



ADVISORY BULLETIN

February 8, 2023

Supersedes March 21, 2022

Transfer of Marijuana Product Between Equivalent Licenses

By administrative rule, the Cannabis Regulatory Agency may authorize licensees who hold equivalent licenses to transfer marijuana product between the inventory of their marijuana facility and the inventory of their marijuana establishment. This CRA process allows marijuana product to move from the adult-use market to the medical market, in certain circumstances.

The transfer of marijuana products between equivalent licenses is allowed in accordance with the administrative rules.

“Equivalent licenses” means any of the following held by a person:

- Marijuana grower license of any class issued under the Michigan Regulation and Taxation of Marijuana Act (MRTMA) and a grower license of any class issued under the Medical Marijuana Facilities Licensing Act (MMFLA).
- Marijuana processor license issued under the MRTMA, and a processor license issued under the MMFLA.
- Marijuana retailer license issued under the MRTMA, and a provisioning center license issued under the MMFLA.
- Marijuana secure transporter license issued under the MRTMA, and a secure transporter license issued under the MMFLA.
- Marijuana safety compliance facility license issued under the MRTMA, and a safety compliance facility license issued under the MMFLA.

Administrative rules require the agency to publish a specific start date, end date, and other requirements for the transfer of marijuana product between equivalent licenses.

These transfers – as defined below – are allowed for the time period beginning February 8, 2023, and until such time as the agency publishes an advisory bulletin notifying all licensees that the effect of this bulletin has been terminated.

This advisory bulletin does not constitute legal advice and is subject to change. Licensees are encouraged to seek legal counsel to ensure their operations comply with all applicable laws and rules.



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Licensees may transfer marijuana product to their equivalent licenses with CRA pre-approval in this scenario:

- Marijuana product which passes total yeast and mold testing in the adult-use market exceeding 10,000 CFU/g, which is the testing limit for total yeast and mold in the medical market.
- To request an equivalent license transfer, email CRA-compliance@michigan.gov with the subject line “Request to transfer product to equivalent license”. The email must include the completed form below for the appropriate transfer.
- [Blank AU to MED Transfer Request Form](#)

Licensees may transfer marijuana product to their equivalent licenses – without CRA pre-approval – if the product meets the following requirements (Please note, the CRA will perform audits to ensure compliance):

- The marijuana product is not derived from caregivers. (Caregiver-derived product is ineligible for transfer.)
- Marijuana product which fails total yeast and mold testing in the medical market exceeding 10,000 CFU/g – which is passing in the adult-use market where the testing limit is less than 100,000 CFU/g – licensees will need to request a status update from Metrc support (support@metrc.com) to change the previously failing results to passing in the adult-use market.
- Infused products cannot exceed the serving and package maximum THC concentrations found [here](#).

All transferred marijuana products must be labeled in accordance with [Rule 4 in the Marijuana Sale or Transfer Rule set - R 420.504 \(1\)](#). The CRA will monitor compliance with the requirements above by performing audits of transfers.



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Questions can be sent to the Cannabis Regulatory Agency Operations Support Section via email at CRA-Compliance@michigan.gov. For more information about the Cannabis Regulatory Agency, please visit www.michigan.gov/CRA.