

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 non-cannabis derived terpenes. Here are the relevant definitions from OAR [845-025-1015](#):

“Inhalable cannabinoid product” means a cannabinoid product or hemp cannabinoid product that is intended for human inhalation.

“Non-cannabis additive” means a substance or group of substances that are derived from a source other than marijuana or industrial hemp.

(a) “Non-cannabis additive” includes but is not limited to purified compounds, essential oils, oleoresins, essences or extractives, protein hydrolysates, distillates, or isolates.

(b) “Non-cannabis additive” does not include plant material that is in the whole, broken, or ground form.

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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 contains 'Trop D Bulk Oil' and the 'Unit of Measure' is set to 'Grams'. The 'Category' dropdown is open, displaying a list of options. The option 'Inhalable Cannabinoid Product with Non-Cannabis Additives' is highlighted in blue and enclosed in a red box. Other options include 'Industrial Hemp Concentrate (each)', 'Industrial Hemp Extract', 'Industrial Hemp Extract (each)', 'Infused Pre-roll', 'Inhalable Cannabinoid Product with Non-Cannabis Additives (each)', 'Inhalable Hemp Cannabinoid Product with Non-Cannabis Additives', and 'Inhalable Hemp Cannabinoid Product with Non-Cannabis Additives (each)'. There are also quantity input fields with '+' and '-' buttons and a '1' value.

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 **1**

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

+ 1 (ingredient) **+** 1 (item) **Click the blue button to add items**

Click the black button to add ingredients

This field requires at least one entry.

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)
Details Item Ingredients History	
Ingredient	
Mango Blend, EZPZ Flavors LLC	
Pineapple Blend, EZPZ Flavors LLC	
Page 1 of 1 20 rows per page	

Item History Tab: Figure 3b

Trop D 1g Vape	Inhalable Cannabinoid Product with Non-Cannabis Additives (each)	Other
Details Item Ingredients History		
Description		
Created Trop D 1g Vape		
- Category: Inhalable Cannabinoid Product with Non-Cannabis Additives (each)		
- Default UoM: Each		
- Unit Weight: 1 Grams		
- Public Ingredients: Non Cannabis Derived Flavorings		
- Item Ingredients:		
Pineapple Blend, EZPZ Flavors LLC		
Mango Blend, EZPZ Flavors LLC		
Page 1 of 1 20 rows per page		

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. The 'Name' field contains 'Tropical D 1g Vape+'. The 'Unit of Measure' is set to 'Each'. The 'Unit Weight' is '1' and the unit is 'Grams'. The 'Category' dropdown is open, showing a list of options. A red box highlights the first two options: 'Inhalable Cannabinoid Product with Non-Cannabis Additives (each; no ingredients)' and 'Inhalable Cannabinoid Product with Non-Cannabis Additives (no ingredients)'. Other visible options include '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', and 'Seeds'. There are also quantity controls for '1' and a '(clear)' button.

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
▶ 🔍 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

Trade Sample, Production Batch, Donation (checkboxes)

+ 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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