



Laboratory Metrc Guide

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General Rules and Guidelines

Rules and requirements related to handling and testing of cannabis is overseen by three state agencies.

The Oregon Liquor Control Commission (OLCC) approves licenses for the recreational marijuana market and oversees recreational marijuana rules, including security requirements; data tracking in Metrc, the state's Cannabis Tracking System; and proper handling of marijuana items produced and sold within the recreational market.

The Oregon Health Authority (OHA) oversees the Oregon Medical Marijuana Program, establishes rules for all testing of marijuana items (for both medical and recreational sales), and regulates the production and sales of medical marijuana items. Within OHA is also the Oregon Environmental Laboratory Accreditation Program (ORELAP), which oversees sampling and testing of all cannabis – medical marijuana, recreational marijuana, and hemp. ORELAP accreditation is required for OLCC-licensure, and labs may only conduct state-required tests for which they are ORELAP-accredited.

The Oregon Department of Agriculture (ODA) oversees the Oregon hemp program; monitors and regulates pesticide use on cannabis products; and, through the Weights and Measures Program, certifies non-sampling scales for recreational marijuana licensees for all weights entered into Metrc.

This guide is specific to rules and data tracking within the recreational marijuana market. All recreational marijuana items available for sale to consumers must be tested as laid out in OHA's testing rules. The types of tests required depends on the product being tested and its destination. For example, usable marijuana for sale to a consumer must pass different tests than usable marijuana being sent to a processor for extraction or concentration.

Products that fail state-required tests may be retested according to OHA rules. The lab doing the original testing must retest the sample for the test(s) that failed. If this retest passes, a second lab must resample from the original batch and conduct a confirmation test. If the product passes both the retest and the confirmation test, the batch may be transferred to its intended destination. If the product fails *either* the retest or confirmation test, the batch must be either remediated in accordance with OHA rules or destroyed in accordance with OLCC rules.

The following guide explains how to use Metrc, the state's Cannabis Tracking System, to record sampling and testing of recreational marijuana items.

Sampling

In Metrc, there are two types of packages – a “regular” package and a sample package. “Regular” packages are those that are created through the Create Packages button in Metrc. Sample packages are those that are created through the Submit for Testing button. The final test results will not be registered until all sample packages taken from a single harvest or “regular” package have been tested – if there are additional sample packages without a test result, the test status for the source package or harvest will remain “TestingInProgress.”

To conduct tests in Metrc you must first create a sample package. The sample package must be created within the account of the licensee requesting testing. One sample package should be created for each lab conducting tests on a batch. For example, if one lab will be testing a batch for pesticides and another lab will be testing a batch for water activity, moisture content, and potency, two sample packages should be created.

If the sampling is done at the site of the producer or processor, the samples should first be physically taken by the lab, and then the lab should instruct the licensee how much weight the sample package(s) should contain. If the sampling is being done on the lab’s premises, the lab will create the sample package in their own Metrc account.

To create a sample package, follow the below steps:

- 1) Select the source of the sample (the process lot or harvest from which you will be sampling). If you are sampling from a package, make sure you are in the Packages section and have clicked the Active tab. If you are sampling from a Harvest, make sure you are in the Plants section and have clicked the Harvested tab.

Figure 1a: Sampling from a harvest at a producer’s grow site

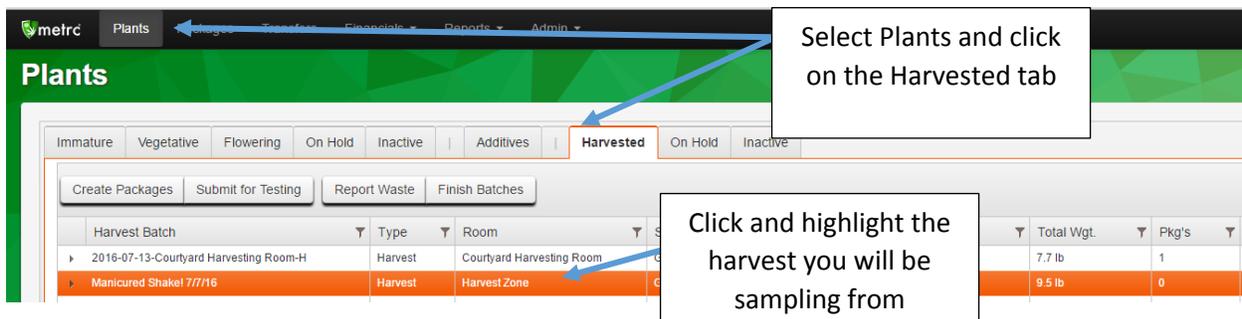
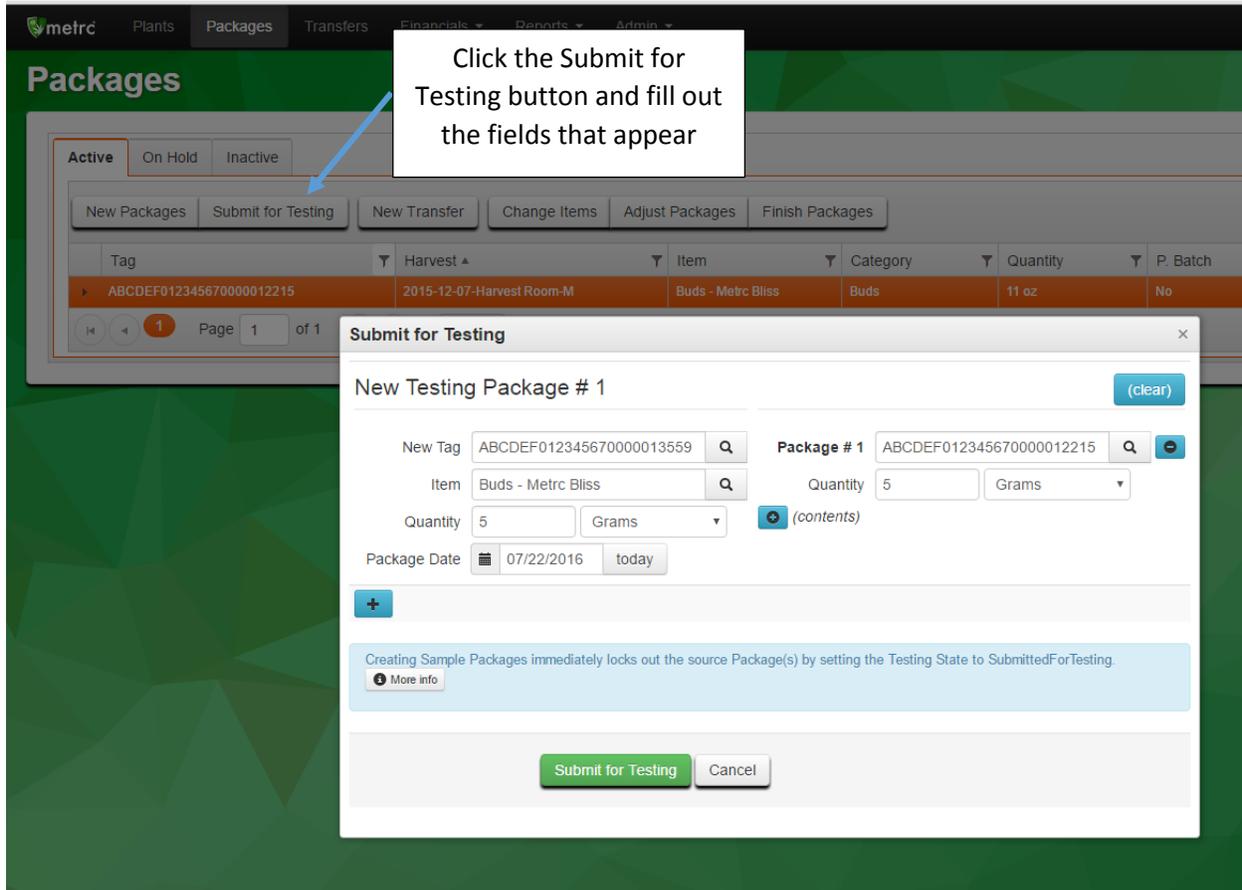


Figure 1b: Sampling from a Metrc package

The screenshot shows the 'metrc' application interface. At the top, a navigation bar includes 'Plants', 'Packages', 'Transfers', 'Financials', 'Reports', and 'Admin'. The 'Packages' tab is selected. Below the navigation bar, the page title 'Packages' is displayed. A callout box with a blue arrow pointing to the 'Packages' tab contains the text: 'Select Packages and click on the Active tab'. Below the title, there are three tabs: 'Active', 'On Hold', and 'Inactive'. The 'Active' tab is selected. A row of action buttons includes 'New Packages', 'Submit for Testing', 'New Transfer', 'Change Items', 'Adjust Packages', and 'Finish Packages'. Below these buttons is a table with columns for 'Tag', 'Harvest', and 'Quantity'. The first row is highlighted in orange and contains the following data: 'ABCDEF01234567000012215', '2015-12-07-Harvest Room-M', and '11 oz'. A callout box with a blue arrow pointing to the '2015-12-07-Harvest Room-M' cell contains the text: 'Click and highlight the harvest you will be sampling from'. At the bottom of the table, there is a pagination control showing 'Page 1 of 1' and '20 items per page'.

- 2) Click to highlight the Package or Harvest Batch, then click the Submit for Testing button and complete the fields in the box that displays. The example below is specific to sampling from a package; the process for sampling from a harvest is nearly identical.

Figure 2: Complete the Submit for Testing fields



New Tag: This is the RFID tag to be associated with the new sample package. Either type the last few numbers of a tag and select the correct one or click the  lookup button and search for the tag

Item: This is the item of the sample package. It should match the item of the package from which the sample is being taken. For example if the item of the source is “Buds – Metrc Bliss,” this would also be the item of the sample package.

Quantity (on the left-hand side): This is the quantity of the sample package (either count or weight of the contents).

Package Date: This is the date when the sample package was created.

Package #1: This is the RFID tag of the source package.

Quantity (on the right-hand side): This is the quantity being sampled from the source package.

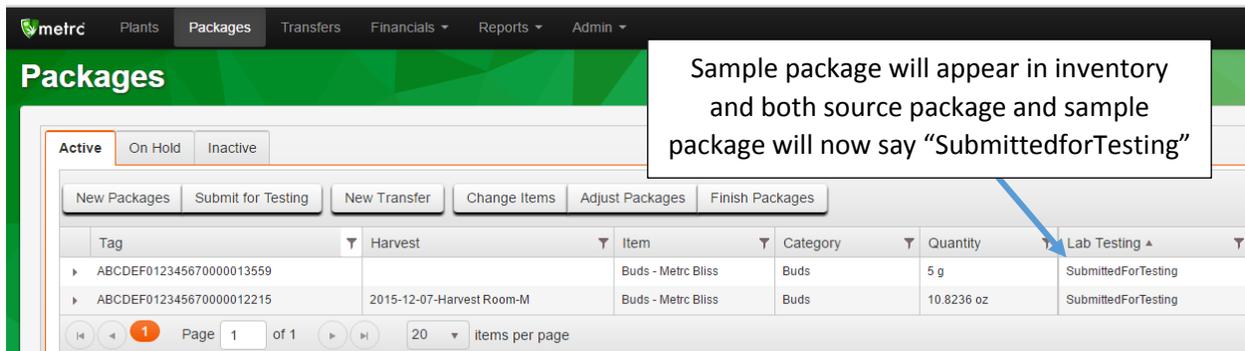
If there are additional source packages being sampled from that should be part of the same

sample package, you can click on the  (contents) button and add additional sources.

Please note: all test results from this sample package will be associated with every source package you include in the sample package contents.

- 3) When all the information for your sample package has been created, click on the Submit for Testing button. Once submitted, the sample package should appear in the Packages inventory and both the source package or harvest and sample package will now have the status of “SubmittedforTesting.” The weight of the source package will be automatically updated to reflect the weight taken out for sampling.

Figure 3: Sample package appears in package inventory



The screenshot shows the 'Packages' section of the metrc interface. It features a navigation bar with 'Plants', 'Packages', 'Transfers', 'Financials', 'Reports', and 'Admin'. Below the navigation bar, there are tabs for 'Active', 'On Hold', and 'Inactive'. A toolbar contains buttons for 'New Packages', 'Submit for Testing', 'New Transfer', 'Change Items', 'Adjust Packages', and 'Finish Packages'. The main area displays a table with the following data:

Tag	Harvest	Item	Category	Quantity	Lab Testing
▶ ABCDEF012345670000013559		Buds - Metrc Bliss	Buds	5 g	SubmittedForTesting
▶ ABCDEF012345670000012215	2015-12-07-Harvest Room-M	Buds - Metrc Bliss	Buds	10.8236 oz	SubmittedForTesting

At the bottom of the table, there is a pagination control showing 'Page 1 of 1' and '20 items per page'. A callout box with a blue arrow points to the 'SubmittedForTesting' status in the 'Lab Testing' column of the second row.

Entering Test Results

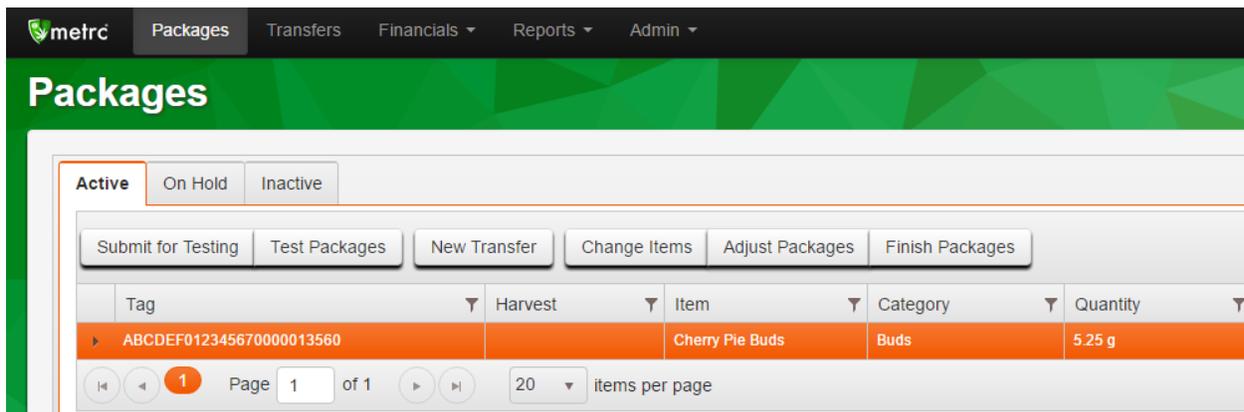
Test results should only be entered into Metrc once per sample. At the time that all testing has concluded and the final results are known for the full battery of tests that have been run, those results will all be entered in the same place. Please note that the final test results will not be registered until all sample packages taken from a source package or harvest have been tested – if there are additional sample packages without a test result, the test status for the source package or harvest will remain “TestingInProgress” even after test results have been entered.

Test results should only be recorded for state-required testing. There are five categories of testing that must be conducted based on the product type and the destination of the product: pesticides, solvents, water activity and moisture content, microbiological contamination, and potency (THC and CBD). Refer to the Oregon Health Authority [rules on cannabis testing](#) for the full explanation of when each test is required and what constitutes passage or failure for each. For an explanation of how to handle non-required testing in Metrc, see the FAQ in Appendix 1.

To enter test results into Metrc, follow the below steps:

- 1) In your Metrc lab facility account in the Packages section, click the Active tab. Select the sample package being tested and click the Test Packages button.

Figure 4: Select sample package for testing



- 2) Complete the fields in the Test Packages box.

Package: RFID tag of the sample package being tested.

Results Date: The date the test result for the sample package is being reported after all tests have been completed. **Please note: this may not be the date that an individual test has been run.**

Result #1: The test type being run; these correspond to the state-required tests.

Quantity (optional field): The test value of the individual test being run. This should be reported in the unit in parentheses in the test type name. For example, “Abamectin

(ppm)” should be reported as parts per million, whereas “Total THC (mg/g)” should be reported as milligrams of THC per gram of sample.

Status: Whether the individual test passed or failed.

Notes (optional field): A place for notes, such as a LIMS record number, comments to the producer or processor requesting the tests, etc.

To minimize the amount of duplicative data entry and opportunity for data entry errors, OLCC is not requiring labs to enter results of every individual test on each specific analyte when testing pesticides or solvents. Instead, when reporting results for these two categories of testing, labs should indicate whether the overall category passed or failed and, if it failed, enter the value of the test result for each analyte above the action limit as specified in rule. See the screenshots below for an example.

Other tests for Water Activity; Moisture Content; Microbiological Contamination (Coliforms and *E. Coli*); and Potency (THC and CBD) should have specific values entered if they have been tested for as part of state-required tests. Please refer to Appendix 2 for how to enter test results for each test category.

Figure 5a: Reporting a passing pesticide result

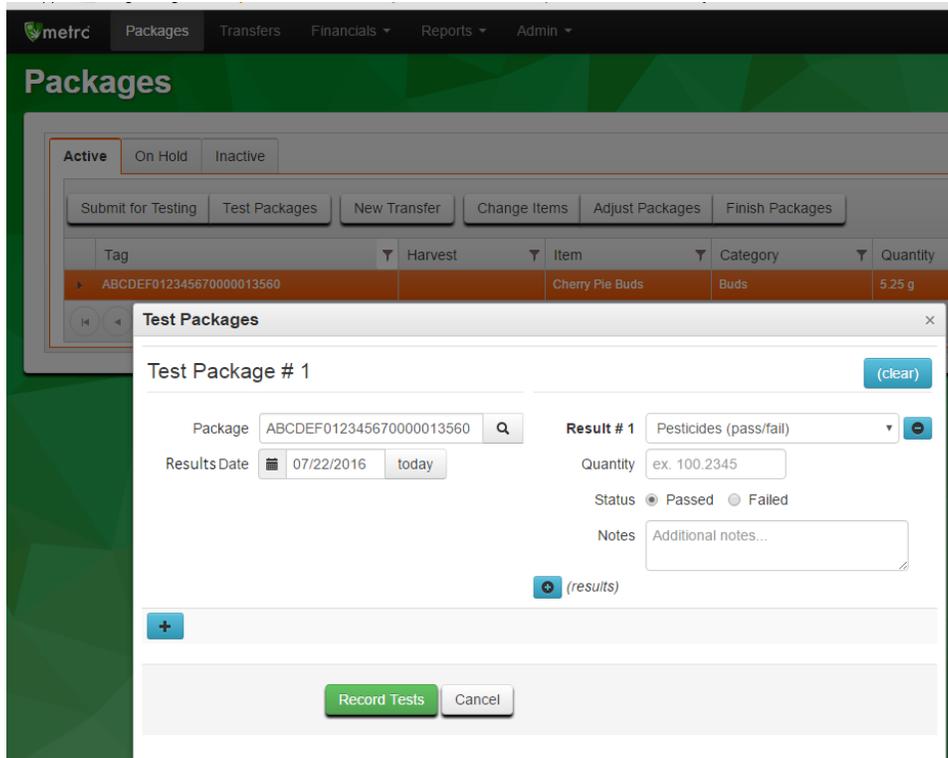
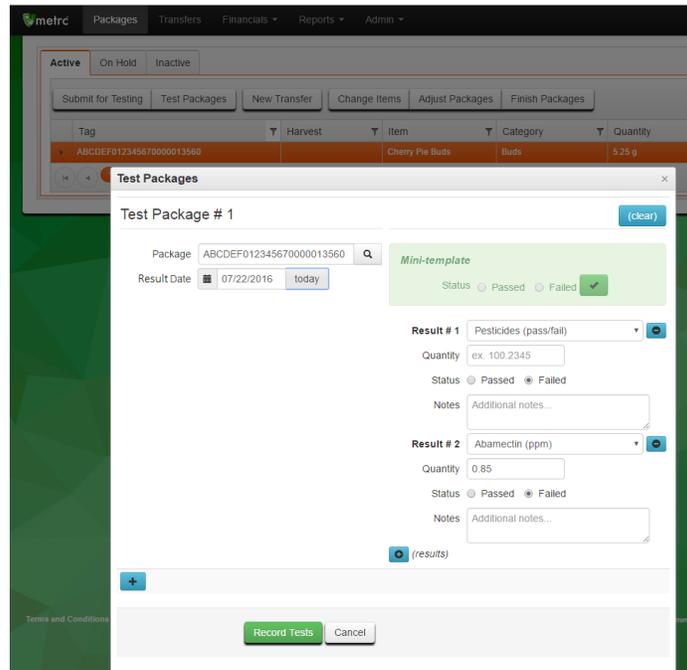


Figure 5b: Reporting a failing pesticide result



- 3) Enter results for each state-required test being conducted on the sample package. You can enter additional results by clicking on the  (results) button. Once all tests have been entered, click the Record Tests button.

Reconciling Weight Taken for Testing (Adjustments)

Every OLCC licensee, including labs, must reconcile inventory on a daily basis. That means that any materials tested and destroyed throughout the day must be netted out from Metrc packages. The process for inventory reconciliation is done via package adjustments, and there are two ways to do this within Metrc.

- 1) Via the Packages tab
 - a. In your lab facility account, click on the Packages tab.
 - b. Highlight the package(s) to be adjusted and click the Adjust Packages button.
 - c. In the “Adjust Packages” box, fill out the relevant fields.

Package: RFID tag of the package being adjusted.

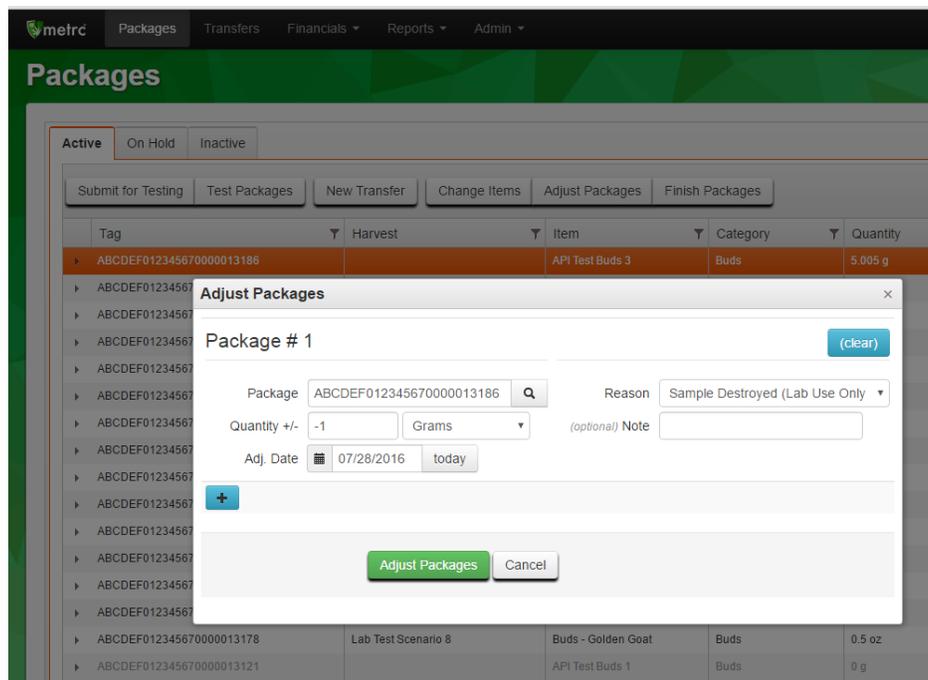
Quantity +/-: The amount of weight to adjust the package by. **Important: if subtracting weight from a package, the quantity must have a minus sign (-) before the number.**

Adj. Date: The date the adjustment was made.

Reason: Reason the adjustment is being made. **Adjustments due to testing should use the “Sample Destroyed (Lab Use Only)” reason code.**

Note: Note to indicate reason for adjustment, tests done, etc. – optional field for reference only

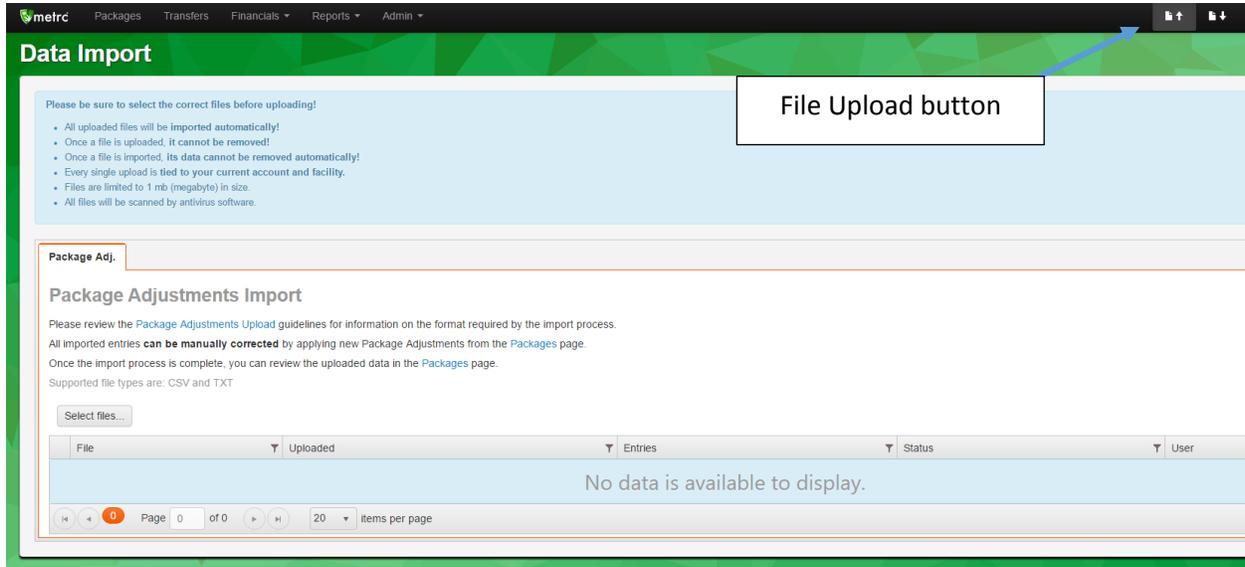
Figure 6a: Adjustments through the Packages tab



- 2) Via the Data Import function
 - a. Click the  button on the top right of the screen.

- b. Review the Package Adjustments Upload instructions, select the CSV or TXT file you wish to upload, and upload the file.

Figure 6b: Adjustments via Data Import



Appendix 1: Frequently Asked Questions

Is a lab able to conduct “extra” tests not required by the state for clients? How should these tests be recorded in Metrc?

If a test is requested that is not part of the state-required testing regime, it can be conducted by a lab even if that lab is not ORELAP-accredited for the specific test. For example, if a producer requests a test for terpenes on a harvest batch, any OLCC-licensed lab may conduct that test.

However, these “extra” tests need to be handled differently in Metrc. First, the test result **should not** be entered into Metrc. Results of these tests should be communicated to clients through some other form.

Second, even though the test results will not be entered into Metrc, the chain of custody must still be documented in Metrc. The transfer of product from the requesting licensee to the lab must be conducted in Metrc via a transfer manifest.

Third, **do not** submit a batch for testing for these “extra” tests. If these optional tests are the only ones being sampled for, create a standard (**non-sample**) package with the appropriate weight and transfer it to a lab. Once testing is completed, the lab will adjust the package with the appropriate reason code, but no test results will be entered. If you create a sample package for a batch undergoing “extra” testing it will block required test results from transmitting to the originating batch (see the question below). Alternatively, if you submit failing results for these “extra” tests, it will fail the batch as a whole and block the producer or processor from selling their batch through the supply chain.

I entered test results for a sample, but the status still says “TestingInProgress” – why?

The final testing status will not be determined until *all* sample packages taken from the same source have had test results submitted. For example, if two sample packages are created from one harvest, after the first sample is tested the status of the harvest and both sample packages will become “TestingInProgress.” After test results for the second sample are submitted the status of the harvest and sample packages will update to reflect the test results (either “TestPassed” if all tests on both samples passed, or “TestFailed” if any test on either sample failed). If you believe that all samples have been tested and the status of “TestingInProgress” is incorrect, please contact Metrc customer support.

Can samples be stored by a lab at a remote, unlicensed facility?

All marijuana items must be stored on a licensed premises. A remote office, if unlicensed, could not be used to store marijuana items. If a remote office is being used as a waypoint as part of transportation of samples or other marijuana items, OLCC must be notified in advance if the stop is longer than two hours.

Samples and other marijuana items can be stored at any licensed premises, not only the lab’s own premises, as long as it is properly documented within Metrc according to OLCC rules. Therefore, if, for example, a sampling lab is too far away from its own licensed premises to store materials overnight, the samples could be instead stored with an OLCC-licensed wholesaler.

If a lab goes out to sample at the site of a producer or processor how should the data be recorded in Metrc?

OHA's testing rules and ORELAP accreditation require that only OLCC-licensed labs accredited for sampling are able to take samples for state-required tests. If a lab is sampling at the site of a producer or processor, the product will still be in this licensee's Metrc inventory when the lab arrives to take samples. The lab should take physical samples according to OHA and ORELAP requirements and then instruct the producer or processor to create sample packages in the producer or processor's Metrc account with the appropriate weight(s). **In Metrc, one sample package should be created for each lab conducting testing.** If only one lab will be conducting all state-required testing for the batch, all the samples taken by the lab should be included in only one Metrc sample package under one RFID tag. The sample(s) should then be transferred via transfer manifest to the lab or labs conducting the testing. When the sample arrives on-site at the lab, the sample should be weighed to verify the information entered into Metrc and the manifest should be accepted into the lab's inventory.

If a grower brings in a 10 pound harvest batch for sampling how should this be recorded in Metrc?

Under OLCC rules, labs may accept whole batches from producers and sample directly at the lab location. In Metrc, the producer would transfer the entire batch to the lab **without submitting for testing.** The lab would receive the transferred batch into their inventory. Once in the lab's inventory, the lab would submit the batch for testing and create the sample package with the appropriate weight. **This requires the lab to have their own package tags in stock.** Once the sample package is created, the lab can choose to either keep the remainder of the batch in their own inventory, transfer it back to the originating producer, or transfer it to an OLCC-licensed wholesaler while the test results are pending.

If I am a licensed lab can I have my employees collect samples?

If a lab is accredited by ORELAP for sampling and licensed with the OLCC, any employee at the lab may collect samples. All physical sampling must be done in accordance with OHA rules and ORELAP standards and must be accurately reflected in Metrc.

Are there options other than manual data entry for inputting information into Metrc?

For both package adjustments and test results there are two alternatives to manual data entry: an Application Program Interface (API) and CSV upload.

Metrc has developed an API that can be used by third-party software, such as LIMS, to enter information into Metrc automatically. Companies must first be credentialed for use within Metrc and be issued an API key. A list of the software companies that have passed this certification process can be found on the Metrc website. Although most functions within Metrc will be supported in the API, creating transfers between facilities will need to be done manually within Metrc.

For labs using third-party software that has not developed an API, CSV upload is another alternative for data entry. The required information for a data upload differs based on the data being imported (e.g. adjustment vs. lab test results), and you should read the relevant

documentation to ensure that all information is included. One common requirement is the package RFID number – if you are able to track this number in your LIMS and your LIMS supports data export to Excel or CSV the data upload to Metrc should be a feasible option to avoid manual data entry.

How many scales do I need? Do they need to be certified?

The number and types of scales you will need depends on what types of weighing you will be doing. OLCC rules require that any weights entered into Metrc must be derived from a scale certified by the appropriate state agency. For any scales covered by the ORELAP accreditation process, such as field sampling scales, ORELAP certification is sufficient. For other scales not directly used for sampling, scales must be certified by ODA.

By and large, if a lab will not accept entire batches into their inventory and will only sample at the premises of a producer, processor, or wholesaler, the lab will not need any scales other than those certified by ORELAP. However, for labs accepting entire batches from a producer into their inventory, those sampling scales certified by ORELAP will not have sufficient capacity and the lab will need one or more ODA certified scales.

Where can I go or who should I ask if I have more questions?

For questions regarding rules and requirements you should check marijuana.oregon.gov. You can also subscribe to [email alerts](#) from OLCC. If you have questions that are not answered by reading the materials posted online, you can contact the OLCC at marijuana@oregon.gov or (503) 872-5000.

For questions regarding how to use Metrc, the Metrc support desk can provide assistance for questions related to specific functionality or troubleshooting. They can be contacted at support@metrc.com or (877) 566-6506.

For questions related to how specific scenarios not covered in this guide should be recorded in Metrc, contact TJ Sheehy, Data Analyst for the OLCC Marijuana Program, at tj.sheehy@oregon.gov or (503) 872-5017.

Appendix 2: How to Enter Test Results

Test Category	How to enter result	If result is failure...
Pesticides	Select "Pesticides (pass/fail)" and select pass or fail as the Status. If the result is a pass, you do not need to enter a specific test quantity.	Select the specific analyte(s) that failed, select "Failed" as the Status, and enter the specific value detected as parts per million in the Quantity field.
Solvents	Select "Solvents (pass/fail)" and select pass or fail as the Status. If the result is a pass, you do not need to enter a specific test quantity.	Select the specific analyte(s) that failed, select "Failed" as the Status, and enter the specific value detected as microgram per gram in the Quantity field.
Water Activity	Select "Water Activity (Aw)," select pass or fail as the Status, and enter the partial vapor pressure value detected.	No additional information required.
Moisture Content	Select "Moisture Content (%)," select pass or fail as the Status, and enter the moisture content of the sample detected as a percentage.	Moisture content cannot fail, but is a required test for informational purposes.
Microbiological Contamination	Select "Coliforms (#)," select pass or fail as the Status, and enter the total coliform count detected.	If coliforms are detected, select "E. Coli (CFU/g)," select pass or fail as the Status, and enter the coliform-forming unit per gram detected.
Potency	<p>First, select "Potency (pass/fail)" and select pass or fail as the Status (no specific value is required). You should select fail as the Status if potency fails for <i>any</i> of the reasons as outlined in rule. Regardless of whether Potency passes or fails, you should also enter the Total THC and Total CBD amounts.</p> <p>Second, select "Total THC (mg/g)," select pass or fail as the Status, and enter the milligrams of Total THC per gram.</p> <p>Third, select "Total CBD (mg/g)," select pass as the Status, and enter the milligrams of Total CBD per gram.</p>	No additional information required; Total CBD cannot fail but is a required test for informational purposes [Potency and Total THC can fail].