

Inhalable Cannabinoid Products and Metrc Tracking

On December 22, 2020, the OLCC adopted rules to regulate non-cannabis additives in inhalable cannabinoid products. These rules create additional requirements for processors, but many of the provisions are applicable to all licensees. Detailed information regarding how these rule changes impact tracking and labeling can be found in [Bulletin CE2020-07](#).

Included in the changes are the ways that Inhalable Cannabinoid Products (ICP) with Non-cannabis Additives (marijuana items) and Inhalable Hemp Cannabinoid Products (IHCP) with Non-cannabis Additives (hemp items) are tracked in Metrc.

What are Inhalable Cannabinoid Products with Non-cannabis Additives? Generally speaking, they are cannabinoid products that are meant for human inhalation and have been combined with non-cannabis ingredients like non-cannabis terpenes or flavorings. The most common example is a vape cartridge with flavorings. See the definitions in [845-025-1015\(44\) and \(64\)](#).

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New Inhalable Item Categories

On and after April 1, 2021, [OAR 845-025-3270](#) requires all Inhalable Cannabinoid Products with Non-cannabis Additives to be explicitly categorized in Metrc under one of two categories:

- “Inhalable Cannabinoid Product with Non-Cannabis Additives” (marijuana items); and
- “Inhalable Hemp Cannabinoid Product with Non-Cannabis Additives” (hemp items).

These item categories are still considered “other cannabinoid products” and Metrc will have a weight-based and a count-based “each” option for creating items.

Reminder: If an item co-mingles hemp-derived extract or concentrate with marijuana-derived extract or concentrate, the resulting item is a **marijuana item**.

In order to be compliant, existing packages meeting the definitions above will need to be listed in Metrc under new items created with the new category types. This step generally cannot be done by editing package in Metrc and will require repackaging in most cases. Please refer to [Bulletin CE2020-07](#) on options available to licensees to complete this task.

Item Creation and Ingredients Tracking for Processors

[OAR 845-025-3270\(2\)](#) requires that processor licenses record the manufacturer and mix name of any non-cannabis additive(s) used in the inhalable cannabinoid product. This information will be recorded at the item creation level in Metrc.

In order to avoid other businesses from accessing the processor’s proprietary information, ingredient information in Metrc will be accessible only to the OLCC and employees at the processor given access to the license’s administrative area of Metrc.

METRC EXAMPLES

Item Creation for Processors

Processors will have the ability to create “Inhalable Cannabinoid Product with Non-Cannabis Additives (each)” or “Inhalable Cannabinoid Product with Non-Cannabis Additives.” The only difference between these two categories is that one is tracked by weight (figure 1) whereas the “each” category (figure 2) is tracked by number of units (with a weight per unit).

Item choices (item by weight is highlighted)

Figure 1

The screenshot shows the 'Add Items' interface. The 'Name' field is 'Trop D Bulk Oil' and the 'Unit of Measure' is 'Grams'. The 'Category' dropdown is open, and the option 'Inhalable Cannabinoid Product with Non-Cannabis Additives' is highlighted in blue. A red box highlights this option and the two options below it: 'Inhalable Cannabinoid Product with Non-Cannabis Additives (each)' and 'Inhalable Hemp Cannabinoid Product with Non-Cannabis Additives'. There are also quantity input fields with plus and minus buttons.

Ingredient entry area (example is an Item by Count)

Once the item details are completed (Item Name, Category, Unit of Measure, and Unit Weight), the item ingredients should be entered. An item created in this category requires at least one entry in the **Public Ingredients** box.

Public Ingredients vs Item Ingredients

Ingredients listed in the Public Ingredients area (Figure 2 (1)) are visible via the API by whichever license is holding a particular package in their inventory. The second **Item Ingredients** area (Figure 2 (2)) was created to allow processors to track ingredients as required by this rule without providing visibility to other licensees; ingredients entered in this new ingredients area are only visible within Metrc at the item level for that particular license (and to users with the requisite permission). Components listed in the item ingredients area should match the additive's name listed in the "Non-cannabis Additive Documentation" that was submitted as part of your label application.

To comply with OAR 845-025-3270, processors must enter the name of the additive mix and manufacturer – for each additive used – in either the “Public Ingredients” or “Item Ingredients” section of the item in Metrc.

Figure 2

Add Items

Item # 1 (clear)

Name: Trop D 1g Vape

Category: Inhalable Cannabinoid Product with Non-Cannabis Additives (each)

Unit of Measure: Each

Unit Weight: 1 Grams

Public Ingredients: Non Cannabis Derived Flavorings

Item Ingredients:

- Item Ingredient # 1: Pineapple Blend, EZPZ Flavors LLC -
- Item Ingredient # 2: Mango Blend, EZPZ Flavors LLC -

Annotations:

- Click the black button to add ingredients (points to minus button)
- Click the blue button to add items (points to plus button)
- This field requires at least one entry. (points to Public Ingredients)

Why is there no multi-Facility create such as that available in Employees, Strains, and Locations?

Certain Item Categories require the selection of a pre-existing Strain. Verifying and informing that the specified Strain exists in all of the selected Facilities would be convoluted and complex to inform. For this reason we have opted to not add the ability to create items in multiple Facilities at the same time.

Create Items **Cancel**

View Item Details

Once the item has been created, it will appear in the item list for the facility in which it was created and details can be viewed by drilling down into the item tabs as shown in Figure 3a and Figure 3b.

Item Ingredients Tab: Figure 3a

Trop D 1g Vape	Inhalable Cannabinoid Product with Non-Cannabis Additives (each)
<p>Details Item Ingredients History</p> <p>Ingredient</p> <p>Mango Blend, EZPZ Flavors LLC</p> <p>Pineapple Blend, EZPZ Flavors LLC</p> <p>Page 1 of 1 20 rows per page</p>	

Item History Tab: Figure 3b

Trop D 1g Vape	Inhalable Cannabinoid Product with Non-Cannabis Additives (each)	Other
<p>Details Item Ingredients History</p> <p>Description</p> <p>Created Trop D 1g Vape</p> <ul style="list-style-type: none"> - Category: Inhalable Cannabinoid Product with Non-Cannabis Additives (each) - Default UoM: Each - Unit Weight: 1 Grams - Public Ingredients: Non Cannabis Derived Flavorings - Item Ingredients: <ul style="list-style-type: none"> Pineapple Blend, EZPZ Flavors LLC Mango Blend, EZPZ Flavors LLC <p>Page 1 of 1 20 rows per page</p>		

Repacking an existing package for non-Processors

Creation of “Inhalable Cannabinoid Product with Non-Cannabis Additives (no ingredients)” or “Inhalable Cannabinoid Product with Non-Cannabis Additives (each) (no ingredients)” categories will be available for other license types (like Wholesalers and Retailers) who may need to repack items previously sent by processors under the prior “Combined Category” designation. As with other items, before it can be repackaged under a facility’s own UID tags, the item will need to be created in Metrc by that facility. An example of the dropdown category choices for these licenses is shown below (Figure 6).

Item Category Choices:

Figure 6

The screenshot shows the 'Add Items' form with the following details:

- Item # 1 (clear button)
- Name: Tropical D 1g Vape+
- Unit of Measure: Each
- Category: Inhalable Cannabinoid Product with... (dropdown menu open)
- Unit Weight: 1
- Grams (dropdown menu)
- Quantity: 1 (with +/- buttons)
- Category list (highlighted in red box):
 - Inhalable Cannabinoid Product with Non-Cannabis Additives (each; no ingredients)
 - Inhalable Cannabinoid Product with Non-Cannabis Additives (no ingredients)
 - Inhalable Hemp Cannabinoid Product with Non-Cannabis Additives (each; no ingredients)
 - Inhalable Hemp Cannabinoid Product with Non-Cannabis Additives (no ingredients)
 - Liquids (each)
 - Non-Infused Pre-Roll
 - Seeds

Once the item has been added to the facility’s item list, existing products can be repackaged under the new category. This process is illustrated below.

The package below contains 1g flavored vape cartridges that are currently designated as Combined Category items (Figure 6). It will need to be repackaged under the new category of “Inhalable Cannabinoid Product with Non-Cannabis Additives (each) (no ingredients)” (Figures 7-9).

Figure 7 – Existing Item:

Tag	Src. H's	Src. Pkg's	Item	Category
▶ Q ABCDEF012345670000014852	JS3 10.26.18	ABCDEF012345670000014851	Tropical D 1g Vape	Combined Category (each)

Figure 8 – Repackaging under new item:

New Packages

New Package # 1 (clear)

New Tag: ABCDEF012345670000013839

Item: Tropical D 1g Vape+

Quantity: 25 Each

Package # 1: ABCDEF012345670000014852

Quantity: 25 Each

Packaging: - new total will be 0 ea

Finish Date: 03/04/2021 (today)

Package Date: 03/04/2021 (today)

Note: recategorizing per Rule

Package Date: 03/04/2021 (today)

Trade Sample:

Production Batch:

Donation:

+ 1

Create Packages Cancel

Select newly created item from your item list

The remaining quantity should be zero so the source package can also be finished at this time

Figure 9 – Completed repackaging under new item with correct category

Tag	Src. H's	Src. Pkg's	Item	Category	Item Strain	Quantity
ABCDEF012345670000013839	JS3 10.26.18	ABCDEF012345670000014852	Tropical D 1g Vape+	Inhalable Cannabinoid Product with Non-Cannabis Additives (each; no ingredients)		25 ea

Description	Employee	Date	Reported
Packaged 25 Each of Tropical D 1g Vape+ from another Package - Took 25 Each of Tropical D 1g Vape from Package ABCDEF012345670000014852 - Package Type: Product - Note: recategorizing per Rule	*****	03/04/2021	03/04/2021

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