

REMINDER: Final Implementation of New Rules for Vape Cartridges, Certain Pre-Rolls Takes Effect July 1st



June 2, 2021

The **July 1, 2021** deadline for “Inhalable Cannabinoid Products with Non-cannabis Additives” (“ICP”) is rapidly approaching. Generally, ICPs are vape cartridges and pre-rolls with non-cannabis terpenes or flavorings. On and after July 1, 2021, licensees **cannot possess or transfer these products unless they comply with the new rule standards**.

Before July 1, 2021, licensees can sell, destroy (waste), or return to the processor any ICPs that do not comply with the new rules – but if returning to another licensee, the ICPs will still need to be wasted in compliance with OLCC rules prior to July 1, 2021.

Licensees can use the following to spot labels subject to the “sell down” (cannot be possessed or transferred on and after July 1, 2021) and what labels are not subject to the sell down:

- **Labels subject to the sell down** contain product identities like “*marijuana extract with non-marijuana terpenes*” or “*marijuana extract with natural and artificial flavors*” and ingredient listings that state “*natural*” or “*artificial flavors.*” Here is an [example](#);
- **Labels that are NOT subject to the sell down** contain product identities and ingredient listings that contain the words “non-cannabis additives” and list all the ingredients in the product – either on an insert or on the exterior label. Here is an [example](#).
- **Licensees may no longer utilize generic labels** for ICPs created on and after April 1, 2021.

In December 2020, the OLCC enacted new additive rules that impact all OLCC marijuana licensees and industrial hemp certificate holders. This is only a [summary](#) of the rules and in some instances the rule requirements are generalized. This is not a substitute for reading the rules. A more detailed explanation of the requirements can be found in [Compliance Bulletin CE2020-07](#) along with links to the rules.

There are two important dates for licensees in these rules: **April 1, 2021** and **July 1, 2021**:

- **On and after April 1, 2021**, all ICPs manufactured or processed must comply with the new rule requirements;
- **On and after April 1, 2021**, all ICPs must be correctly categorized in Metrc (this includes ICPs made before April 1, 2021). Licensees with these products in their inventory must make these changes. See the [Inhalable Cannabinoid Products and Metrc Tracking Guide](#) for more information; and
- There is a limited “sell down” period for ICPs made before April 1, 2021. Processors may transfer ICPs **made before April 1, 2021** that do not comply with the new rule requirements **until June 30, 2021**. As of July 1, 2021 licensees cannot even possess or transfer products that do not meet the new rule requirements.

Questions related to the rules or labeling should be directed to marijuana.packaging@oregon.gov.

Questions related to Metrc should be directed to marijuana.cts@oregon.gov