

Recreational Marijuana Program Compliance Education Bulletin

Bulletin CE2020-02

July 14, 2020



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 CE2020- covers the following issues:

- **Transfer Rule and Common Mistakes**
- **Virtual Transfer Guidance**

See [Bulletin CE2021-02](#) for updated guidance on submitting Virtual Transfer Requests.

- **Rejecting Transfers Guidance**
- **'Stuck' Manifest Guidance**
- **CSV Upload for Packages on a Manifest**

Questions regarding the contents of this bulletin may be sent to marijuana.cts@oregon.gov.

Synopsis

Bulletin CE2020-02 provides an in depth explanation of the transfer rule for recreational licensees and highlights common mistakes made on manifests and during license-to-license transfers. The bulletin provides guidance and best practices to avoid these common transfer issues.

New CTS functionality allows the OLCC to facilitate virtual transfers for licensees and return 'stuck' manifests when the receiver fails to reject the transfer. Virtual transfers are only allowed when approved by the OLCC. The process and information needed from licensees for the OLCC to intervene in these situations are detailed within bulletin CE2020-02.

The 'stuck' manifest issue can be solved by delivery drivers ensuring that transfers are properly rejected before they leave the receiving licensee's facility. Additionally, the CTS Team has seen an increase in virtual transfer requests made because of receiving licensees improperly using the reject transfer template in Metrc. This bulletin includes screenshots and instructions on the proper use of the rejection template.

Finally, Bulletin CE2020-02 describes new functionality in Metrc that enables licensees to use Comma Separated Value file (CSV) uploads to add package UIDs to a manifest.

Additional information on transfers and Metrc compliance is available at the [Oregon Metrc Wiki Transfer](#) page.

Transfer Rule for Recreational Marijuana Licensees and Common Mistakes

The OLCC's transfer rules apply to all recreational licensees and CTS-tracked facilities; the rule is available [here](#). In Oregon, we currently use Metrc as our Cannabis Tracking System (CTS).

NOTE: Rules effective February 1, 2020 clarify how tracking and manifest requirements apply to a CTS-tracked facility based on the type of facility and the destination. All CTS-tracked facilities must record a transfer manifest for items that are being transported to another location under their applicable privileges. See [Bulletin CE2020-01](#) for details.

Additionally, the rules allow for "cold calling" or "circular manifests" under certain circumstances in order to visit other licensed facilities with marijuana items prior to accepting an order. See [Bulletin CE2020-01](#) and the OLCC's [Metrc "How-to" Guide](#) for information about this type of transfer. Manifests must reflect accurate delivery details for the transporter, duration of time the marijuana items are in transit, and driving instructions.

- The driver must be an employee of the transporter; the transporter field defaults to the shipper's license but should be changed to **reflect the actual transporting license** such as when the receiver picks-up the transfer or a wholesaler acts as transporter. In the image below we see the transporter field being edited, in this case for a pick-up by the destination licensee:

New Licensed Transfer

Transporter: 060-X0001 | OR LARGER THAN SALES, LLC

Employee ID: 060-X0002 | OR LARGER THAN SALES, LLC

Driver's Name:

Driver's Lic. No.:

Phone No.: +1-123-456-7890 (use default)

Destination 1: 060-X0001

Planned Route: Head north toward SE Frontage Rd
Turn right toward SE Frontage Rd
Turn right onto SE Frontage Rd
Turn right

Type: Transfer

Est. Departure: 06/02/2020 03:15 PM

Est. Arrival: 06/02/2020 03:20 PM

Package # 1: Type part of Package number...

1 (package)

1 (destination)

Register Transfer Cancel

- Estimated Time of Departure (ETD) and Estimated Time of Arrival (ETA) should accurately reflect the duration of time the marijuana items are in transit. Additionally, ensure that the ETD is later than the created time for the manifest. Generally, we recommend that licensees do not create manifests as they are rushing out of the facility to ensure that all manifest details are accurate.
- Driving directions for the transporter should accurately reflect a high level of detail of the planned route; "per Google map" is not an acceptable route description. Additional driving instruction requirements must be adhered to for circular manifests. Refer to the OLCC's [Metrc "How-to" Guide](#) for specific guidance related to circular manifests.

All manifests should be accepted by the destination facility *prior to the delivery driver leaving the destination facility's licensed premises*. Any rejected items **must** be rejected prior to the delivery driver leaving the destination facility. Before completing this step, the receiver should check for the following common issues:

- Check that all required test results for a product's category are passed. A "TestPassed" status on its own is not an indication that all compliance testing is complete. Licensees should always check the package's "Lab Results" tab and Certificate of Analysis to confirm that all required tests have been completed.
- Confirm quantities and weight of deliveries and enter those confirmed quantities/weights when accepting the manifest in Metrc. **If you accept inaccurate quantities you are accountable for the discrepancy.** We suggest rejecting packages with large discrepancies between the package delivered vs. quantity on manifest (i.e. received a package of 10 each with 50 each on the manifest, received a package of 10 grams with 10 pounds on the manifest) because they can cause larger complications with chain of custody if accepted.
- Entire packages can be accepted or rejected, but partial packages cannot be accepted (i.e. if 20 each are delivered and on the manifest, you cannot accept only 10 physically and in CTS).
- Reject packages with tags not matching the manifest (wrong item delivered).

Before transferring any package, sales for that package must be reconciled within Metrc. Once transferred, no sales can be reported against a package tag that you do not have in your Metrc inventory.

Virtual Transfer Guidance

The use of virtual transfers are limited and require OLCC approval. The use of virtual transfers does not substitute for a licensee's due diligence in reporting information into CTS accurately. Virtual transfers are approved by the OLCC when one licensee has a package physically while another licensee has control of the package in Metrc. *Virtual transfers are not approved when product or tags need to physically change locations.*

~~The OLCC CTS Team now has the functionality to facilitate virtual transfers on your behalf. Therefore, virtual transfers require the requestor to first obtain a Metrc Support ticket number from support@metrc.com, and then forward a written request to marijuana.cts@oregon.gov with the following information for documentation purposes:~~

- ~~• The Metrc Support ticket number;~~
- ~~• Your license number and worker permit number;~~
- ~~• Manifest number with problem;~~
- ~~• Package UIDs that need to be moved in CTS and their current physical location (license name, license number);~~

Any virtual transfers done without pre-approval may result in a compliance action. Transfers between businesses located on the same premises should not be recorded as virtual transfers and do not require pre-approval. However, transfers between licenses sharing the same location must be recorded and tracked in CTS as required by rule. We recommend that co-located facilities use “co-located handoff” or “transfer within same building” or similar wording rather than “virtual” on their manifests. Using virtual will flag manifests for review by compliance staff.

Rejecting Transfers Guidance

OLCC staff has noticed an increase in a need for virtual transfers to correct for errors that occur due to the incorrect rejection of transfers by licensees. Some of this may be due to functionality in Metrc allowing for users to select multiple packages for rejection using the “template” feature.

When you click on the reject box in the template area of the receive transfer interface, make sure to click the green check box. This will fill in the reject box on each line item if you want to reject the entire manifest, as seen below:

The screenshot shows the 'Receive Licensed Transfer' interface. It includes fields for Manifest (000037301), Transfer Type (Wholesale), Origin Lic. No. (020-X0001), Origin Name (OR LOFTY ESTABLISHMENT, I), Main Phone No. (+1-800-420-MAIN), Mobile Phone No. (+1-800-420-CELL), Transporter Lic. No. (020-X0001), Transporter Name (OR LOFTY ESTABLISHMENT, I), Phone No. for Questions (123-456-7890), Employee ID (Pending), Vehicle Make (Ford), Driver's Name (X), Vehicle Model (F150), Driver's Lic. No. (X), and License Plate (085-GLD). The 'Template' section is highlighted in green and contains three line items. Each line item has a 'Reject' checkbox with a green checkmark, which is highlighted by a red box. Below the 'Template' section is a 'Receive Transfer' button, also highlighted by a red box.

Package #	Item	Shipped Qty.	Reject
Package # 1	Blue Master Buds	15 g	<input checked="" type="checkbox"/>
Package # 2	Shake/Trim	10 g	<input checked="" type="checkbox"/>
Package # 3	Buds - AK-47	289 g	<input checked="" type="checkbox"/>

If you only wish to reject a single line item or a few line items on the manifest, you will not use the reject template feature, but rather click on the individual reject box on each package. Once you've rejected the packages you do not want, click the green “receive transfer” button. The rejected packages will return to the shipping licensee’s rejected transfers area of Metrc while the accepted packages, if any, will be put into your active packages inventory.

The error we have seen is that licensees are only clicking on the reject box in the template, *but not clicking on the green check box*. By doing this, the packages are not actually rejected, but rather accepted into the receiving licensee’s inventory. This causes problems when the origin licensee tries to send those same packages to other entities.

'Stuck' Manifest Guidance

In rare occasions a manifest will get 'stuck' in transit when the receiving facility does not accept or reject the transfer in Metrc and then goes out of business or is otherwise unresponsive. The receiver rejecting items on the manifest while the driver is still present will prevent the stuck manifest issue. If the manifest is not processed properly, the origin licensee can be stuck with product physically in their possession but without CTS access to the packages. The OLCC CTS Team now has the capability to 'return' the manifest to the origin licensee.

If you need a manifest returned to your facility, first obtain a Metrc Support ticket number from support@metrc.com, and then send a written request to marijuana.cts@oregon.gov with the following information:

- The Metrc Support ticket number;
- Your license number and worker permit number;
- Manifest number with problem;
- Package UUIDs that need to be moved in CTS and their current physical location (license name, license number).

CSV Upload for Package UUIDs on Manifest

Licensees will now see a new option allowing them to populate the package list of a Transfer via Comma Separated Value file (CSV) file. The licensee will select a CSV file to upload within the Create transfer or Create transfer template modal and the package list would be populated from that file.

The screenshot shows the 'New Licensed Transfer' modal form. At the top, a red error message states 'This field is required' pointing to the 'Destination 1' field. The form includes a 'Planned Route' text area, a 'Type' dropdown menu, and 'Est. Departure' and 'Est. Arrival' date and time pickers. Below these, there is a 'Package # 1' section with a search input, a 'Select files...' button (highlighted with a red box), and a 'Register Transfer' button at the bottom.

New Licensed Transfer

* This field is required

Destination 1 Type part of the License Number

Planned Route

Type - Select -

Est. Departure 06/08/2020 today 10 : 35 AM

Est. Arrival 06/08/2020 today 10 : 35 AM

Package # 1 Type part of Package number...

1 (package)

1 (destination)

The CSV file should be a single column listing the package UIDs to include on the manifest.

The screenshot shows the Microsoft Excel ribbon with the 'HOME' tab selected. The 'Clipboard' group contains 'Cut', 'Copy', 'Paste', and 'Format Painter'. The 'Font' group shows 'Calibri' font, size '11', and various formatting options. The 'Alignment' group shows alignment options. The active cell is A1, containing the text 'ABCDEF012345670000012265'. Below the ribbon, a table with 8 columns (A-H) and 14 rows is visible. The first 7 rows contain the same package UID in column A, and the remaining 7 rows are empty.

	A	B	C	D	E	F	G	H
1	ABCDEF012345670000012265							
2	ABCDEF012345670000012266							
3	ABCDEF012345670000012267							
4	ABCDEF012345670000012268							
5	ABCDEF012345670000012269							
6	ABCDEF012345670000012282							
7	ABCDEF012345670000012283							
8								
9								
10								
11								
12								
13								
14								

A package that is not eligible to transfer will not upload into the manifest package listing. For example, CSV uploaded packages will only load on the manifest if the file is uploaded to the correct facility. If an employee works at several related facilities and sees that packages are not added to the manifest after the CSV upload, they should check that they are uploading the correct file for the correct facility. Once the packages are added, the manifest can be edited as usual.

The screenshot shows a web application interface. At the top right, there is a date and time selector showing '01 : 14 PM'. Below this, there is a list of packages, each with a 'Package #' label, a text input field containing a package UID, a search icon, and a delete icon. The packages are numbered 1 through 7. Below the list, there is a section for file upload. It includes a 'Select files...' button and a file named 'test2.csv' with a size of '0.18 KB'. At the bottom, there is a section for destination selection, showing a dropdown menu with '1' selected and the label '(destination)'.