

Processors (Extracts) Technical Subcommittee

July 8, 2015 Meeting Summary and Recommendations

Committee Attendees: Amanda Jamrose, Cameron Yee, Charles Weller, Karen Sprague, Jason Wasserman, Michael Lausmann, Norris Monson

Absent: Ethan Felcher

Other Attendees: Chris Lyons (RAC Chairperson)

OLCC Staff Representatives: Kelly Routt, Anna Davis, Amanda Borup, Steve Marks, Will Higlin

The processors' (extracts) technical subcommittee met on July 8, 2015 to discuss transportation, tracking, waste disposal, and packaging. The following is a summary of that meeting and the subcommittee's rule recommendations on those topics. For purposes of this and future summaries and recommendations, these phrases are defined as follows:

- **"Believes"** or **"agrees"**: no member of the committee voiced a conflicting opinion or approach.
- **"Generally agrees"**: some members of the committee voiced a differing sentiment than this prevailing opinion or approach.

1. Transportation and Delivery

The subcommittee believes that licensees should be able to transport marijuana items under their own licenses. The subcommittee also believes that wholesalers could be hired to transport and/or distribute marijuana items based on the preference of the licensee. The subcommittee believes that licensees should be able to enter the amount of marijuana items been transported into the tracking system immediately before transportation begins. Vehicle information should also be included in the manifest that is created within the tracking system. The subcommittee agrees that the number of employees involved in transporting product should not be set out in rule. The subcommittee also agrees that rules should not set out weight limits when transporting products.

2. Record Keeping

The extract subcommittee members currently gather data regarding marijuana at several points in the process. Subcommittee members assign lot numbers to the marijuana they receive for processing. Several lots or parts of several lots may be included in a single processing batch. Batch numbers are assigned to the individual batches. The part or all of the marijuana items produced in individual batches may then be blended with marijuana items produced in other batches. The blended batch would then be assigned a new batch number. Subcommittee members track the lot and batch numbers. The subcommittee members also track product loss at every stage where loss occurs through processing. They note that every time the marijuana is moved from one container to another it loses some weight. The weight loss averages approximately 5%.

Subcommittee members also track products given as samples. Samples are used to allow retailers and consumers to learn about a product. The subcommittee agrees that there should not be a limit on the number of samples they can provide to retailers. The subcommittee agrees on a rule requiring that any product that has been given away as a sample or gift cannot be resold.

HB 3400 requires records be retained for two years. Subcommittee members keep records longer than this for their own business purposes.

3. Waste Disposal

The extracts subcommittee members try to minimize waste through several methods.

a. Residual solvents

The subcommittee members extract solvents at the end of processing so that the solvents can be reused. Any ethanol that is used is reclaimed. Liquid waste that cannot be reclaimed can be taken by local hazmat waste processors.

b. Processed marijuana

Marijuana that has been processed so that active ingredients are removed can be reused in several ways. Some subcommittee members compost the used marijuana at the same location where the processing occurs. Other options for reusing the marijuana are to compost at other locations or to sell the used marijuana to companies that make items including hempcrete and animal feed from the used marijuana. There was discussion regarding whether it is necessary to track the processed/spent marijuana that is considered waste by the processors. Processed/spent marijuana may look like unprocessed marijuana, which could raise concerns in transportation. The subcommittee did not reach consensus on whether processed spent/marijuana removed from the premises should be tracked.

c. Returned and Defective products

The subcommittee agrees that licensees should keep records regarding returned and defective products. Subcommittee members generally store these products and whenever possible reprocess the products into a non-defective marijuana product. The reprocessed marijuana product could then be sold in the normal course of business. At times the defective marijuana product may be transferred to another processor who can remediate the product.

4. Packaging and labeling

The subcommittee discussed the requirements regarding packaging and labeling. HB 3400 requires child-resistant packaging and requires that packaging not be appealing to minors. The subcommittee generally agrees that their packaging responsibilities end once the consumer opens the package. In addition, the subcommittee members would like packaging to be environmentally responsible with clear guidelines on what “attractive to minors” means. There was significant debate on whether packaging could be limited to a single dose, but there was agreement that dosage amounts differ based on the type of product. The subcommittee members did not want child-resistant packaging guidelines to apply to bulk product that will be further processed by another processor or divided into individual units by a retailer.

This discussion will be continued at the July 22, 2015 subcommittee meeting. OLCC staff agreed to research the definition of “child-resistant packaging” (using resources such as the Oregon Health Authority and the FDA). Subcommittee members will provide examples of packaging currently being used.