# 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 <u>Bulletin CE2020-07</u>.

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 <u>845-025-1015</u>:

"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 <u>Bulletin CE2020-07</u> on options available to licensees to complete this task.

# Item Creation and Ingredients Tracking for Processors

<u>OAR 845-025-3270(2)</u> requires that processor licenses record the manufacturer and mix name of any noncannabis 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

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## 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)

Add Items				×
Item # 1				(clear)
Name	Trop D Bulk Oil	Unit of	Grams	~
Category	Inhalable Cannabinoid Product wit 🗸	Measure		
	Industrial Hemp Concentrate (each)			^
	Industrial Hemp Extract			
	Industrial Hemp Extract (each)			
	Infused Pre-roll			
+ 1 🗦 (in	Inhalable Cannabinoid Product with No	n-Cannabis Addit	ives	
<b>-</b> 1 🗄 (	Inhalable Cannabinoid Product with No	n-Cannabis Addit	ives (each)	
	Inhalable Hemp Cannabinoid Product	vith Non-Cannabis	Additives	
14/h	Inhalable Hemp Cannabinoid Product v	vith Non-Cannabis	s Additives (each)	

#### 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.

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



	Add Items ×	<
	Item # 1 (clear)	
	Name Trop D 1g Vape Unit of Measure Unit Weight 1 Grams VIII Unit Weight 1 Ingredients Non Cannabis Derived Flavorings	This field requires at least one entry.
Click the black button to add ingredients	Item     Pineapple Blend, EZPZ Flavors LLC       Ingredient # 1     Mango Blend, EZPZ Flavors LLC	
	+       1          ⊕ (ingredient)          +       1          ⊕ (item)           ← Click the blue button to add items	
	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.

1	Frop D 1g Vape	Inhalable Cannabinoid Product with Non- Cannabis Additives (each)				
	Details Item Ingredie	ents History				
	Ingredient					
	Mango Blend, EZPZ Flav	ors LLC				
	Pineapple Blend, EZPZ F	lavors LLC				
	Page	1 of 1 () H 20 V rows				
	Page					

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nem	ingreatents	rub.	riguie	Ju

rop Ding vape	Inhalable Cannabinoid Product with Non- Cannabis Additives (each)	Other
Details Item I	ngredients History	
Description		
Created Trop D	1g Vape	
- Category: Inh	alable Cannabinoid Product with Non-Cannabis Additives	(each)
	-	
- Default UoM:	Each Grams	
- Default UoM: - Unit Weight: 1 - Public Ingredi	Each Grams ents: Non Cannabis Derived Flavorings	
- Default UoM: - Unit Weight: 1 - Public Ingredi - Item Ingredier	Each Grams snts: Non Cannabis Derived Flavorings ts:	
- Default UoM: - Unit Weight: 1 - Public Ingredi - Item Ingredier Pineapple	Each Grams ents: Non Cannabis Derived Flavorings ts: Blend, EZPZ Flavors LLC	

#### Edit Item Details

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If ingredients need to edited, this can be done by selecting the item from the item list and clicking the "Edit Items" button to open the dialog box (figure 4). If you are deleting an ingredient, click the minus "-" button from the line of the ingredient that needs to be removed. Metrc will prompt for confirmation prior to deleting the ingredient. If an ingredient needs to be added, select the black plus "+" sign as needed to complete the ingredient list. Click save to complete the change.

Please note that the editing area is meant for corrections. A change in additives, additive formulation, or manufacturer requires adherence with <u>845-025-3265</u> and label resubmission and pre-approval before the label can be compliantly used (see <u>OAR 845-025-7160(8)</u>).

Item # 1     Item Trop D 1g Vape     Category     Inalable Cannabin     OK     Category     Inalable Cannabin     Imabis Derived Flavors LLC     Imabis Derived Flavors     Imabis Derived Flavors     Imabis Derived Flavors     Imabis Derived Flavors </th <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>lit Items</th>								lit Items
Item Trop D 1g Vape   Name Trop D 1g Vape   Category Inhalable Cannabin   OK Cancel   nnabis Derived Flavorings   Item Mange Blend, EZPZ Flavors LLC Item Pineapple Blend, EZPZ Flavors LLC Item (item) Item Discourse Cancel			(clear)	-				em # 1
Name Trop D 1g Vape Category Inhalable Cannabin OK Cancel mabis Derived Flavorings Item Mango Blend, EZPZ Flavors LLC Item Princapple Blend, EZPZ Flavors LLC Item Princapple Blend, EZPZ Flavors LLC An ingredient directly, but you not be promp about the chart			~		h to remove line # 2?	Are you sure you wi	Trop D 1g Vape	ltem
Category Inhalable Cannabin OK Cancel nnabis Derived Flavorings USE CAUTION An ingredient may be edited gredient # 1 Mango Blend, EZPZ Flavors LLC Item gredient # 2 Pineapple Blend, EZPZ Flavors LLC 1 (ingredient) 5 The line of Cancel							Trop D 1g Vape	Name
Item   ngredient #1     Item   ngredient #2     Pineapple Blend, EZPZ Flavors LLC     Item   ingredient #2     Item     Pineapple Blend, EZPZ Flavors LLC     Pineapple Blend, EZPZ Flavors LLC <td>DN: t line ted</td> <td>USE CAUTION. An ingredient lin may be edited</td> <td>Flavorings</td> <td>innabis Deri</td> <td>Cancel</td> <td>ОК</td> <td>Inhalable Cannabin</td> <td>Category</td>	DN: t line ted	USE CAUTION. An ingredient lin may be edited	Flavorings	innabis Deri	Cancel	ОК	Inhalable Cannabin	Category
Item   gredient # 2     I :: (ingredient)     I :: (item)     Same lingues     Cancel	ou will nted	directly, but you not be prompte		•		ngo Blend, EZPZ Fla	Ма	Item gredient # 1
1 (ingredient) 1 (item) Saus Items: Cancel	ange.	about the chang		•	avors LLC	eapple Blend, EZPZ	Pin	Item ngredient # 2
1							gredient)	1 😫 (in
Saus House Cancel							item)	+ 1 😫 (i
Carcer						ns Cancel	Save Iten	

Any ingredient changes will be reflected in the item history screen (figure 5):

Frop D 1g Vape		Inhalable Can Cannabis Ad	Inhalable Cannabinoid Product with Non- Cannabis Additives (each)		
Details	Item Ingredients	History			
Descri	ption				
- Cate - Defa - Unit \	gory: Inhalable Cani ult UoM: Each Weight: 1 Grams	nabinoid Produ	uct with Non-Ca	nnabis Additi	ves (each)
- Public - Item I P M	c Ingredients: Non C ngredients: ineapple Blend, EZF lango Blend, EZPZ I	Cannabis Deriv 2Z Flavors LLC Flavors LLC	ved Flavorings		
- Public - Item I P M Update - Cates - Defa - Unit V - Public - Item I	c Ingredients: Non C ngredients: ineapple Blend, EZF lango Blend, EZPZ I ed Trop D 1g Vape gory: Inhalable Canu uit UoM: Each Weight: 1 Grams c Ingredients: Non C ngredients:	Cannabis Deriv 27 Flavors LLC Flavors LLC nabinoid Produ Cannabis Deriv	ved Flavorings	nnabis Addīti	ves (each)
- Public - Item I P M Update - Cate - Defa - Defa - Unit V - Public - Item I M O	c Ingredients: Non C ngredients: ineapple Blend, EZF ango Blend, EZPZ I ed Trop D 1g Vape gory: Inhalable Canu uit UoM: Each Weight: 1 Grams c Ingredients: Non C ngredients: ango Blend, EZPZ I range-Pineapple Bl	Cannabis Deriv 22 Flavors LLC Flavors LLC nabinoid Produ Cannabis Deriv Flavors LLC end, EZPZ Fla	ved Flavorings	nnabis Additi	ves (each)

## 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							
Add Items				×			
Item # 1				(clear)			
Name	Tropical D 1g Vape+	Unit of Measure	Each	~			
Category	Inhalable Cannabinoid Product with	Unit Weight	1 Grams	$\sim$			
	Infused Pre-roll			^			
	Inhalable Cannabinoid Product with Non-Cannabis Additives (each; no ingredients)						
+ 1 🕀 (	Inhalable Cannabinoid Product with Non-	Cannabis Additives	(no ingredients)				
	Inhalable Hemp Cannabinoid Product with	n Non-Cannabis Ado	ditives (each; no ingredients)				
Why is there no	Inhalable Hemp Cannabinoid Product with	n Non-Cannabis Ado	ditives (no ingredients)				
Certain Item Cate	Liquids (each)			sts			
in all of the selec to create Items in	Non-Infused Pre-Roll			ability			
	Shaa2						

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 Package	S				×			
	New Packa	ge # 1				(clear)			
Select newly created Item fron your item list	New Tag Item Quantity Note Package Date	ABCDEF012345670000013839 Tropical D 1g Vape+ Same Item 25 Each recategorizing per Rule 03/04/2021 today Trade Sample Production Batch Donation	<b>α</b> <b>α</b>	Package # 1 Quantity Finish Date	ABCDEF012345670000014852 25 È Each Packaging - new total will be 0 ea ✓ Finish Package ■ 03/04/2021 today		The remaining quantity should be zero so the source package can also be finished at this time		
	Create Packages Cancel								

*Figure 9 – Completed repackaging under new item with correct category* 

Tag	Src. H's	Src. Pkg's	i Item	Categ	ory :	Item St	rain <mark>:</mark>	Quantif	ty :
Q # ABCDEF012345670000013839	JS3 10.26.18	ABCDEF0123456700000148	52 Tropical D 1g Vape+	Tropical D 1g Vape+ Inhalable Cannabinoid Product with Non-Cannabis Additives (each; no ingredients)					
Lab Results History						1			
Description					Freedows		Data		Deserts
Description				:	Employee	:	Date	:	керопео
Packaged 25 Each of Tropical D 1g - Took 25 Each of Tropical D 1g Vag - Package Type: Product - Note: recategorizing per Rule	*******								
H I Page 1 of	1 🕨 🕨 🛛 20	▼ rows per page							