Recreational Marijuana Program Compliance Education Bulletin

Bulletin CE2021-01
July 15, 2021

OLCC Marijuana License Holder

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

The bulletin is part of OLCC's compliance education. <u>It is important that you read it, and understand it.</u> 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 CE2021-01 covers the following issue:

- **Reviews of production instructions and ingredients (OAR 845-025-3230)**

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

Upcoming reviews of production instructions and ingredients

Starting in July 2021, the OLCC will include requests for production instructions and ingredients in Cannabis Tracking System (CTS) desk reviews of processor licensees.

Processors are required to "create and maintain written, detailed standard policies and procedures (Processor Policies and Procedures - OAR **845-025-3230**) that include but are not limited to:

(1) Instructions for making each cannabinoid concentrate, extract or product;

(2) The ingredients and the amount of each ingredient for each process lot;

(3) The process for making each product.

Accordingly, on future Processor licensee Metrc reviews the CTS Team will include requests for information on random packages and production batches, including:

1. An electronic copy or image of the policy and procedures (mix logs, recipes, standard operating procedure (SOP), etc.) that includes the product's ingredients, the process for making the product, and any other written, detailed standard policies and procedures for the process lot.

2. An image of the label for the products (including the front and back), or the name and license number of the licensee that provides labels for these products, and the Label ID number.

What will the OLCC be looking for?

In reviewing the information requested the CTS and Packaging & Labeling teams will be looking to ensure:

- Required information and documentation is available and provided
- Products are correctly categorized in CTS
- Information provided is consistent across CTS, Label Applications, Labels, and Production Instructions
- All ingredients used are disclosed and compliant