



Massachusetts Seed-to-Sale Guidance

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Massachusetts Cannabis Control Commission

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Definitions

Additive means any botanically derived or artificially derived substance added to Marijuana or Marijuana Products to achieve a specific technical and/or functional purpose during processing, storage, or packaging. Additives may be direct or indirect. Direct additives are used to impart specific technological or functional qualities. Indirect additives are not intentionally added but may be present in trace amounts as a result of processing, packaging, shipping, or storage.

Marijuana (or Cannabis) means all parts of any plant of the genus Cannabis, not excepted in 935 CMR 500.002(a) through (c) 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.

Marijuana Products (or Cannabis Products) means Marijuana and its products, unless otherwise indicated. Marijuana Products includes products that have been Manufactured and contain Cannabis, Marijuana, or an extract from Cannabis or Marijuana, including concentrated forms of Marijuana and products composed of Marijuana and other ingredients that are intended for use or consumption, including Edibles, Beverages, topical products, ointments, oils and Tinctures. Marijuana Products include Marijuana-infused Products (MIPs) defined in 935 CMR 500.002.

Clone means a clipping from a Cannabis or Marijuana plant that can be rooted and grown.

Cultivation “Harvest” Batch means a collection of Cannabis or Marijuana plants from the same seed or plant stock that are cultivated and harvested together, and receive an 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 Plant means the gametophytic or reproductive state of Cannabis or Marijuana in which the plant produces flowers, trichomes, and Cannabinoids characteristic of Marijuana.

Finished Marijuana means Usable Marijuana, Cannabis resin, or Cannabis concentrate.

Immature Plant means a rooted plant in the Vegetation stage of development that is no taller than eight inches, no wider than eight inches, and is in a growing/cultivating container.

Licensee means a person or entity on the application and licensed by the Commission to operate a Marijuana Establishment or Independent Testing Laboratory under St. 2016, c. 334, as amended by St. 2017, c. 55, M.G.L. c. 94G, and 935 CMR 500.000. Any person or entity that solely provides initial capital to establish or operate the establishment and to whom, in return for the initial capital, requires only repayment of the loan and does not have any ownership or direct or indirect authority to control the Marijuana Establishment or Independent Testing Laboratory, will not be a Licensee.

Marijuana Cultivator means an entity licensed to cultivate, process and package Marijuana, and to Transfer Marijuana to other Marijuana Establishments, but not to Consumers. A Craft Marijuana Cooperative is a type of Marijuana Cultivator.

Mature Plants means plants greater than eight inches tall.

Mother Plant means a marijuana plant that is grown or maintained for the purpose of generating Clones, and that will not be used to produce plant material for sale to another Marijuana Establishment or Medical Marijuana Treatment Center.

Package means 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 means 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.



Repackaging means to uniformly wrap or seal Marijuana that has already been wrapped or sealed, into a ready-made product for retail sale, without combining, infusing, or changing the chemical composition of the Marijuana.

Seed-to-sale Electronic Tracking System means a system designated by the Commission as the system of record (Seed-to-sale SOR) or a secondary electronic tracking system used by a Marijuana Establishment or an MTC or an Independent Testing Laboratory. This system shall capture everything that happens to an individual Marijuana plant, from seed and cultivation, through growth, harvest and Manufacture of Marijuana Products and MIPs, including transportation, if any, to final sale of finished products. Seed-to-sale Electronic Tracking System shall utilize a unique-plant identification and unique-batch identification. It will also be able to track agents' and Registrants' involvement with the Marijuana Product. Any secondary system used by the Marijuana Establishment or an MTC or an Independent Testing Laboratory shall integrate with the SOR in a form and manner determined by the Commission.

Seed-to-sale System of Record (Seed-to-sale SOR) means the electronic tracking system designated and required by the Commission to perform a process.

Usable Marijuana means the fresh or dried leaves and flowers of the female Marijuana plant and any mixture or preparation thereof, including Marijuana, Marijuana Products, or MIPs, but does not include the seedlings, seeds, stalks, roots of the plant, or Marijuana rendered unusable in accordance with 935 CMR 500.105(12)(c).

Vegetation means the sporophytic state of the Cannabis or Marijuana 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.

White Labeling means to affix a product label that includes the branding, including the name and logo, of a specific Marijuana Establishment Licensee to a Finished Marijuana Product that was previously produced and packaged by a licensed Product Manufacturer, Cultivator, Microbusiness or Craft Marijuana Cooperative for sale to Consumers. Vaporizer Devices shall not be white labeled. White labeled products shall be required to comply with 935 CMR 500.105(5), and (6), 935 CMR 500.130(6) and 935 CMR 500.146(7).



Cultivation

1. Are additives required to be entered in Metrc during cultivation?

No, during cultivation, additives are not required to be tracked in the state's seed-to-sale tracking system, Metrc. Cultivators may input additives into Metrc to track growing processes. A Licensee cannot edit or delete an additive once it has been entered.

2. How many tags do I need to order for plants and packages?

The number of tags you order is a business decision; however, you are responsible for having a sufficient stock of tags at all times for daily inventory reconciliation and tracking. A Licensee can order a maximum of 5,000 tags per order.

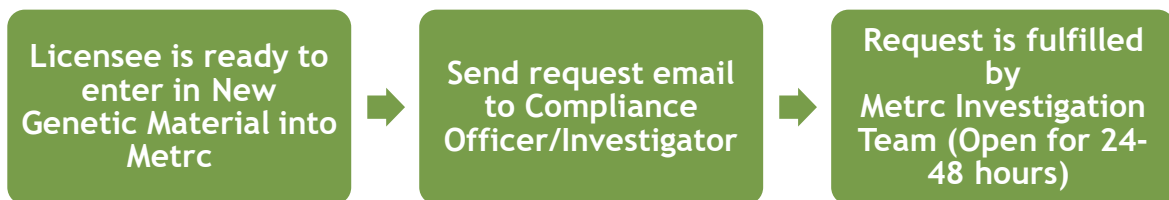
Immature Plants

3. Can I transfer seeds or clones to another license?

Yes, seeds and clones that are under eight inches can be transferred to a different license. Once a plant is tagged in Metrc, it must remain under that license.

4. Can I bring in New Genetic Material that is outside of Metrc?

Yes, please contact your Investigator or Compliance Officer.



5. How does a Licensee add their 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 are moved to the vegetative stage, usually once clones reach eight inches tall. All clone packages must be strain-specific, and the item name must include clones, for example, Blue Dream Clones.

The Commission strongly recommends Licensees manually enter their inventory into the state's seed-to-sale tracking system. If a Licensee chooses to upload their inventory through their third-party API, they must ensure the figures entered reflect accurate inventory.

If a Licensee chooses this route, the Commission recommends that the Licensee create a master spreadsheet of inventory to keep on file.

6. How are seeds entered in Metrc?

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.

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

Transferring seeds: When transferring to a retailer, the seeds are physically put into seed lots of six for sale. Licensees may put multiple packets of six under one Metrc tag.

7. How does a facility 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.

8. Do I need to enter strain-specific immature batches if I do not know what the strain is?

Yes, a Licensee is required to enter the strain name.



Flowering Plants

9. If a Licensee enters the incorrect wet weight for a plant, are they required to destroy their harvest batch?

No, a Licensee that enters the incorrect wet weight for plant is not required to destroy the harvest. Licensees have 48 hours after the entry to contact Metrc Support to request a correction. If not corrected within 48 hours, Licensees should complete an incident report and document a plan of correction. Licensees are not allowed to average the wet weights of plants in their harvest batches.

10. When plants are entered in Metrc, should they be weighed individually or in bulk and then averaged?

Plants must be weighed individually when entered in Metrc. Licensees are not allowed to average weights of plants.

11. How does a Licensee make test packages?

For cured and dried flower, test packages are made from each strain-specific post-harvest batch after trimming and drying. Post-harvest batches are limited to 15 pounds of dry weight flower, shake, or trim.

Because fresh frozen cannabis is not dried and cured and is also not wet plant material, the Commission has determined the 15-pound limit above is not applicable. As a result, the Commission will allow the below equivalency standard for fresh frozen cannabis.

As it relates to fresh frozen cannabis only:

1. Licensees may use test batches of up to 60 pounds for fresh frozen cannabis and assign a Metrc tag to production batches of up to 120 pounds;
2. Licensees must adhere to the Commission's regulations and Testing Protocols in all other respects; and
3. The Commission reserves the right to take action against the licensee for any action taken in



excess of the alternative testing in item 1.

Licensees who will be utilizing the interim equivalency standard above must update any Standard Operating Procedures (SOP) as appropriate and email a copy to the assigned Lead Investigator/Compliance Officer.

When making a test sample, all associated package tags must be selected in the creation of the Metrc test sample package.

12. How should cultivation waste be tracked in Metrc?

Waste should be reported in Metrc either by room or by plant tag. A Licensee may have multiple entries of waste, but all waste must be accounted for by the end of the business day.

13. Can a Licensee wait to create a harvest batch until the entire strain is harvested, which might take several days?

No, at the end of day physical inventory must match Metrc. For example, if a Licensee is harvesting a strain that takes two days to complete, the Licensees would create a batch each day for what is harvested.

14. Is it a requirement that Licensees enter the strain name as the harvest batch name?

Yes, Licensees should include the strain name and date of harvest in the harvest batch name.

15. Is there a maximum number of plants in a harvest batch?

No, there is no maximum number of plants in a harvest batch. Any product harvested throughout the day must match the end-of-day inventory in Metrc.

Post-harvest batches, i.e., cured and dried flower, are limited to 15 pounds per batch.



Product Manufacturing

16. During the product manufacturing stages, when is it required to assign a production batch number?

A production batch is a group of packages created from the same production run of infused product. A production batch is only for product chemically or physically altered during the manufacturing process. A new production batch must be created for each new product designated to sell to the general public.

Example: Bulk distillate is processed into a refined distillate. This refined distillate will infuse an edible. This refined distillate should be designated as a production batch to initiate new testing results. Additionally, if that distillate is further processed or altered to infuse a vape product, that would be a new production batch as it will be used to infuse a new production run.

Any questions related to what constitutes a production batch and how to designate this in Metrc should be directed to Metrc Support.

17. When does the separation of medical versus adult use product occur?

If potency levels allow the product to be sold to either medical patients or adult consumers, the separation must be demonstrated at the point of sale.

18. Are additives required to be entered into Metrc during product manufacturing?

Yes, product manufacturing additives, THC and CBD potency, serving size, and ingredients are required.

19. Is there a limit to how much product can be assigned to a Metrc tag?

Yes, no more than three liftable containers, each not heavier than 50 pounds, per Metrc tag. Once assigned a Metrc tag, these containers cannot be separated. We strongly suggest keeping all inventory in one contained location for the purpose of inventory tracking.

Multiple containers containing one package (termed one lot) must travel together. For example, if one container is needed in product manufacturing, then the other two must go with it. If lots



are separated, either within or outside a facility and are assigned to one tag, Licensees will be in violation of the Commission's seed-to-sale tracking protocol.

For beverages, no more than 10 cases may be assigned to a Metrc tag. Once assigned a Metrc tag, these lots cannot be separated unless broken down into smaller quantities and assigned another package tag.

For the purposes of this guidance document, a case is defined as 24 beverages.



Retail

20. When does the separation of medical versus adult use product occur?

If during production the potency of the product exceeds the allowable limit for adult use, the product must be separated at that stage. If potency levels allow the product to be sold to either medical patients or adult consumers, the separation must be demonstrated at the point of sale.

All sales must be recorded under the appropriate license in Metrc. This ensures that medical patients remain exempt from paying sales tax on products, and appropriate sales data is aggregated under the applicable license.

21. How should display product be tracked in Metrc?

Display products should have their own separate Metrc package tag, created from the parent package.

These tags can be kept in a contained location in a secured area. Display products do not require tags to be physically displayed on the product. Once the product is wasted, this package tag will also allow transportation of this product to a processor for disposal if the waste disposal process does not occur at the retail.

22. How do retailers enter their sales into Metrc?

Retailers can utilize an API, CSV file, or Manual Upload. Retailers should contact their point-of-sale provider for the functionality.

When utilizing an API, all sales must be recorded under the employee who conducted the transaction.

When utilizing a CSV upload, all sales will populate under the employee who submitted the file. Licensees shall maintain raw transaction history to identify individual employees involved with individual sales.



23. How does an MTC perform a patient return or exchange in Metrc?

Any patient return cannot be resold and must be wasted.

For waste with an unknown source, a new package tag is created with the item category name “waste – concentrate” or “waste – flower.” Creating this category requires Commission approval. Contact your Lead Compliance Officer in this situation.

A new waste log feature is in development for accepting and wasting returned products. Once this feature is complete, further industry guidance may be released in the form of a Metrc bulletin.

24. How do Licensees perform home deliveries to patients and consumers?

Delivery to patients and consumers must be tracked using the sales delivery feature.

25. Can a Retail Licensee sell seeds and clones?

Commission regulations allow for the ability to sell seeds and clones; however, guidance on testing, packaging, and clone limits is to be developed.



Product Catalog

26. Who is responsible for entering products into the product database?

Marijuana Product Manufacturers must provide the required information pertaining to the product database for the products it intends to provide at wholesale to Retailers or Delivery Operators.

If a Marijuana Retailer or Delivery Operator white labels product, the same requirements apply.

27. Do repackaged items need to be added into the product database?

A Marijuana Retailer or Delivery Operator does not need to create items for items they are repackaging (breaking down a large package of product into smaller packages without changing the product's packaging) in Metrc. Using the Same Item Functionality, Licensees can associate the same item of the initial package without creating a new item under the retailer license. For more information, see [Metrc Bulletin Number: MA_IB_0041](#).

28. What are the photo specifications?

File Format: Metrc supports .bmp, .gif, .jpg, and .png.

File Size: Metrc supports files under 30 megabytes.

29. Do beverages and concentrates require a photo outside of the packaging?

Yes, a product photo of the item, against a white background, next to the packaging, is required. This can be done by putting the product in a clear container.

For more information, see [Metrc Bulletin Number: MA_IB_0035](#).

Bulk beverages and bulk concentrates do not require a photo outside of the packaging.

For more information on bulk categories, see [Metrc Bulletin Number: MA_IB_0036](#). For questions related to the product database, please contact Metrc Support.



Miscellaneous

30. Can Licensees list multiple registered agents on a manifest?

Yes, include the names and badge or registration card number of all registered agents transporting product on the manifest. All registered agents must be entered in the space provided, separated with either a comma or slash. Licensees must include the travel route. If changing drivers in route, identify the location of the change in the planned route section.

31. When a Licensee is transferring product to another Licensee, what transfer type do they select on the manifest?

If the Licensees are not affiliated through licensure, then it will be an “unaffiliated transfer.”

32. When a Licensee does an affiliated transfer within the same facility, does there need to be a physical paper manifest?

No, if the movement is within the same physical space a paper manifest is not necessary. Any movement between separate physical locations requires a paper manifest.

33. 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, cultivators cannot send wet plants to another Licensee to dry. However, cultivators may send wet plant material that has been tested in accordance with the Commission testing protocol, to another facility for extractions.

34. How are sample packages created?

All sample packages should have an assigned package tag; specific name denoting it is a sample or research and development (R&D) item (e.g., “R&D: UniqueName”); and proper testing status prior to transfer. Samples and R&D packages cannot be sold.

35. How are Vendor Samples created?

Cultivation and Product Manufacturing Licensees may provide Vendor Samples to a Marijuana



Retailer or Delivery Operator. All vendor sample packages should have an assigned package tag; specific name denoting it is a vendor sample (Vendor Sample: UniqueName); and proper testing status prior to transfer. The Marijuana Retailer or Delivery Operator must enter any samples given to employees into their point-of-sale system (POS). Upon providing a sample to employees, the Marijuana Retailer or Delivery Operator must record the name and agent registration number of the employee who received the sample. This can be done via comment in the package history or at the POS.

36. How are Quality Control Samples created?

Cultivation and Product Manufacturing Licensees may provide Quality Control Samples to employees. All Quality Control sample packages should have an assigned package tag; specific name denoting it is a quality control sample (Quality Control Sample: UniqueName; QC Sample: UniqueName); and proper testing status prior to being given as a sample. Upon providing a sample to employees, the Licensee must make an adjustment to the package showing the reduction in quantity. A comment shall be added for each adjustment recording the name and agent registration number of the employee who received the sample.

37. 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 within 24 hours.

38. Can retailers create gift box package tags?

No, retailers are not allowed to create gift box package tags.



Transferring Product After Testing

39. Can a Licensee transfer or receive product that has not been tested?

No, a Licensee may only transfer cannabis product that has test results. This requirement includes transfers between licenses.

40. Can a Licensee transfer or receive failed product?

Yes, failed product can be transferred between Cultivator and Product Manufacturer for the purposes of remediation only. Product that fails for Pesticides cannot be transferred out of cultivation.

Questions?

If you have additional questions regarding this Seed-to-Sale Guidance, please contact the Commission at (774) 415-0200 or Commission@CCCMass.Com.

