Greetings Metrc® Users,

Please note Bulletin 18 was slightly revised and the bulletin numbering “Updated_MI_IB_018” should be referenced for guidance.

Effective 11/22/2019, the Marijuana Regulatory Agency (MRA) and Metrc announced the creation and required use of the new item category, “Vape Cart.” This item category will encompass all products which utilize a vaporizer as part of its delivery system. The intent of this bulletin is to assist licensees with complying with the new MRA Emergency Rules on Marijuana products intended for vaping.

ALL vape products in current inventory intended for inhalation must be tested for the presence of Vitamin E in compliance with the new MRA Emergency Rules on Marijuana products intended for vaping.

All existing packages of vape products:

- Must be repackaged into the new “Vape Cart” category and tested for the presence of Vitamin E.
- If a facility has active packages that received a “Test Passed” status for items that fall under the new “Vape Cart” category; they must be repackaged by production batch into a new, ‘bulk Vape Cart package’.
- The newly created ‘bulk Vape Cart package’ must be submitted for Vitamin E testing.
- The new Lab Test Batch “Vitamin E” will have a single Lab Test Type required.

Please see the following pages for further details on these updated changes:
Provisioning Center Procedures

All provisioning centers with current vape products will have **three options** for their active packages inventory.

**Option 1:** Repackage all active vape cartridge packages by production batch (the manufacturing batch from which they were made) into a new bulk package associated to the new “Vape Cart” category.

1. To reference these packages, a licensee should use the “Source Package” column to filter and find all packages that came from the same production batch.
2. Once combined, the provisioning center must submit their new packages for Vitamin E testing.

**Steps for Option One**

**Step 1:** Identify all packages to be repackaged into the new bulk package, using the filter function on the source package column.

![Figure 1: Active Packages](image)

The screenshot above shows six packages. From those six, one is not part of the original source package where the production batch occurred and should be repackaged separately. You can also verify packages from the same production batch by referencing the sample package in the “Lab Results” tab.
Step 2: Select all packages of the same source package from where the production batch occurred and click the “New Packages” button.

Figure 2: New Packages Window
Step 3: Enter the total quantity of every package going into the new bulk package and finish each package.

Figure 3: New Packages Window

The new item must be created using the vape cart category.

Step 4: Verify the newly created package has the total quantity of the source package(s) and the new item is associated to the “Vape Cart” category.

Figure 4: Active Packages Grid with New Vape Cartridge Item
Step 5: Once all packages are combined from the original production batch, the licensee must submit the newly created bulk package for testing of Vitamin E.

![Figure 5: Active Packages Grid with New Vape Cartridge Item](image.png)

Step 6: The newly created sample package must be transferred to a safety compliance facility for testing. Once the package has passed Vitamin E testing in the Metrc system, the provisioning center can resume sales to patients for those packages.
Option 2: The provisioning center can elect to transfer their vape cartridge packages back to the originating licensee. If sales have occurred from any of the packages that are being transferred the provisioning center must create a new item as outlined in Bulletin 17.

1. Once the new item has been created, a new package with the remaining quantity will be created and transferred to the licensee who packaged the product.

2. The previous package will be finished in the licensee’s active inventory.

**Steps for Option Two**

**Step 1:** Identify all packages to be transferred back to the originating licensee.

**Step 2:** Review each packages history to determine whether any sales were made.

![Figure 6: Packages History](image)
Step 3: If sales have been made, the provisioning center must repackage.

1. To perform this action, the user must select and highlight the packages to be changed.
2. Then select the “New Package” button.

![Figure 7: Select Package to Repackage](image)

Step 4: Selecting “New Package” will prompt an action window where the user should indicate that they are affixing a new tag to the package and changing the package to the new item under the Vape Cart category. The user should also finish the original package.

Medical products (YELLOW Metrc tag) cannot be repackaged as adult-use (BLUE Metrc tag) products. Only products which have been approved by the MRA through the request process can be transferred to an equivalent license. Any transfers of product made without MRA approval could result in disciplinary action.

![Figure 8: BHO Bulk Item](image)
The “Production Batch” option should **NOT** be selected.

**Step 5:** Highlight the packages that must be transferred and select the “New Transfer” button.

**Figure 9: New Transfer**

**Step 6:** Fill out the transfer form and once completed, select “Register Transfer”.

**Figure 10: Transfer Form**

**Step 7:** Once the transfer is created, notify the licensee of the incoming packages.
Option 3: If no sales were made, the provisioning center can transfer the existing package directly back to the licensee without repackaging.

Steps for Option Three

Step 1: Identify all packages to be transferred back to the originating licensee.

Step 2: Review each packages history to determine confirm no sales were made.

Step 3: Highlight the packages that must be transferred and select the “New Transfer” button.
Step 4: Fill out the transfer form and once completed, select “Register Transfer”.

![Transfer Form]

**Figure 13: Transfer Form**

Step 5: Once the transfer is created, notify the licensee of the incoming packages.
Procedures for Other License Types

All licensees who have existing vape cartridges on hand with passing test results will need to combine all of their active packages by production batch into a new bulk package associated to the new “Vape Cart” category. To reference these packages, a licensee should use the Source Package column to filter and find all packages that came from the same production batch.

Prior to repackaging, licensees will need to ensure they have created new vape items within the newly created “Vape Cart” category and discontinued the old vape items that may have been in a Concentrate or Concentrate (Each) category. The procedural steps to accomplish this are outlined in Bulletin #17.

Licensees who will be receiving transfers of vape cartridges from licensed provisioning centers for repackaging, must wait until ALL packages are received before repackaging.

Once all packages that are going to be combined into a new bulk package are in the licensee’s facility, the following steps will ensue for packages that have a “Test Passed” status.

**Step 1:** Identify all packages that are going to be repackaged into the new bulk package.

![Active Packages](image)

**Figure 14: Active Packages**

The screenshot above shows six packages. From those six, one is not part of the original source package where the production batch occurred and should be repackaged separately. You can also verify packages from the same production batch by referencing the sample package in the “Lab Results” tab.
Step 2: Select all packages of the same source package from where the production batch occurred and click the New Packages button.

![Figure 15: New Packages Window](image)

Step 3: Enter the total quantity of every package going into the new bulk package and finish each package.
Step 4: Verify the newly created package has the total quantity of the source package(s) and the new item is associated to the Vape Cartridge category.
Step 5: Once all packages are combined from the original production batch, the licensee will need to submit the newly created bulk package for testing of Vitamin E.

![Submit for Testing](image)

Figure 18: Active Packages Grid with New Vape Cartridge Item

Step 6: The newly created sample package must to be transferred to a safety compliance facility for testing. Once the Test Passed Vitamin E results have been entered in the Metrc system, the licensee can continue their next steps for delivery to provisioning centers.

Please contact Metrc support at support@metrc.com or 877-566-6506 with any Metrc questions.

Please reach out to MRA-compliance at MRA-compliance@michigan.gov with any Michigan compliance questions.