



OMMP Marijuana Tracking Program Compliance Education Bulletin

Bulletin MMCE2019-03

April 10, 2019

The Oregon Liquor Control Commission is providing the following information to: recreational marijuana licensees and medical registrants.

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 MMCE2019-03 covers the following issues:

- **Sampling and Testing Procedures for Pre-Rolls**

Sampling and Testing Procedures for Pre-Rolls

This bulletin describes how the weight of pre-rolls should be calculated for sampling and testing for purposes of potency.

Two types of pre-rolls exist:

- Non-infused ("plain") pre-rolls that consist only of usable marijuana, unflavored rolling paper, and a filter, tip, or cone. These types of pre-rolls are usable marijuana and may be made by Recreational Producers, Recreational Wholesalers, and Recreational Retailers.
- "Infused" pre-rolls that contain usable marijuana combined with anything other than plain paper and a filter, tip, cone, etc. This may include, but is not limited to, combining usable marijuana with any of the following: flavored rolling paper, flower petals, concentrate (e.g. kief), or extract (e.g. oil). These types of pre-rolls are "other cannabinoid products" and may only be made by Recreational Processors.

Recreational Marijuana Program Compliance Education Bulletin [CE2019-04](#) describes how pre-rolls should be categorized in Metrc beginning April 1, 2019.

OLCC's labeling rules describe the requirements for labeling weights and potency of [usable marijuana \(non-infused\) pre-rolls](#) as well as [cannabinoid product \(infused\) pre-rolls](#).

Visit OHA's Oregon Medical Marijuana Program's [rules webpage](#) for regulations regarding testing. Testing rules can be found under [Division 7](#) for both medical and recreational marijuana.

Non-Infused (Usable Marijuana) Pre-Rolls

If usable marijuana has been created into pre-rolls prior to testing, the following procedures should be followed:

For purposes of sampling: **the full item net weight**, including the unflavored paper, filter, tip, cone, etc., counts towards the weight of the 15 pound batch limit.

For purposes of testing and calculating Total THC and Total CBD: labs should unroll any pre-rolls that have been sampled and conduct tests on only the usable marijuana. When calculating Total THC and Total CBD as milligrams of THC (or CBD) per gram of item weight, **only the weight of the usable marijuana** should be included in the denominator of the calculation.

For purposes of labeling percent THC and CBD: labels for non-infused (usable marijuana) pre-rolls require the concentration of THC and CBD to be expressed as a percentage. The value on the label should be based on **only the weight of the usable marijuana**.

For example:

- A Recreational Producer has a single-strain harvest lot that they intend to use for pre-rolls. If the pre-roll is 1 gram of usable marijuana and an aggregate weight of 0.5 grams of unflavored rolling paper, filter, tip, etc., the Producer could have a maximum of 4,535 pre-rolls in a 15 pound batch for purposes of sampling.
- The appropriate number of samples are taken by the lab. When the lab tests the pre-rolls for Total THC the result is 200 milligrams of THC per pre-roll; the lab would report the result as 200 mg/g Total THC because the weight of the usable marijuana is 1 gram.
- The label of the pre-roll for sale to a customer would list the THC percentage as 20% because the weight of the usable marijuana in the pre-roll is 1 gram.

Usable marijuana may be tested prior to making into non-infused (usable marijuana) pre-rolls. As long as no additional elements are added other than unflavored paper, a filter, tip, cone, etc., the test results for the batch of usable marijuana remain valid. If creation of the pre-rolls is done after testing has been conducted, the labeling of the percentage of THC and CBD should be based only on the usable marijuana weight of the pre-roll and should not be based on the full item net weight (see above labeling example).

Infused (Other Cannabinoid Product) Pre-Rolls

Infused pre-rolls must be tested like any other cannabinoid product – all input material must be tested according to the Oregon Health Authority’s rules based on the input product type (see the “if intended for further processing” column at this link) and the final item must be tested for potency.

For purposes of sampling, testing, and labeling the full item net weight (including the filter, tip, crutch, etc.) must be used.

For example:

- A Recreational Processor combines 1 gram of usable marijuana; 0.25 grams of keif; and a total of 0.5 grams of flavored rolling paper, filter, tip, cone, etc. The full infused pre-roll net weight is 1.75 grams.

- The appropriate number of samples are taken by the lab. When the lab tests the pre-rolls for Total THC the result is 450 milligrams of THC per pre-roll; the lab would report the result as 257.14 mg/g Total THC because the net weight of the pre-roll as a whole is 1.75 grams ($450 \text{ mg THC} \div 1.75 \text{ grams item net weight}$).
- On the label for sale to a customer, cannabinoid products must express THC and CBD as milligrams in each serving and in the container. The label of this infused pre-roll would list the Total THC for the container as 450 mg ($257.14 \text{ mg/g THC} * 1.75 \text{ gram item net weight}$). The per-serving Total THC amount would be 450 mg divided by the number of servings.

Resources for Licensees and Medical Registrants Related to Pre-Rolls

- OLCC's [Metrc Product Categorization](#) guide
- [Oregon Metrc Wiki](#) and wiki [Item Categorization](#) page
- OLCC's [Metrc Sampling and Testing](#) guide
- OHA's [marijuana testing](#) webpage

Rules impacting this issue

- Usable Marijuana labeling requirements ([845-025-7070](#))
- Testing Requirements for Usable Marijuana ([333-007-0320](#))