



Tips for Licensees – Common Issues

These tips are intended to provide guidance to marijuana businesses on:

- How to compliantly create pre-rolls
- Best practices for shipping and receiving transfer manifests
- Compliance with the Weights and Measures Act

Pre-Rolls

Definitions

Raw Pre-Roll: Ready-made joint created from ground marijuana flower that is placed in a paper wrap.

Pre-Roll with Concentrate Added: Ready-made joint created from ground marijuana flower that is placed in a paper wrap and contains the addition of a concentrate.

Cultivators: Raw Pre-Rolls

Raw pre-rolls made from bud, shake, or trim from the same strain and harvest batch **do not** need to be re-tested in final form **if** the flower used to create the pre-rolls has already passed full-compliance testing.

The following is **not** permitted for pre-rolls created by a cultivator:

- Pre-rolls made with mixed strains.
- Adding hemp flower, CBD concentrate, or any other product except for the paper wrap.
- Adding kief to pre-rolls (kief not already present in the flower). **Exception:** the only time a cultivator can add kief to pre-rolls is under the following circumstances: If the kief is from the same harvest batch and strain as the flower in the pre-rolls and the resulting pre-rolls **are retested in their final form** before being transferred or sold. “Final form”

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means the form a marijuana product is in when it is available for sale by a marijuana sales location.

Cultivators: Pre-Rolls with Concentrate Added

Cultivators **cannot** add concentrate to pre-rolls.

Producers: Raw Pre-Rolls

Raw pre-rolls made from bud, shake, or trim from the same strain and harvest batch **do not** need to be re-tested in pre-roll form **if** the flower used to create the pre-roll has already passed full-compliance testing.

The following is **not** permitted for raw pre-rolls created by a producer:

- Pre-rolls made with mixed strains.
- Adding hemp flower, CBD concentrate, or any other product except for the paper wrap.
- Adding kief to pre-rolls (this is kief not already present in the flower).

Producers: Pre-Rolls with Concentrate Added

To create pre-rolls with added concentrate, a producer **must** add concentrate that is compliantly tracked in the Statewide Monitoring System (MetrC).

- To compliantly create the product:
 - Create a new production batch(es).
 - The production batch will include the total grams of flower pulled from the test passed package of flower used and the total grams of concentrate from the package of concentrate.
 - The package category will be concentrate/each. The resulting pre-roll with added concentrate must be tested in its final form as a concentrate. “Final form” means the form a marijuana product is in when it is available for sale by a marijuana sales location.

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- **As long as the producer is adding concentrate that is compliantly tracked in Metrc to the pre-roll**, mixed strains, kief, and/or CBD concentrate can also be added:
 - Mixed strains: A producer can mix strains of flower to create the pre-roll as long as the packages of product used are tracked compliantly in the Metrc system.
 - Kief: A producer can add kief to a pre-roll as long as the packages of product used are tracked compliantly in the Metrc system.
 - CBD concentrate: CBD concentrate that is derived from hemp is not tracked within Metrc. A producer can add CBD concentrate to a pre-roll if concentrate that is tracked within Metrc is also added to the pre-roll. **Hemp flower cannot be added to pre-rolls.**

Sales Locations: Raw Pre-Rolls

Raw pre-rolls made from bud, shake, or trim from the same strain and harvest batch do not need to be re-tested in pre-roll form if the flower used to create the pre-roll has already passed full-compliance testing.

The following is **not** permitted for pre-rolls created by a sales location:

- Pre-rolls made with mixed strains.
- Adding hemp flower, CBD concentrate, or any other product except for the paper wrap.
- Adding kief to pre-rolls (this is kief not already present in the flower).

Sales Locations: Pre-Rolls with Concentrate Added

Sales locations **cannot** add concentrate to pre-rolls.



Best Practices for Shipping and Receiving Transfer Manifests

Marijuana Business Must Verify Product Before Shipping

Rule 6(15) in the Marijuana Operations Rule Set - R 420.206 (15)

A marijuana business transferring marijuana product to or receiving marijuana product from a marijuana transporter shall initiate the procedures to transfer or receive the marijuana product within 30 minutes of the marijuana transporter's arrival at the marijuana business.

Rule 12(1) in the Marijuana Operations Rule Set - R 420.212 (1)

All marijuana products must be stored at a marijuana business in a secured limited access area or restricted access area and must be identified and tracked consistently in the statewide monitoring system under these rules.

Before a secure transporter leaves a marijuana business to transport product, the sending marijuana business must first ensure that all product listed on the transfer manifest matches the physical product contained within the shipment.

The sending marijuana business must verify the:

- Metrc transfer tags (listed under the 'Package' box on the manifest).
- Product(s) contained in the shipment have the tag(s) listed on the labels and match what is listed in Metrc and on the transfer manifest.
- Item/product names.
- Quantity/Weight.

Marijuana Transporter Must Verify Product Before Shipping

Rule 6(7)(f) in the Marijuana Operations Rule Set - R 420.206 (7)(f)

A marijuana transporter shall not possess marijuana product that is not on a manifest.

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Before a marijuana transporter leaves a marijuana business to transport product, the transporter must first ensure that all product listed on the transfer manifest matches the physical product contained within the shipment.

The marijuana transporter must verify the:

- Metrc transfer tags (listed under the 'Package' box on the manifest).
- Product(s) contained in the shipment have the tag(s) listed on the labels and match what is listed in Metrc and on the transfer manifest.
- Item/product names.
- Quantity/Weight.

Receiving Marijuana Business Must Verify Product While Transporter is Onsite

Rule 6(15) in the Marijuana Operations Rule Set - R 420.206 (15)

A marijuana business transferring marijuana product to or receiving marijuana product from a marijuana transporter shall initiate the procedures to transfer or receive the marijuana product within 30 minutes of the marijuana transporter's arrival at the marijuana business.

Rule 6(7)(i) in the Marijuana Operations Rule Set - R 420.206 (7)(i)

A marijuana transporter transferring marijuana product to a marijuana business shall remain onsite until the marijuana product is weighed and accepted or rejected before leaving the marijuana business.

When a marijuana business receives a transfer, the receiving licensee must audit the shipment against the transfer manifest while the marijuana transporter is onsite at the marijuana business. This is to ensure that all items contained within the shipment correctly match what is listed on the manifest.

The receiving marijuana business must verify the:

- Metrc Transfer tags (listed under the 'Package' box on the manifest).
- Product(s) contained within the shipment have the tag(s) listed on the labels and match what is listed in Metrc and on the manifest.

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- Item/product names.
- Quantity/Weight.

Packages on the manifest meeting any of the following criteria **must be rejected** in Metrc and returned to the originating marijuana business by the marijuana transporter:

- The Metrc tag on the physical product does not match the Metrc tag listed on the transfer manifest.
- The Item/product name of the physical product does not match the item/product name listed on the transfer manifest.
- The quantity/weight of the physical product does not match the quantity/weight listed on the manifest.

Rule 12(1) in the Marijuana Operations Rule Set - R 420.212(1)

All marijuana products must be stored at a marijuana business in a secured limited access area or restricted access area and must be identified and tracked consistently in the statewide monitoring system under these rules.

Accepting product from a shipment that does not match what is listed on the transfer manifest and/or does not match what is listed in Metrc is not in compliance with the administrative rules and may subject the marijuana business to disciplinary proceedings.

Weights and Measures Act

When weighing, measuring, and packaging product, licensees must ensure that they are in compliance with the [Weights and Measures Act](#). Additional information regarding the Weights and Measures Act can be found on the Michigan Department of Agriculture & Rural Development [website](#).

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

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