

General Services Administration  
Interagency Committee on Security Equipment  
Security Equipment and Locking Systems  
Washington DC 20405

13 December, 2018

All Cabinet Manufacturers  
Lock Manufacturers  
Training Organizations

Subject: Security Cabinets and Combination Locks for Pharmaceutical and Cannabis  
Producers and Distributors

Reference: A: 21 CFR 1301.76

B: Executive Order 13526

C: Federal Specification AA-F-358J

The General Services Administrations (GSA), Interagency Committee on Security Equipment has noticed an increase in questions regarding the use of GSA-approved security products for the protection of Pharmaceuticals (drugs) and Cannabis (Marijuana Products). While the protection of pharmaceuticals is important, it does not fall under the purview of this committee. As such any security container or vault door used for the protection of pharmaceuticals shall not display a GSA approval label, nor use the GSA approved “Limited Use” combination lock (FF-L-2740).

Based on Drug Enforcement Agency (DEA) policy requirements including 10 man-minute container “forced entry” and 20 man-hour lock manipulation and radiological technique resistance, GSA security cabinet manufacturers may produce and distribute Class 5 equivalent security cabinets WITHOUT a GSA approval label, and WITHOUT a GSA approved combination lock (FF-L-2740B or FF-L-2937). A Group 1R mechanical combination lock (i.e. S&G 8435 and 8560) meets all DEA policy requirements and shall be used in lieu of GSA approved combination locks. Under no circumstances are the security cabinets sold to a Pharmaceutical or Cannabis facilities to include ANY of the labels specified in paragraph 3.8 or the combination locks as specified in paragraph 3.4 of federal specification AA-F-358J.

If you have any questions, please feel free to contact me.

Sincerely,

*/Signed*

*Christopher Pollock*

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