

Compliance Education Bulletin

Bulletin CE2017-16

November 27, 2017

The Oregon Liquor Control Commission is providing the following information to: recreational marijuana licensees.

The bulletin is part of OLCC's compliance education. It is important that you read it, and understand it. If you don't understand it please contact the OLCC for help.

Failure to understand and follow the information contained in this bulletin *could result in an OLCC rules compliance violation affecting your ability to work or operate your business.*

Bulletin CE2017-16 covers the following issues:

- Competitions and Promotional Events

Competitions and Promotional Events

The Oregon Liquor Control Commission has been receiving an increase in questions regarding how licensees can enter into Cup Competitions and remain in compliance with recreational marijuana laws and rules. It is important that you understand the proper process for entering these competitions as well as what is – and is not – allowed.

How to Enter Samples into a Cup Competition

Only Retailers can sell or give directly to the public. Producers, Processors, Wholesalers, and Labs cannot sell or gift to non-licensees.

The only compliant way for Cup Competition samples to be provided to judges is for the items to be purchased at an OLCC Retailer location. As a licensed producer or processor you can transfer items to an OLCC Retailer within Metrc, and those items can be purchased at cost by a judge or competition organizer for consumption in the judges' or organizer's personal residence. The retail store may charge a discounted price for the marijuana items or give it away free if the customer is an OMMP cardholder.

Most commonly, we have heard licensees say that they intend to use the "In-house Quality Control" adjustment reason in Metrc to enter samples into competition. **This is not compliant.** Using a licensee's "quality control" allowance to remove product from the system and provide to individuals would be circumventing the rules and would not be a valid method of entering into a competition. Quality Control samples are intended for quality improvement purposes within a facility, not for providing free product to individuals off the licensed premises.

Any attempt to use adjustments – of any kind – in Metrc for purposes of entering samples into a cup competition would be a violation of OLCC rules.

Booths at a Cup Competition

Under Oregon law, no consumption is allowed in a public place. **Any location with an OLCC liquor license would be a public place, even if the venue is specifically reserved for a cannabis event.** If the location is not licensed to sell liquor, whether it is considered “public” is determined by the local jurisdiction. For more information on what is and is not allowed regarding consumption, see OLCC’s [“Consumption, Gifting, and Giveaways” guide](#).

However, **with prior approval**, an OLCC licensee can set up a booth at an event and have limited amounts of marijuana items on-site **for display only**. The event as a whole would operate as a “promotional event” in which OLCC licensees with prior approval may participate.

More information regarding promotional events, including how to apply and how to document in Metrc can be found in bulletin [CE2017-10](#) on OLCC’s website.