

Recreational Marijuana Program

Compliance Education Bulletin

Bulletin CE2018-08

November 8, 2018

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 CE2018-08 covers the following issues:

- **Processor and Wholesaler licensees:**
 - Receiving usable marijuana from medical marijuana grow sites.
- **Recreational Marijuana Retailer licensees:**
 - Prohibited from receiving marijuana from medical marijuana grow sites.
- **Medical Marijuana Grow sites:**
 - Registering to transfer marijuana to recreational marijuana licensees.

Marijuana transfers from Medical Marijuana Grow Sites

Medical marijuana grow sites that are subject to tracking in the Cannabis Tracking System (CTS, also known as METRC) are allowed to transfer limited amounts of usable marijuana to recreational marijuana Processor or Wholesaler licensees. A medical marijuana grow site must register for this privilege and be approved by the OLCC prior to making any of these transfers. The registration form can be found on [OLCC's web page](#). For the specific law see ORS 475B.825.

A recreational marijuana licensee must confirm the transfer is coming from an approved source. A list of medical marijuana grow sites that have been approved will be published on the OLCC's website at: https://www.oregon.gov/olcc/pages/ommp_tracking.aspx. Any grow site operator that wishes to make this type of transfer must be approved by the OLCC. It is a violation for an OLCC licensee to accept a transfer from an unapproved medical marijuana grow site.

A properly-recorded CTS transfer manifest is required. To accept a transfer of marijuana from a medical marijuana grow site, a Processor or Wholesaler licensee should see an incoming transfer in CTS from the grow site, identical to the way an incoming transfer from another licensee would appear.

Licensees are not obligated to accept a transfer. A licensee may reject a transfer in CTS. Nothing in OLCC's rules require a licensee to accept a transfer of marijuana from a medical marijuana grow site.

All testing requirements must be met. All testing rules apply for any medical marijuana being transferred to recreational marijuana licensees, just as they would for a transfer from another licensee.

For specific marijuana testing requirements, see the [Oregon Health Authority's Testing Requirements web page](#).

Grow sites are not visible to recreational marijuana licensees in CTS. A licensee will not be able to look up a medical marijuana grow site in CTS. Because grow site information is protected, the only time a licensee will see grow site information is when it is populated into the "incoming transfers" section of the "licensed transfers" interface in CTS and on the physical transfer manifest received with the marijuana.

Marijuana may not be returned to a grow site. Recreational marijuana Processor and Wholesaler licensees are not allowed to return marijuana to a medical marijuana grow site. If marijuana is unwanted, it must be rejected on the manifest. Once the marijuana is accepted, it becomes the responsibility of the licensee who received it.

Retailers are not allowed to accept transfers from a medical marijuana grow site. If a Retailer wishes to receive marijuana from a medical marijuana grow site, the Retailer must obtain the marijuana through a transfer from a Wholesaler licensee that has received a transfer from the medical marijuana grow site.

Registering to Transfer Marijuana

Medical marijuana grow sites required to track in CTS that want to transfer marijuana into the OLCC system must register with the OLCC.

A Person Responsible for a Medical Marijuana Grow site (PRMG) at a grow site required to use CTS may register to transfer marijuana to recreational marijuana Processors and Wholesalers. The designated Grow Site Administrator (GSA) must submit specific documentation to OLCC in order to be considered for the transfer privilege.

The registration form and additional information can be found at https://www.oregon.gov/olcc/pages/ommp_tracking.aspx under "Product Transfers" and "Tracking in CTS."

Oregon Statutes & OLCC Rules impacting this issue:

[ORS 475B.825 Transfer of usable marijuana](#)

[OAR 845-025-2130 Grow Site Transfers to Processor or Wholesaler Licensees](#)