Massachusetts Seed-to-Sale Guidance

Table of Contents

DEFINITIONS

CANNABIS OR MARIJUANA

Cannabis or Marijuana means all parts of any plant of the genus Cannabis and whether growing or not; the seeds thereof; and resin extracted from any part of the plant; clones of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin including tetrahydrocannabinol as defined in M.G.L. c. 94G, § 1; provided that cannabis shall not include:

(a) the mature stalks of the plant, fiber produced from the stalks, oil, or cake made from the seeds of the plant, any other compound, manufacture, salt, derivative, mixture or preparation of the mature stalks, fiber, oil, or cake made from the seeds of the plant or the sterilized seed of the plant that is incapable of germination;

(b) hemp; or

(c) the weight of any other ingredient combined with cannabis or marijuana to prepare topical or oral administrations, food, drink or other products.

CULTIVATION BATCH

A collection of cannabis or marijuana plants from the same seed or plant stock that are cultivated and harvested together, and receive identical propagation and cultivation treatment including, but not limited to: growing media, ambient conditions, watering and light regimes and agricultural or hydroponic inputs. Clones that come from the same plant are one batch. The licensee shall assign and record a unique, sequential alphanumeric identifier to each cultivation batch for the purposes of production tracking, product labeling and product recalls.

FLOWERING PLANTS

Flowering is the gametophytic or reproductive state of cannabis in which the plant is in a designated flowering space within a cultivation facility with a light cycle intended to produce flowers, trichomes and cannabinoids characteristic of marijuana. The flowering space shall be clearly identified by signage and all marijuana shall be accounted for as inventory.

IMMATURE PLANTS

A non-flowering Marijuana plant that is no taller than eight inches and no wider than eight inches produced from a cutting, clipping, or seedling and that is in a growing/cultivating container.

MATURE PLANTS

Plants greater than 8" tall.

PACKAGES

An amount of marijuana that may be sold, processed or transferred and must be placed into one or more containers, each having a unique Metrc tag.

PRODUCTION BATCH

A batch of finished plant material, cannabis resin, cannabis concentrate, or marijuana-infused product made at the same time, using the same methods, equipment and ingredients. The licensee shall assign and record a unique, sequential alphanumeric identifier to each production batch for the purposes of production tracking, product labeling and product recalls. All production batches shall be traceable to one or more cannabis or marijuana cultivation batches.

REAL-TIME INVENTORY OR SEED-TO-SALE TRACKING

The electronic system of record required by the Commission that provides the electronic tracking of an individual cannabis or marijuana plant, including its cultivation, growth, harvest and preparation of cannabis or marijuana products, if any, and final sale in real time. This system shall utilize a unique-plant identification and unique-batch identification. It will also be able to track agents' and licensees' involvement with the marijuana product

VEGETATIVE PLANTS

The state of the *Cannabis* plant which is a form of asexual reproduction in plants during which plants do not produce resin or flowers and are bulking up to a desired production size for flowering.

IMMATURE BATCHES

HOW DOES A LICENSEE ADD THEIR BEGINNING INVENTORY TO METRC?

Clones are entered as strain-specific immature batches. There is a maximum clone count of 100 clones per batch. The licensee is required to tag each clone once they reach a height of 8 inches. All clone packages must be strain-specific, and the item name must include clones, for example, Blue Dream Clones.

HOW DO FACILITIES TRACK THE CHAIN OF CUSTODY FOR CLONES AND SEEDS?

Strain-specific clone and seed packages are transferred using a transfer manifest in Metrc. The licensee will select the tab "create plantings" from each of the strain-specific package tags. This will create a new strain-specific immature planting. The same "create plantings" tab is available under both the vegetative and flowering tabs for seeds or cuttings generated from tagged plants.

HOW DO I ENTER STRAIN-SPECIFIC IMMATURE BATCHES IF I DO NOT KNOW WHAT THE STRAIN IS?

A licensee is required to enter the strain name. Mystery strains are not permitted.

HOW ARE SEEDS ENTERED INTO METRC?

Harvested Seeds: Once seeds are harvested they must be tracked. Each harvested seed package cannot contain more than 50 seeds.

Immature Seeds: Strain-specific immature seeds will be counted and entered into Metrc unless they are in the process of being planted. Retail licenses can store seed packages as count-based for internal use.

Transferring Seeds: When transferring to a retailer, the seeds are physically put into packages of 6 for sale. Licensees may put multiple packages of 6 under one Metrc tag for transfer, but no more than 2099 (Metrc system limit) each in one tag. All seed packages must be strain-specific, and the item name must include seeds (e.g. "Blue Dream Seeds").

ARE ADDITIVES REQUIRED TO BE ENTERED INTO METRC?

Additives are required to be tracked per plant or per room. The licensee must input the additives in Metrc each time they use it on a plant or in a room. A licensee cannot edit or delete an additive once it has been entered. If a licensee does not know the percentage, then the licensee needs to call the manufacturer directly and obtain the accurate information.

HOW MANY TAGS DO I NEED TO ORDER FOR PLANTS AND PACKAGES?

A licensee is responsible for having a sufficient stock of tags at all times to reconcile inventory daily. Whether or not to "order ahead" is a business decision, but tag shipping time is not an excuse for running out of a supply once the Marijuana Establishment is already licensed.

HARVESTING PLANTS

ARE LICENSEES REQUIRED TO DESTROY THEIR MULTI-STRAIN HARVEST BATCHES?

All harvest batches should be strain-specific. Multi-strain harvest batches should be destroyed in Metrc, separated by strain and replanted if possible, and reentered into Metrc.

IF A LICENSEE ENTERS THE INCORRECT WET WEIGHT FOR A PLANT, ARE THEY REQUIRED TO DESTROY THEIR HARVEST BATCH?

Within 48 hours of harvest: Licensees should complete an incident report, document a plan of correction requiring the batch be discontinued if no packages or waste were created, and make the correction.

Outside 48 hours of harvest: Licensees would need to destroy the batch and identify it as waste in Metrc. Licensees are not allowed to average the wet weights of plants in their harvest batches.

HOW DOES A LICENSEE MAKE THEIR TEST PACKAGES?

Test packages are made directly from each strain-specific harvest batch. Packages are limited to 10 pounds of flower or trim.

IS A LICENSEE ALLOWED TO REPORT ALL STRAIN-SPECIFIC WASTE UNDER ONE HARVEST BATCH?

Waste should be reported in Metrc by entering the amount of waste under its tag number ensuring that all waste is reported by specific strains. A licensee may have multiple entries of waste, but they must be reported individually by tag number and by the end of the business day.

CAN A LICENSEE WAIT TO CREATE THEIR HARVEST BATCH UNTIL THE ENTIRE STRAIN IS HARVESTED, WHICH MIGHT TAKE SEVERAL DAYS?

The end of day inventory must match Metrc. For example, if a licensee is harvesting a strain and it takes two days to complete, then they would create a batch each day for what they harvested.

IS IT A REQUIREMENT THAT LICENSEES ENTER THE STRAIN NAME AS THE HARVEST BATCH NAME?

They should include the strain name and date of harvest in the harvest batch name.

IS THERE A MAXIMUM AMOUNT OF PLANTS IN A HARVEST BATCH?

There is no maximum amount of plants in a harvest batch. The only requirement is that any product harvested throughout the day must match the end of day inventory in Metrc.

IS A LICENSEE ALLOWED TO HANDWRITE TAGS TO KEEP WITH THEIR CURING MANICURE BATCHES?

Yes, but all tags must be legible.

CREATING PACKAGES AFTER CURING

WHAT IS THE TOTAL PACKAGE WEIGHT THAT CAN BE TRANSFERRED FOR TESTING AFTER CURING?

10 pounds

CAN A LICENSEE USE A NUMBER INSTEAD OF A STRAIN NAME WHEN CREATING THEIR ITEMS FOR PACKAGING?

No, all packages must use a strain name and be item specific with the correct category.

CAN A LICENSEE REPACKAGE THE SAME STRAIN PRODUCT INTO A BULK PACKAGE AFTER TESTING IS COMPLETE?

No, all packages must be harvest batch specific to accurately reflect testing results, comply with labeling requirements and enable possible recalls.

ARE THE LABS ALLOWED TO HAVE THE LICENSEE MAKE THEIR OWN TEST SAMPLES?

Please refer to the regulations for the testing of marijuana and marijuana products found under 935 CMR 500.160. The Commission has incorporated DPH's *Protocol for Sampling and Analysis of Finished Marijuana Products and Marijuana-infused Products* into its regulations. The Commission will provide further specific guidance on the identification of test samples.

TRANSFERRING PRODUCT AFTER TESTING

CAN A LICENSEE TRANSFER OR RECEIVE PRODUCT FROM A LICENSEE THAT IS NOT LICENSED IN METRC?

No.

CAN LICENSEES LIST MULTIPLE DRIVERS ON A MANIFEST?

Yes, they will include the names and badge/registration card number of all drivers on the manifest. They must include the travel route. In addition, they will identify in the planned route section at what point they will change drivers, if applicable.

WHEN A MARIJUANA ESTABLISHMENT IS TRANSFERRING PRODUCT TO ANOTHER MARIJUANA ESTABLISHMENT, WHAT TRANSFER TYPE DO THEY SELECT ON THE MANIFEST?

If the marijuana establishments are not affiliated through licensure, then it will be an unaffiliated transfer. If they are affiliated through licensure, then it will be an affiliated transfer. For example, a craft marijuana cooperative transferring product between its cultivation location and its product manufacturing location would record this as an affiliated transfer. An example of an unaffiliated transfer would be when JT, Inc. transfers product from its cultivation location to MB, Inc.'s product manufacturing location.

CAN A LICENSEE SEND WHOLE WET PLANTS TO ANOTHER LICENSEE TO DRY, CURE AND PACKAGE INTO BUD AND TRIM PACKAGES AND TEST ON THEIR BEHALF?

No.

DISPENSARIES

HOW DO WE ADJUST SAMPLE PACKAGES?

Retailers will choose the adjustment reason "Sample" for their own use and then will adjust down for the sample since samples CANNOT be sold. All sample packages should be item specific and tested prior to transfer.

CAN THE RETAILERS ENTER THEIR BEGINNING INVENTORY SALES IN BULK?

Yes.

HOW DO RETAILERS ENTER THEIR SALES INTO METRC?

They can utilize an API, CSV file or manual upload. They will need to contact their POS provider to utilize the API function.

HOW DO RETAILERS EDIT THEIR SALES IF THEIR FILE WAS UPLOADED TWICE, SOLD FROM THE INCORRECT PACKAGE ID OR NEED TO DELETE A SALE IF RECEIPT BASED?

The retailer will be required to VOID or edit each receipt number individually upon notification of the issue and reconcile the VOID in METRC and point-of-sale system by the end of the business day.

CAN RETAILERS CREATE GIFT BOX PACKAGE TAGS?

No.

BEGINNING INVENTORY GUIDE

This section is intended to help guide the process of tagging and reporting your beginning inventory in *Metrc*. These steps are for beginning inventory only and will not necessarily be followed for your ongoing inventory.

There are two types of tagged inventory in Metrc: Plants and Packages. Plants are immature, vegetative, or flowering. All plants must enter the system through immature plant batches. Packages are created from immature plant batches, harvest lots, production runs or other packages.

For your beginning plant inventory, once an immature batch has been created it can be moved directly to the group's current phase of growth and a plant group can be moved directly from immature to flowering.

Harvested inventory, while in the drying and curing phase, is not tagged but given a unique identifying batch number. This inventory is reported as weight and once finished will be packaged for further processing or transfer. The harvested inventory currently in cultivation will not need to be entered into Metrc as beginning inventory. However, the packages created from harvested inventory will need to be reported and tagged as beginning inventory.

In Metrc, tags are ordered by license number. When the licensee orders tags, they will come in blue for a retail facility and gold for all other license areas. The tags will also have the facility license number and a unique identification number for that tag.

After the licensee has placed the tag order, go into Admin/Strains and add in all of the strains currently in the facility. Next, go into Admin/Items and add in all of the items the facility currently carries. Item names should have "beginning inventory" included in the name. I.E. "Blue Dream – Beginning Inventory." For clarity, marijuana strains are the types of marijuana, e.g., blue kush, ak-47, and are derived from sativas or indicas. Marijuana items are the products that are manufactured or sold, e.g. brownies, oils, cookies, etc.

Please make sure not to start beginning inventory in Metrc until the licensee has ordered and received tags physically and in Metrc. Always tag in Metrc before tagging physically.

Finally, as a caution, the Metrc tags are designed for onetime use. If an error is made assigning a tag to a plant, that plant's tag will need to be replaced using the "Replace Tag" option. If an error is made assigning a tag to a package, the package tagged with a wrong tag will need to be discontinued and the package recreated.
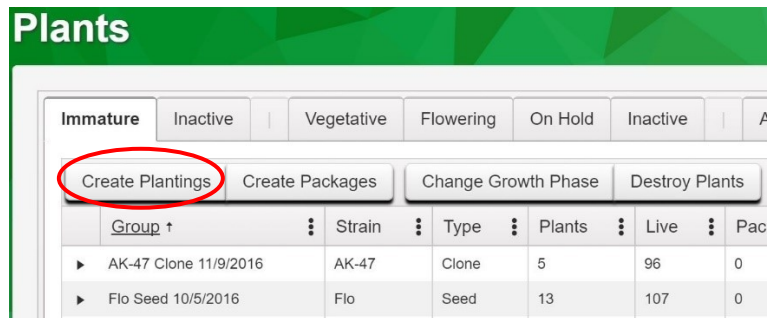
A licensee will be granted access to Metrc once a final license is issued by the Commission. Beginning inventory must be introduced into Metrc prior to commencing operations.

Immature Plants, *The Steps*

1. Select "Plants" from the navigation bar
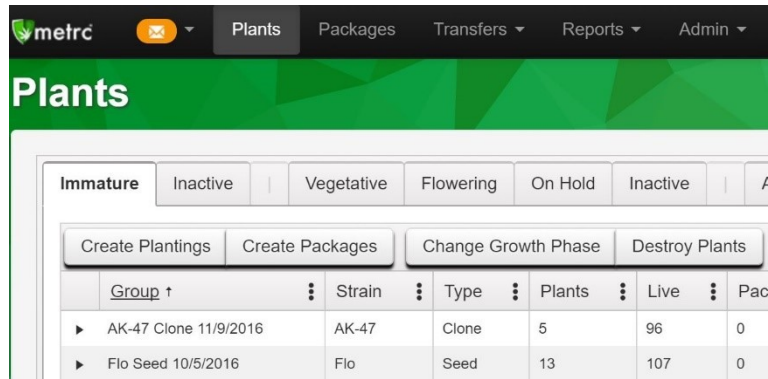
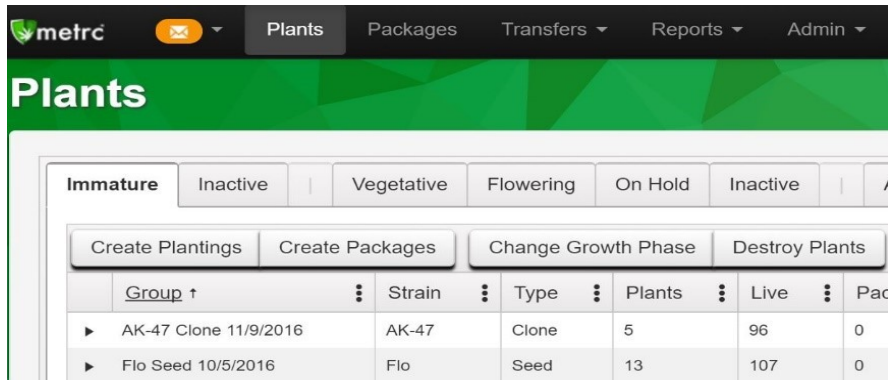2. Select "Immature - Create Plantings"

3. Enter - Batch Name (Can use any name familiar to your Cultivation) or for example, Flo Seed 10/5/16
4. Select - Plants Type
5. Enter – Plants Count (number of plants in plantings batch)
6. Select – Strain
7. Enter – Date (Today's Date)
8. Select "Create Plantings"

Vegetative Plants, *The Steps*

1. Select "Plants" from the navigation bar

2. Select "Immature – Create Planting"
3. Select "Create Plantings"
4. Select - Plants Type
5. Enter – Plants Count (number of plants you want to tag as vegetative)
6. Select – Strain
7. Enter Date (Today's Date)
8. Select "Create Plantings"

9. Select "Immature – Change Growth Phase"
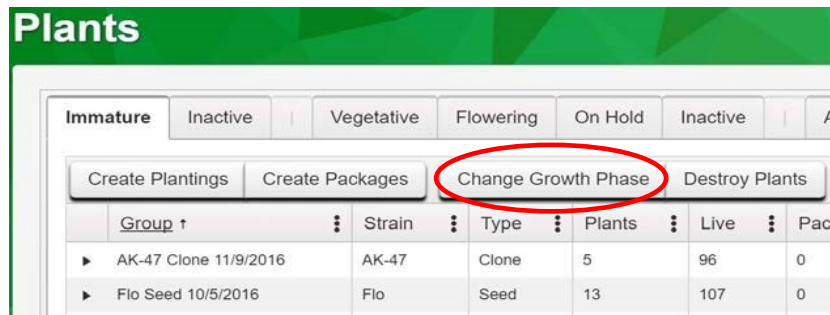
10. Select - Batch (Beginning Inventory)
11. Enter – Plants Count (number of plants you want to tag as vegetative or flowering)
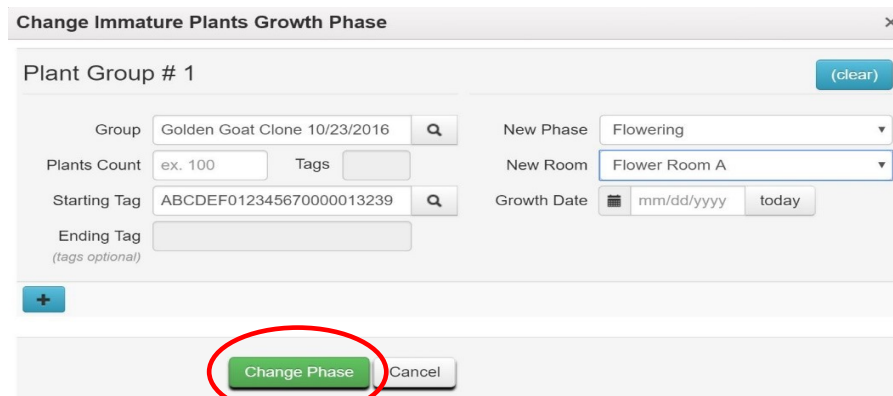12. Select – Phase (Vegetative)
13. Select "Room"
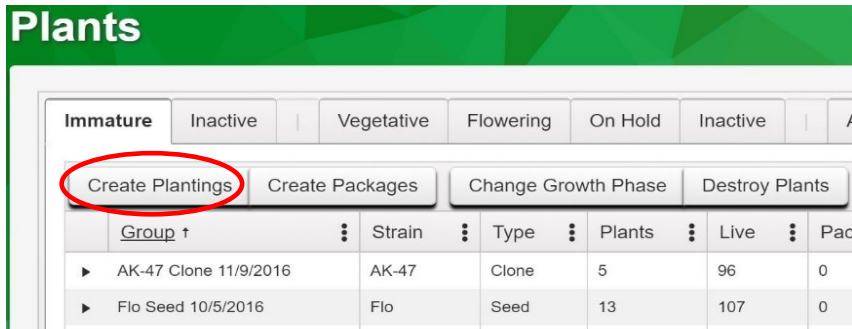14. Enter Date (Today's date)
15. Enter Starting tag number
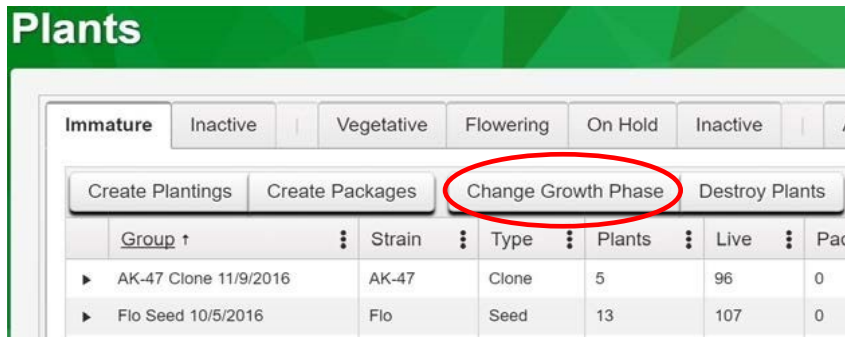16. Enter Ending Tag Number
17. Select "Change Phase"

Flowering Plants, *The Steps*

1. Select "Plants" from the navigation bar
2. Select "Immature - Create Plantings"

3. Enter Batch Name (Beginning Inventory)
4. Select - Plants Type
5. Enter – Plants Count (number of plants you want to tag as flowering)
6. Select – Strain
7. Enter – Date (Today's Date)
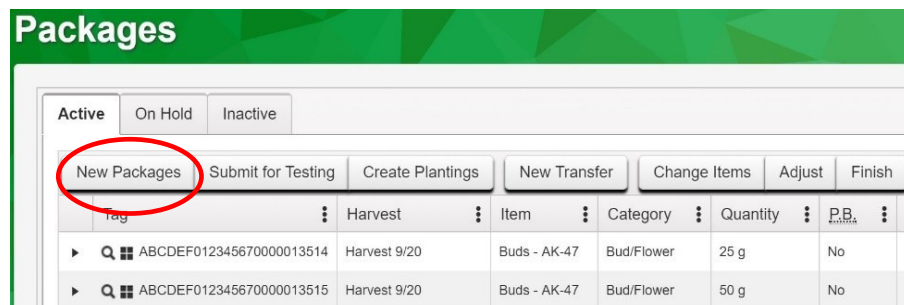8. Select "Create Plantings"
9. Select "Change Growth Phase"

10. Select - Batch (Beginning Inventory)
11. Enter – Plants Count (number of plants you want to tag as vegetative or flowering)
12. Select – Phase (Flowering)
13. Select - Room
14. Enter - Date (Today's date)
15. Enter – Starting tag number
16. Enter Ending Tagging Number
17. Select "Change Phase"

Packages, *The Steps*

1. Select "Packages" from the navigation bar
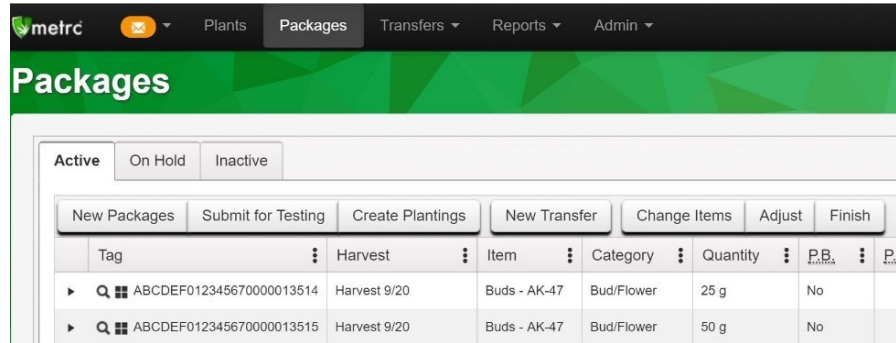
2. Select "New Packages"

3. Select "Package Tag"
4. Select "Item"
5. Enter Quantity
6. Select "Unit of Measure"
7. Enter Package Date (Today's Date)
8. Select "Create Packages"

MISCELLANEOUS FAQ'S

CAN A LICENSEE PROCESS, SELL OR GIVE AWAY WASTE?

No.

HOW DO RETAILERS HANDLE WASTE THAT DO NOT HAVE A COMPOSTER ON SITE?

They will follow the regulations of the State set forth in 935 CMR 500.105(12).

ARE OWNERS REQUIRED TO BE THE KEY ADMIN OR CAN THEY APPOINT ANOTHER EMPLOYEE?

One of the owners must be the Key Admin. There will only be one (1) Key Admin.