



COMPLIANCE BEST PRACTICES

May 3, 2024

This document aims to provide clarification and best practice information on several common topics. It will be updated as needed to add additional information.

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**New since the July 3, 2023, version*

Marijuana Product Destruction

When destroying product, documentation of the destruction, including the full Metrc tag number, the reason for destruction, and the method of destruction, is required to be logged on the waste/destruction log. Licensees should keep photos or video of the marijuana product in its destroyed state, and photos or video of all Metrc tag numbers that correlate with the product being destroyed.

Once product has been destroyed, the package(s) should be adjusted down to 0 and finished in the Statewide Monitoring System (Metrc). When making the adjustments, please use “waste” as the reason code and include a note that indicates the reason for destruction and the date it was completed.

Evidence of destruction must be made available to the CRA upon request, but you are not required to send destruction information unless it is requested.

Please note that products on administrative hold will require agency approval prior to destruction. Please email CRA-Compliance@michigan.gov to request hold removal for destruction.

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When disposing of marijuana product, please reference this [bulletin](#).

Video and Photo Evidence of Destruction

When collecting video evidence to demonstrate the destruction of product, it is essential that the CRA can clearly view and observe the actions taken by the licensee. To accomplish this, there are several things to keep in mind:

1. Ensure that the destruction is taking place where there is a clear camera view. The frame should be free of obstructions, and all staff completing the destruction should be behind the product so as not to obstruct the view of the product.
2. The product should be shown in its storage container before any product is removed.
3. The Metrc tag number should be visible and if possible, held up to the camera.
4. The weight or count should be shown prior to destruction, either by weighing the product or by placing the individual items in groups (i.e., 10, 20, etc.) to clearly demonstrate the number of products on hand that is being destroyed.

All questions related to marijuana product destruction should be directed to CRA-Compliance@michigan.gov.

All questions related to compliant waste practices should be directed to CRA-Enforcement@Michigan.gov.

Labeling Products for Transfer

All products transferred between marijuana businesses must be traceable in Metrc in compliance with the administrative rules. Product traceability is reliant on correct product labeling.

Package tag - an RFID tag supplied from Metrc for the purpose of identifying a package containing a marijuana product. The industry has coined the term “transfer tag.” In this document, we will use package/transfer tag. Package/transfer tags may only be used once and for the initially created to hold.

Source package tag - the first tag created for a marijuana product, for example, the package containing the harvest batch. This number is not required to be on the package.

Example:

Every item (brownie, cookie, vape, wax) created in Figure 1 below requires a new package/transfer tag, which will carry the source package in its history, ensuring accurate product tracking throughout the supply chain.

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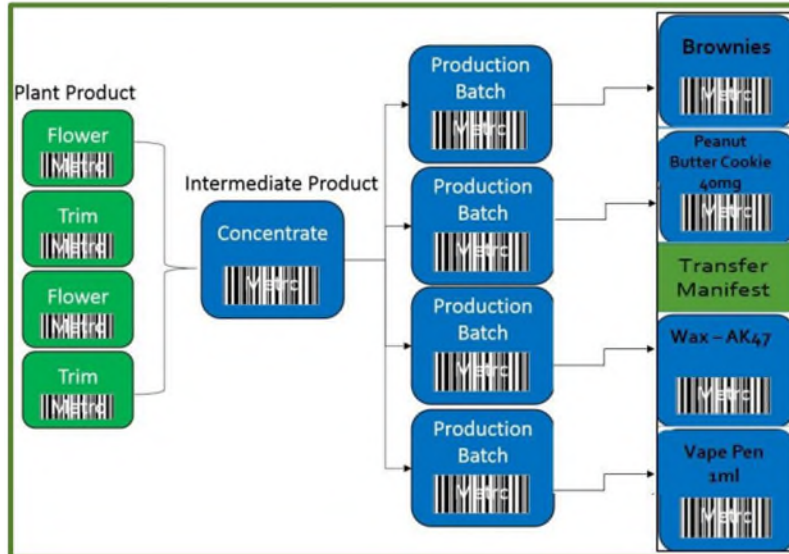


Figure 1. Product creation from flower to finished product

Compliant Labeling Practices

Labeling Requirements Cultivator to Cultivator/Producer Transfer

1. Business or trade name
2. License number
3. Package/transfer tag assigned by Metrc
4. Name of the strain
5. Date of harvest
6. Seed strain (if applicable)
7. Universal symbol

Labeling Requirements Producer to Producer Transfer

1. Business or trade name
2. License number
3. Package/transfer tag assigned by Metrc
4. Universal symbol

Labeling Requirements Cultivator or Producer to Sales Location

1. Business or trade name
2. License number
3. Package/transfer tag assigned by Metrc
4. The name and the marijuana license number of the licensee that packaged the product, including business or trade name, if different from the producer of the marijuana product.
5. Date of harvest, if applicable.
6. Name of strain, if applicable.
7. Net weight in the United States customary or metric units.

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8. Concentration of tetrahydrocannabinol (THC) and cannabidiol (CBD) as reported by the laboratory after potency testing along with a statement that the actual value may vary from the reported value by 10%.
 9. Activation time is expressed in words or through a pictogram.
 10. Distinct or unique name of the laboratory that performed passing compliance testing on the product in final form and any test analysis date.
 11. The universal symbol for marijuana product published on the agency's website.
 12. A warning that includes all the following statements:
 - (i) "It is illegal to drive a motor vehicle while under the influence of marijuana."
 - (ii) "National Poison Control Center 1-800-222-1222."
- (iii) For products being sold by a marijuana facility that exceeds the maximum THC levels allowed for products sold under MRTMA, "For use by registered qualifying patients only. Keep out of reach of children."
- (iv) For all other products, "For use by individuals 21 years of age or older or registered qualifying patients only. Keep out of reach of children."
- (v) In clearly legible type and surrounded by a continuous heavy line: "WARNING: USE BY PREGNANT OR BREASTFEEDING WOMEN, OR BY WOMEN PLANNING TO BECOME PREGNANT, MAY RESULT IN FETAL INJURY, PRETERM BIRTH, LOW BIRTH WEIGHT, OR DEVELOPMENTAL PROBLEMS FOR THE CHILD."

Product Labeling and Tagging After Equivalent License Transfer*

When products are transferred to an equivalent license, they do not need to be retagged as long as they are not repackaged. Please note that all products must bear the required labeling under R 420.504.

Changing Product Categories using Production Batches

A production batch is the compliant way of creating new products that change categories. For example, you cannot create a package of vape carts directly from shake/trim; you must first create a new production batch of oil and then pull from the production batch of oil to make the vape carts. Refer to Figure 1 above for an illustration.

To create an intermediate product – like a production batch of concentrate – you will pull from a package or packages of raw product to create the new package for the new concentrate. It is imperative that the weights used in the packages are accurate and the CRA can transparently see what and how much you are using. You may then pull product out of that production batch to create additional production batches (e.g., infused edible products). Each new production batch will have a new package tag and be marked as a production batch. If these production batches are final products, packages will be created from them for transfer to the sales locations and distribution to patients or consumers.

Compliant Creation of Concentrates from Raw Plant Material

Raw Plant Material to Distillate

Every process should result in a new production batch. When creating a new package of concentrate, all packages of flower which were combined in the production batch must be reflected in the package of concentrate. By the end of each business day products are required to be entered into Metrc to reflect what they are for example crude, shatter, distillate, etc. and their current weight.

Example:

If 4 packages of flower/bud are processed on Monday into crude oil, when the extraction is done and the yield of the process lot/batch is known, you will create the production batch in Metrc pulling from the 4 packages of flower/bud. This step is critical to ensure that the physical product which was combined is electronically combined to transparently show what packages were used in the creation of the new product.

If on Tuesday, the crude oil is refined twice, then you would create a new production batch for the refined oil. This is an intermediate step but should be reflected in Metrc since the product is no longer crude oil but has now been refined.

If then on Wednesday, the refined oil is winterized, and the product is in its final state, by end of the business day, a new production batch should be created to reflect the new distillate that was created and its associated, final, weight.

Licensees can contact the CRA Operations Support Section at CRA-Compliance@michigan.gov with any compliance questions regarding this process.

Raw Plant Material to BHO

Example:

If we take 5 packages of flower/bud on Monday and do a Butane extraction which takes 12 hours, by the end of the business day the production batch should be created in Metrc once you have the total weight of the yield to reflect the BHO product that was created.

If more Butane needs to be burned off on Tuesday, then a new production batch package will be created to accurately reflect the additional process.

Metrc Tagging for Better Inventory Control

Metrc tags are single-use and cannot be reassigned in the statewide monitoring system once assigned to a package or plant. To prohibit unlicensed businesses from obtaining Metrc tags, the tags should be destroyed – preferably by shredding – so they are made unusable.

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Packages

A Metrc package tag must be placed on the container holding the product. Packages should have the RFID tags attached in a visible location where the tag can be easily seen and scanned. The Metrc package tags are likened to a sticker and should be affixed to the container by removing the protective sheet on the back.

If the product is housed in multiple containers each container holding the product must have the Metrc package tag number, name of item, and preferably labeled to include the number of containers such as 1 of 4, 2 of 4, etc. To label the additional containers, licensees can handwrite or use a computer or label printer to create additional labels. One of the containers should have the RFID Metrc tag.

Metrc Tags should not be placed over the top of one another. If a package is re-used the first tag should be removed.



Immature Plant Batches

Immature Plant Batches have a unique batch name assigned in Metrc which includes the strain and planting date for the specific group of immature plants. The Immature Plant Batch unique batch name should physically be identified with the batch. This can be done by placing a label on the tray or container containing the plant batch. The label should exactly match the name in Metrc.

Vegetative or Flowering Plants

When immature plants reach 8" in height or width, they will be moved over to the Vegetative growth phase. At that time, each plant will be required to be tagged physically and in Metrc. The instructions for how to properly tag a vegetative plant physically are listed below:

1. The Metrc strap that comes with the Metrc plant tags should be used to insert the notched end of the strap through the perforated top and bottom holes of the Metrc plant tag.
2. On the back of the Metrc strap is a notch. The top hole of the Metrc plant tag should be placed above the notch to ensure that the plant tag does not fall down once the tag has been placed on the plant.
3. The strap holding the assigned Metrc tag, will be extended out flat and pushed down into the growing material. This is what is known as a "staked plant tag." This is shown in the picture below.

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When a Vegetative plant is identified as being hearty enough to withstand the weight of the plant tag, the tag will be removed from the growing medium and attached to the physical plant. The instructions on how to attach the Metrc plant tag to the actual plant are listed below:

1. The staked plant tag is removed from the plant's growing material.
2. The strap is removed from the lower hole of the Metrc plant tag (the notched end of the strap).
3. The strap is then placed around one of the lowest branches at the bottom of the stalk of the plant and locked into place using the notch on the strap. The plant tag should be placed in a way to ensure it is up out of the growing material. This is critical to easily identify that all plants are tagged properly for inventory control.

Tags must always remain visible and in clear view. See image below.



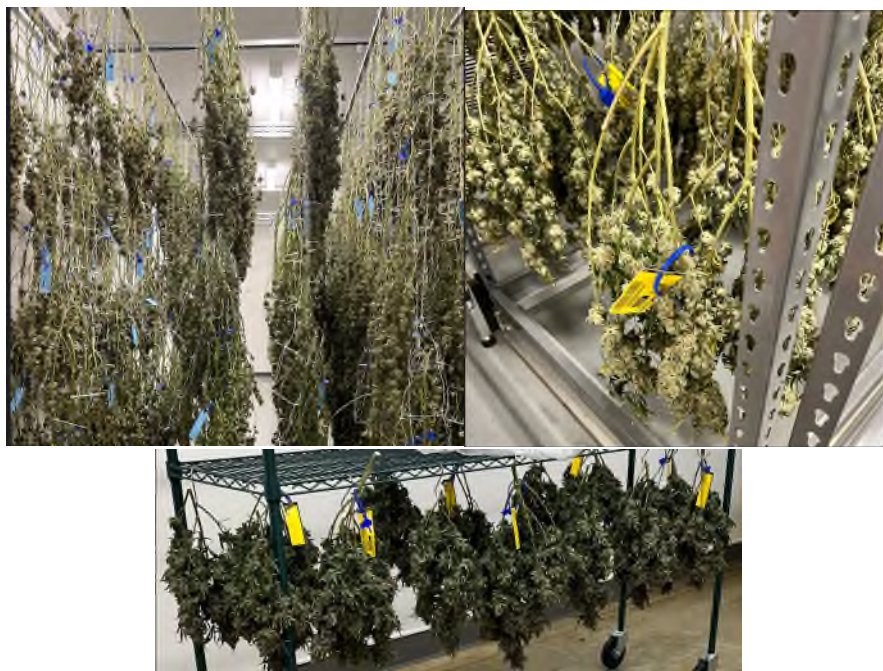
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Ideally all plant tags should be facing down on the lower first or second branch facing the aisle and visible from the entrance to the room. CRA staff should be able to walk up and down the aisles and clearly see the tags on all plants. It is recommended to tag plants sequentially and by strain. This will make it easier to identify the plant if a tag falls off during movement or watering.

Harvested Plants

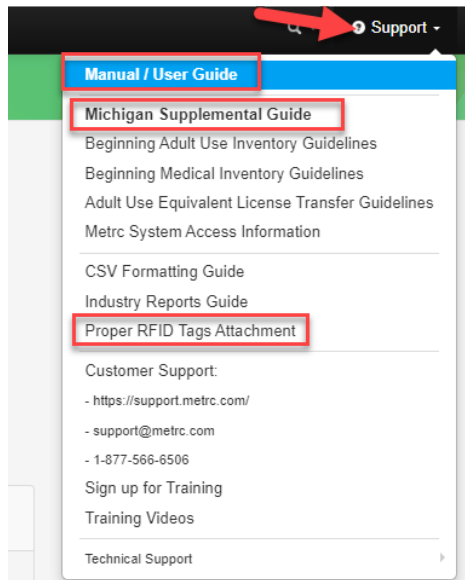
When plants are harvested, the plant tag must stay with the plant until the material is placed into a package both in Metrc and physically and bears the package tag. See image below.



Licensees can also place the plant tag on the hangers used to hold the plants as long as the plants can be individually identified.

For guidance on plant and package tagging and specific functions within Metrc, please review the Michigan Supplemental Guide which can be found under the support tab in Metrc.

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Testing Workflow and Holdups

Additional Testing After Passing Full Compliance

Metrc was designed to track product from seed to sale. When a product is tested in final form and receives passing test results, the system was not designed to accept additional results and the status may not update correctly.

For example:

A package with passing full compliance testing which later is submitted for additional potency, will not update automatically to test passed. The package will need a manual override. Please submit a Metrc support ticket requesting the status to be updated.

Creating Packages Before Retesting

When a package receives failing test results and the licensee chooses to retest the package, the same source package which failed testing should be the same source package the retest samples are pulled.

For example:

A failed package which is repackaged into a child package prior to retesting will not update automatically and will need a manual override. Please submit a Metrc support ticket requesting the status to be updated.

Incorrect Test Panels Selected at Sampling

When a licensee selects an incorrect test panel at the time of sampling, Metrc is expecting to see results entered for the selected panel. The laboratory should be confirming the product type with the selected test panels before accepting to ensure this is correct and matches their chain of custody.

For example:

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A package of vape cartridges was selected for raw plant material in error. The laboratory performs the required testing and enters the results for the vape testing panel. The package will remain in testing in progress as Metrc is awaiting the raw plant material results. This package will require a manual override. Please submit a Metrc support ticket requesting the status to be updated.

Entering Partial Testing Panels

All testing panels include the required testing analytes. If all analytes do not have a numerical value entered in the required field, the panel will remain in testing in progress.

For example:

Retest samples are selected for additional microbials. The only failing analyte from the initial testing is Total Yeast and Mold (TYM). If the laboratory only enters results for TYM, the testing status will remain testing in progress. The laboratory will need to enter results for all required analytes within the selected testing panel. For any analyte which testing was not performed, the laboratory should enter a zero and, in the notes, state "testing not performed." This compliantly shows the CRA that only TYM was completed.

Incorrect Package Sourcing/Sample Creation*

Verify that the package being sampled matches the same package in Metrc. To verify that the physical package is correct, the source package item name, item category, Metrc tag number and weight in Metrc should be compared to the physical package. Any discrepancies should be resolved prior to sampling. Once the package is sampled the transfer manifest should be compared to the laboratory chain of custody and any issues resolved prior to transporting the material.

Metrc Housekeeping*

For improved efficiency within Metrc, the following items should be done routinely:

Finalizing Sales*

Sales locations should regularly and frequently finalize their receipts to archive them. Failure to do so can cause Metrc to lag or error out when trying to edit receipts. Finalized receipts can be "unfinalized" if they need to be edited.

Finishing Packages*

Once a package has zero quantity, the package should be "finished" in Metrc to move it to the inactive packages tab. Failure to do so can cause Metrc to lag or error out when trying to view or adjust package inventory. Finished packages can be "unfinished" if they need to be adjusted.

Finishing Harvests*

Once the package weight and waste weight of a harvest has been recorded in Metrc, the harvest should be finished. Metrc will assign the remaining weight in the harvest to be "moisture loss." The harvest can be "unfinished" to account for a package or waste that was not originally recorded.

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Outstanding Manifests*

Licensees should review their incoming and outgoing manifests for transfers that have not yet been accepted. Unaccepted manifests can lead to disputes over where inventory ended up. If these manifests are not reviewed frequently, the video footage of the transfer may be lost before the error is discovered.

Inhalable Compound Concentrate Products*

Inhalable compound concentrate products (moonrocks, tarantulas, infused pre-rolls, etc.) are considered concentrates for purposes of determining purchasing and transportation limits, labeling requirements, and trade and internal product sample allotments. The full weight of the product counts toward these limits/allotments.

R 420.206(14) states: When combining marijuana and marijuana product into another marijuana product, each form of marijuana and marijuana product being combined must have passing safety compliance test results in the statewide monitoring system prior to the creation of the new combined product.

This means each marijuana component of an inhalable compound concentrate product **must** have passing safety compliance test results in Metrc **prior** to creating the combined product. The combined product must then be tested in final form in compliance with R 420.304 and R 420.305.

Infused Edible THC Serving and Package Information

The THC per dose/serving and package are required to be entered into the item details for all infused items.

Certificates of Analysis

Certificates of Analysis (COA) can be uploaded to Metrc when publishing testing results. Once a COA is uploaded, it is available to anyone who has that product in their inventory. This feature allows full transparency of product testing throughout the supply chain. Please refer to this [Metrc bulletin](#) for information on how to view these in the system.

Marijuana Product Samples

Trade Samples*

The following licensees may provide trade samples:

- (a) A cultivator may transfer to a producer or a marijuana sales location.
- (b) A producer may transfer to a producer or marijuana sales location.

The transfer of trade samples does not require the use of a secure transporter if the amount of trade samples does not exceed either of the following:

- (a) 15 ounces of marijuana.
- (b) 60 grams of marijuana concentrate.

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It is a best practice for an employee conducting a trade sample transfer to verify the transfer has been accepted into Metrc by the receiving licensee prior to leaving their facility.

All trade samples must be tracked in the statewide monitoring system (Metrc).

A cultivator and producer are limited to transferring the following aggregate amounts of trade samples to a producer or a marijuana sales location in a 30-day period:

- (a) 2.5 ounces of marijuana.
- (b) 15 grams of marijuana concentrate.

To determine the amount of infused product that can be transferred to another licensee as trade samples, the usable marijuana equivalencies must be used, just as they are for purchasing limits.

For purposes of determining usable marijuana equivalency, the following shall be considered equivalent to 1 ounce of usable marijuana:

- (1) 16 ounces of marijuana-infused product if in a solid form
- (2) 36 fluid ounces of marijuana-infused product if in a liquid form

The samples will then count toward the 2.5-ounce marijuana limit for transfer, not the 15-gram concentrate limit.

All marijuana businesses are required to keep internal records of how much product is provided to each licensee to ensure compliance with the limits as prescribed in the rule (the limits are per receiving license). One suggestion for record-keeping is to create a spreadsheet where the limits are populated, and if the sum of quantities exceeds the maximum allowed, the formula will flag the user.

To transfer trade samples, a child package will be created for the samples. After creating a child package with a new transfer/package number for the trade samples, you can transfer the package(s) using the “trade sample transfer” transfer type.

A producer or marijuana sales location that receives trade samples may distribute the samples to its employees to determine whether to purchase the marijuana product. A producer or marijuana sales location is limited to transferring a total of 1 ounce of marijuana, a total of 6grams of marijuana concentrate, and marijuana-infused products with a total THC content of 2000 mgs of internal product samples to each of its employees in a 30-day period.

The correct way to record trade samples provided to employees is by adjusting the source package down to account for the product being distributed. When making the adjustment, the adjustment reason is “trade sample;” the adjustment reason note must include the employee’s name, Metrc ID, and quantity of product received.

All marijuana businesses are required to keep internal records of how much product was provided to each employee to ensure compliance with the limits as prescribed in the rule. Any trade samples provided to an employee count toward the employee’s internal product sample allotment.

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Internal Product Samples

A cultivator, producer, marijuana sales location, marijuana microbusiness, or class A marijuana microbusiness may transfer internal product samples directly to its employees.

Internal product samples are prohibited from being transferred or sold to another licensee or consumer.

All internal product samples must be recorded in Metrc.

All internal product samples must have passed full compliance testing completed and recorded in Metrc.

The correct way to record internal product samples in Metrc is by adjusting the source package down to account for the product being distributed. When making the adjustment, the adjustment reason is "internal product testing samples;" the adjustment reason note must include the employee's name, Metrc ID, and quantity of product received.

All marijuana businesses are required to keep internal records of how much product was provided to each employee to ensure compliance with the limits as prescribed in the rule.

Product Development

A cultivator, class A microbusiness, microbusiness, or producer may engage in product development. No other marijuana business may engage in product development.

A cultivator, class A microbusiness, or microbusiness may designate marijuana plants for product development; these count toward the authorized total amount of marijuana plants for a cultivator and must be tracked in Metrc.

A producer, class A microbusiness, or microbusiness may designate marijuana concentrate for product development. Any marijuana concentrates designated for product development must be tracked in Metrc.

A licensee engaged in product development may submit his or her product development inventory to a laboratory for research and development testing in accordance with these rules.

Disciplinary action may not be taken against a licensee for failed research and development test results on his or her product development inventory.

A cultivator, class A microbusiness, microbusiness, or producer may transfer its product development inventory to its employees for consumption.

Any product development inventory that is not transferred to an employee must be destroyed pursuant to these rules.

All product development inventory transferred to an employee cannot exceed the limits prescribed for internal product samples listed above.

A licensee shall record the transfer of product development inventory in Metrc.

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Product development inventory may not be consumed or used on the premises of the licensee.

A licensee shall not transfer or sell inventory designated for product development to a marijuana sales location, or to a marijuana customer, until after the inventory is tested pursuant to R 420.304 and R 420.305, and the test results in Metrc indicate passed full compliance testing.

The way to record product development material in Metrc is by including “product development” in the strain or item name. The distribution tracking will follow the process listed above for internal product samples.

Transfer Types and When to Use Them

Adult-Use Affiliated Transfer

For transfers between adult-use licenses with the same ownership.

Adult-Use Seeds and Seedlings

For adult-use cultivators to bring in seeds or seedlings from individuals aged 21 or older.

Caregiver

For medical cultivators to bring in seeds, seedlings, tissue cultures, or cuttings from a registered caregiver.

Educational Research License Transfer

For transfers to an Educational Research License.

External Cannabinoids*

For acquiring hemp-sourced cannabinoids from businesses that do not hold a marijuana license. Please note all products must be legally obtained from a MI licensed hemp processor handler and MUST contain less than 0.3% Total THC. Total THC = THCA (%wt.) \times 0.877+ Δ 9THC (%wt.)

Grow to Grow Between Medical and Adult-Use*

For transfers between equivalent medical and adult-use cultivators that are under the same ownership.

Immature Plants Between Medical and Adult-Use

For transferring immature plants between equivalent medical & adult-use licenses under the same ownership.

Infusion Transfer

For any non-affiliated transfers where there is no price associated. This would include 3rd party processing agreements.

Medical Affiliated Transfer

For transfers between medical licenses with the same ownership.

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Microbusiness Transfer

For allowable transfers of seeds, tissue cultures, and clones that do not meet the tradition of a plant to a microbusiness.

Provisioning Center and Retailer Between Medical and Adult-Use*

For transfers between equivalent medical and adult-use sales locations that are under the same ownership.

Processor to Processor Between Medical and Adult-Use*

For transfers between equivalent medical and adult-use producers that are under the same ownership.

Temporary Event

To create a manifest for product going to a temporary event. This transfer must be voided after the manifest is printed.

Temporary Event – Return

To create a manifest for product returning from a temporary event. This transfer must be voided after the manifest is printed.

Testing Transfer (to Safety Compliance Facilities)

For transfers to safety compliance facilities (SCF) where the SCF is the transporter.

Trade Sample Transfer*

For trade sample transfers to another license (if carrying more than 15 ounces of marijuana or 60 grams of concentrate, a secure transporter is required).

Wholesale

For transfers between licenses when the product is being sold with an upfront price negotiated. Prices should not be listed as rates per pound and should be the price paid for the product.

Manifest Documentation

Walking Transfers – sender of product selects themselves as the secure transporter, enters “walking transfer” for the route, driver, and vehicle information. Gross weight, etc. same as package weight.

Virtual Transfers – All transfers where no physical transfer is occurring must be approved by the CRA through Metrc Support.

Trade Sample Transfers – sender selects themselves as the transporter. The driver and vehicle information will be from the employee delivering the product.

Temporary Event Transfers – Sender will void the transfer after the manifest has been printed.

Secure Transporter Delivery Extension Requests*

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Secure transporter delivery extension requests must be sent to the CRA via email to CRA-compliance@michigan.gov.

The email must include the following information:

- a. The name and license number of the secure transporter.
- b. All manifest numbers for the requested delivery extension.
- c. The reason for the delivery extension request.

Please note, requests received after 5pm, on state holidays, and on weekends will not be reviewed until the next business day; please plan accordingly.

Internal Analytical Testing Tracking Requirements

A licensee will designate a room in their Metrc inventory to perform internal analytical testing on marijuana or a marijuana product grown or produced by the marijuana business.

The licensee will create a package for any samples taken for internal analytical testing.

The licensee will change the location of the product to the room designated as the internal analytical testing space when products are placed in the room for testing.

All marijuana and marijuana product must have a Metrc tag affixed to them.

Once marijuana samples have been manipulated for testing (i.e., solvent added for extraction or buffer for microbial testing), this product is now considered waste since it is no longer usable and must be adjusted and finished in the Metrc system.

Internal analytical testing results are for informational purposes only and cannot be entered into the Metrc system. Prior to being sold or transferred, the batch from which the samples were obtained is required to undergo full compliance testing at a licensed laboratory, with passing test results entered into Metrc.

Retesting

When performing retesting after passing compliance testing, the last result entered in the Metrc system is the test result that should appear on the package label.

When performing retesting after products have been distributed, any testing done on the packages will update the testing status of all packages. Before retesting packages that have been distributed, please consult metrc support and the CRA.

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Example:

A retailer requests potency testing on a passed product at their location. Once the retailer creates the test samples, the status of all related packages from the source will update to “submitted for testing” and will no longer be eligible for sale or transfer as they are no longer passing in the Metrc system. If the product is mistakenly tested for additional tests and fails, the package and all associated packages are now test failed and ineligible for sale.

Product Categorization

Item Categories in Metrc

Buds- whole dried/cured buds.

Concentrate- shatter, batter, sauce, sugar etc.

Infused Liquids- beverages which require additional permission to produce, please follow the procedure outlined in this [bulletin](#). Additional items may include tinctures.

Infused Edible – gummies, chocolate bars, capsules, etc.

Infused Non-edible Liquid- topicals such as lotion and balm.

Infused Non-edible solid-patches, tampons, suppositories etc.

Inhalable Compound Concentrate- Pre-rolls with concentrate added, moon rocks, etc.

Vape Cart- any vaping product.

Wet Whole Plant- any plant material which is frozen at harvest; this could be buds, shake/trim, or a combination of both.

This is a non-exhaustive list. Please contact the CRA Operations Support Section at CRA-Compliance@michigan.gov with any questions regarding item categories.

Pre-Rolls

All raw pre-rolls must be categorized as shake/trim (pre-packaged), regardless of whether they are made from buds. This is due to the way the Metrc system calculates their quantity and weight for reporting.

Rick Simpson Oil (RSO)

RSO must be categorized and tested as a concentrate.

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Accurate Item Creation*

When creating new items in Metrc, please make sure to double check the unit weight is correct. Inaccurate item weights can lead to oversales.

For example, if a cultivator creates a 1g pre-roll but instead of using 1g in the item weight, they enter 28g, every time the retailer sells the 1g pre-roll it is showing in Metrc as an ounce. If the customer buys 3, this is over the allotted 2.5 ounces per transaction.

Adjustment Reasons*

Adjustments do not need to be reported to the CRA, but a transparent explanation should be provided in the adjustment notes. **Positive adjustments should include where the additional material came from including the Metrc tag number.** If the adjustment is due to the addition of non-marijuana ingredients, this should be indicated in the notes with the amount added.

Shipping Errors

All errors made during shipping and receiving must be corrected at the time of receipt.

Physical and electronic inventory must match exactly to be compliant.

Examples of common errors include receiving more or less than what is stated on the manifest or receiving product not on a manifest.

It is never acceptable to correct errors by adjusting packages. Incorrect packages should be rejected.

After rejecting the package(s), the licensee should contact Metrc Support to open a Metrc Support ticket for assistance with correcting the error compliantly.

Facility Inventory Errors

All inventory errors must be corrected.

Physical and electronic inventory must match exactly to be compliant.

Examples of common errors include not creating products as production batches, adjusting down packages instead of creating a new package, and packaging errors during the harvest process.

All errors should be reported to Metrc support for assistance with correcting them compliantly.

The Metrc support ticket number should be added to the notes.

When reporting issues to Metrc support, please make sure to include your license number, Metrc ID, package tag numbers, and a summary of the issue in the email.

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Metrc support can be reached via email at support@metrc.com or by calling 1-877-566-6506.

There are some helpful videos for performing common functions within metrc that can be found on the Michigan-Metrc website [here](#).

Notifications of Criminal Activity, Loss, or Theft

Licensees must notify the CRA and local law enforcement authorities within 24 hours of criminal activity at the marijuana business or theft or loss of any marijuana product. Failure to notify may result in sanctions or fines, or both.

To notify the agency of criminal activity, loss, or theft, licensees must complete a Reporting Form and upload it to their record in Accela. The form and instructions can be found [here](#).

Licensees must make the appropriate package adjustments in Metrc to account for any lost/stolen marijuana product, as electronic and physical inventories must match. When making the adjustments, please use “theft” as the reason code and include the date of the incident and, if possible, the police report number. If an entire package has been lost/stolen, the package should be finished out in Metrc after adjusting it down to 0.

Notifications of Adverse Reactions

Sales locations are required to notify the agency of adverse reactions using this [form](#) via email to CRA-Compliance@michigan.gov and entering the information into Metrc following the guidance found [here](#). The form will need to be downloaded and opened in a PDF program to utilize the submit form function.

Provisioning Center Guidance for Patient Allotment Issues*

When patients have reached their daily or monthly purchasing limit and believe it is in error, the CRA can review their purchasing history. To do this, the provisioning center must call the CRA while the patient is at the facility. The CRA is unable to speak directly to patients due to privacy laws. Provisioning centers must call (517) 284-8599 to speak with a CRA representative who will verify the employee information and review the purchasing limit issues.

Packaging and Billboard Review*

Licensees are now able to request these informal reviews in Accela, using a form available on the CRA's [website](#). The form can be found under “Miscellaneous Forms” on our [Paper Applications, Forms, and Resources](#) page.

Please note, only authorized contacts for the licensee can submit documentation, information, or requests. To be added as an authorized contact, please complete the [Authorization of Additional Contact Person](#) form.

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Questions regarding packaging and billboard review should be directed to CRA-Enforcement@michigan.gov.

License Collapse

Co-located stacked C cultivators have the option to track inventory for all grow licenses from the same market in one license in Metrc. The licensee only needs to purchase Metrc tags for the single license they are using to track their inventory. When renewing, if choosing not to keep all licenses active, please ensure you do renew the license that has tracked all inventory. All licenses must be active in Metrc.

For more information, please refer to this [bulletin](#).

For information on how to collapse an existing license, please refer to this [bulletin](#).

Additional Resources

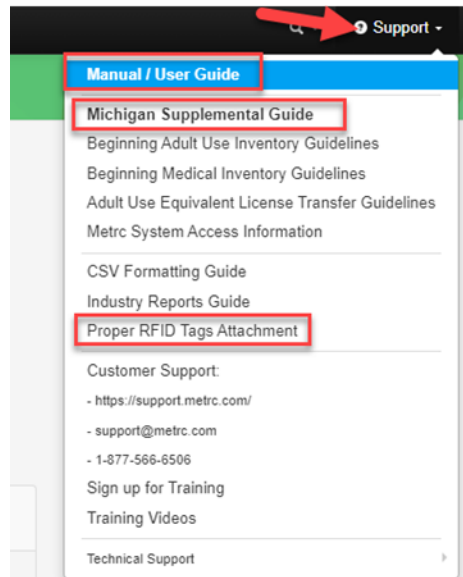
[Bulletin explaining additional Metrc training available](#)

[Metrc Learn](#)

[Metrc Knowledge Center](#)

Under the support tab in Metrc you can find the below documents:

- Michigan State Supplemental Guide
- Metrc User Guide



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