

CANNABIS COMPLIANCE BOARD STATE OF NEVADA



JOE LOMBARDO
Governor

ccb.nv.gov

CARSON CITY OFFICE
3850 Arrowhead Drive, Suite 100
Carson City, Nevada 89706
Main Line: (775) 687-6299

LAS VEGAS OFFICE
700 East Warm Springs Road, Suite 100
Las Vegas, Nevada 89119

MICHAEL MILES
Executive Director

MAJ. GEN. ONDRA BERRY, (RET.)
Chair

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Kief-Enhanced Usable Cannabis – Classification, Processing, and Testing Requirements

This notice is to provide guidance to **licensed cultivators** and **production (manufacturing) facilities** regarding the classification, processing, and testing of cannabis and cannabis products enhanced through the addition of kief. All process updates will be effective June 1, 2026.

This guidance establishes standardized requirements to improve transparency, consistency, traceability, and auditability within the seed-to-sale system.

Background

The Board has identified instances where cannabis and cannabis products have been enhanced through the addition of kief without clear identification in the seed-to-sale system (e.g., Metrc) or without appropriate testing controls.

Kief is classified as usable cannabis, and its addition to other usable cannabis does not constitute the creation of an “infused cannabis product.” The absence of standardized classification, processing, and testing requirements has created challenges related to transparency, potency interpretation, representative laboratory sampling, and inventory traceability.

These requirements are supported by NCCR 6.080(6) and NCCR 11.050(4), which require accurate inventory tracking, documented processing activities, and compliance with established procedures.

CLASSIFICATION

Naturally Occurring Kief vs. Intentionally Separated Kief

Naturally Occurring Kief

“Naturally occurring kief” refers to trichomes or loose resin glands that separate incidentally during ordinary cultivation, harvesting, drying, curing, trimming, packaging, transportation, or handling activities without the use of a deliberate separation process intended to isolate or concentrate trichomes.

Examples may include:

- Kief accumulation within trim bins, curing containers, or packaging containers;
- Trichomes naturally separating during hand or machine trimming; and
- Residual kief generated through ordinary handling of cannabis.

Naturally occurring kief generated incidental to standard harvest and handling activities does not, by itself, constitute a production or extraction process under NCCR 9.020. Any collection, accumulation, transfer, sale, or further processing of naturally occurring kief must be conducted in accordance with applicable inventory tracking, testing, and traceability requirements under NCCR 6.080

Intentionally Separated Kief

“Intentionally separated kief” refers to kief or concentrated trichome material intentionally isolated, collected, or concentrated through methods intended to separate trichomes from cannabis plant material. Pursuant to NCCR 9.020, a cannabis production facility may use heat, screens, presses, steam distillation, ice water, and other methods without employing solvents or gases to create kief.

Examples may include:

- Dry sifting through screens;
- Mechanical tumbler separation;
- Ice water extraction processes;
- Deliberate collection or concentration of loose trichomes; and
- Pressing or processing trichome material into hash or concentrates.

Intentionally separated kief constitutes a production or manufacturing activity and must be conducted by an appropriately licensed cannabis production facility in compliance with applicable inventory tracking, testing, and recordkeeping requirements.

The determining factor between naturally occurring kief and intentionally separated kief is whether the separation occurred incidentally through ordinary handling activities or through a deliberate process intended to isolate or concentrate trichomes.

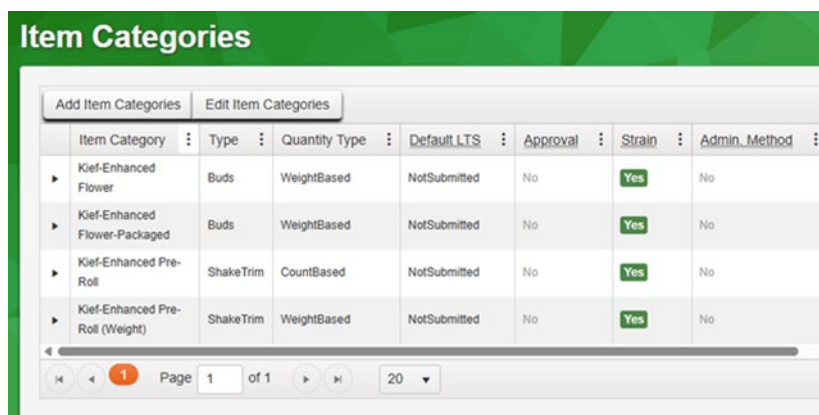
Classification and Approval

- Kief-enhanced cannabis products remain classified as usable cannabis.
- These products are not considered infused cannabis products.
- Menu approval **is not** required solely due to kief enhancement.

Item Categories (Metrc)

The following item categories have been established in Metrc and must be used when creating kief-enhanced products:

- Kief-Enhanced Flower – Bulk
- Kief-Enhanced Flower – Packaged
- Kief-Enhanced Pre-Roll (Count-Based)
- Kief-Enhanced Pre-Roll (Weight-Based)



Item Category	Type	Quantity Type	Default LTS	Approval	Strain	Admin. Method
Kief-Enhanced Flower	Buds	WeightBased	NotSubmitted	No	Yes	No
Kief-Enhanced Flower-Packaged	Buds	WeightBased	NotSubmitted	No	Yes	No
Kief-Enhanced Pre-Roll	ShakeTrim	CountBased	NotSubmitted	No	Yes	No
Kief-Enhanced Pre-Roll (Weight)	ShakeTrim	WeightBased	NotSubmitted	No	Yes	No

All applicable licensees are required to utilize these categories when creating kief-enhanced cannabis products.

PROCESSING

Processing Job Requirements

A processing job labeled “Kief-Enhanced” has been established to document the addition of kief. Kief-enhanced products must be created through this processing job and shall not be conducted as a packaging activity or inventory adjustment.

Licensees are required to:

- Utilize the “Kief-Enhanced” processing job within Metrc;
- Create a production batch number; and
- Record the following:
 - Total weight of kief used;
 - Total weight of cannabis or cannabis product used; and
 - Total combined weight of the final product.

The screenshot shows a Metrc system interface for a 'Kief-Enhanced' processing job. At the top, there are 'No' and 'Yes' buttons, with 'Yes' highlighted in green. Below this is a table with columns for 'Description', 'Employee', and 'Date'. The 'Description' column contains the following text: 'Updated Kief-Enhanced', 'For Items: False', 'For Processing Jobs: True', 'For Requires Processing Job Attributes: False', 'Processing Job Category related Facility Types: - Retail Cultivation, - Tribal Cultivation'. The 'Employee' column contains the name 'Meiny Trisno (MTrisno)'. The 'Date' column is empty. At the bottom of the table, there is a pagination control showing 'Page 1 of 1' and a dropdown menu set to '20'.

This ensures full traceability and supports audit verification in accordance with NCCR 6.080(6).

Facility Responsibilities

Cultivators and production facilities are required to:

- Utilize the designated Metrc item categories;
- Use the required “Kief-Enhanced” processing job;
- Maintain accurate, lot-specific inventory records in accordance with NCCR 6.080(6);
- Ensure all kief and resulting products are properly tested prior to transfer or sale;
- Maintain complete traceability between source lots, kief lots, and resulting finished products;
- Update Standard Operating Procedures (SOPs) to reflect the kief enhancement process in accordance with NCCR 11.050(4);
- Ensure kief is added to cannabis in a homogeneous manner, resulting in even distribution throughout the entire lot to support accurate and representative testing; and
- Present the entire lot to the testing laboratory for sampling and testing and shall not engage in selective sampling or provide non-representative portions of the lot.

TESTING

Kief Lot and Testing Requirements

- Kief must be **lot-specific** when used for enhancement
- If kief from multiple lots is combined, **each lot must be tested prior to combining**, consistent with standard lot combination requirements
- Kief lot sizes shall not exceed **15 pounds**, consistent with shake/trim lot limits
- Keif Enhanced Flower lots shall not exceed 5 pounds, consistent with flower lot limits.

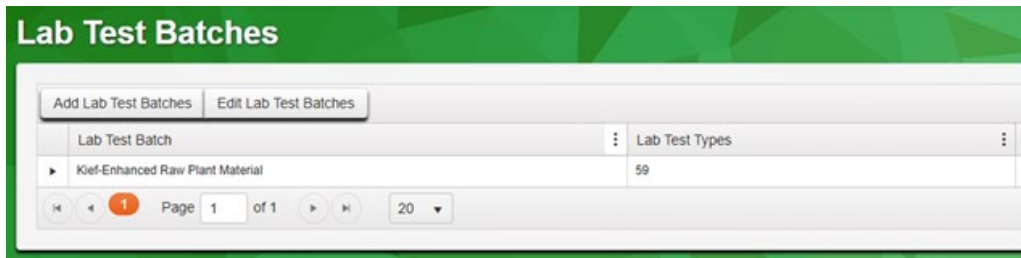
All kief designated for sale, transfer, enhancement, or further processing must comply with these requirements.

Laboratory Testing Requirements

Lab test batches for **Kief-Enhanced Raw Plant Material** shall follow the same required testing standards as standard **Raw Plant Material**.

All kief used for enhancement must:

- Be **tested prior to use**
- Be associated with a valid test batch
- Meet all applicable compliance testing requirements



The screenshot shows a web interface titled "Lab Test Batches". At the top, there are two buttons: "Add Lab Test Batches" and "Edit Lab Test Batches". Below these is a table with two columns: "Lab Test Batch" and "Lab Test Types". The table contains one row with the text "Kief-Enhanced Raw Plant Material" in the first column and "59" in the second column. At the bottom of the table, there is a pagination control showing "Page 1 of 1" and a dropdown menu set to "20".

Lab Test Batch	Lab Test Types
Kief-Enhanced Raw Plant Material	59

Testing laboratories must be provided with access to the complete lot to ensure representative sampling consistent with applicable laboratory standards and sampling protocols.

Questions regarding this notice should be directed to auditinspections@ccb.nv.gov