OHA - OLCC

Cannabis Tracking System Workshop Grow Site Administrator Training Spring 2018

Presenters

Carole Yann Christopher Westfall Margaret Flerchinger



PUBLIC HEALTH DIVISION
Oregon Medical Marijuana Program

Goals of the training

- Clarify changes made to the law around the Cannabis Tracking System (CTS) with the Oregon Liquor Control Commission (OLCC).
- Ensure that Growers understand which tracking system they must use.
- Ensure growers that are to use the Cannabis Tracking System know how to complete the required steps with OHA to get set up in CTS.
- Ensure growers understand the importance of tracking in either OHA's monthly tracking in Oregon Medical Marijuana Online System (OMMOS) or CTS.
- Ensure growers understand the consequences if tracking and reporting requirements are not met.



Topics Covered

- · Changes in requirements of who needs to report
- Determining Reporting type: Cannabis Tracking System (CTS), Oregon Medical Marijuana Online System (OMMOS); or Exempt
- How to designate a Grow Site Administrator (GSA)
- What happens if a GSA is set up in CTS but not activated or the GSA doesn't report in CTS.
- · What happens if OMMOS reporting is not done?



PUBLIC HEALTH DIVISION Oregon

Legislation 2018

- Senate Bill 1544 passed in 2018, slightly modified who needs to track in the CTS system for grow sites:
 - In simple terms: All grow sites with 3 or more patients must use the CTS tracking.



Which System Do I Use to Report?

Cannabis Tracking System (CTS) with OLCC

- A grow site with three or more patients registered at the grow site address is required to use CTS.
- · CTS is administered by OLCC
- OLCC's CTS vendor is Metrc[™]



PUBLIC HEALTH DIVISION Oregon Medical Marijuana Program

Which System Do I Use to Report?

Oregon Medical Marijuana Online System (OMMOS) Monthly

- Registered grow sites with two or fewer patients if ANY of the following is true:
 - You are the designated grower for an OMMP patient (other than yourself).
 - You are a patient growing for yourself at your own residence and you are transferring marijuana items to a medical processor or dispensary.
 - You are a patient growing for yourself at a grow site address that is NOT your residence.
 - You are growing at a grow site address that submitted an application for a producer license to OLCC prior to January 1, 2018 and OLCC has not yet acted on your application.



Which System Do I Use to Report?

Exempt from CTS and OMMOS Monthly Reporting

- All the following must be true to be exempt from all reporting and tracking requirements:
- You are a patient only growing for yourself at your residence; AND
- There are no more than 12 mature plants and 24 immature plants being grown at the grow site; AND
- You are not transferring to a medical processor or dispensary



PUBLIC HEALTH DIVISION Oregon Medical Marijuana Program

How Grow Sites Connect to CTS Tracking

- Each grow site subject to CTS must have a grow site administrator (GSA)
- GSA's must be designated by May 31, 2018
 - First step in process to get you credentialed and into the tracking system to be ready to track by July 1, 2018
 - Data is sent electronically to the OLCC vendor
 - OLCC vendor will then credential the GSA at the grow site



PUBLIC HEALTH DIVISION Oregon
Medical Marijuana Program

How to set up a Grow Site Administrator

- Must have an active account in the Oregon Medical Marijuana Online System (OMMOS)
- · Must be a grower at the grow site
- · Complete the GSA designation request
- Agree to be responsible for the reporting and tracking in the CTS system and comply with all of the tracking requirements as outlined in OLCC Rules
- Pay the Cannabis Tracking Fee (CTS Fee) of \$480

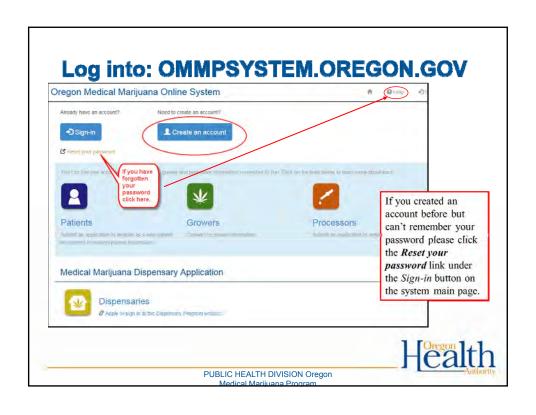


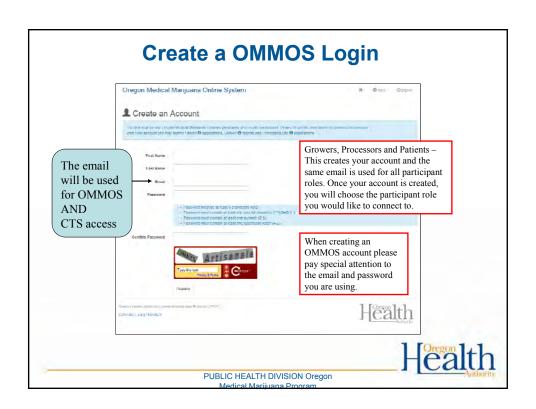
PUBLIC HEALTH DIVISION Oregon

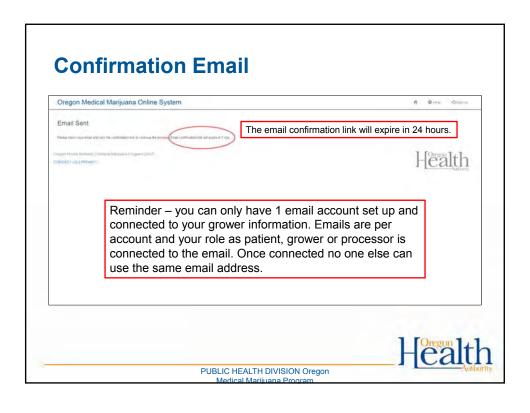
Set up your account in OMMOS

OMMPSYSTEM.OREGON.GOV



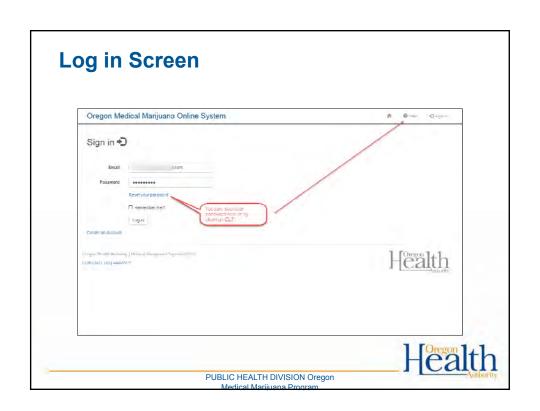






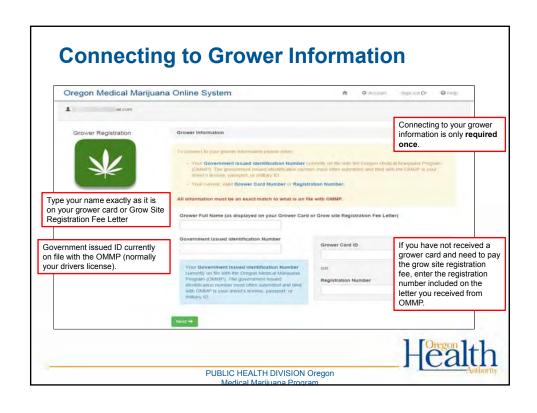


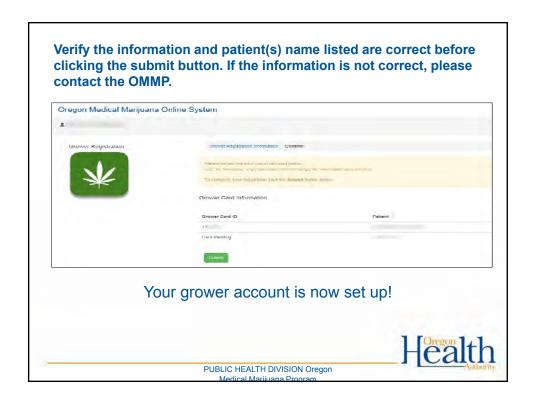




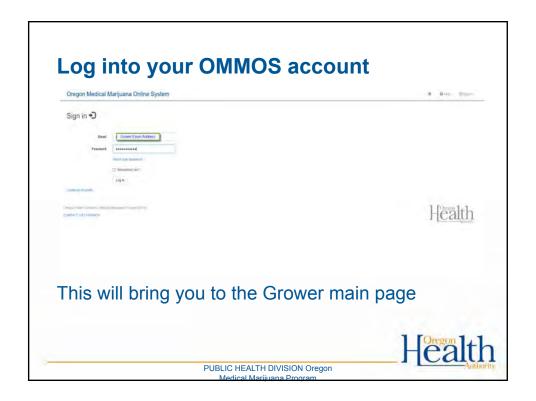




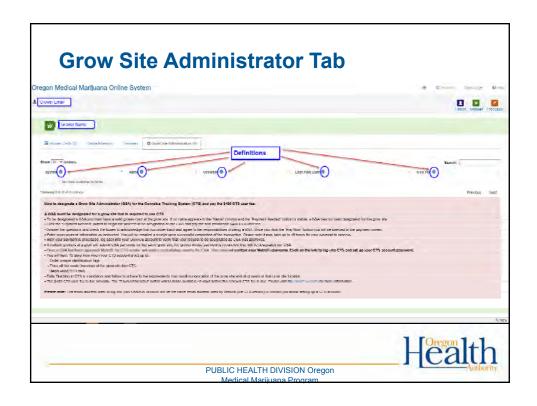


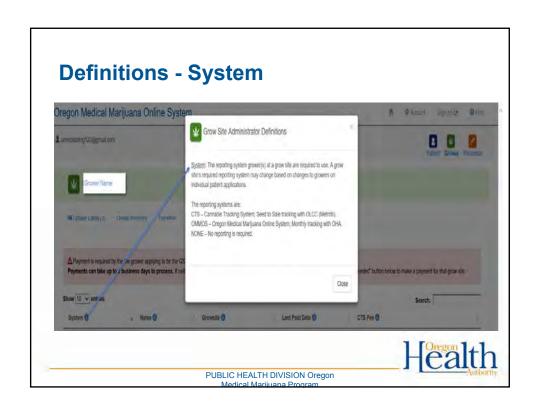






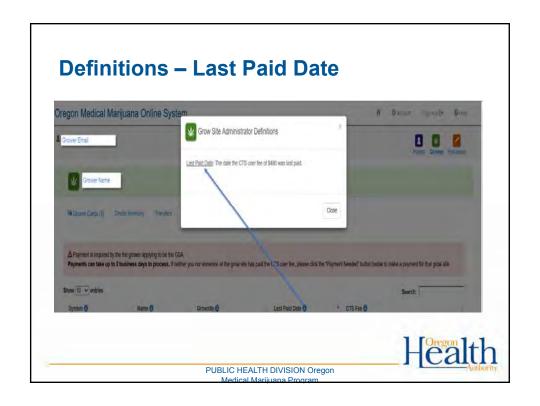


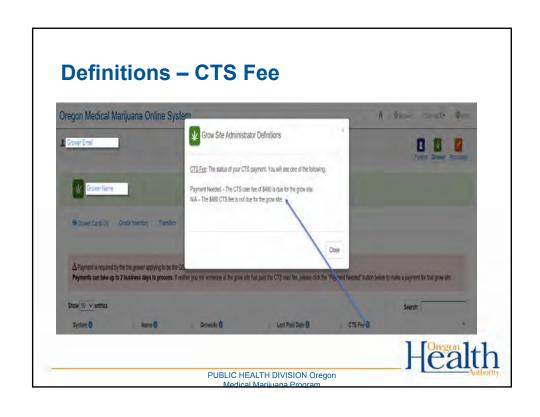




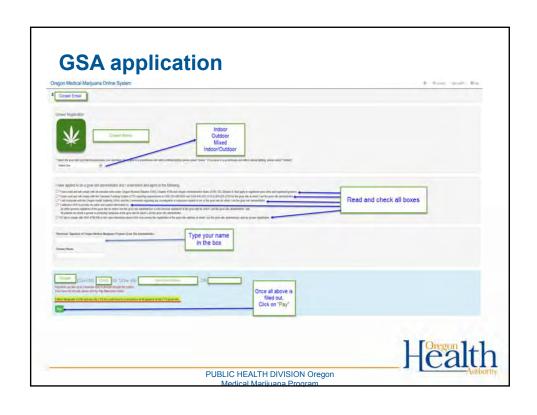


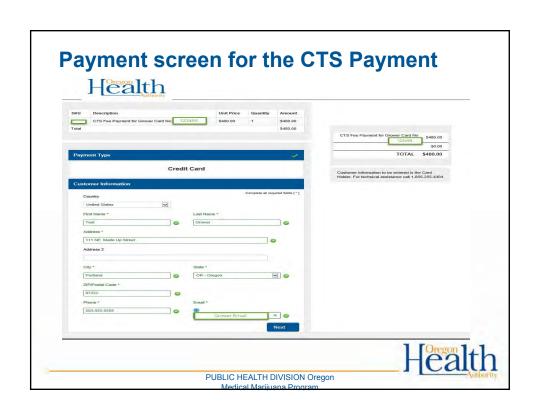






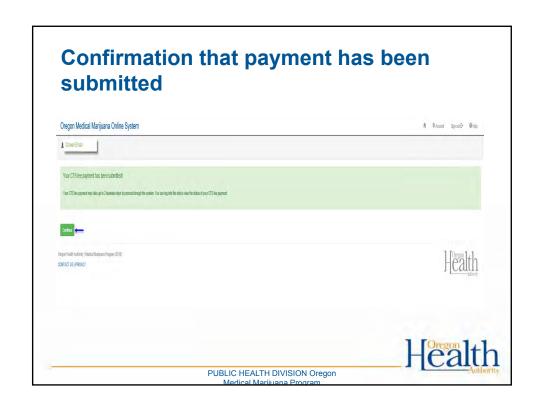


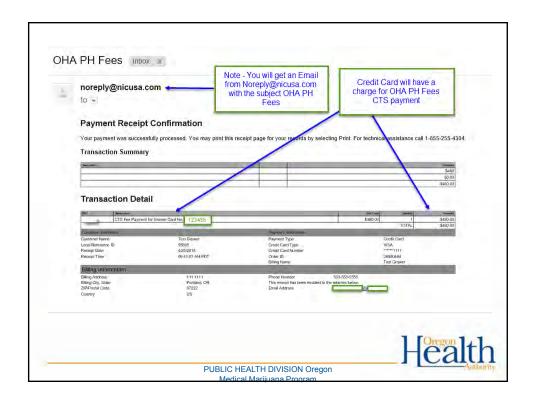


















What happens if a GSA is set up in CTS but not activated or a GSA doesn't report in CTS

- OHA will work with GSAs to get into compliance and to determine if there are barriers beyond a GSA's control in achieving compliance, however OHA may:
 - Revoke or refuse to renew registrations if grow site is not tracking in CTS by July 1, 2018; or
 - Issue civil penalties.

Oregon Laws 2017, ch 183, Sec. 41



PUBLIC HEALTH DIVISION Oregon
Medical Marijuana Program

What happens if a grower is to use OMMOS monthly reporting and doesn't

- OHA will work with growers to get into compliance and to determine if there are barriers beyond a growers control in achieving compliance, however OHA may:
 - Revoke or refuse to renew registrations if grow site is not tracking in OMMOS by July 1, 2018; or
 - Issue civil penalties.

Oregon Laws 2017, ch 183, Sec. 41



PUBLIC HEALTH DIVISION Oregon Medical Marijuana Program

What's Next?

- OHA sends data on all qualifying locations to OLCC to begin the credentialing process
- The May 31, 2018 date is the first deadline GSA's be designated by this date.
- The OLCC vendor will begin the GSA's credentialing process after May 15, 2018
- The GSA is the conduit to get connected to the OLCC tracking system from OHA to OLCC
- When you receive the Welcome to Metrc[™] email, you will have 10 days to complete the credentialing process.
- Once credentialed, you will have 10 days to order tags and enter your inventory.



Where do I get materials or assistance?

CTS Information

- Metrc[™] Training
 - https://www.metrc.com/oregon
- Visit OLCC's website:
 - http://www.oregon.gov/olcc/marijuana/Pages/cannabistrackingsystem.a spx
 - Training materials are on OLCC's website under Cannabis Tracking System

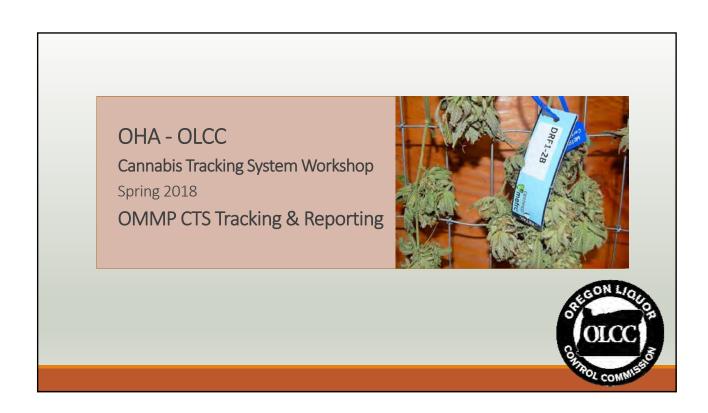
GSA Information

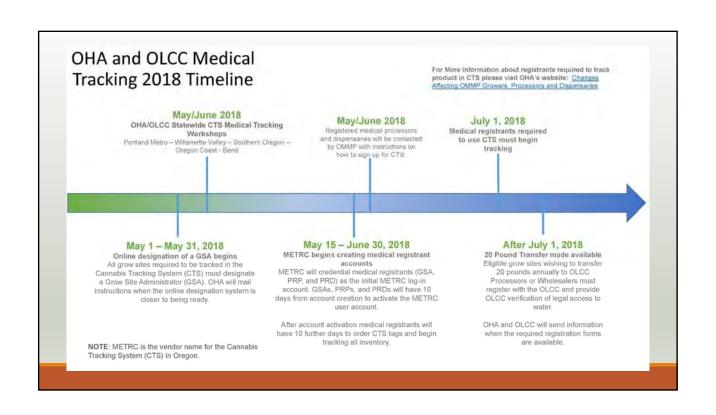
- Contact OMMP for questions related to Grow Site Administrators, reporting requirements and program related issues at 971-673-1234 (M-F noon to 4:00 p.m.) or mmg.online@state.or.us.
- healthoregon.org/ommp

OHA Rules

• healthoregon.org/ommprules







Common Acronyms Used



- CTS: "cannabis tracking system" also referred to by company name Metrc
- ODA: Oregon Department of Agriculture
- OHA: Oregon Health Authority
- OLCC: Oregon Liquor Control Commission
- OMMP: Oregon Medical Marijuana Program, managed by OHA

Common Acronyms Used



- OMMOS: Oregon Medical Marijuana Online System, reporting to OHA
- OWRD: Oregon Water Resources Department
- RFID: Radio Frequency Identifier <u>UID tags</u> are embedded with RFID chips and are sometimes referred to as "RFID tags"
- UID: Unique Identifier used to refer both to the "UID number" recorded in CTS and an associated physical "UID tag" bearing that number

Overview

- Overview
- Setup requirements in CTS
- Ongoing tracking and reporting
- Recording transfers
- Grow site transfers to OLCC licensees
- Interaction with OLCC
- Additional Resources
- Q&A



Overview - CTS Reporting for Grow Sites



- CTS is a "seed-to-sale" tracking system
 - Functions primarily as a "closed loop"
 - All marijuana items on site must be in CTS
 - Any time marijuana is entered by weight, an Oregon Dept. of Agriculture-licensed scale must be used
 - All marijuana arriving or leaving is added to inventory by recording a "transport manifest"
 - Transport manifests move marijuana items into and out of tracked inventory in CTS

Overview - CTS Reporting for Grow Sites



- A medical site that reports into CTS is **not** an OLCC licensee
 - Medical sites may not transfer to licensees except:
 - A grow site may transfer 20 lbs annually to a Wholesaler or Processor
 - Marijuana submitted for testing is transferred to a lab through CTS

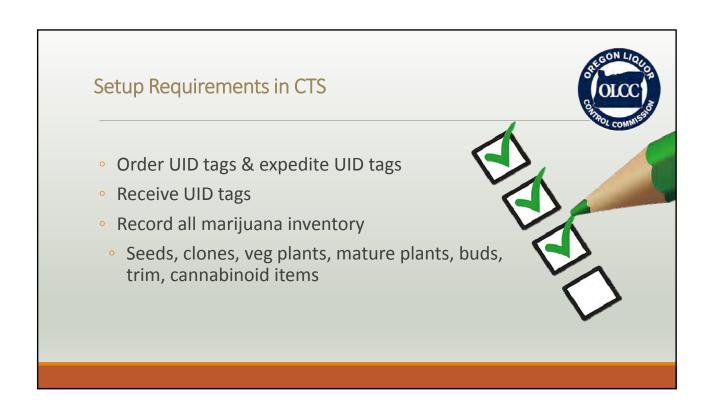
Overview – CTS Reporting for Other Sites

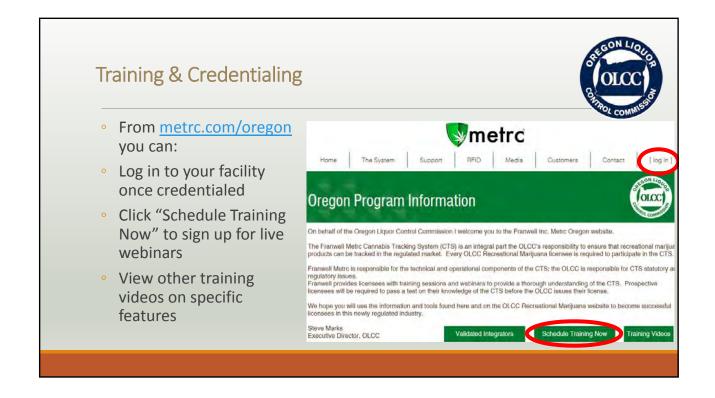


- <u>Processing</u> sites and <u>Dispensaries</u> will also use CTS
- These sites only require package tags, **not** plant tags
- All incoming or outgoing inventory is recorded at the time it is received or when it leaves



Setup Requirements in CTS Sign up for training at metrc.com/oregon Credential into CTS Add "employees" and permissions Set up strains Set up items





"Employees" and Permissions in CTS

- Add workers who will be at your site in the "Employees" section
- Add permissions
 - You can give any user permission to view and/or enter data in CTS
 - Only enter information using your own login
 - Although the GSA, PRP, or PRMG is responsible, any user can be granted permission to enter data
- Data can be entered remotely

Setup Strains & Items



- Strains & item types must be set up before adding plants & packages,
- Strain & item lists can be edited later
- Select from these values when you record inventory
- Setting up strains and item types does not track inventory these are only values to select later

Order & Receive UID Tags

- Tags are embedded and printed with the site information and do not expire, but cannot be re-used
- A site must have an adequate supply of UID tags at all times
- Order enough tags to record current inventory and near future inventory
- UID tags can only be ordered through CTS
- You can always order more through the same CTS interface
- Plant tags cost 45 cents each, package tags cost 25 cents each
- Contact Metrc support (1-877-566-6506) to expedite a tag order

Record all Marijuana Inventory – On Site = Tracked

- Sites have 10 days from the date of credentialing into CTS to get all inventory recorded
- All marijuana items are subject to tracking, including (as applicable):
 - Immature plants under 24 inches
 - Immature plants over 24 inches
 - Mature (flowering) plants
 - Harvested and drying/curing marijuana
 - Usable marijuana (trimmed or untrimmed flower and shake/trim)

Record all Marijuana Inventory – On Site = Tracked



- Marijuana seeds
- Cannabinoid items

CTS will not stop a user from recording more marijuana than they are allowed to possess

Record all Marijuana Inventory – Specific Items



- Immature plants under 24 inches are tracked in a "plant batch" (no UID required)
- Any plant over 24 inches must be assigned a plant tag at or before the time the plant reaches 24 inches in height or begins to flower (whichever comes first)
- Vegetative plants are assigned a UID plant tag no later than when they reach 24 inches in height – once assigned a UID, plants are tracked individually

Record all Marijuana Inventory – Specific Items

- Mature plants are created by changing the growing state of a vegetative plant to "mature" – therefore a mature plant will always have a plant tag
- Any usable marijuana on site (including trim, or untrimmed flower), or cannabinoid items are entered as packages by weight using an "incoming external manifest"

Sites have 10 days from the date of credentialing into CTS to get all inventory recorded

Record all Marijuana Inventory – Affixing UID Tags



- Plant tags must be physically affixed to the plant
 - If tagging a smaller plant, the tag may be inserted into the dirt with the plant
 - If tagging a larger plant, the tag should be looped around a branch to prevent removal

Record all Marijuana Inventory – Affixing UID Tags



- Package tags must be physically affixed to the outermost receptacle holding a quantity of identical marijuana items
 - All marijuana items under a single tag must be identical
 - Marijuana that is part of a harvest <u>must be assigned package</u> tags within 45 days of the harvest
 - A "package" in CTS does not necessarily mean marijuana is packaged for sale, but means it has an identified quantity in a physical receptacle that matches what is recorded in CTS for the marijuana associated with that tag number



Ongoing Reporting in CTS

- Daily reconciliation
- Transfers
- Between licensees/other sites
- To or from outside sources (external transfers)
- Laboratory testing



Daily Reconciliation

- "Daily reconciliation" refers to the requirement to record all inventory activities in CTS before the beginning of the next day of operations
- Unlike OMMOS, there is no "no activity to report" option in CTS

 if there were no changes, there is no requirement to change existing information
- Information may be entered on-site or remotely CTS is webbased and can be accessed from any computer or mobile device with an Internet connection
- Although the GSA, PRP, or PRD is the person responsible for all inventory tracking, <u>a user may add additional users into the</u> <u>tracking system and give them access to record changes</u>

Daily Reconciliation



- Users do not need to enter information into CTS as it occurs, but must report changes daily
- Manual worksheets will be available at marijuana.oregon.gov to assist in collecting information to report into the system daily, but worksheets do not replace the requirement to track in CTS

Daily Reconciliation



- If a user loses access to CTS for any reason, they must keep detailed record of tracking activities that occurred during the outage, including time access was lost and restored – tracking information must be entered immediately when access is restored
- Transfers cannot be recorded during any temporary loss of access to CTS

Transfers



- Transfers must be recorded in CTS before sending or receiving marijuana
 - For transfers to or from patients or sites that are not required to be in CTS
 - The same limits regarding packing plants and adding only whole packages apply

Transfers

- OLCC STREET
- The external transfer option is used to identify the source or destination of any transfer that does not include two sites required to be in CTS
- An **external transfer** may reflect
- Receipt of marijuana items at a grow site from a patient (incoming transfer)
- Transferring usable marijuana to a patient (outgoing transfer)
- Creating initial "start up" inventory

Transfers



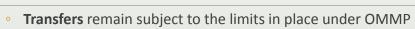
- Only whole packages may be transferred
 - To send smaller amounts, the item must be repackaged into smaller units with new UID numbers and tags first
 - Sending or receiving a package in CTS that does not match the physical unit creates tracking/reporting violations

Transfers



- Plants must be added to a package by using the "pack plants" option
- A manifest may have multiple packages
- Multiple manifests may be recorded to the same destination

Transfers



- Transfers of patient marijuana from a grow site still require patient authorization
- It is the responsibility of the administrator, not CTS, to ensure compliance



Lab Testing

- Lab testing requirements remain the same, but tracking of tests occurs in CTS
- If testing is required, a batch must be presented for sampling by a lab
- The site administrator must:
 - Create a new sample package for the sample taken
 - Manifest the sample packages to the lab
 - Segregate the batch until the test is performed
- Test information automatically shows up on the associated package(s)



20 Pound Transfers

- Rule overview
- Registration requirements
 - Application to OLCC
 - Water rights
 - Patient releases
- Limits
- Approval and access in CTS



Rule Overview



OAR 845-025-2130

Medical grow sites **that are tracked in CTS** and meet rule criteria will be able to transfer limited quantities of usable marijuana annually to OLCC licensed processors and wholesalers. A grow site will not be eligible for transferring usable marijuana into the OLCC system until the grow site has an account in CTS beginning in the Spring of 2018.

Rule Overview



OAR 845-025-2130

Grow sites will need to be **approved by the OLCC** and provide verification of **legal access to water** prior to any transfers. All transfers will come through CTS and be accompanied with a valid transfer manifest.

Registration Requirements – Applying for the 20 Pound Transfer

- A grow site may apply for the privilege to transfer 20 pounds of usable marijuana to an OLCC-licensed recreational marijuana Processor or Wholesaler by submitting a registration form to the OLCC
- Growers will need to confirm:
- Legal access to water for commercial purposes
- Patients have agreed to allow the transfer of medical marijuana to OLCC processors and wholesalers

Registration Requirements – Applying for the 20 Pound Transfer



- OLCC will review the registration form and confirm the information
- The privilege is not granted until approved by OLCC

Registration Requirements – Legal Access to Water

All marijuana that is sold for commercial purposes needs to be grown using a legal source of water.

Can be demonstrated by:

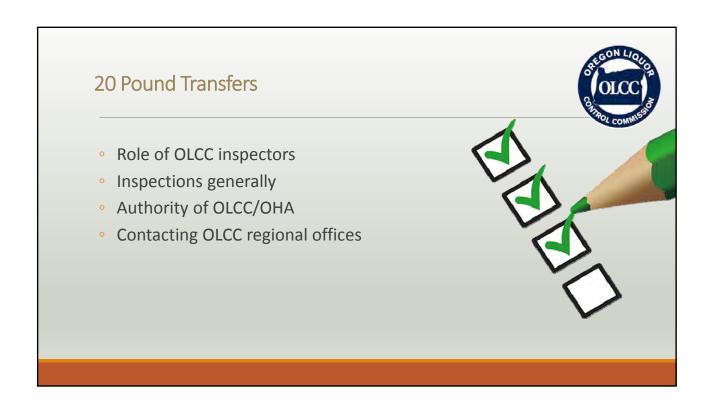
- Holding a water right permit or certificate for the proposed premises
- Demonstrating that water will be provided by a public or private supplier
- Providing completed "Exempt Water Form" from the Oregon Water Resources Department that the water to be used for production does not require a water right

A grow site that is not transferring marijuana to a recreational marijuana wholesaler or processor is not required to submit this information to OLCC

Applying for the 20 Pound Transfer

- OLCC TO COMMENT
- Transfers are limited to 20 pounds per grow site, not per grower
- No grow site may transfer more than 20 pounds in any 12-month period
- Transfers are recorded by creating a transport manifest in CTS to the licensed facility that will receive the marijuana
- Marijuana transferred to an OLCC-licensed Processor or Wholesaler is subject to the testing requirements for usable marijuana under OAR 333-007-0320
- The registration form will be available at marijuana.oregon.gov





Role of OLCC Inspectors

- OLCC inspectors may perform inspections of grow sites, processing sites, and dispensaries subject to tracking in CTS based on tracking information
- Inspectors may contact the person responsible for the site to verify information and perform walkthroughs of the site to verify tracking information and proper use of UID tags
- OHA remains the agency responsible for enforcement of any violations and may take action based on OLCC documentation – Inspectors do not write direct citations but may provide instruction on certain requirements

Role of OLCC Inspectors

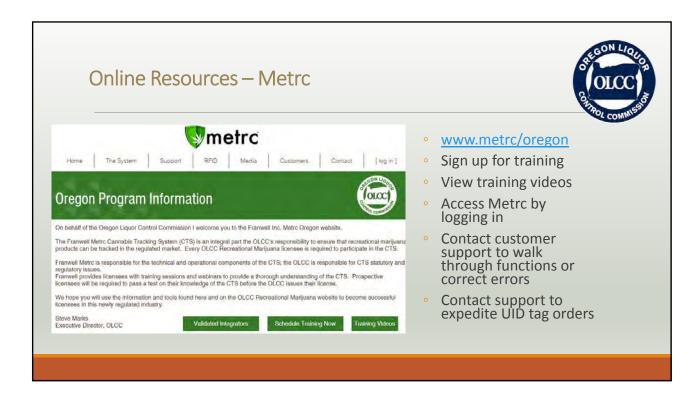
- OLCC inspectors will identify themselves as state representatives, and will present state identification
- OLCC regional offices can be contacted to verify information
- A list of regional offices and contact information can be found at http://www.oregon.gov/olcc/

° [Bend Regional Office	(541) 388-6292
° F	Portland Regional Office	(503) 872-5000
•	Medford Regional Office	(541) 776-6191
• E	Eugene Regional Office	(541) 686-7739
0 5	Salem Regional Office	(503) 378-4871









Online Resources – Oregon Dept. of Agriculture



- Weights & Measures Division
 - www.oregon.gov/ODA/MSD
- Find out about licensing a commercial scale for marijuana a licensed scale is required for entering weight information into CTS
- Pesticide Program
- http://www.oregon.gov/ODA/programs/Pesticides/Pages/Cann abisPesticides.aspx
- View guidance on pesticide use and marijuana in Oregon

Online Resources - OLCC



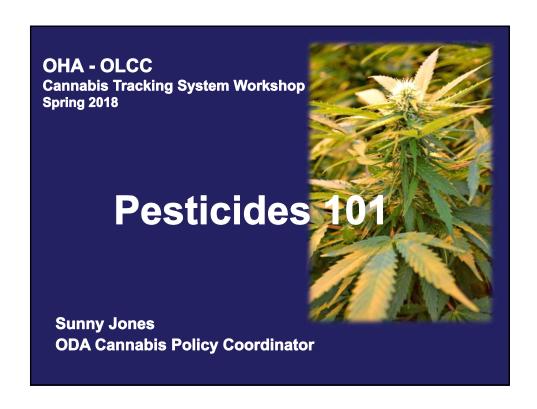
- OLCC marijuana hotline
 - 503-872-6366
 - General questions regarding compliance with OLCC rules and regulations including compliance and licensing
- OLCC CTS email
 - marijuana.cts@oregon.gov
 - Questions about compliance with the CTS tracking requirements

Online Resources - OLCC



- Metrc Support
 - 1-877-566-6506
 - Questions about specific features and performing specific actions in CTS –
 - <u>Complete a Metrc training before contacting support!</u> Sign up for training at www.metrc.com/oregon

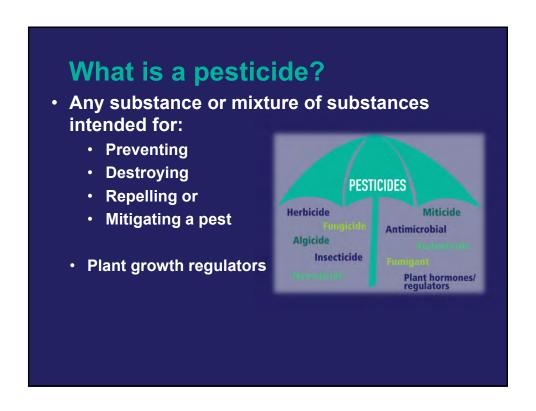


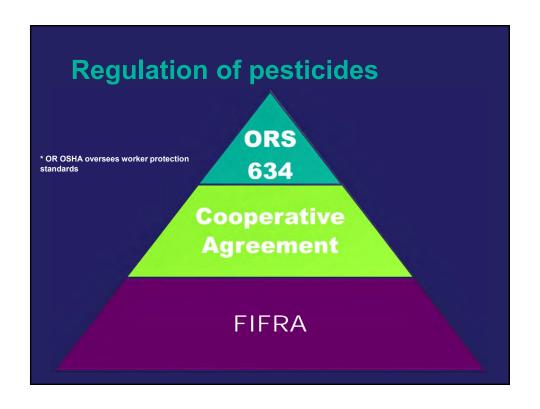


ODA –like any other ag crop

- Pesticides
- Food safety
- Weights and measures
- Ag water quality
- Industrial hemp







EPA – data requirements

- Depend on proposed use(s)
 - · Type of chemical: antimicrobial, biopesticide, conventional
 - Use: food involves more data than non-food
- Hundreds of studies may be required
 - Product chemistry
 - Toxicology and health effects
 - Applicator and post-application exposure
 - Residue chemistry
 - Environmental fate
 - Ecotoxity
 - Efficacy



The label is the law

- EPA registration number Hazard statements
- Establishment number
 Environmental hazards
- Directions for use
- Physical or chemical hazards
- Signal word
- Storage and disposal

First aid

- Warranty statement
- Ingredients statement
- Net contents
- Precautionary statements

Labeling requirements are product specific and are informed by the data.

25b - A bit of an exception

- "Minimum risk pesticides" pose little to no risk to human health or the environment
- E.g. castor oil, citronella oil, clove oil, garlic oil, peppermint oil, rosemary, thyme oil
- · Inert ingredients considered low risk
- List all ingredients on label
- Cannot claim to control human health pests
- Cannot contain false or misleading statements



FIRST AID - Agricultural Use
If in eyes: Hold eyes open and rinse slowly and gently with water
for 15-20 minutes. Remove contact lenses, if present, after the
first 5 minutes, then continue rinsing eye. Call a poison control
center or doctor for treatment advice.

If on skin: Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible, Call a poison control center or doctor for further treatment advice.

Have the product label with you when calling a poison control center or doctor.

Hot Line No.:1-800-255-3924 for additional information

PRECAUTIONARY STATEMENTS - Agricultural Use HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION: Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with eyes or clothing. Avoid breathing spray mist. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

- Applicators and other handlers must wea

 Long-sleeved shirt and long pants

 Waterproof gloves

 Shoes plus socks

Shoes plus socks
 Mixerfloaders and applicators must wear a dust/mist filtering
 respirator meeting NIOSH standards of at least N-95, R-95, or P-95,
 Repealed exposure to high concentrations of microbial proteins can
 cause allergic sensitization. Follow manufacturer's instructions for
 cleaning and maintaining PPE. If no instructions are available,
 use detergent and hot water for washables. Keep and wash PPE
 separately from other laundry.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides, the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

- Users should:
 Remove clothing/PPE immediately if pesticides get inside. Then wash thoroughly and put on clean clothing.
 Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS- Agricultural Use
Do not apply directly to water or to areas where surface water is
present, or to interfidal areas below the mean high water mark. Do
not contaminate water when disposing of equipment washwaters or
rinsate. Do not apply when weather conditions favor drift or runoff
from treated areas. from treated areas

GENERAL INFORMATION

GENERAL INFORMATION
Double Nickel 55 is a broad-spectrum preventative biofungicide for control or suppression of fungal and bacterial plant diseases. The active ingredient of Double Nickel 55 is a naturally occurring strain (0747) of the beneficial thizobacterium Bacillus amylologuerlaciens, which colonizes roots, leaves, and other plant surfaces. DT4T rapidly colonizes plant root hairs, leaves, and other surfaces, preventing establishment of disease-causing fungi and bacteria.

Double Nickel 55 can be applied alone or in combination and/or rotation with chemical fungicides as a tool for integrated disease management in agricultural crops, omamental and nursery plants, and turfgrass, in accordance with the most restrictive of those label limitations and precautions. Double Nickel 55 offers a valuable tool for management of resistance to chemical fungicides through its multiple and unique modes of action.

Double Nickel 55 can be applied up to and including the day of

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For any requirements specific to your State or Tribb, consult the State or Tribbal Agency responsible for pesticide regulation. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR Part 170. This standard the Worker Protection Standard 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water is: cover-alls, waterproof gloves, shoes plus socks.

Exception: If the product is soil injected or soil incorporated, the

Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated

NON-AGRICULTURAL USE REQUIREMENTS

NON-AGRICULTURAL USE REQUIREMENTS
The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

MIXING AND HANDLING INSTRUCTIONS

Mix the required amount of Double Nickel 55 in cool water with sufficient agitation to maintain a uniform suspension in the spray or mixing tank. Tank should be cleaned prior to use. Do not use highly alkaline or highly acidic water to mix sprays. Use a buffering agent if necessary to maintain neutrality (pH 6 to 8) of water in the tank. Maintain agitation during application. Apply immediately after mixing; do not allow spray mix to stand overnight.

CROPS	DISEASES/PATHOGENS (See footnotes for additional information)
Vegetables and melo	ns (continued)
Bulb vegetables such as onions, garfic, shallots, and others (including those grown for seed production).	Botryfis spp. (neck rot, leaf blight) Purple blotch (Allemaria spp.) Downy midsew (Peronospon spp.) Powdery mildew (Erisyphe spp.) Rust (Puzonia pori)* White rot (Sclerolium cepivorum)* "Damping off," seedling blights, and root or crown diseases caused by Pythium, Rhizoctonia, Fusarium, Phylophthora, or Verticillium" spp. (see instructions below for "Soil application").
Cucurbits such as cucum- bers, squash (all types), cantaloupes, muskmelons, water- melons. and other melons (including those grown for seed production).	Powdery mildew (Erisyphe and Sphaerotheca spp.) Downy mildew (Pseudoperonospora spp.) Gurmny stem blight (Didymella bryoniae and Phoma cucurbitacearum) stem instructions below for "Soil application" against the following diseases: Vine decline (Monosporascus cannonballus)** Charcoal rot (Macrophomina phaseoli)** "Damping off," seedling blights, and root or crown diseases caused by Pythium, Rhizoctonia, Fusanium, Phylophthora, or Verbicillium" spp.
Fruiting vegetables such as formatoes, peppers, eggplant, tomatillo, okra, and others (including those grown for seed production).	Bacterial spot (Xanthomonas spp.)** Bacterial spock (Pseudomonas syringae pv. tomato)** Gray mold (Botytsic cinera) Powdory mildew** (Leveillula, Oidiopsis, Erisyphe, and Sphaerotheca spp.) Early blight (Alternaria solani)* Late blight (Phytophthora infestans)* See instructions below for "Soil application" against the following diseases: "Damping off," seedling blights, and root or crown diseases caused by Pythium, Rhizoctonia, Fusarium, Phytophthora, or Verticillium" spp. Southem blight (Selerolium rofisia") and"

5

APPLICATION METHODS

Ground: Double Nickel 55 can be applied in most commonly-used Ground: Double Nickel 55 can be applied in most commonly-used ground application equipment, such as tractor-mounted boom, airblast, high clearance, hose-end, backpack, and other pressurized sprayers; hose-end or hand-held sprayers; foggers or mist blowers; water wheel and other drench applicators; and shank or other soil injection method.

Aerial: Double Nickel 55 can be applied by fixed or rotary winged aircraft in a minimum of 3 gallons of water per acre. Standard precautions should be taken to minimize spray drift.

Chemigation: Double Nickel 55 can be applied through drip (trickle) and sprinkler type irrigation equipment. Refer to the section entitled "Chemigation Instructions" for detailed instructions.

Agricultural crops

CROPS	DISEASES/PATHOGENS (See footnotes for additional information)
Vegetables and melo	ns
Brassica vegetables such as broccoli, cabbage, cauliflower, Brussels sprouts, kohlrabi, and other cole crops (including those grown for seed production).	Pin rot complex (Alternaria/Xanthomonas)* Leal spots (Alternaria spp., Xanthomonas spp.) Downy midew (Peronospora spp.) Powdery midew (Ensyphe polygon) 'Damping off, seedling blights, and root or crown diseases caused by Pythium, Rhizoctonia, Fisanim, Phylophthora, or Verticillium' spp. (see instructions below for "Soal application").

(continued)

Leafy vegetables such as head and leaf lettuce, celery, spinach, radicchio, arugula, watercress, and others (including leaf) Brassica wegetables such as mustard and collard greens, kale, bok. choi, and related crops), including those grown for seed production.	Downy mildew (Brenia lactucae, Peronospora spp.)* Powdery mildew (Golorinomyces (Erysphe) achoracearum* Bacterial blights Head and leaf drop (Sclerotinia spp.)* Pink rot (Sclerotinia sclerotiorum)* Leaf spots (Gercospora spp.) See instructions below for "Soil application" against the following diseases: **Damping off, seedling blights, and root or crown diseases caused by Pythium, Rhzocotonia, Fusanium, Phytopthhora, or Verticallium* spp. Bottom rot (Rhzocotonia solani)
Legume vegetables succulent and dried beans and peas such as green, snap, shell, and Lima beans, garbanzo beans, garbanzo beans, peas, soybeans, dry beans, peas, split peas, lentils, and other legumes, including those grown for seed production.	White mold (Solerolinia aderoliorum)* Gray mold (Bothylia cinerna) Powdery mildew (Morcsphaera diffusa) Rusts*, including Uromyoes appendiculatus, Puocinia spp., and Asian soybean rust (Phayospora pachyrhizi) **Damping oli,** seedling blights, and root or crown diseases caused by Pythium, Rhizoctonia, Fiusanium, Phylophthora, or Verticillium* spp. (see instructions below for "Soil application"),

(continued)

ssion only; for improved control mix or rotate with chemical fungicide approved for such use. **NOT FOR USE IN CALIFORNIA : Tank mix or rotate with

Footnotes:

"Suppression only, for improved control mix or rotate with chemical fungicide approved for such use. "'NOT FOR USE IN CALIFORNIA + Tank mix or rotate with copper-based fungicides at label rates for improved control.

2Apply at or immediately following planting (but before plant emergence) as a banded seedline treatment 4 to 6 inches wide. Make second application at thinning or cultivation in sufficient water and multiple nozzles to ensure thorough coverage of lower leaves and surrounding soil surface. Incorporation with light imigation after application may improve disease control. Repeat at 10-14 day intervals if conditions promoting disease persist.

3For greasy spot suppression, apply at lists new foliat flush and repeat with each new flush. Tank mix with spray oil or copper based fungicide at labeled rates.

3For greasy spot suppression, apply at lists new foliating flush and repeat at petal fall and when fruit are ½ and rinch in diameter.

3For greasy spot suppression, apply at lists rever foliating flush and repeat at petal fall and when fruit are ½ and rinch in diameter.

3For greasy spot suppression, apply at lists reversion for the spot of the

re-pply at bouncean and repeat on 14-21 day interval as needed through harvest 29 Apply at first appearance of leaves and repeat at 7-21 day intervals as needed through harvest 20 Apply at first appearance of leaves and repeat at 7-21 day intervals as needed, in sufficient water to obtain thorough coverage of foliage. Tank mix with spray oil or other registered fungicides for improved control. 21 Mix 0.5-1 b Double Nickel 55 per 100 gallons of water and apply in minimum of 20 gallons per acre from emergence to training, 50 gallons per acre from training to wire, and 100 gallons per acre from wire fouch through harvest. 22 For treatment of horseradish or strawberry roots immediately before transplanting: immerse bare roots (individually or in bunches) for 10 seconds in a suspension of 2-4 ounces Double Nickel 55 per gallon of water.

6

Foliar application: For control of diseases on foliage, flowers, fruit, or other above-ground parts of plants: Mix Double Nickel 55 in water and apply as a spray at a rate of 0.25 to 3 pounds per acre in sufficient water to achieve thorough coverage of the crop canopy with minimal runoff. Begin applications at crop emergence, transplanting, or when conditions are conducive to development of disease. Repeat application every 7 to 10 days, or as needed, for as long as conditions favor disease development. Lower rates (0.25 to 1 pound per acre) may be applied under light disease pressure, to smaller (e.g. newly-emerged) plants, or when Double Nickel 55 is used in a tank mix with other fungicides whose labels allow such use. Under moderate to severe disease pressure, or when environmental conditions and plant stage are conducive to trapid disease development, use higher label rates (1 to 3 pounds per acre), apply more frequently (every 3 to 7 days), and mix or rotate Double Nickel 55 with other fungicides for improved performance.

such use. Under moderate to severe disease pressure, or when environmental conditions and plant stage are conducive to rapid disease development, use higher label rates (1 to 3 pounds per acre), apply more frequently (every 3 to 7 days), and mix or rotate Double Nickel 55 with other fungicides for improved performance.

Soil application: For control of soilborne diseases infecting seeds, seedlings, roots, crown, stems, or other plant parts below ground or in contact with soil: Apply Double Nickel 55 at 0.125 to 1 pound per acre. Mix the required amount in sufficient water to apply by one of the following methods:

- Soil drench applied to transplants in flats or pots in the greenhouse or nursery any time prior to transplanting (see additional drench instructions under "Nurseries, greenhouses, shade houses, and omamental plants" below).
- Soil drench at transplanting, using a "water wheel" injector, spray nozzles/hoses, or other method to drench each root ball and/or planting hole.
- Soil or seedline drench, or banded spray (in-furrow) at planting. See the section on "Banded (in-furrow) application" below for additional instructions.

Follow-up (post-planting) preventative applications can be made every 2-4 weeks by one or more of the following methods, if needed:

- Drip (trickle) or any type of sprinkler irrigation, any time after planting or transplanting. See Chemigation Instructions for additional information.
- Spray directly onto the soil surface and/or lower plant parts. If targeting root disease, follow immediately with sufficient overhead sprinkler irrigation to move Double Nickel 55 to the root zone.
- Injection directly into the rooting zone using shanks or similar equipment.

equipment. Lower rates (0.125 to 0.5 pounds per acre) may be applied under light disease pressure, to smaller plants, or when Double Nickel 55 is used in a tank mix with other fungicides whose labels allow such use. Under moderate to severe disease pressure, or when environmental conditions and plant stage are conducive to rapid disease development, use higher label rates (0.5 to 1 pound per acre), apply more frequently (every 2 weeks), and mix or rotate Double Nickel 55 with other fungicides for improved performance.

Banded (in-furrow) application: Use the table below to determine the correct application rate of Double Nickel 55 per 1,000 row feet, based on row spacing and desired rate per acre. Mix the required amount of Double Nickel 55 in water and apply as banded spray (4* to 6* wide) or seedline drench centred over the planting furrow. Apply directly over seeds in the furrow just before they are covered with soil. The volume of water required per acre or per 1,000 row feet will depend on the application equipment used. Consult your local cooperative extension service if you need assistance calibrating band spraying equipment.

Rates for banded (in-furrow) application: Find desired application rate in the left column. Read across that line to the correct row spacing indicated at the top to find the number of ounces (dry) per 1,000 row feet that will provide the desired application rate per acre. To convert to level teaspoons, multiply the number of ounces by 8.2. For level tablespoons, multiply the number of ounces by 2.75.

Rate/acre	Space between rows (inches)														
(pounds)	12	14	16	18	20	22	24	26	28	30	32	34	36	38	40
0.25	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.3	0.3	0.3	0.3
0.5	0.2	0.2	0.2	0.3	0.3	0.3	0.4	0.4	0.4	0.5	0.5	0.5	0.6	0.6	0.6
0.75	0.3	0.3	0.4	0.4	0.5	0.5	0.6	0.6	0.6	0.7	0.7	0.8	0.8	0.9	0.9
1.0	0.4	0.4	0.5	0.6	0.6	0.7	0.7	0.8	0.9	0.9	1.0	1.0	1.1	1.2	1.2
1.25	0.5	0.5	0.6	0.7	0.8	8.0	0.9	1.0	1.1	1.1	1.2	1.3	1.4	1,5	1.5
1.5	0.6	0.6	0.7	0.8	0.9	1.0	1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.7	1.8
1.75	0.6	0.7	0.9	1.0	1.1	1.2	1.3	1.4	1.5	1.6	1.7	1.8	1.9	2.0	2.1
2.0	0.7	0.9	1.0	1.1	1.2	1.3	1.5	1.6	1.7	1.8	2.0	2.1	22	2.3	2.4
2.25	0.8	1.0	1.1	1.2	1.4	1.5	1.7	1.8	1.9	2.1	2.2	2.3	2.5	2.6	2.8
2.5	0.9	1.1	1.2	1.4	1.5	1.7	1.8	2.0	2.1	2.3	2.4	2.6	2.8	2.9	3.1
2,75	1,0	1,2	1.3	1.5	1.7	1.9	2.0	2.2	2.4	2.5	2.7	2.9	3.0	3.2	3.4
3.0	1.1	1.3	1.5	1.7	1.8	2.0	2.2	2.4	2.6	2.8	2.9	3.1	3.3	3.5	3.7

Nurseries, greenhouses, shadehouses, and ornamental plants Spray application: Mix 0.25 to 3 pounds of Double Nickel 55 per 100 gallons of water and apply as a foliar spray of sufficient volume to wet the entire plant with minimal runoff. Begin preventative applications at plant emergence and repeat every 3-28 days as needed (every 3-7 days if disease pressure is high or environmental conditions are highly favorable to disease outbreak, 10-28 days under low pressure or less conducive conditions).

Drench application: Mix 0.125 to 2 pounds of Double Nickel 55 per 100 gallons of water and apply as a drench or coarse spray to soil or ofther growing media in pots, flats, plugs, trays, or planting beds, for control or suppression of soilborne diseases of seedlings, cutlings, bedding plants, and transplants (including vegetables and other transplanted food crops). Make first application at or immediately before seeding, sticking, germination, or transplanting.

Repeat applications every 14-28 days as needed. Transplants can be treated immediately before transplanting into field soils to protect against damping-off and other diseases that reduce plant establishment.

Cutting or root dip: Dip basal end of cuttings or bare roots (individually or in bunches) in a suspension of 1 to 2 pounds of Double Nickel 55 per gallon of water. Immerse for 5-10 seconds immediately before planting.

Chemigation: Mix 0.125 to 2 pounds of Double Nickel 55 per 100 gallons of water and apply via drip, handheld, or sprinkler irrigation systems. Refer to "Chemigation Instructions" for more details.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. Pesticide Storage: Store in a dry area inaccessible to children Store in original containers only. Keep container closed when not in use. Pesticide Disposal: Wastes resulting from the use of this prod-

uct may be disposed of onsite or at an approved waste disposal facility. Container Used of providing the use of us

CHEMIGATION INSTRUCTIONS General information:

Chemica from this Not into seer a information:
Apply this product only through drip (rickle) ingation (including micro-imigation through spaghetti tubes or individual tubes) or sprinkler imigation (including impact or microsprinklers, overhead boom, solid set, lateral move, end tow, side-roll, center pivot, or hand move, including mist-type systems); or with hand-held calibrated irrigation equipment (such as a hand-held wand with injector). Do not apply this product through any other type of irrigation system. Crop injury or lack of effectiveness can result from non-uniform distribution of treated water. If you have questions about calibration, contact State Extension Service specialists, equipment manufacturers or other experts. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

- 6. Systems must use a metering pump such as a positive displacement injection pump (i.e., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interiods.
 7. Ditute the product in water following the label mixing directions: It may be premixed in a supply tank with water, fertilizer, or other appropriate tank-mixed agricultural chemicals. Agitation is necessary. Apply to moderately most soils. Use volumes that thoroughly wet the soil but that do not cause significant runoff or excessive drip from pots. Application should be continuous in sufficient value for apply the recommended rate eventy to the entire treated area.

- Sprinkler chemigation:

 1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water
- The system must estimate a miscolar and secondary and source contains a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

 The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interfock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut
- down.

 4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.

 5. The impation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- where pesticide distribution is adversely affected.

 6. Systems must use a metering pump, such as a positive displacement injection pump (i.e., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system intertook.

 7. Dilute the product in water following the label mixing directions. It may be premixed in a supply tank with water, fertilizer or other appropriate tank-mixed agricultural chemicals. Agitation is necessary. Apply to moderately moist soils. Use volumes that thoroughly wet the soil but that do not cause significant runoff or excessive drip from pots. Application should be continuous in sufficient water to apply the recommended rate evently to the entire treated area.

 8. Do not apply when wind speed favors drift beyond the area intended for treatment.

ODA jurisdiction – ORS 634

- FIFRA compliance monitoring for EPA
 - Inspections
 - · Pesticide registration and use regulation
- Oregon Pesticide Control Act
 - · Sales, use, and distribution
 - Pesticide use licensing and recertification
 - · Pesticide registration
 - Routine compliance monitoring
 - Pesticide use investigations



Tolerances

- Amount of pesticides that may remain in or on foods in the US
- Established for each crop use of a pesticide after developing a risk assessment that considers:
 - Aggregate, non-occupational exposure (diet, drinking water, and from pesticides used in and around the home)
 - Cumulative effects from pesticides that have a common mechanism of toxicity)
 - Increased susceptibility to infants and children or other sensitive subpopulations?
 - Endocrine disruption effects?

"a reasonable certainty that no harm will result from aggregate exposure"

ODA guide list criteria

- Active ingredient is exempt from the requirement of a tolerance on all food crops
- Product label includes directions for use on:
 - Unspecified food crops (bedding plants, outdoor or enclosed facility), or
 - Unspecified home garden plants, or
 - Unspecified herbs (bedding plants, outdoor or enclosed facility), or
 - Unspecified plants or crops
- Did not fail a pyrolysis test if conducted

How does pesticide enforcement work?

- Routine inspections
 - Application record inspection, dealer record inspection, marketplace inspection, worker-protection standard
- Use follow-up investigations
 - Non-ag use follow-up, ag use follow-up
- Use observations
 - Non-ag use observation, ag use observation

Use follow-up investigation

- Develop evidence
 - Interviews
 - Application records
 - Product labels
 - Site visit photos
 - Samples
 - Equipment information
 - GPS records
 - · Weather data
- Report



Examples of some failed tests

Active Ingredient	Range found PPM	OHA Action Level in PPM
Abamectin	0.76 - 0.84	0.5
Etoxazole	0.22 - 2.97	0.2
Malathion	1.71 – 7.94	0.2
Myclobutanil	0.30 - 60.46	0.2
Piperonyl butoxide	3.61 – 16.24	2
Pyrethrins	6.31 – 16.31	1
Spinosad	0.21 - 42.06	0.2

MJ compliance assistance program (MCAP)

- Temporary program to assist cannabis growers learn how to comply with pesticide law
- Consent agreement with grower
- ODA violation does not affect grower's OHA or OLCC license status
- Violation record with ODA
- Grower or representative passes ODA license test

MJ compliance assistance program (MCAP)

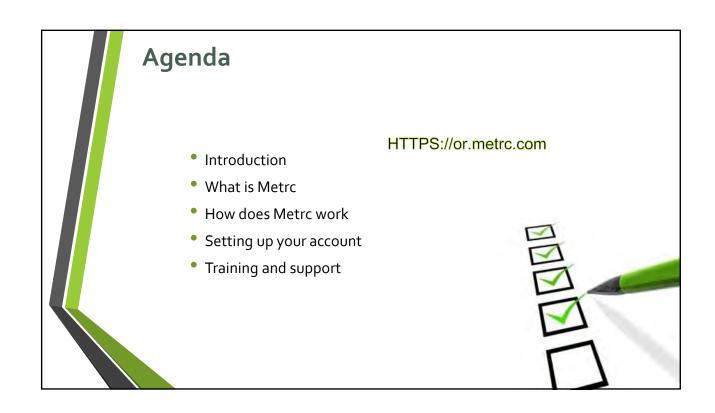
- Grower provides list of products used
- Grower provides list of mj inventory either growing or in possession
- Grower agrees to a site visit from ODA
- Grower shows WPS video to employees

ODA email listserv

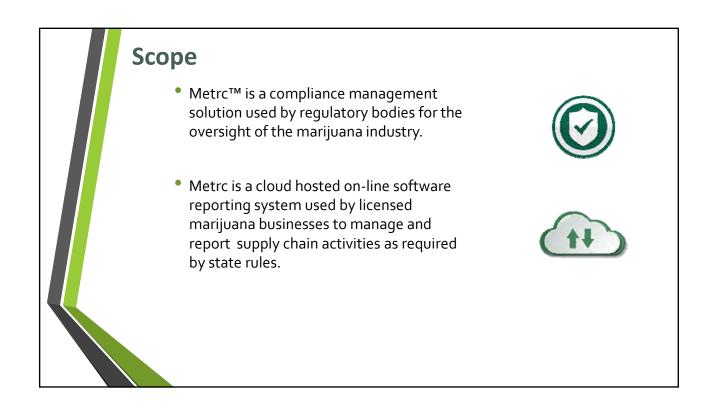
- oda.fyi/subscribe
- Additions and removals from guide list
- Adulterated products
 - · Guardian abamectin
 - Mega Wash pyrethrins
 - Olivia's Cloning Gel indole-3-butyric acid
- Other ODA cannabis specific information

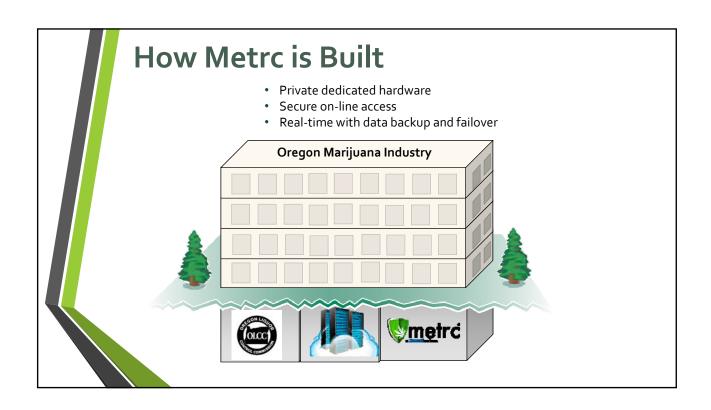


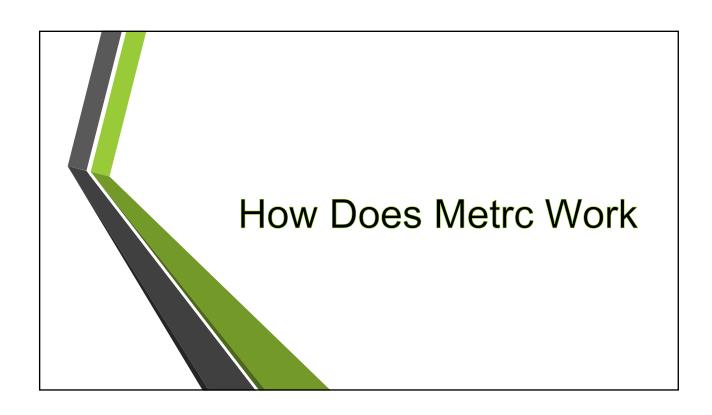


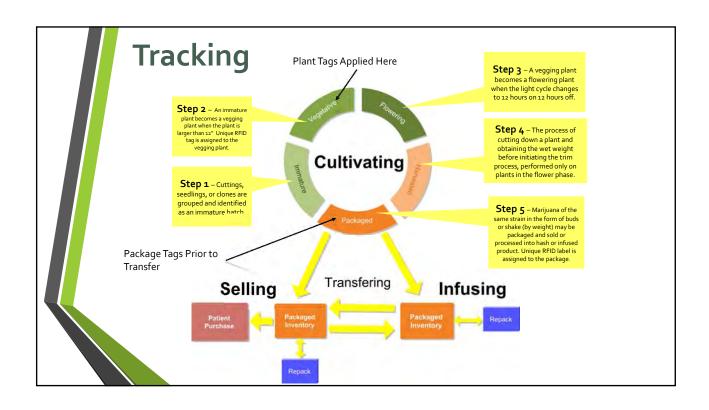


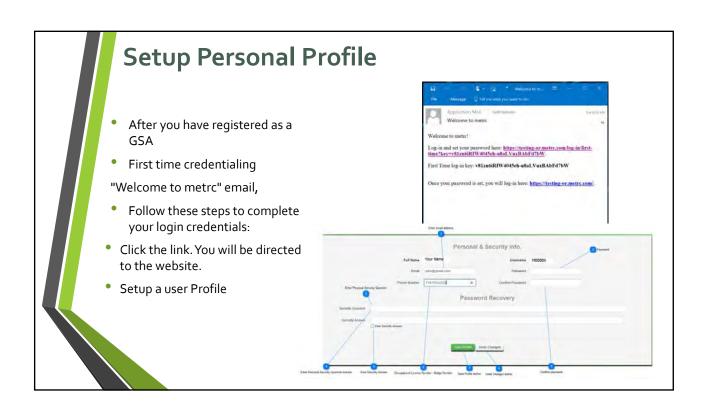


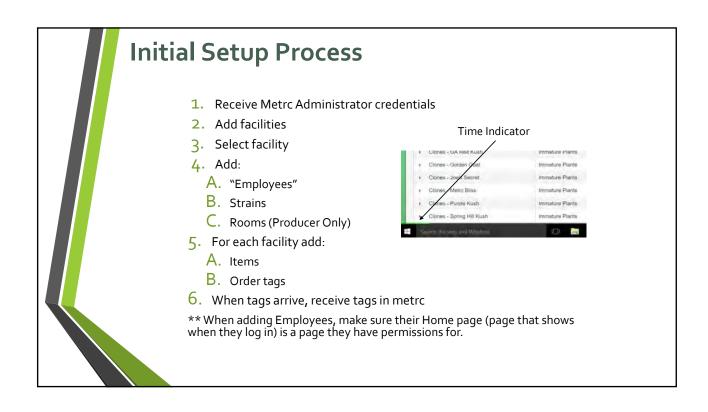


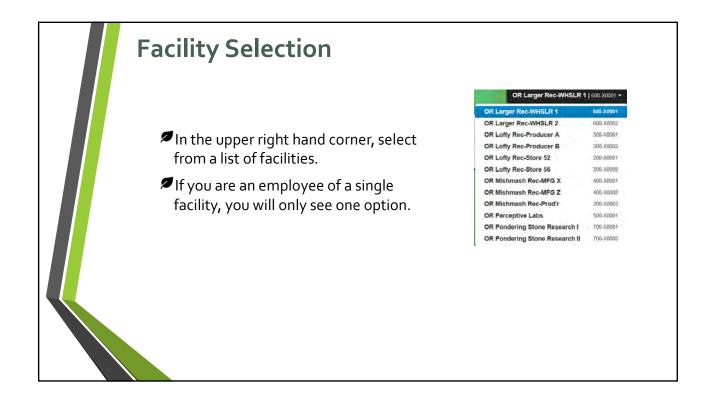


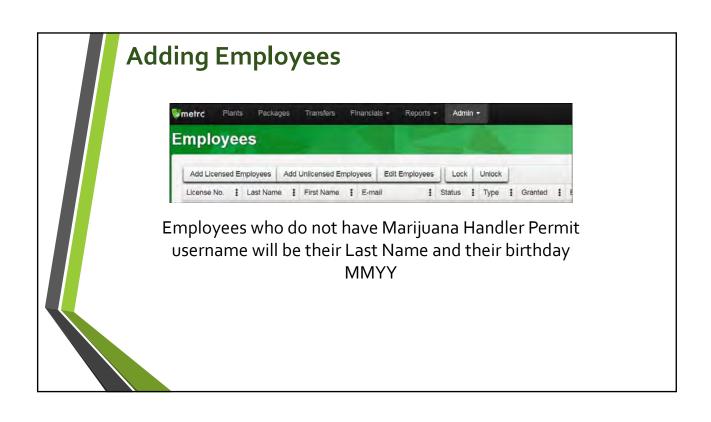














Setup Product Profile

Items

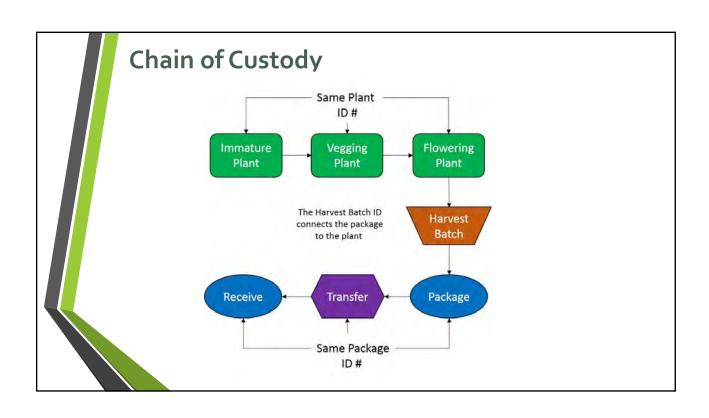
- Item names are used to identify what type of item is packed into a package.
- Category
- Type of product
- Quantity
- Unit of measure
- Used for traceability and recalls if necessary.

Categories

- Buds (by strain)
- Capsule
- Capsule (each)
- Combined Category
- Combined Category (each)
- Concentrate
- Concentrate (each)
- Extracts
- Extracts (Each)
- Immature Plants
- Seeds (each)
- Seeds (weight)

- Shake/Trim (no strain)
- Shake/Trim (by strain)
- Suppository
- Suppository (each)
- Tinctures
- Tinctures (each)
- Topicals
- Topicals (each)
- Transdermal Patch
- Transdermal Patch (each)
- Waste
- Whole Harvested Plant





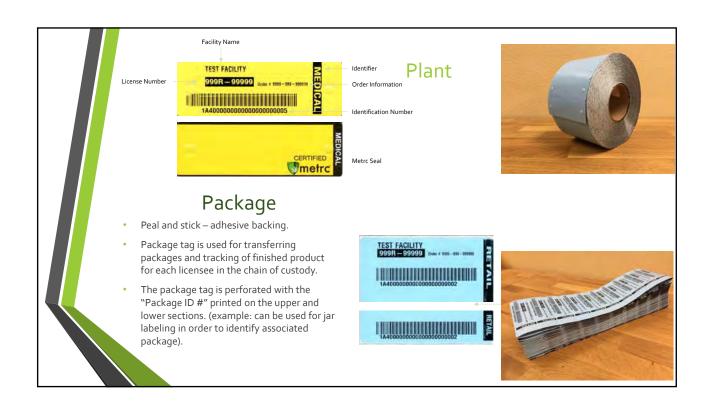
Tagged Inventory in Metrc

- 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. However, immature plants will be entered as un-tagged Planting Groups in Metrc.
- Packages are created from immature plants, harvest batches or other packages.



Ordering Tags

- Tags are ordered from the Admin function
- Tags can be ordered via Credit Card, Money Order or check (money order and check orders will not be printed and shipped until payment is received)
- Payment information is not required to be the licensee or the business owner
- Each facility must have billing information entered
- Tags will be sent by UPS (No PO Boxes)
- Expedited Shipping (Air or Overnight & Saturday) Must be emailed in before 11am EST Mon - Fri
- Tag cost .45 plant & strap or .25 package

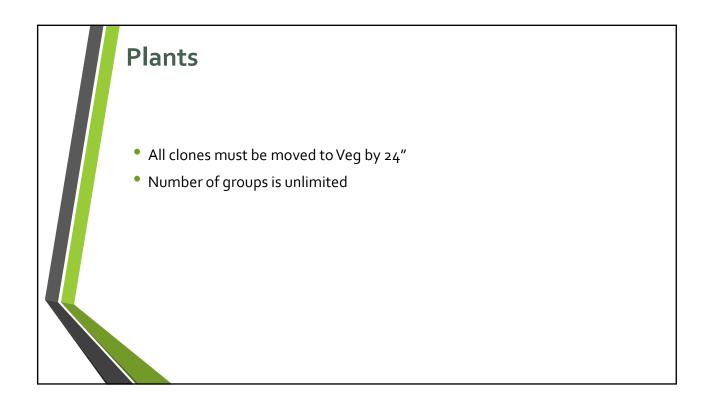


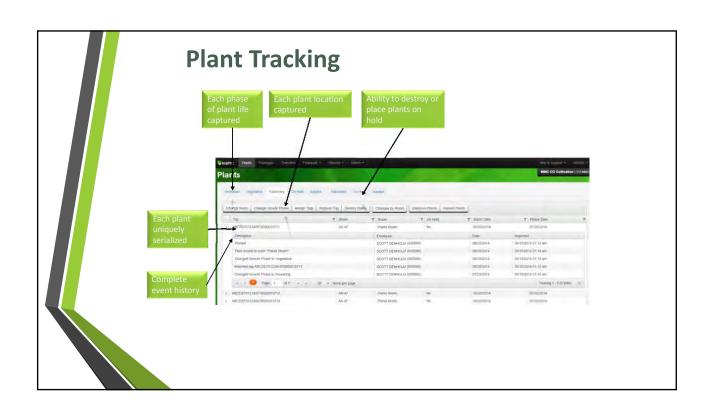


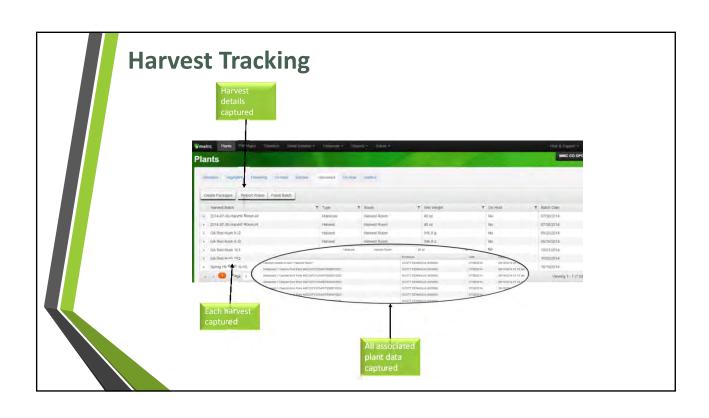




Metrc Plants





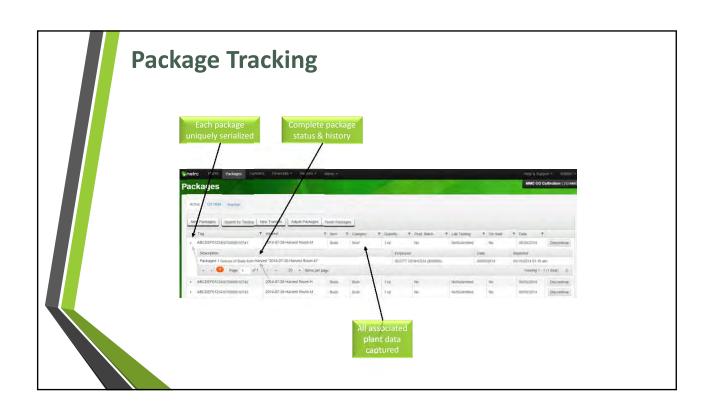




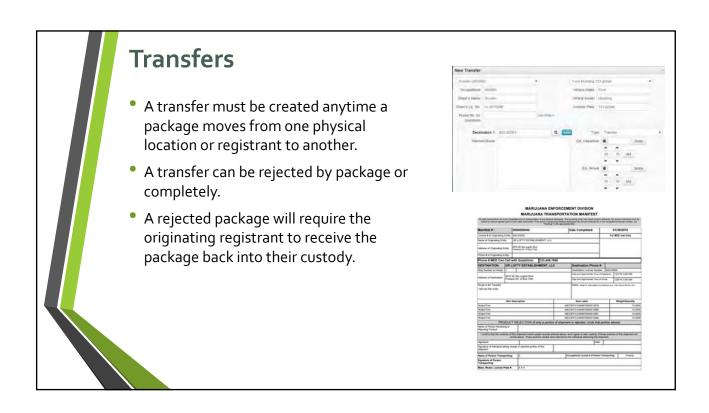
Packages - Definition

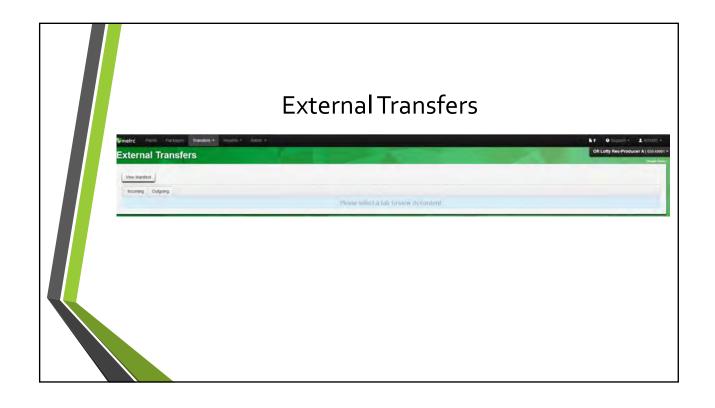
- Any amount of marijuana or infused product that may be sold, processed or transferred and must be placed into one or more containers, each having a unique tag created in Metrc.
- Any product intended for transfer must have a package tag.
- Metrc allows you to repack any package into a new package.

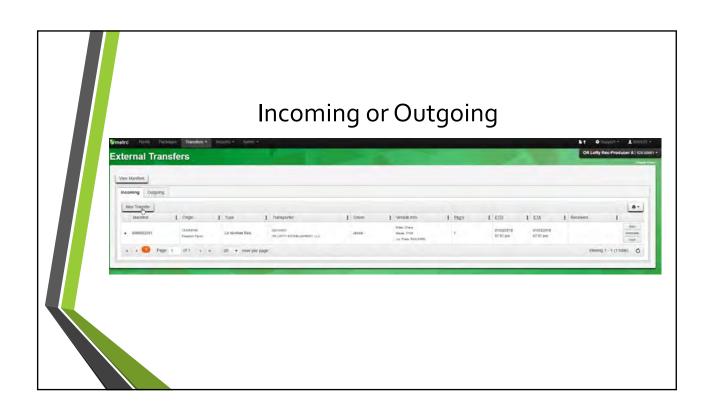


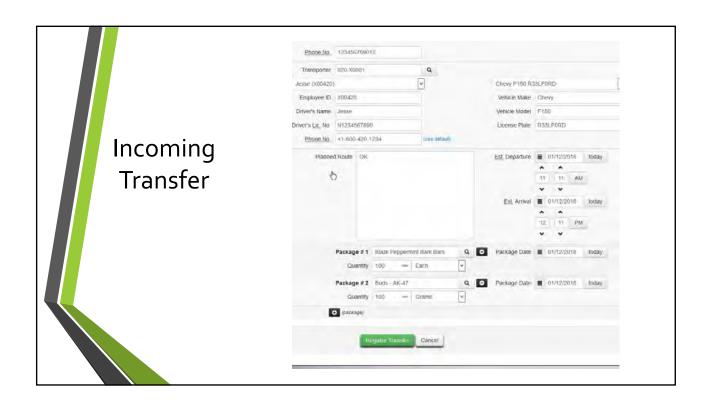


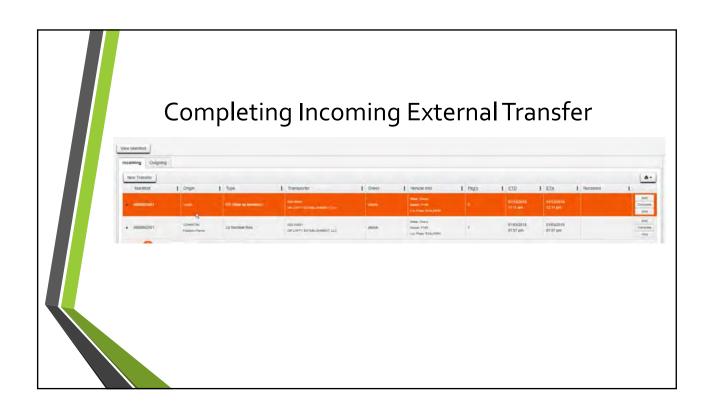














External Transfers Outgoing

