

Medical Marijuana Registrant Requirements

OLCC MEDICAL MARIJUANA TRACKING PROGRAM

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2. Overview & Purpose

This document includes the collected rule requirements for medical marijuana grow site administrators (GSA), persons responsible for medical marijuana processing sites (PRP), and persons responsible for medical marijuana dispensaries (PRD) subject to tracking in the cannabis tracking system (CTS).

GSAs, PRPs, and PRDs for locations subject to tracking in CTS are collectively referred to as “CTS administrators.”

These requirements are found under Oregon Administrative Rules Chapter 333, Division 8 (Oregon Health Authority, Public Health Division, Medical Marijuana rules); Oregon Administrative Rules Chapter 845, Division 25 (Oregon Liquor Control Commission, Recreational Marijuana rules); and Oregon Revised Statutes Chapter 475B (Cannabis Regulation/Adult and Medical Use of Cannabis Act).

A step-by-step visual guide for initial inventory setup in CTS can also be found at <https://tinyurl.com/OLCC-MEDMJ>.

2.1. Note: Use of Certain Terms

CTS Administrator: The term “CTS Administrator” refers to any medical marijuana grow site administrator (GSA), primary person responsible for a medical marijuana processing site (PRP), or primary person responsible for a medical marijuana dispensary (PRD) that is subject to tracking in CTS.

Metrc and “CTS”: The cannabis tracking system “CTS” is the official terminology for the system administered by the OLCC for the tracking of licensed recreational marijuana, medical marijuana subject to its requirements, and certain hemp activities. “Metrc” is the brand-name of the product that meets this need. “Metrc” is a private company contracted by the State of Oregon to provide the CTS software. In general, when referring to the system officially, the State will use the term “CTS,” but it is common to use the term “Metrc” and “CTS” interchangeably when referring to the system.

Parent and Child Packages: In CTS, all items must have a source. When referring to a package of marijuana that is taken from another source package, the source package is often referred to as the “Parent” package and the package that was taken is often referred to as the “Child” package. The lineage of any marijuana item can be traced back along its “family tree” in CTS to identify all related packages.

Registrant: Through this document, the term “registrant” refers to GSAs, PRMGs, PRPs, and PRDs. Note that this term refers only to dispensaries and processing sites in security rules found in OAR 333-008-2000 to OAR 333-008-2200.

Transfer: In the context of this documentation, the term “transfer” refers to any actual transfer of possession of marijuana from one person or entity to another. This means that this term includes a “transfer” of marijuana from a grow site to the patient for whom the marijuana was produced and is not limited in this document to those “transfers” of marijuana from a grow site or other site on a patient’s behalf to another facility.

2.2. Sites Subject to Tracking in CTS

Medical marijuana sites subject to tracking in CTS include any medical marijuana grow site that is authorized to produce marijuana for **three or more patients** (regardless of the number of patients for which marijuana is actually produced at the site), all medical marijuana processing sites, and all medical marijuana dispensaries. Exemptions exist for grow sites that would otherwise be subject to tracking in CTS if the site has a pending OLCC Producer license application filed on or before January 1, 2018.

3. Medical Marijuana CTS Site Administrator Requirements

A medical marijuana registry identification cardholder (patient) may designate another person (grower) to possess their medical marijuana and to produce marijuana at a registered medical marijuana grow site. This person is referred to as a “person responsible for a marijuana grow site” (PRMG) or a “grower.” A person may be designated to produce marijuana as a grower for up to eight patients.

The GSA is responsible for all marijuana tracking in CTS. The GSA may designate other users, such as other growers at the site, to enter information, but the GSA remains responsible for the accuracy of the information.

Growers at the site other than the GSA are required to cooperate with the GSA (OAR 333-008-0635 (10)) for all CTS requirements, including accuracy and timeliness of information entered. Failure by a grower to provide necessary information for tracking may be considered a violation of this rule and as with any other violation of Division 8 rules, could result in revocation of the grower’s registration.

Similarly, Persons Responsible for Marijuana Processing Sites (PRP) for medical marijuana processing sites, and Persons Responsible for Dispensaries (PRD) for medical marijuana dispensaries are designated at the CTS administrators for their facilities. The GSA, PRP, or PRD is the person responsible for compliance with all tracking requirements and the accurate entry of information into CTS,

The following set-up requirements apply to any medical marijuana facility subject to tracking in CTS that is currently registered and must record existing inventory:

3.1. CTS Access

A grower must produce marijuana only at a registered medical marijuana grow site. Any number of growers may be registered to grow at that site. A marijuana grow site that is registered to produce marijuana for **three or more patients** in total must:

- Designate one PRMG as the “grow site administrator” (GSA) with the Oregon Health Authority (OHA) using the Oregon Medical Marijuana Online System (OMMOS)
- Pay an annual \$480 non-refundable CTS user fee to OHA.

For processing sites or dispensaries, the PRP or PRD is already assigned and is the person responsible for paying the annual \$480 CTS fee.

Once the fee is paid to OHA, the CTS administrator will receive an email notification from Metrc (the OLCC vendor) to validate their CTS account. A CTS administrator must:

- Complete training on use of CTS
- Validate their CTS user account within 10 days of receiving the first email notification
- Order UID tags through the interface in CTS
 - The UID tag order should include enough plant and package tags to tag all units of usable marijuana. For a grow site, the GSA must also order enough UID plant tags to tag all immature plants over 24 inches and any mature plants
 - Package tags are required to record initial inventory, including plants which will later be assigned plant tags
 - It is recommended that the first order be expedited by calling Metrc support immediately after placing the order online
- Enter all current on-site inventory in CTS within 10 days of validating their account

3.2. Inventory Set-up

OLCC has published a visual guide on initial inventory set-up at:

https://www.oregon.gov/olcc/Pages/ommp_cts_guide.aspx

Once the CTS user account is validated, the CTS administrator can immediately:

- Add additional users and set up permissions through the “employees” tab
- Set up strains and item types
- Set up rooms (for grow sites)
- Order UID tags through the web interface
- Contact Metrc support at 1-800-566-6506 to expedite shipping of tags if desired
- Track current live plants (grow sites):
 - Track all immature plant batches (plants under 24 inches in height)
 - Immature plant batches should be separated by strain and patient
 - A registrant can have any number of immature plant batches, but no single batch may be over 100 plants
 - A registrant is still limited to the number of immature plants they may possess based on OHA regulations
 - Track all vegetative plants (non-flowering plants of any size)
 - A plant may be moved to “vegetative” in CTS at any point, but must be moved to vegetative in order to assign a tag
 - Assigning a tag is required for any plant 24 or more inches in height
 - Assigning a tag is required for any plant that is flowering
 - “Flowering” means that any mass of pistils on the plant measures greater than two centimeters at its widest point
 - Tags may not be assigned until received, but the plants may be moved into “vegetative” to prepare ahead of time for tag assignment, including flowering plants
 - Plants must first be “received” as a package via an incoming external manifest and the “planted” from that package in CTS
 - Plants must be received as an item type “immature plant” even if they are mature

Note: Usable marijuana, seeds, and harvested plants cannot be tracked **until tags are received**; A registrant must have tags in order to track any item that would require a package tag. Plants are unique in that they can be entered prior to assigning a tag. However, the registrant should prepare the incoming external manifests for those items before receiving tags.

Once UID tags are received, the CTS administrator can identify the order as received in CTS. Tags become available for assignment in CTS once they are marked as “received”. When assigning a tag in CTS, the physical tag matching that number must be physically affixed to the plant (if a plant tag) or to the outermost physical receptacle containing the marijuana items (if a package.)

3.2.1. Adding Additional Users

A CTS administrator may add other users to CTS. Each user may be granted permissions to view or edit (“manage”) any area of CTS that the CTS administrator has access to. For example, other PRMGs at a grow site might be given view access to allow double-checking of information. Edit access may be granted for any other user who will track information in the system. Any user who will enter information into CTS must have their own user account. Using another user’s account and login to enter information is prohibited. Regardless of the number of other users added, the CTS administrator remains the primary account administrator and the person responsible for the accuracy of all information entered into CTS.

The “Employees” menu is accessed through the “Admin” menu by selecting the “Employees” value in the list.

It is recommended that the CTS administrator **does not** give “manage” permissions for the Admin> Employees function to other users, since this will allow those other users to also credential other users and edit user privileges. The GSA may choose to do so, but remains responsible for all tracking activities in CTS.

3.2.2. Setting up Strains and Item Types

Items tracked in CTS are identified by item type and strain, as appropriate to the item. To identify these values when tracking specific inventory, the lists of item types and strains must first be populated. More items can be added to these lists at any time, but if there are no values present, then the CTS administrator will not be able to record any existing items in CTS and will be presented with only blank values when attempting to record inventory.

Any items later received via a facility-to-facility manifest will already be associated with an item type from the origin facility.

To record strains in CTS:

- Access the “strains” section by selecting Admin> Strains
- Click the “add strains” button
- Enter a strain name in the “add strains” window that opens
 - Additional values present in the window are not used for regulatory purposes but may be used by the CTS administrator to record information for their own purposes. If you do not wish to track this information, select “none” from the “testing status” drop down and leave the other fields blank.
- If you are the CTS administrator for multiple facilities, you can select additional facilities in the list on the right of the window. Doing so will add this strain information to those other facilities’ lists as well without requiring re-entry of the information.
- If you wish to add additional strains at the same time, click the blue “+” button in the lower left
- Once you have entered the information, click “create strains” at the bottom of the window
- The window will close and your strains list will be updated
- You can access this function in the future if you need to add more strains to your list

To record item types in CTS:

- Access the “items” section by selecting Admin> Items
- Click the “add items” button
- Enter an item name
 - A grow site will need at least one “immature plants” item and at least one “buds” item
 - Most grow sites will also need at least one “shake/trim” item
 - Typical “buds” item names will identify the strain
 - You may create as many item types as you wish – For example, some grow sites will have “Blue Dream (a buds) (oz),” “Blue Dream (b buds) (oz)” of the type “Buds (by strain)” with the measurement unit of ounces.
 - When using “Buds (by strain)” item type, you will need to select a strain from the list.
 - If you have harvested plants at the time you are initially recording inventory in CTS, you will also need at least one “whole harvested plant” item. This item type is not used for new harvests created from mature plants and is only used for initial set-up or for transferring whole harvested plants to medical marijuana processing sites
- If you wish to add additional items at the same time, click the blue “+” button in the lower left
- Once you have entered the information, click “create items” at the bottom of the window
- The window will close and your items list will be updated
- You can access this function in the future if you need to add more items to your list

Your items and strains will be used when creating incoming external manifests, plantings of marijuana plants, and new packages of marijuana in CTS.

3.2.3. Set up Rooms (Grow Sites)

Marijuana plants and items are assigned to “rooms” in CTS. “Rooms” represent any discrete location at the facility. A “room” may include an outdoor area such as “outdoor field 1”. A facility may have as many rooms as needed in CTS and any identifiers can be used as long as they do not misrepresent information. For example, a GSA may have a single physical room used as a flowering area for plants grown indoors. However, this room may be used for multiple patients/growers. The GSA may choose to create a single “Flowering Room” in CTS, or may create multiple instances of this room, such as, “Flowering Room - Smith,” “Flowering Room - Doe,” “Flowering Room - Davis,” and so on. However, tracking plants that are in an indoor room as being assigned to “Outside” would be misrepresenting information.

Items may be moved to different rooms in CTS and should always accurately reflect the actual location of the item.

To create rooms in CTS:

- In CTS, access the “rooms” section by selecting Admin> Rooms
- Click “add rooms”
- Enter a room name in the window that appears
- On the right-hand side of the window, select any additional facilities that will use this room name (most grow sites will not use this option)
- To add additional rooms at the same time, click the blue “+” icon in the lower-left of the window and repeat the steps above
- Click “create rooms” to add your rooms to your room list.

3.2.4. Receiving and Assigning Tags in CTS

Tags cannot be assigned in CTS unless they have been tracked as received. Once a grow site administrator has confirmed tags have been delivered, they must take the following steps:

- In CTS, access the “tag orders” section by selecting Admin> Tag Orders
- Find the tag order that was received
- If you have multiple pending orders, compare the tracking number to the shipping information to confirm
 - You can click the black triangle to the left of the order in the display list to see more information
- On the far right side of the tag order in the list, you should see two buttons, “invoice” and “receive”
 - “Invoice” will display a copy of the original invoice for your records
 - “Receive” will mark the order received and will make the associated tags available for assignment
- Click “receive”
- In the dialog box that appears, confirm you wish to receive this order by clicking “OK”
- Your tags are now available for assignment and the received order can be viewed in the “history” tab of the “tag orders” section

Assigning a UID tag includes both associating the tag with an item in CTS and physically affixing the tag to the marijuana item matching that association in CTS.

3.2.5. Using External Manifests to Record Initial Inventory

To record initial inventory, a CTS administrator must use the “incoming external manifest” option. Once the manifest is recorded, it must be “received”. When receiving, the user will be prompted to assign package tags. When assigning package tags:

- All items under a single tag must be identical
- All items under a single tag must be items belonging only to a single patient
- All items on a manifest must be items belonging only to a single patient
- Plants will be assigned a package tag and be tracked as an item “by count” and then “planted” using the “create plantings” function
 - Plants should not remain “packaged” under a package tag, they are packaged only for transfer in or out of the CTS inventory
 - Once all of the plants in a plant package are “planted” and the quantity becomes zero, the package tag becomes “inactive” and the physical tag may be discarded
- Plant tags are assigned after creating a planting
 - After creating a planting from a package of plants, the plants show up in the “plant batch” tab
 - The “change growth phase” function is used to move plants from the immature plant batch to “vegetative”
 - When moving plants to “vegetative” tags may be assigned
 - If the plants are not yet 24 inches in height, they may be moved to “vegetative” without assigning tags
 - Any untagged vegetative plants may be assigned tags at a later time by selecting them in the plants tab
- Any flowering plants are moved from “vegetative” to “flowering” after assigning plant tags by using the “change growth phase” function
- Any harvested plants may be recorded either as a package of “whole harvested plant” by weight for the initial start-up inventory or brought in as an immature plant batch, moved through the appropriate growth phases immediately, and then recorded as a harvest.
 - As whole harvested plants are dried, and flower is removed, create new packages to reflect the removal of usable marijuana and use the “adjust packages” function to remove waste weight from the whole harvested plant. Once all usable marijuana has been separately packaged with new UID tags, use a final package adjustment to “zero out” the whole harvested plant and “finish” that package.
- This process is also used to receive items from patients into the CTS inventory.

3.3. Ongoing Tracking

The CTS administrator is responsible for keeping inventory accurate in CTS. Tracking rules require that inventory be reconciled before the start of operations the following day. This means that any changes must be reflected in the tracking system daily and **inventory should be 100% accurate at the beginning of each day.**

3.3.1. Grow Sites

Because grow sites possess, cultivate, and harvest marijuana plants and produce usable marijuana for patients or to transfer as allowed by their registration type, grow sites have specific requirements related to tracking plants at the site

Immature Plant Batches (Under 24 Inches) (Grow Sites)

Immature plant batches must have their counts reduced for any that die or are intentionally destroyed or disposed of. This is done by using the “destroy plants” option in the “immature” tab of the “plants” section.

A grow site may have any number of immature plant batches. However, any associated plant limits must still be observed.

- Immature plant batches reflect plants under 24 inches in height that are not yet flowering
- Plant batches are uniquely identified but plants in a batch **do not require a tag until they reach 24 inches in height**
- Immature plant batches should be single-strain only
- All plants within a single batch should be associated with only one patient
- An immature plant batch may have no more than 100 plants in it, but you may record any number of immature plant batches.
- **You cannot add plants to a batch**, to add more plants, create a new batch from a mother or a package. You will then have to track the batches separately until the plants are moved to a new growth phase and individually tagged
 - **If it is essential that a number of plants be under a single batch**, first, create a new batch for the immature plants to be added.
 - Next, “package” both immature plant batches. This will require assignment of a package tag to each.
 - Next, create a new package using both of the immature plant packages as sources and move the total quantity of the immature plants by “each” into the new package. This will require assignment of a third package tag.
 - Next, create a new planting using your newly-created immature plant package.
- If immature plants die or are destroyed, use the “destroy plants” option during daily inventory reconciliation to reflect the reduced number.

Do not leave plants assigned to a package. During daily reconciliation, if you have any plants in “packages,” unpackage them into new plantings. Plants may only remain packaged for transfer or when carried for sale at a dispensary or Retailer.

Creating Plantings from a Package

If you have:

- Received plants from a patient;
- Are creating your initial inventory; or
- Are creating a new planting from seeds,

Then you will first need to have a source package in CTS. If the package is coming from a patient, record the receipt of a package of plants or seeds by using an external manifest. See “Using External Manifests to Record Initial Inventory” in the previous section. Once the package being used to create the planting is in your inventory, see below.

To create a planting from a package, whether it is seeds or a package of immature plants (which must be unpacked before inventory reconciliation,) the source package must be identified. To select a source package and create a planting:

- In CTS select “Packages” from the upper menu
- In the “Packages” section, select the “Active” tab
- Select the correct package, using filters if needed to find it
- Ensure the correct row is highlighted in orange
- In the section below the tabs display, select the button labeled “Create Plantings.” The “Create Plantings from Packages” window will open
- In the window, type in the quantity that will be removed from the package
 - For a package of plants, this will be the total number of plants going into the planting
 - For a package of seeds, this will be the quantity or weight of seeds being taken to create the planting (depending on the unit of measurement you used for the seed package)
- Enter a group name. By default, this is the tag number of the source package, but may reflect any group name you wish. For example, a group name might be “Blue Dream Clone Batch (Patient 001234)”
- Select either “clone” or “seed” as appropriate for the “Plants Type”
- For “Plants Count” enter the number of immature plants that will be in the batch
 - No immature plant batch should exceed 100 plants, per tracking rules. In addition, each plant batch should include only plants belonging to a single patient. However, you may record any number of batches as long as each is physically separated and countable and each contains no more than 100 plants.
 - Any limit to the number of immature plants under 24 inches that the grower and patient may jointly possess still applies; The system will not stop a user from recording more plants than they are allowed to possess
- Enter the “Strain”
 - If you have no values to select from in the “Strain” section, you have not set up strains. You will need to close the window and set up strains in “Admin>Strains” first.

- Enter the planting date. This should generally be the same day you are recording the planting due to the daily reconciliation requirements. However, if for any reason you are recording information late, enter the actual date the planting was created.
- If “Unpackage Date” is displayed, enter the same date on this line
- Click “Create Plantings”
 - Your planting will now appear in Plants>Immature
 - The source package will automatically be reduced by the amount you specified.
 - When a package reaches zero quantity, it is “finished” and moved to “inactive”
 - Once a package is finished, there is no requirement to keep the associated package tag; Finished package tags may not be re-used and may be discarded

Creating Plantings from a Mother Plant

If a creating clones from a mother plant, the clones **must be recorded in CTS prior to any recording of the destruction of the mother plant**. Any “vegetative” or “flowering” plant may be used to create clones in CTS. If attempting to create clones or seedlings from a plant that is still tracked in an “immature” plant batch, that plant will first need to be moved to the “vegetative” growth phase.

- In CTS, select “Plants” from the upper menu
- In the “Vegetative” or “Flowering” tab, select the plant to be used as a mother plant; Use filters to identify the correct tag number (or identifier if making clones from an untagged vegetative plant under 24 inches in height.)
- Ensure the correct plant is highlighted orange
- In the section below the tabs display, you will see several buttons. On the right-hand side, you should see a group of three buttons labeled “Create Plantings,” “Create Packages,” and “Manicure”
- Click “Create Plantings”
- In the window “Create plantings from vegetative plants” that opens:
 - Confirm the correct “Plant” is identified
 - Enter a group name for the new immature plant batch
 - In “Plants type” select “Clone” (if you are taking seeds from the plant to create a planting, you may select “Seed” instead)
 - In “Plants count” enter the number of clones created from this plant
 - Remember a plant batch may not have more than 100 plants
 - If you are making more than 100 clones, use the blue “plus” to create a new line for a separate plant batch. You may select the same mother plant
- Enter the “Strain,” which should be the same as the mother, if the mother had an identified strain.
- Enter the planting date. This should generally be the same day you are recording the planting due to the daily reconciliation requirements. However, if for any reason you are recording information late, enter the actual date the planting was created.

- Click “Create Plantings”
 - Your planting will now appear in Plants>Immature
 - Your mother plant will show in its history that clones were created
 - If your mother plant was destroyed in the process of creating clones, you will need to use the “Destroy” button to track the plant as destroyed.

Vegetative Plants (24 Inches and Over)

Vegetative or flowering plants that are not yet associated with a tag must be moved to the correct phase. To move a plant into “vegetative”:

- Find the correct “immature plant batch” by going to Plants>Immature
 - If you do not have any immature plant batches, you must create them before you can track vegetative plants. See “Immature Plant Batches” above.
- Select the batch
- Ensure the correct batch is highlighted orange
- In the section below the tabs display, click “Change Growth Phase”
- In the window “Change immature plants growth phase” that opens:
 - Confirm the correct “group” is identified
 - Enter the number of plants that will be changed to “vegetative”
 - You cannot create more vegetative plants than there are immature plants. Any amount in excess of the immature plants available **will not be created**
 - In “starting tag”:
 - If you are assigning tags at this time, click the magnifying glass icon next to “starting tag” and select the first tag in the list you wish to use. If you are creating multiple vegetative plants, the system will automatically assign the correct number of tags
 - If you are not assigning tags at this time, you may leave “starting tag” blank. However, it is recommended that you assign tags at the time you move plants into “vegetative.”
 - Select the new growth phase
 - Generally, you will move a plant from immature to vegetative before moving it to flowering. However, if you have a plant that flowers before reaching 24 inches in height, then you may move plants directly from an immature plant batch into the “flowering” state
 - Enter a “New Room” or the same room if you are not physically relocating the plants
 - Enter the “Change date.” Generally, this will be the same day you are doing the data entry
 - Click “Change Phase”
 - Your plants will now appear in Plants>Vegetative (or Plants>Flowering if you moved them to that state
 - Your immature plant batch will have its count reduced by the number of plants you moved to the new growth phase

- A plant batch count may not go below zero
 - If your immature plant batch was reduced to zero, it will move to the Plants>Inactive tab next to the “immature” tab
- Your plant batch will show in its history that a number of plants were changed to a new growth phase
- **Physically affix the plant tags to the plants**
 - Assigning a tag requires both associating the tag number in CTS and affixing the matching tag physically to the plant
 - **Do not skip this step. Failing to physically tag items as tracked in CTS will result in tracking violations.**

Flowering Plants

Regardless of plant height, once a plant becomes flowering, it is considered mature. A plant is considered to be flowering for regulatory purposes once it is identified as female and has formed any mass of pistils measuring greater than two centimeters wide at its widest point. A plant may be moved to a “flowering” phase in CTS when they begin to display flower and are considered by the grower to be viable, even if visible masses of pistils are smaller than the regulatory definition.

Generally, a plant will be tracked as “vegetative” prior to being moved into a “flowering” state (see above). For start-up inventory or for any flowering plants that did not first reach 24 inches in height, plants may also be moved directly from an immature plant batch into the “flowering” growth phase.

When moving plants from an immature plant batch to the “flowering” growth phase, follow the same process as above for vegetative plants, replacing the “vegetative” identifier with “flowering” when identifying the phase in CTS.

When moving plants from “vegetative” to “flowering,” do the following:

- Ensure the plant is assigned to a UID tag in CTS and that the correct tag is physically affixed to the plant. If the vegetative plant is not yet assigned a UID tag, assign one first. You cannot change a plant’s growth phase to “flowering” without a UID plant tag assigned.
- In the Plants> Vegetative section of CTS, select one or more vegetative plants.
 - Changes can be done by selecting multiple individual plants (hold SHIFT while clicking to select a range of plants, or hold CONTROL and click on individual plants to select them together) or by room.
 - To perform changes by room (see “set up rooms,” above,) click the “changes by room” button
- Changing individual plants
 - Once you have selected the plants to move to flowering, click “change growth phase”
 - Complete the template at the top of the window if you have multiple plants
 - Select the new growth phase (flowering)

- Select the new room (or enter the current room if the plants are not being moved to a new location)
 - Enter the change date (this will be the same day you are entering the information in most cases, click “today” to automatically fill the current date)
 - Click the green check marks next to each of these items to automatically fill in the information for each of the listed plants
- If you need to replace any lost or damaged tags, you can assign a new tag. **Do not enter any value in the “replace tag” section for each plant if the plant is already tagged and the tag is still intact.**
- Changing plants by room
 - If you are changing all of the plants in a particular room to a new growth phase, you can click the “changes by room” button. This is often used when using light deprivation to force all plants in an area into a flowering status.
 - Enter the room name **of the current room** in the window that appears. **All vegetative plants that are assigned to this room will be moved to the new growth phase.**
 - Enter the change date (this will be the same day you are entering the information in most cases, click “today” to automatically fill the current date)
 - Enter the new growth phase (flowering)
 - Select the new room (or enter the current room if the plants are not being moved to a new location)
 - If you wish to change the phase of plants in other rooms at the same time, you can click the blue “+” in the lower-left and select another room. Complete the information for that room as above.
 - Click “perform changes” to move all vegetative plants in the selected room to the new growth phase (and new room, if applicable)

Harvesting plants

Harvested plants must be individually weighed. The whole plant does not necessarily need to be weighed at once, but the total wet weight from a single harvested plant must be recorded at the time of harvest. When recording a harvest, several plants may be tracked within the same harvest, but weight is recorded for each plant individually. You may not weigh all plants together and assign an average value per-plant.

Harvests appear in the “harvest” tab of the “plants” section. Harvests may remain in this section for up to 45 days. As waste is removed (fan leaves, stalks, stems, etc.) during drying, the “report waste” function must be used to report waste against each harvest. Harvests must remain physically separate from one another.

To harvest a whole plant, use the “harvest” button, which will track the plant as harvested and no longer active. If only part of a plant is being harvested, use the “manicure” button, which will track that a manicure harvest occurred, but will leave the plant available for additional harvests. For the last harvest on a plant, the “harvest”

option should be used. To “finish” a plant that has had one or more manicure harvests recorded but will have no more harvests, use the “destroy” function instead.

No later than 45 days after harvest, all remaining physical weight for the harvest must be weighed and assigned one or more package tags by using the “create packages” function. Once all weight is accounted for as waste or as packages, the harvest must be “finished,” which will assign all remaining weight to “moisture loss” and will move the harvest to the “inactive” tab.

Marijuana does not need to be fully trimmed before being tracked as “packaged”. If a harvest still contains waste stalks/stems/fan leaves that need to be removed but the harvest must be packaged due to the 45-day deadline, this weight may be included in the package. When it is later removed, its removal is tracked as an “adjustment” to the package.

To create a new harvest:

- In the Plants> Flowering section of CTS, click either “Harvest” or “Manicure”
 - If you are cutting down entire plants that will not be harvested again, use “harvest”
 - If you are cutting branches or “topping” plants and those plants will have additional harvests, use “manicure”
- Enter or select the plant tag number in the “harvest flowering plants” window
- Enter the weight of all material removed from the plant as part of the harvest (i.e.: the “wet weight”)
- Enter a harvest name
 - All plants recorded with the same harvest name at the same time will be recorded as a single harvest in CTS.
 - If you enter different harvest names, it will create separate harvests
 - Harvests with different names need to be kept physically separate in the drying room so that they can be separately identified
- Select your “drying room.”
- Select the harvest date – this will usually be the same day of entry
- To add additional plants to the harvest, click the blue “+” button in the lower left. This will create a new line for another plant.
 - For any harvest of more than one plant, you can click the blue “+” first and fill out the template at the top of the window with the harvest name, unit of measure, drying room, and date, and then click the green check mark next to each of these sections to automatically fill that information into the relevant sections for each listed plant
 - You will still need to record the individual plant tag number and weight for each plant
- Once you have entered all plants for your harvest, create “harvest plants”
- A new harvest will appear in your “harvested” tab
 - If you used “harvest” this will mark the plants as no longer active and they will be moved to your “inactive” plant tab. Any associated plant tags may now be discarded or kept with the harvested plants until they are packaged.

- If you used “manicure” this will be indicated on each plant under the “harvested” column. This column shows how many harvests have affected that plant.
- If you used “manicure” in error or later determine that the remaining live plant is not harvestable, you can use “destroy plants” as normal to remove the plant from your “flowering” tab when you physically destroy the plant.

Additives and Waste

A GSA may notice that CTS provides an opportunity to report additives on individual plants or groups. This information is not required for GSAs and this function does not need to be used. Trimmings, fan leaves, and normal plant waste that occurs from a live plant is not reported in CTS unless the plant is wholly dead or destroyed.

Note that trimming a mature plant and drying the flower to produce usable marijuana is considered a “manicure harvest” and must be reported as such in CTS.

Similarly, a GSA may notice that they have the option to report waste on live plants. This function is not used in Oregon. To report destruction of a whole live plant, use the “destroy plants” option instead. If reporting waste on a harvest, use the waste reporting option there. If reporting waste on a package, use the “adjust packages” function.

When destroying any medical marijuana items, a registrant must obtain written approval from OMMP. A notification and request must be filed with that agency. Full instructions can be found at

<https://www.oregon.gov/oha/PH/DISEASES/CONDITIONS/CHRONICDISEASE/MEDICALMARIJUANAPROGRAM/Pages/Destruction.aspx>

3.3.2. All CTS Administrators

All types of CTS administrators will track “packages” and will be responsible for tracking the source and quantity of marijuana items associated with any UID package tag in CTS. Even a grow site that only produces marijuana that is provided directly back to the patient will use “packages” in CTS and will need package tags to track units of usable marijuana (flower and shake/trim) while it is at the facility and when it is transferred to the patient.

Packages

Packages represent a discrete quantity of marijuana other than a harvest. Packages are reconciled by recording any waste lost during repackaging or any waste removed such as removal of stalks or stems. When separating a package into different units, such as separating a package of untrimmed flower into a package of trim and a package of bud, use the “repackage” option to move the appropriate weight to the newly-created package. For any package that has had all physical material removed, ensure the weight shows as zero in CTS. Use package adjustments to account for any discrepancy due to waste or loss during the repackaging process.

When combining packages select each of the packages as a source and identify the quantity of marijuana being taken from each to create the new package. A grow site may not combine marijuana that is the possession of different patients or that was harvested during different 72-hour windows.

Seed packages may be by weight or count. Seed packages may be sourced from other items in CTS or received via external transfer (if allowed by your facility type) or through a facility-to-facility (or “licensed”) transfer manifest recorded in CTS. At a dispensary, seeds must be tracked by count, due to limitations on the transfer of seed numbers. Any package that needs to be changed to a different unit of measure can be changed to that new unit of measure by “repackaging” into a new UID package tag using the new measurement converted from the old.

Transfers

To record the transfer of any marijuana items to a patient from a grow site or from one facility to another, a user must record the transfer in CTS using a transfer manifest. Once the item is **physically received** at the facility, the items on the manifest must then be accepted in CTS. This adds the items to the inventory of the receiving facility and removes them from the inventory of the sending facility (if applicable.) For transfers between facilities, any items not accepted by the destination must be “rejected” and physically returned to the shipping facility, who must then accept the rejected item back into its inventory.

Note that CTS will **not necessarily stop a user from attempting prohibited transfers**. It is the responsibility of the CTS administrator and all registrants and licensees to understand the allowable transfer types. For example, a grow site may not possess cannabinoid items such as edibles, concentrates and extracts. However, a user may find that the system allows the grow site to record the receipt of such an item.

There are two types of transfers, “**licensed**” and “**external.**”

Licensed transfers are used when a facility in CTS transfers marijuana to another facility subject to tracking in CTS. For medical marijuana facilities, this includes:

- Grow site transfers
 - Transfers of marijuana items to medical marijuana dispensaries and medical marijuana processing sites;
 - Transfers of usable marijuana to recreational marijuana Processors and Wholesalers, if the grow site is registered for this privilege;
 - Transfers of usable marijuana to Laboratory licensees, when testing is required
 - Receipt of immature plants from recreational marijuana Producers that are registered to produce marijuana for patients
- Processing site transfers
 - Receipt of marijuana items from a grow site;
 - Transfers of cannabinoid items to medical marijuana dispensaries
 - Transfers and receipt of marijuana items to or from other medical marijuana processing sites
- Dispensary transfers
 - Receipt of marijuana items from grow sites and medical marijuana processing sites

External transfers are used when a facility in CTS is transferring or receiving marijuana to or from an external source. For medical marijuana facilities, this includes:

- Grow site transfers
 - Transfers of marijuana items to the patients for whom the items were produced;
 - Receipt of marijuana items from patients registered to a grower at the site
- Processing site transfers
 - Receipt of marijuana items from a grow site not subject to tracking in CTS;
 - Receipt of usable marijuana from patients to be processed into products;
 - The return of those products to the patient.
- Dispensary transfers
 - Receipt of marijuana items from grow sites not subject to tracking in CTS
 - **Transfers to patients at a dispensary are recorded as “sales” not as an external transfer**

Laboratory Testing

Laboratory testing of usable marijuana is required when marijuana will be transferred to a medical marijuana processing site or medical marijuana dispensary. In addition, if a grow site has registered with the OLCC for the transfer of medical marijuana to OLCC-

licensed recreational marijuana Wholesalers and Processors, then any marijuana to be transferred to those locations must also be tested.

Usable marijuana transferred from a grow site to the patient for whom it was produced does not need to be tested.

Medical marijuana processing sites must test cannabinoid items prior to any transfer of those items to a medical marijuana dispensary.

Laboratory testing may be done in one of two ways. The entire “batch” of all packages to be sampled may be transferred to the Laboratory via a “Licensed” transfer in CTS and the Laboratory can take the samples at their facility, or a laboratory representative may come to the grow site to directly take a sample.

If the laboratory will come to the site to take a sample, to perform testing in compliance with all applicable rules, a “sample package” must be made from an existing package in CTS. A sample package must only be created after a Laboratory licensee has arrived on site to take the sample and has physically taken the samples from the parent packages. To make a sample package:

- Before the package is presented for sampling, in CTS, find the correct package tag number in the Packages> Active section
 - Confirm the physical tag number matches the tag on the item
 - Confirm the weight is correct in CTS by weighing the package
 - Confirm the item type and category are correct
- The laboratory representative then takes a physical sampling from the package
- The sample is weighed and a new package is created by using the “Submit for Testing” button, which will create a new sample package and set the status to “SubmittedForTesting.” **Do not use “New Packages” to create a sample package for testing.**
- The sample package is then added to a “licensed” transfer manifest and sent to the Laboratory

Once the package is submitted for testing, it must remain unaltered until the laboratory test results show that it has passed testing. This means it must not be used to create any new packages. Once a package has a passing test result, new packages created using that package as a source will “inherit” its testing status.

Information on specific testing requirements can be found on the OHA’s website at <https://www.oregon.gov/oha/PH/DISEASES/CONDITIONS/CHRONICDISEASE/MEDICALMARIJUANAPROGRAM/Pages/index.aspx>.

The OLCC has published a “Metric Sampling and Testing Guide” at <http://marijuana.oregon.gov>. A direct link can be found here: <https://tinyurl.com/OR-CTS-Sampling>

Failed Tests

Depending on the reason for a test failure, a package may be reanalyzed, remediated, or may require destruction. See the “Retesting and Remediation” section of the “Metric Sampling and Testing Guide” available at <http://marijuana.oregon.gov>.

4. Operating Requirements

This section lists most physical and recordkeeping requirements related to grow sites, processing sites, and medical marijuana dispensaries and their relevant rule or statutory reference. This section is not intended to provide a comprehensive overview of the specifics on meeting each requirement or preventing each type of violation, nor does it include the entirety of the rule or statutory language. It is intended as a general reference only.

4.1.1. Physical Requirements – All Registrants

In addition to CTS tracking requirements, and physical operating requirements specific to the registration type, all medical marijuana facilities are subject to the following requirements:

[Weighing Devices \(OAR 333-008-0550, OAR 333-008-1200, OAR 333-008-01740, OAR 845-025-1215\)](#)

Each grow site, processing site, and dispensary must have and utilize one or more **licensed scales** on the premises. Any time information is entered into CTS by weight, such as harvesting plants, recording waste, creating packages, and recording incoming or outgoing manifests, the weight entered must be verified by using a licensed scale. This requirement includes when transferring marijuana to patients and is addition to rules that separately require transfers of marijuana between facilities to be weighed using licensed scales.

The Oregon Department of Agriculture’s (ODA) Weights & Measure Division is the agency responsible for licensing weighing devices in Oregon. Operators are advised to review the requirements on that agency’s website **prior to purchasing scales**. Not all scales meet the requirements for licensing in Oregon.

The ODA’s Weights & Measures Division website can be found here:

<https://www.oregon.gov/ODA/programs/ISCP/WeightsMeasures/Pages/LicenseScaleMeter.aspx>

4.1.2. Physical Requirements – Dispensaries and Processing Sites

Medical marijuana dispensaries and medical marijuana processing sites are subject to certain signage, security, and surveillance requirements in addition to operational requirements specific to their registration types. Those requirements that are applicable to these types of registrants can be found in [Oregon Health Authority administrative rules](#).

- [333-008-2080 Security Requirements](#)
- [333-008-2090 Video Surveillance Equipment](#)
- [333-008-2100 Required Camera Coverage and Camera Placement](#)
- [333-008-2110 Video Recording Requirements](#)
- [333-008-2120 Location and Maintenance of Surveillance Equipment](#)
- [333-008-2150 General Sanitary Requirements](#)
- This sections **does not** apply to medical marijuana grow site operation. See [Section 4.1.1 Physical Requirements - All Registrants](#) and [Section 4.1.4 Grow Site Operations](#) for specific operational requirements for medical marijuana grow site operations.

4.1.3. Additional CTS Requirements

Requirements for tracking in the cannabis tracking system (CTS) for medical marijuana CTS administrators are found in Oregon Administrative Rules Chapter 333, Division 8, Division 7 (Oregon Health Authority) and Chapter 845, Division 25 (Oregon Liquor Control Commission.) Some rules listed within Chapter 845, Division 25 apply to both medical marijuana tracking in CTS and recreational marijuana tracking in CTS.

OAR 845-025-2120 (1)(b), (2)(b), and (3)(b) each reference that a CTS administrator for a medical marijuana grow site, processing site, or dispensary site must track inventory received, possessed, and transferred using CTS.

This section is intended to identify those requirements that apply to medical marijuana CTS administrators.

All CTS Administrators

Regardless of type, any facility subject to tracking in CTS must:

- Maintain an accurate list of all representatives with user access to CTS and CTS administrators in CTS through the “Employees” function. This list must be updated when a new user is trained and added.
- Train any new CTS users *before* they are permitted to access CTS or manipulate any information in the system. The training requirement is met by completing a Metrc-provided webinar or in-person training by the current CTS administrator.
 - Training is scheduled online at <https://metrc.com/oregon> by clicking the “Schedule Training Now” button
 - Medical marijuana CTS administrators must use the “OMMP” section and enter their Metrc facility ID number (found in the upper-right hand portion of the window after logging in to CTS.)
- Cancel any CTS administrator or user account (in the “Employees” section) when the person is no longer a representative of the facility.
- Correct any errors.
- During any loss of access to CTS:
 - Keep accurate records during any loss of access to CTS
 - Enter the information as soon as access is regained
 - Document when access was lost and when it was restored
 - It is prohibited to perform any transfers of marijuana items when the CTS administrator does not have access to CTS
- Maintain an adequate supply of UID package and UID plant (grow sites only) tags at all times

Grow Sites

- Tag all plants (grow sites only) with a UID plant tag that is assigned in CTS no later than when the plant is 24 inches tall or when it is flowering, whichever comes first
- Track all harvested and drying marijuana by wet weight and assign package tags to remaining weight after recording any waste no later than 45 days after the harvest was recorded.

- Marijuana that is “packaged” and has package tags assigned **does not** need to be fully trimmed or have all waste removed. “Packaged” in CTS does not necessarily mean packaged for final sale or transfer. However, after assigning package tags, weight must be reconciled daily. If a user assigns “wet” marijuana to a package, they will need to ensure that package adjustments are recorded regularly to ensure the weight remains accurate in CTS. The best practice is to allow marijuana to dry fully during the 45-day window it may remain in a “harvest” in order to avoid needing to make daily adjustments.
- Additional waste removed after packaging is recorded as a package adjustment.
- After all physical waste is recorded from a harvest, and all remaining physical weight is assigned package tags, the harvest must be recorded as “finished” in CTS. This will assign any remaining weight to “moisture loss”.

4.1.4. Grow Site Operations

Physical Site Requirements

Display of Registration Information (OAR 333-008-0550)

The grow site registration card must be displayed physically on site by each PRMG and for each patient for whom marijuana is produced. “Displayed” means physically posted at or near the location where the plants are grown so that the cards are clearly visible to a nearby observer. This will often mean that cards must be displayed outdoors and PRMGs should take reasonable steps to ensure any cards that must be displayed are protected as needed to remain visible and legible.

If a grower-patient relationship is terminated by the patient or the grower ceases producing marijuana for the patient, the card may no longer be displayed and must be returned to the Oregon Health Authority.

Plant Identification (OAR 333-008-0570)

At a site where multiple PRMGs are registered, in addition to any tags required by rules relating to CTS tracking, plants must be physically identified per PRMG. By rule, this requirement can be satisfied by:

- Tagging each plant with the PRMG name, grower card number, and patient identification number – This information may be written on the back of required UID plant tags which have a blank side for this purpose; or
- Physically separating each PRMG’s plants from those of other PRMGs by fencing or cordoning the areas where plants are located and physically posting all grow site registration cards at the associated plant locations.

Plot Plan (OAR 333-008-0570)

At a site where multiple PRMGs are registered, a plot plan or graphic matrix must be posted depicting the plant layout of the site and which PRMG and patient are associated with which plant. A keyed or alphanumeric legend must be included that allows a reader to confirm the assigned PRMG name and patient name and identification number for each plant. **This is in addition to the requirement above to individually tag or cordon off plants by patient and PRMG.**

Plant and Usable Marijuana Limits (OAR 333-008-0580, ORS 475B.831, ORS 475B.834)

Each PRMG that possesses marijuana plants on behalf of a patient possesses that marijuana jointly with the patient.

The number of plants that may be jointly possessed at a grow site is:

- 6 mature (flowering) marijuana plants per patient
- 12 immature marijuana plants that are 24 inches or more in height per patient
- 36 immature marijuana plants that are under 24 inches in height per patient (As of October 1, 2018)

The amount of usable marijuana that may be jointly possessed by a PRMG at a grow site is based on the number of mature plants the PRMG is authorized to possess. A PRMG who produces marijuana for a patient may possess the usable marijuana harvested from plants they cultivated on their patients' behalf, but no more than the following amounts of usable marijuana per mature plant:

- 6 pounds of usable marijuana per mature plant allowed if produced indoors
- 12 pounds of usable marijuana per mature plant allowed if produced outdoors

This means a single PRMG who is producing marijuana for eight patients outdoors could possess up to 576 pounds of usable marijuana: (eight patients x six plants each x twelve pounds per plant.)

In addition to the *per-patient* limit, a grow site as a whole is limited to the number of mature plants and immature plants over 24 inches in height that may be present. For sites subject to tracking in CTS that are **not grandfathered** sites, these limits are:

- For a site in city limits and zoned residential:
 - 12 mature plants
 - 24 immature plants over 24 inches in height
- For a site outside city limits, or inside a city but not zoned residential:
 - 48 mature plants
 - 96 immature plants over 24 inches in height

Some sites are **grandfathered** by the Oregon Health Authority. These sites retain previously-allowed higher total limits. However, when a patient is “dropped” (when a grower or patient terminates the grower-patient relationship either voluntarily or by failing to renew,) a grower cannot be designated by a new patient until such time as the maximum plant limit is reduced to the above levels. This means new patients can never be added to a grandfathered site, because once new patients can be added, the site is no longer grandfathered.

This status never grants a site a higher allowance than the maximum it could have had at the time it was grandfathered. The maximum allowance is based on the number of patients that were registered to the site at the time the grandfathering took effect. This means the maximum for a particular site may be less than the allowable maximum for any grandfathered site, but will still be greater than the limits above.

- For a site within city limits and zoned residential **that has been registered since January 1, 2015 and has remained continuously registered:**
 - 12-24 mature plants
 - 48 immature plants over 24 inches high
- For a site outside city limits, or inside a city but not zoned residential **that has been registered since January 1, 2015 and has remained continuously registered:**
 - 49-96 mature plants
 - 192 immature plants over 24 inches high

Seed Limits

There is no limit on the number of seeds that may be possessed by a PRMG on behalf of a patient.

Cannabinoid Items

A PRMG **may not** possess cannabinoid concentrates, extracts, topicals, or other cannabinoid products on behalf of the patient for whom they are producing usable marijuana, nor may they manufacture these items as a grower or transfer them to a patient as a grower.

However, if a grower is also a patient and possesses marijuana items **as a patient** that are not subject to CTS tracking, the home manufacture of certain cannabinoid items may be allowed and patients may be allowed to share these marijuana items with other patients. Such activities are not part of the grow site operations.

A PRMG who is also a patient or who is a caregiver may not use their patient's marijuana to make cannabinoid items while in possession of those items as a PRMG. Instead, if creating cannabinoid items that may be created at a household, the usable marijuana must first be transferred out of the possession of the PRMG to the patient or caregiver using an **outgoing external manifest**.

A PRMG who is subject to tracking in CTS may also be their own patient. In such a case, when that person takes possession of their marijuana for use as a patient, they must transfer the marijuana from the facility in CTS **as an outgoing external transfer**. That marijuana is then no longer part of the grow site inventory (and should be removed from the grow site area.)

A person may be a patient, grower, and caregiver. However, each of these roles is tracked separately and for the purposes of CTS tracking, it is important to determine which single role a person is in at any time. To avoid tracking errors, each role a person has should be treated as a separate entity when tracking activity in CTS.

Recordkeeping

Personal Agreements (ORS 475B.822, OAR 333-008-1760, OAR 333-008-1230)

If a patient has assigned any portion of the right to possess marijuana to their registered PRMG, then that patient and grower must have a personal agreement assigning that right. The patient may not assign the right to possess mature marijuana plants, which remain the property of the patient. The agreement must include:

- The patient name, OMMP card number, expiration date, and contact information
- The name of the PRMG who has been assigned the right, the PRMG's card number, expiration date, and contact information
- The specific portion of right assigned regarding:
 - Quantity of seeds
 - Number of immature plants
 - Amount of usable marijuana

A personal agreement may not include an assignment of the right to possess mature plants. Mature plants remain the property of the patient.

Operations

Packaging and Labeling (OAR 333-008-0600)

In addition to the requirement of holding marijuana items within physical receptacles affixed with a UID tag matching the associated item descriptors in CTS, when transferring marijuana to a registered processing site, dispensary, or to a recreational marijuana Wholesaler or Processor (if registered for the privilege to do so,) a PRMG must comply with all packaging and labeling requirements, as well as pre-approval requirements for any item intended for use by a consumer or patient.

This does not apply to items transferred directly from the grow site to the patient for whom the marijuana is produced.

The OLCC has published a “Packaging and Labeling Guide” available at <http://marijuana.oregon.gov> under the “Packaging and Labeling” section at <https://www.oregon.gov/olcc/marijuana/Pages/PackagingLabelingPreApproval.aspx>.

Storage and Segregation of Marijuana Items (OAR 333-008-0580)

PRMGs must keep each patient’s marijuana segregated and clearly identifiable from other patients’ marijuana. If any patient has entered into a personal agreement with the PRMG to possess some amount of seeds, immature plants, or usable marijuana as described in ORS 475B.822, the marijuana that is possessed by the PRMG must also be segregated and clearly identified.

In addition to the UID tags required by the CTS rules, each receptacle containing marijuana must be labeled with the PRMG name, identification card number, and patient card number.

A single patient or PRMG’s receptacle may be a large container that contains several separate “packages” of usable marijuana with individual UID tags, or each package may be individually tagged and labeled.

Testing of Usable Marijuana (OAR 333-007-0320)

Usable marijuana that is produced for a patient does not require testing when it is provided to the patient for whom it was produced. When usable marijuana is provided to a medical marijuana dispensary, medical marijuana processing site, recreational marijuana Processor, or recreational marijuana Wholesaler, it must meet all testing requirements for the transfer type. Note that a PRMG seeking to transfer marijuana to a recreational marijuana Processor or Wholesaler must register with the Oregon Liquor Control Commission for that privilege.

When transferring to a medical marijuana dispensary, usable marijuana that will be distributed to patients at a dispensary must be tested for:

- **Water activity and moisture content**
- **Pesticides**
- **Potency**

Note that a grow site **may not transfer usable marijuana to a recreational marijuana Retailer**. However, a grow site who qualifies for this, may transfer to a Wholesaler licensee and that Wholesaler may then transfer the marijuana to a Retailer.

When transferring to a processing site or Processor, required testing will depend on the type of processing and the item being created. Note that these required tests must be ordered and performed *prior* to the transfer of marijuana to a processing site or Processor. Tests can occur while the marijuana is at the grow site or at a Wholesaler site only. Processing sites and Processors may not order compliance tests on usable marijuana. The required tests are:

- **Water activity and moisture content**
 - This test is required when the processing method does not result in effective sterilization through use of approved chemicals or high heat.
- **Pesticides**
 - This test is required when the marijuana will be used directly in the creation of a **cannabinoid product** such as a **tincture, edible, capsule, topical**, or any other cannabinoid item that would not itself be required to be tested for pesticides.
 - This test is not required when the marijuana will be used to produce a **cannabinoid concentrate** or a **cannabinoid extract**. *(The concentrate or extract itself must be tested for pesticides by the processing site or Processor before transfer or use in another product.)*
 - Some processing sites or Processors will require marijuana be tested for pesticides prior to accepting it. This is because if a cannabinoid extract or concentrate fails pesticide testing, it may be remediated only if the marijuana used passed required pesticide testing first. Otherwise, the cannabinoid extract or concentrate must be destroyed as ordered.

When transferring to a Wholesaler, required testing will depend on the intention for the usable marijuana. Because a Wholesaler is allowed to order compliance tests for usable marijuana, a grow site that is registered to do so may transfer untested usable marijuana to a Wholesaler.

If the marijuana is to be transferred from the Wholesaler to a Processor (Wholesalers may not transfer any items to a medical marijuana **processing site**), then the test requirements are the same as if the grow site were transferring directly to a processing site or Processor and those tests may occur prior to transfer to the Wholesaler or at the Wholesaler prior to transfer to the Processor.

If the marijuana is to be transferred from the Wholesaler to a recreational marijuana Retailer, then the testing requirements are the same as if the grow site were transferring directly to a medical marijuana dispensary.

Tests must be recorded in CTS and when a Laboratory takes samples, these samples must be transferred through CTS with a manifest. See the [“All CTS Administrators”](#) section, under “Operating Requirements” in the “Additional CTS Requirements” section above for more information on this process.

If a test fails (OAR 333-007-0450 (14)(a),(b))

If a compliance test for usable marijuana fails and is not successfully reanalyzed or remediated, that marijuana must be segregated, stored securely, and labeled to indicate the failed test and the test batch number.

20 Pound Transfers (to Processor or Wholesaler Licensees) (OAR 845-025-2130)

Grow sites may register with the Commission to transfer up to twenty pounds annually to OLCC-licensed recreational marijuana Processor or Wholesaler licensees. These transfers must be recorded via a “licensed” transfer manifest in CTS. Instructions and application forms are posted online at

https://www.oregon.gov/olcc/pages/ommp_tracking.aspx.

5. Section Revision History

Date	Type	Staff	Notes
2018-11-19	Draft	P. Owen	Incorporates clarifications from Oregon Health Authority
2018-12-05	Final Review	P. Owen	