	Feeback on the new section - Methods of Analysis/ Stop Testing Procedures and Negative/Indicative Results	Sub-committee response:
P10	(P10) Section IIIE1.1 states “The decision to stop analysis and report negative or indicative findings is contingent upon the question being asked…”. Section IIIE.3 states “When analysis neither provides a conclusion nor satisfies stop-testing criteria, the analyst shall perform further testing There is no provision for the “question being asked” to change based on engagement with the party asking the question during the analysis process i.e. customer agreement. It can be the case that engaging with the customer during the analysis process can lead to a decision that further testing is unwarranted on balanced effort-reward considerations. The current wording imposes that analysis is to continue in reference to the question asked without allowing for the question to be conceded by the party asking the question.	(P10): Non-persuasive. Re-establishing the investigative question based on engagement with the customer is not excluded by the document.
P9	(P9-A) 1.2.3 and 1.2.4 are not related to seized drugs analysis in crime/ forensic labs. (P9-B) 3.2.1 Most of the time only qualitative analysis is performed on seized drugs. An upper limit/quantity must be defined by the lab, which can be used to reach a conclusion/ positive result. Just continuing to concentrate the samples may lead to very very dilute samples/ traces to be reported as positive. This may lead to false accusations especially in possession cases.	(P9-A): Section 1.2 is relevant to seized drugs analysis results. (P9-B): Non-persuasive. Laboratories should create/set the procedures for additional testing.
P8	(P8-A) Section IIIE.3.2.2: Propose to add on example under "Adjust instrument parameters to increase sensitivity", such as increasing injection volume or reducing split ratio during sample introduction (P8-B) Section IIIE3.2.6.1: Propose to add on examples such as the use of basified water/ethyl acetate solvent mixture for the removal of glycerol from e-liquids (P8-C) Section IIIE.4.2: Propose to include the example scenarios for the different reporting statements outlined in Section IIIE.4.2.1 to IIIE4.2.4 to enhance clarity and distinction (P8-D) Section IIIE.4.2: Could SWGDRUG provide clarification on the distinctions between the terms, "identified", "detected" and "found" as well as between "no common substances identified" and "no substances identified" to ensure consistent interpretation across laboratories (P8-E) Section IIIE4.2.3: The reporting statement on "No drugs of interest found" is vague and subjective unless the drugs of interest are clearly defined in the report (P8-F) IIIE.2, IIIE.3.1 and footer: Should there be a hyphen for "stop-testing"? If so, it will be good to standardize across the whole document for consistency	(P8-A): Non-persuasive. Examples are just general examples. A Supplemental Document to cover more extensive examples is planned. (P8-B): Non-persuasive. Examples are just general examples. A Supplemental Document to cover more extensive examples is planned. (P8-C): Non-persuasive. The reporting statements are intended to be largely equivalent example language. Additionally, a Supplemental Document to provide example scenarios is planned. (P8-D, E): Terms are intended to be representative of those used in different laboratories (as required as jurisidictional, customer requirements, etc.) (P8-F): Concur, standardized across document.
P7	(P7-A) IIIE.1.2 and sub points 1.2.1-1.2.4: Removal as it not relevant to the scope of this document. (P7-B) IIIE.1.3: Suggested language to include IIIE.2.3: "The laboratory shall ensure testing is sufficient and employ an analytical scheme to address when a negative or indicative result is encountered." (P7-C) IIIE.1.4: Concise language. "…indicative results convey the possible presence of a compound that has not been identified." (P7-D) IIIE.2.2.1: If a "finding" is the same as a "result", then remove as these are defined in IIIE.1.4. If they are not, then this should be clarified. (P7-E) IIIE.2.3: Remove if revised language for IIIE.1.3 is accepted. IIIE.3.1: Remove "The additional testing shall be based …. previous testing conducted." This is intuitive in a "fit for purpose" scheme (IIIE.1.3) and clarified by the examples provided in IIIE3.2. (P7-F) IIIE.3.2: Suggest noting that these methods must be validated by the laboratory and included in the laboratory's standard operating procedures. (P7-G) IIIE4.1: Concise language. "The language used…. shall be unambiguous and address the limitations of analysis." (P7-H) IIIE.4.1: Is the intent of this standard to require reporting of all limitations associated with an analytical method, such as thermally labile compounds?	(P7-A): Non-persuasive. Section 1.2 is relevant to seized drugs analysis results. (P7-B): Non-persuasive. Concept is introduced in Section 1.3 and expanded in Section 2. (P7-C): Addressed as a result of other edits. (P7-D): Non-persuasive. 2.2 and 2.2.1 require laboratories to define negative and indicative results. (P7-E) Non-persuasive. Language is deliberately explicit. (P7-F): Non-persuasive. SWGDRUG Recommendations are based on validated methods. (P7-G): Non-persuasive. (P7-H): No, it is not the intent.
P6	Analysis of "unknown" substances with GCMS	N/A

P5	(P5) My suggestion is for IIIE.4 Reporting and Conclusions. You list examples for when a substance is not present at all and answering a specific question (indicating a specific substance). It might also be beneficial to provide examples for a generic reporting when the lab doesn't want to specify a particular drug if it is only indicated in analysis and not confirmed. Most of the time, the request is for whether a controlled substance is present or not. This document doesn't provide an example for not being able to confirm a substance for some reason (lack of the right instrumentation, lack of reference material, etc) without providing the name of the substance you suspected.	Non-persuasive. Reporting examples are not all-inclusive. This can also be addressed in future edit or the planned Supplemental Document.
P4	Ill submit later	N/A
P3	(P3) IIIE.1.4 Negative results convey the lack of a conclusive identification of a drug of interest - This sounds like you could call a sample with a drug but not conclusive ID (no standard, too weak) as negative... same as an indication. Not really seeing much difference between the two definitions. Should negative be more concrete, for example "with standard laboratory analysis, no drugs of interest were detected"	Section 1.4 was removed.
P2	(P2-A) IIIE.4.2: Consider adding "no controlled substances confirmed" as an added example. (P2-B) IIIE.4.3: I'm not sure I understand what would be considered a targeted analysis based on the examples you have provided. Would you consider the question "is delta 9-THC greater than 0.3%?" a targeted analysis? If so, this might be a good example to include for clarity as numerous labs perform this analysis. (P2-C)General: Have you considered whether labs need to address bias at all in their stop-testing procedures? For example, do you run the risk of bias if a laboratory creates the procedure, but it inadvertently ends with them "hunting" to confirm any controlled substance?	(P2-A): Modified 4.2.4 to say "No substances confirmed" (P2-B): 4.3 is purely to report a qualitative result based on a validated limit of detection. It is not purity threshold reporting. (P2-C): Outside the scope of the document/language.
P1	(P1) IIIE.2.1 Since this section is trying to decide when testing can stop, i.e. when sufficient testing has been performed, I would suggest amending the language in IIIE.2.1 to: "The laboratory shall establish procedures to address when sufficient testing has not produced results to support identification of the analyte(s) of interest." (basically when to stop testing, which is what IIIE.2 covers) If I'm understanding it correctly, the current wording sounds as if it should be part of IIIE.3 Additional Testing When Stop Testing Criteria Are Not Met, i.e. when testing has not produced sufficient results, you must do additional testing.	Non-persuasive. Part 3 is to address the testing specifically. Part 2 is to address the requirement of having a procedure for the situation.