Recreational Marijuana Program Compliance Education Bulletin

Bulletin CE2021-03

December 6, 2021

OLCC Marijuana License Holder

The Oregon Liquor and Cannabis 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 the loss of your recreational marijuana license.*

Bulletin CE2021-03 covers the following issues:
- **Common lab sampling errors**
- **Common errors after testing is completed**
- **Ways to prevent sampling and testing errors**
- **What to look for in Metrc**
- **Sampling and testing learning resources**

Early Identification of Sampling and Testing Errors Limits the Impact on the Supply Chain

Errors in sampling and testing can cause effects at all levels of the supply chain. It is important for all licensees to have an understanding of how the testing process flows and what to look for in Metrc. Errors identified and corrected **before test results are posted** will minimize the impact of a mistake down the supply chain. The following bulletin explains how to identify common issues and who to contact to assist in getting the issues resolved.

Common Lab Sampling Errors

Typically, a lab sampler transports a sample back to the lab, but the originating licensee is the one creating the sample package and the manifest in Metrc. ***Prior to leaving the licensed premises***, it is recommended that the lab employee AND an employee of the originating license verify the package and manifest information for the following:
- Is the sample the correct item category?
- Is it a sample package with the correct icon in Metrc?
- Is the sample from the correct source package(s)?
- Is the sample from the correct harvest(s)?

If any of the above information is incorrect, the sample can be easily [discontinued](#) and recreated prior to leaving the licensee's premises. However, any issue identified after a manifest has been rejected or accepted makes the issue much more complicated to resolve.

Below is more detail on the information that should be verified by licensees and lab employees, and how to verify the information – and remember that the *earlier* an issue is identified, the *more easily and quickly* it can be resolved.

Item Category Issue

All licensees should be verifying that the packages on a manifest (both before sending and before receiving the manifest) physically match the information in Metrc. If a lab receives a sample that is in the incorrect category in Metrc, for instance an edible labeled as a concentrate, the lab should reject the item.

1. Package	Shipped	Production Batch No.	Item Name	Quantity
1A4FFFB000493E1000000144 Lab Test: SubmittedForTesting		Bulk Oil Afghan Kush (Concentrate)	Shp: 5.0000 g
Item Details			
Source Harvest(s)	Test B_6/9/2021_Purple Kush_06/10/21		
Source Package(s)	1A4FFFB000493E1000000140		

In the above example the lab arrives to take a sample of 5 1:1 Dark Chocolate Bars from package 1A4FFFB000493E1000000140. The processor has created the sample in Metrc, however the "Same Item" box was not checked during package creation and the wrong item/category was assigned to the sample package. The lab physically has 5 chocolate bars from 1A4FFFB000493E1000000140, but the manifest lists 5 g of concentrate. The listed source package on the manifest matches the physical package the samples were taken from, so the issue is with the item/category.

If a category mismatch is identified before the transfer occurs, the package should be discontinued and re-created with the correct information.

If the issue is identified after the transporter has left with the sample, or after it has arrived at the lab, contact Metrc support (support@metrc.com) to get a ticket number; after receiving a ticket number you can contact OLCC at marijuana.cts@oregon.gov for assistance on how to resolve the issue.

If this issue is identified after the results are posted in Metrc, the results in the Lab Results tab will show the wrong category, but the CoA should list the correct category and have the required tests for the category the package truly is. OLCC cannot take action to correct the category after results have been added to Metrc.

Lab Sample Created as a Standard Package

An employee of the originating license and lab sampling staff should be checking to ensure that all compliance sample packages are marked as lab samples on manifests before leaving the facility. *Lab samples have a black "tear drop" icon at the end of the tag number.*

If a sample was created as a standard package and this issue is identified before the transfer occurs, the package should be discontinued and re-created correctly as a sample package.

If the issue is identified after the transporter has left with the sample, or after it has arrived at the lab, notify the lab/other party as soon as possible. The test results should NOT be posted in Metrc. Request a

ticket number from Metrc Support (support@metrc.com.) They will then have you contact the OLCC at marijuana.cts@oregon.gov and we will guide you through correcting the error. OLCC staff will need the Chain of Custody or sampling documentation to confirm what solutions are available for the situation.

Lab samples have a black tear drop icon at the end of the tag number

If this issue is identified *after* the results are posted in Metrc, the lab results tab in Metrc will continue to be blank for the package and its descendants. OLCC staff will work with you to get a lab status override on the package. The original source package and all of its descendants will generate potential violation emails when transferred to a retailer. All licensees in the chain of custody will be required to send the CoA to their clients and include the following notice:

> "When sampling issues are identified after lab results are posted to the wrong package, the lab is not allowed to repost the lab results or attach the Certificate of Analysis (CoA) to another package. This is the only case where a package can have "TestPassed" test status and no test results or CoA in Metrc. Transferring packages without all compliance lab results in Metrc to a Retailer will generate a Potential Violation. The sending licensee has the responsibility of pre-notifying the receiving licensee of the Potential Violation and providing a copy of the CoA. This is the only situation where a Potential Violation may be disregarded by a Retailer and product sold with missing test results."

Wrong Source Package

Both the originating license and the lab employee should verify the source package of each sample that has been created. Test results transmit back only to the source package(s) from which the sample was pulled in Metrc, meaning that pulling from the wrong source package will post the results to the wrong place – even if all other information at the sample level is correct.

If a sample was created from the wrong source and this issue is identified before the transfer occurs, the package should be discontinued and re-created from the correct source package.

If the issue is identified after the transporter has left with the sample, or after it has arrived at the lab, notify the other party as soon as possible when the error is found. *The test results should NOT be posted in Metrc.* The licensee with the source package will need to request a ticket number from Metrc Support (support@metrc.com) explaining that the wrong source package of a sample was listed in Metrc. Metrc will then have you contact the OLCC at marijuana.cts@oregon.gov and we will guide you through correcting the error.

Here is an example of when this error should be caught in the process. The lab went out and physically sampled package ABCDEF012345670000013088, which was verified with their sampling forms. Before leaving, the producer and the lab employee review the manifest to ensure all of the information is correct. They notice that the manifest lists the source package as ABCDEF012345670000013087.

In this example, the issue was identified before the transporter left with the sample. Because it was identified early, the manifest can be voided and the sample package can be discontinued, and then the sample package re-created from the correct source package. This can all be done easily and quickly by the originating license without any need to contact Metrc or OLCC.

The lab employee should wait until the originating license creates a new manifest with the correct information on it. A new manifest will need to be created with the new sample package that is now from the correct source package (in this case ABCDEF012345670000013088).

If the issue is identified after the transporter has left with the sample, or after it has arrived at the lab, contact Metrc support (support@metrc.com) to get a ticket number; after receiving a ticket number you will contact OLCC at marijuana.cts@oregon.gov for assistance on how to resolve the issue.

If this issue is identified *after* the results are posted in Metrc, the lab results tab in Metrc will continue to be blank for the package and its descendants. OLCC staff will work with you to get a lab status override on the package. The original source package and all of its descendants will generate potential violation emails when manifested to a retailer. All licensees in the chain of custody will be required to send the CoA to their clients and include the following notice:

> "When sampling issues are identified after lab results are posted to the wrong package, the lab is not allowed to repost the lab results or attach the Certificate of Analysis (CoA) to another package. This is the only case where a package can have "TestPassed" test status and no test results or CoA in Metrc. Transferring packages without all compliance lab results in Metrc to a Retailer will generate a Potential Violation. The sending licensee has the responsibility of pre-notifying the receiving licensee of the Potential Violation and providing a copy of the CoA. This is the only situation where a Potential Violation may be disregarded by a Retailer and product sold with missing test results."

Incorrect Harvest Batch

Like the issues described above, identifying that a sample is from an incorrect harvest *prior* to the transporter leaving with the sample makes the situation much easier (and quicker) to resolve. A sample package from the wrong source harvest typically means that the sample was either pulled from the wrong source package OR the source package itself was pulled from the wrong source harvest. If this issue is identified prior to the transporter leaving with the sample, it can be resolved via the method described below.

1. Package	Shipped	Production Batch No.	Item Name	Quantity
1A4FF0300000001000000594 Lab Test: SubmittedForTesting			Buds (Buds)	Shp: 5.0000 g
Item Details				
Source Harvest(s)		Psl Harvest 11/25/2019 (2)		
Source Package(s)		ABCDEF012345670000013087		

If the issue is identified after the transporter has left with the sample, or after it has arrived at the lab, notify the other party as soon as possible when the error is detected. The test results should NOT be posted in Metrc. Request a ticket number from Metrc Support (support@metrc.com.) They will then have you contact the OLCC at marijuana.cts@oregon.gov and we will guide you through correcting the error.

A producer wants to test source harvest Harvest 11/25/2021 (2). They make the manifest and when double checking the data identify that the wrong source harvest – 11/25/19 (2) – is listed on the manifest.

This means one of two mistakes was made:
1. The source package from which the sample was taken (in this example, ABCDEF012345670000013087) was itself pulled from the wrong Metrc harvest batch; or
2. The sample package was pulled from the wrong source package.

1. Package	Shipped	Production Batch No.	Item Name	Quantity
1A4FF0300000001000000594 Lab Test: SubmittedForTesting		Buds (Buds)	Shp: 5.0000 g
Item Details			
Source Harvest(s)	Psl Harvest 11/25/2019 (2)		
Source Package(s)	ABCDEF012345670000013087		

If the problem is problem #1 (the source package was pulled from the wrong harvest), the sample should be discontinued, followed by the source package (ABCDEF012345670000013087) being discontinued. Once both packages are discontinued, the source package can be re-created from the correct harvest, and then the sample package can be re-created from the new, correct source package.

If the problem is #2 (the sample was pulled from the wrong source package), follow the guidance in the "Wrong Source Package" section above.

If the issue is identified after the transporter has left with the sample, or after it has arrived at the lab, notify the other party as soon as possible when the error is detected. *The test results should NOT be posted in Metrc.* Request a ticket number from Metrc Support (support@metrc.com.) They will then have you contact the OLCC at marijuana.cts@oregon.gov and we will guide you through correcting the error.

If this issue is identified *after* the results are posted in Metrc, the lab results tab in Metrc will continue to be blank for the package and its descendants. OLCC staff will work with you to get a lab status override on the package. The original source package and all of its descendants will generate potential violation emails when transferred to a retailer. All licensees in the chain of custody will be required to send the CoA to their clients and include the following notice:

> "When sampling issues are identified after lab results are posted to the wrong package, the lab is not allowed to repost the lab results or attach the Certificate of Analysis (CoA) to another package. This is the only case where a package can have "TestPassed" test status and no test results or CoA in Metrc. Transferring packages without all compliance lab results in Metrc to a Retailer will generate a Potential Violation. The sending licensee has the responsibility of pre-notifying the receiving licensee of the Potential Violation and providing a copy of the CoA. This is the only situation where a Potential Violation may be disregarded by a Retailer and product sold with missing test results."
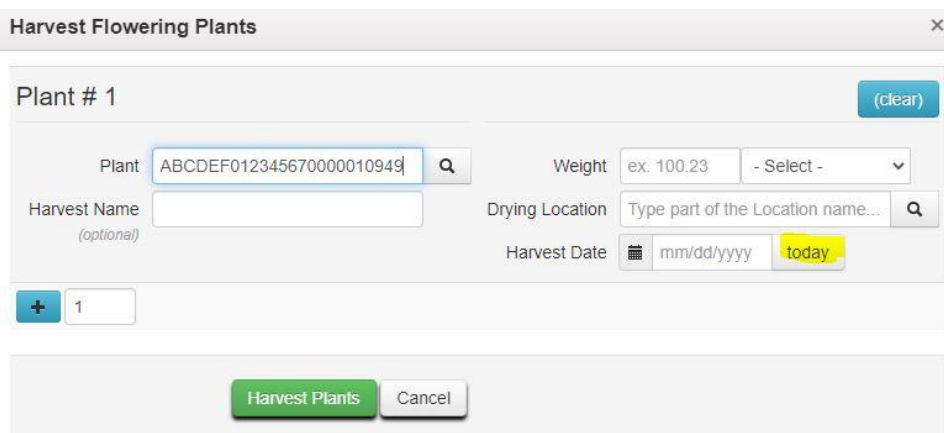
Common Errors After Testing is Completed

New Package Accidentally Created as a Production Batch

If possible discontinue the package in Metrc and create a new package without checking the production batch box. If the package cannot be discontinued, request a ticket number from Metrc Support (support@metrc.com.) They will then have you contact the OLCC and OLCC staff will work with you to get a lab status override on the package. The package and all of its descendants will generate potential violation emails when activities occur at a retailer. All licensees in the chain of custody will be required to send the CoA to their clients and inform them of the potential violation notfications.

Ways to Prevent Sampling and Testing Errors

Harvest date

Ensure that the harvest date recorded in Metrc is the actual harvest date. The easiest way to ensure the correct date is entered is to report harvests in Metrc on the day that they occur and use the "today" button. If you are reporting a harvest prior to 8 am the following day, double check that the date you enter is correct. The most common harvest date error is the wrong year being entered. It is especially important to have correct dates if you plan to have a composite sample. If the harvest date is wrong in Metrc the sample won't be able to be tested with the appropriate harvest lot.


Manifests

When transporting lab samples double check that the correct package number is being transported, the item name and category in Metrc matches the physical item, and that the correct parent package that was sampled from is listed in Metrc. Please also verify that the item is being manifested with the correct quantity and unit of measure.

Composite Samples

When submitting samples for compositing ensure that they are either all weight based or count based in Metrc. A batch cannot be composited between mixed weight and each based items.

Sample at the Correct Level

Taking samples from the correct package level is important for having the results flow to all the correct packages. Test results from samples will flow up the tree to the non-sample source package and from that package will flow down the tree indefinitely. Package 1A is used to create packages 2A and sample package 2B. Package 2A is then used to create package 3A.
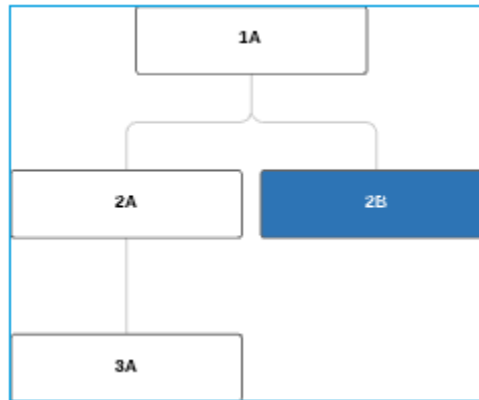
Why is package 2B the sample package? The results from 2B will flow up to its parent package 1A and then down to all of 1A's descendants. What would happen if 3A were the lab sample? The results will flow up to its parent package 2A and to any of 2A's descendants. The results would not show up on packages 2B nor 1A. This is why it is important to make sure you take the sample from the correct level. The lab results will only flow up to the first non-sample package it "hits" on its way up the tree, so you must make the sample package directly from the package you want the results to flow down from.

What to Look for in Metrc

"TestPassed" with Nothing in the Lab Results Tab

Sampling issues that are not discovered until after the results have been posted to Metrc will result in a package with a "TestPassed" status, but no results in Metrc. All licensees in the chain of custody should send the CoA to receiving licensees and include the following notice:

> "When sampling issues are identified after lab results are posted to the wrong package, the lab is not allowed to repost the lab results or attach the Certificate of Analysis (CoA) to another package. This is the only case where a package can have "TestPassed" test status and no test results or CoA in Metrc. Transferring packages without all compliance lab results in Metrc to a Retailer will generate a Potential Violation. The sending licensee has the responsibility of pre-notifying the receiving licensee of the Potential Violation and providing a copy of the CoA. This is the only situation where a Potential Violation may be disregarded by a Retailer and product sold with missing test results."

The accompanying CoA should have all of the required tests for the category recorded on it. If you believe any are missing please send a copy of the CoA to us at marijuana.cts@oregon.gov and let us know what you believe is missing.

The Package in the Lab Results Tab is a Different Category

Verify that the product is the correct category in Metrc. If your license has accepted or created a standard package with the incorrect category in Metrc a new child package should be created with the full quantity that is in the correct category. In the package notes please indicate that the parent package was miscategorized.

Verify that the CoA lists the correct category and that Metrc has all the required compliance tests for the actual category. If that information is correct then the package may be received and sold.

Learning Resources

The OLCC has made several resources available for licensees to assist with the sampling and testing process:

- OLCC Sampling and Testing Guide
- Overview of Testing Requirements in Oregon
- Advanced Metrc Training by License Type
- ~~Metrc XP- a sandbox environment where users have access to mock data for each license type. With the ability to simulate everyday activities from seed to sale, supported by scenarios to walk you through the process.~~
- Wiki- A resource for how-tos and answers to frequently asked questions regarding Metrc and Oregon's marijuana program

Questions?

- If you have any questions about this Bulletin, please send them to: marijuana.cts@oregon.gov or OLCC.Labs@oregon.gov.