administrativehold@rld.nm.gov).