CANNABIS
REGULATORY AGENCY

COMPLIANCE BEST PRACTICE GUIDE

Updated July 2025

This document aims to provide clarification and best practice information on several common topics. It will be updated as new information is released. This document does not constitute legal advice. Licensees should seek legal counsel to ensure their operations comply with all applicable laws and administrative rules.

Table of Contents

Introduction 7

Compliance Resources 7

Inspections 7

Investigations 8

Expectations for Standard Operating Procedures (SOPs) 8

Updating License Contacts 10

Updating Notification Email Address for Metrc 11

Closing a Licensed Marijuana Business 11

Criminal Activity, Loss or Theft Notifications 11

Adverse Reaction Notifications 11

Secure Transporter Delivery Extension Requests 12

Receiving and Rejecting Transfers ... 12

Provisioning Center Guidance for Patient Allotment Issues 12

Purchasing Limits and Equivalencies 12

Medical 12

Adult-Use (Recreational) 13

Packaging and Billboard Review 14

New Product Review 14

Multi-Packs 14

Temporary Marijuana Events 15

How to Make Compliance Order Payments Online 17

AFS Requirements and Required AFS Report Form 17

Contingency Planning: Power Outages 17

MRTMA & MMFLA Employee Requirements 18

Who is Considered an Employee? 18

Pre-Employment Requirements 19

Onboarding & Recordkeeping 20

Employment Oversight 20

Separation from Employment..... 21
Visitors & Non-Employee Access..... 21
Recordkeeping & Agency Access..... 21
Plant and Package Tagging.....22
Immature Plant Batches..... 22
Vegetative or Flowering Plants 22
Manicure Harvest..... 24
Plant Harvest/Creating a Harvest Batch…….24
Packages 25
Repackaging..... 25
Waste..... 26
Immature Plant Sales Approval Process.....26
Stacked Class C Growers/License Collapse.....28
Required Testing Points.....29
MCT (medium-chain triglyceride) Oil 30
Remediation Protocol.....30
Product Samples 31
Trade Samples..... 31
Internal Product Samples..... 32
Product Development 33
Donations..... 34
Product Giveaways..... 34
When to Use Production Batches 34
Requirements for All Non-Marijuana Ingredients 35
Compliant Use of Inactive Ingredients 36
Compliant Creation of Concentrates from Raw Plant Material.....39
Raw Plant Material to Distillate 39
Raw Plant Material to Butane Hash Oil (BHO)……. 39
Labeling Products for Transfer.....39
Labeling Requirements for Cultivator to Cultivator/Producer Transfer:….40

Labeling Requirements for Producer-to-Producer Transfer:…….. 40

Labeling Requirements for Cultivator or Producer to Sales Location:….. 40

Product Labeling and Tagging After Equivalent License Transfer…… 41

Compliance Labeling Requirements by Product Type 41

Creating Homogenous Products 47

Child-Resistant Packaging 47

Universal Agency Symbol for Marijuana Product 48

Avoiding Testing Delays 48

Additional Testing After Passing Full Compliance… 48

Creating Packages Before Retesting…48

Incorrect Test Panels Selected at Sampling.….48

Entering Partial Testing Panels..... 49

Incorrect Package Sourcing/Sample Creation…….. 49

Retesting..... 50

Certificates of Analysis (COA) 50

Product Categorization 50

Item Categories in Metrc..... 50

Pre-Rolls 51

Pre-Rolls with Non-Marijuana Terpenes…….51

Rick Simpson Oil (RSO) and Distillate Darts…….51

Metrc Item Creation 51

Inhalable Compound Concentrate (ICC) Products..... 52

Infused Edible THC Serving and Package Information 52

Infused Edible Expiration Date Function 52

Marijuana Product Destruction..... 53

Video and Photo Evidence in Destruction…..53

Administrative Recall Function..... 54

Transferring Packages on Administrative Recall….. 54

Notices of Potential Noncompliance 55

Creating a Transfer Manifest 55

Transfer Types and When to Use Them 55
Adult-Use Affiliated Transfer 55
Adult-Use Seeds and Seedlings 55
Caregiver 55
Educational Research License Transfer55
External Cannabinoids 55
Grow to Grow Between Medical and Adult-Use…… 56
Immature Plants Between Medical and Adult-Use…56
Infusion Transfer 56
Medical Affiliated Transfer..... 56
Microbusiness Transfer..... 56
Provisioning Center and Retailer Between Medical and Adult-Use…….. 56
Processor to Processor Between and Adult-Use…..56
Temporary Event 56
Temporary Event – Return..... 57
Testing Transfer to Safety Compliance Facility…….57
Tolling Transfer 57
Trade Sample Transfer 57
Wholesale 57
Manifest Documentation 57
Walking Transfers 57
Virtual Transfers..... 57
Trade Sample Transfers 57
Temporary Event Transfers 58
External Cannabinoid Transfers..... 58
Equivalent License Transfers..... 58
Internal Analytical Sample Tracking..... 59
Adjustment Reasons..... 60
Shipping Errors 60

Facility Inventory Errors 61
Correcting Inaccurate Sales 61
Packages: Discontinue or Finish 61
Metrc Housekeeping 62
Finalizing Sales 62
Finishing Packages 62
Finishing Harvests 62
Outstanding Manifests 62
Additional Regulatory Requirements & Opportunities 63
Michigan Occupational Safety and Health Administration (MIOSHA)..... 63
Michigan Department of Agriculture & Rural Development (MDARD)..... 63
Michigan Department of Environment, Great Lakes, and Energy (EGLE)..... 65
Available Metrc Training 67
Additional Resources 67

Yellow highlight indicates new information from the previous version.

Introduction

This Compliance Reference Manual serves as a guide for licensed marijuana businesses, providing guidance and assistance for the procedures necessary to adhere to the administrative rules and statutes. Ensuring operations remain compliant and aligned with the commitment that the Cannabis Regulatory Agency (CRA) will establish Michigan as the national model for a regulatory program that stimulates business growth while preserving safe consumer access to cannabis.

Compliance Resources

All licensed marijuana businesses should bookmark the Cannabis Regulatory Agency website, which is where forms, bulletins and other helpful information can be found.

All licensed marijuana businesses should also bookmark the webpage for the administrative rules and statutes. The documents are searchable PDFs.

All licensed marijuana businesses should bookmark the Statewide Monitoring System (Metrc) webpage, this page includes helpful information, bulletins and how to videos.

This webpage provides information for when a form is required to be submitted for changes made to the business. Please note: the changes must be submitted and approved before they can take into effect.

All licensed marijuana businesses should register to receive information including bulletins and press releases from the CRA. This can be done by following the prompt at the bottom of the CRA main webpage listed above.

Inspections

The Cannabis Regulatory Agency (CRA) has transitioned to unannounced semi-annual inspections at all licensed marijuana businesses effective October 1, 2024. The inspection checklists can be found here under technical bulletins. Here is a link to a presentation on how to prepare for an inspection.

Compliance Tip:

Conducting self-inspections is a useful tool to check for compliance in preparation for an unannounced visit. Performing these self-inspections whether announced or unannounced on a monitored frequency can assist licensees with ensuring compliance and inspection readiness for staff.

Investigations

Investigations are part of the regulatory process. All employees should know how to interact with CRA staff, where to find important information, and their responsibilities if the CRA is onsite.

Compliance Tip:

- There must always be someone onsite who can access and navigate Metrc.
- There must be someone onsite who can access and navigate the video surveillance system.

Expectations for Standard Operating Procedures (SOPs)

A marijuana business should create and maintain SOPs for all routine tasks or processes performed at their business. An SOP is a document containing step-by-step instructions to guide employees on how to perform a technical, repetitive process within an organization. The purpose of an SOP is to carry out the operations correctly and always in the same manner.

All SOPs should include, at minimum, the information below:

- A clear title that accurately describes the procedure.
- Person or person(s) responsible for performing specific tasks within the procedure by position or role.
- Each step required to complete the task or process.
- If applicable, any controls in place to ensure activities are completed as specified in the SOPs – this may include auditing previously completed work or observance of the staff performing the task or activity.

Below Are Examples of SOPS the CRA Would Expect, At A Minimum:

Producers should include SOPs for the following activities:

- Compliance with Current Good Manufacturing Practice, Hazard Analysis, and Risk Based Preventative Controls for Human Food, 21 CFR part 117 if producing edibles.
- All processing methods, including extraction, distillation, remediation, and any other process where marijuana is changing form or being incorporated into another product.
- Creation of all products, including the recipe and step by step process.
- Compliance with Metrc tracking requirements including:
    - Creating, accepting and rejecting transfers
    - Creating new production batches
    - Creating new packages
    - Repackaging
    - Correcting errors
    - Creating test samples
- Obtaining and verifying ingredients are from approved sources
- Verification that products meet all labeling and packaging requirements prior to transfer
- Operation of security systems in accordance with the rules

Cultivators should include SOPs for the following activities:

- Obtaining plants and recording in Metrc
- Compliance with requirements for applications of chemicals and plant treatments, including the concentration and frequency of application.
- All trimming and harvesting processes, including separating the harvest by product type and category
- Compliance with the 50 lb. single strain harvest batch limit for testing
- Compliance with Metrc tracking requirements including:
    - Creating, accepting and rejecting transfers
    - Creating new plants and moving them through the growth stages
    - Creating harvest batches and packages
    - Repackaging
    - Correcting errors
    - Creating test samples
- Operation of security systems in accordance with the rules

- Verification that products meet all labeling and packaging requirements prior to transfer

Sales locations should include SOPs for the following activities:

- Compliance with requirements for selling marijuana products including:
  - Age verification for purchases
  - Verification that all product passed testing, and the results are recorded in Metrc
  - Verification that product is not on administrative hold or prohibited from sale
  - Verification that the amount of product does not exceed the applicable purchasing limits
  - Verification that products meet all labeling and packaging requirements prior to sale or transfer
- Compliance with Metrc tracking requirements including:
  - Creating, accepting and rejecting transfers
  - Repackaging
  - Correcting errors
  - Creating test samples
- How to report an adverse reaction
- Operation of security systems in accordance with the rules

This is intended to provide licensees with examples of the most basic procedures they should have in place based on their license type; this is not an exhaustive list.

Updating License Contacts

Pursuant to the Administrative Rules, licensees have a continuing duty to provide the CRA with up-to-date contact information and must notify the CRA in writing of any changes to the contact information on file with the agency. Further information regarding contact information and authorized contacts can be found under the Tips for Licensees section on the Bulletins webpage. Please contact the License Maintenance Section at CRA-Amendments@michigan.gov with any questions or concerns regarding contact updates.

Updating Notification Email Address for Metrc

The CRA is utilizing the functions within Metrc which will send an autogenerated email when packages are recalled or placed on administrative hold. This will also show on the banner and in the packages grid as well.

It is critical that these emails are delivered to the correct person via the correct email address for the business. To update the contact information for these notifications, please refer to this Metrc bulletin.

Closing a Licensed Marijuana Business

This webpage provides licensees with instructions for how to properly close a licensed marihuana business.

Criminal Activity, Loss or Theft Notifications

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. In addition to the reporting form, please include documentation that the products have been adjusted out of inventory following the instructions below. This documentation includes the list of packages showing the adjustments, and the Metrc adjustment report, which can be located in the canned reports.

Marijuana products which have been lost or stolen should be adjusted down. 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.

Adverse Reaction Notifications

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. Please ensure the form is filled out completely.

The form will need to be downloaded and attached to an email. Please send the completed form to CRA-Compliance@michigan.gov.

Secure Transporter Delivery Extension Requests

Secure transporter delivery extension requests must be sent to the CRA via email to CRA-compliance@michigan.gov. Please note, requests received after 5pm, on state holidays, and on weekends, will not be reviewed until the next business day; please plan accordingly.

The email must include the following information:

- Name and license number of the secure transporter
- All manifest numbers for the requested delivery extension
- The reason for the delivery extension request

Receiving and Rejecting Transfers

To receive or reject a transfer manifest, please follow the instructions found here.

Provisioning Center Guidance for Patient Allotment Issues

When patients appear to have reached their daily or monthly purchasing limit but 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.

Purchasing Limits and Equivalencies

Medical

For a registered qualifying patient, an amount of marihuana product that does not, in total, exceed 2.5 ounces of marihuana or marihuana equivalent per day.

For a registered primary caregiver, an amount of marihuana product that does not, in total, exceed 2.5 ounces of marihuana or marihuana equivalent per day for each registered qualifying patient with whom he or she is connected through the agency's registration process.

The monthly purchasing limit of 10 ounces of marihuana product per month to a qualifying patient, either directly or through the qualifying patient's registered primary caregiver.

Adult-Use (Recreational)

(a) A marihuana retailer, under the MRTMA, is prohibited from making a sale or transferring marihuana to an adult 21 years of age or older in a single transaction that exceeds 2.5 ounces.

(b) Not more than 15 grams of marihuana may be in the form of marihuana concentrate.

(c) A marihuana sales location may sell no more than 3 immature plants to a marihuana customer per transaction.

This means a single transaction cannot contain more than 15 grams of concentrate and the total amount sold for all products must be less than the transaction limit of 2.5 oz.

Flower and concentrates are sold 1:1, meaning whatever the gram weight sold is the gram weight recorded in Metrc without an equivalency.

For infused products an equivalency is needed as not all ingredients in the final product are marijuana.

The equivalencies are as follows:

To determine usable marihuana equivalency the following shall be considered equivalent to 1 ounce of usable marihuana:

(1) 16 ounces of marihuana-infused product if in a solid form.

(2) 7 grams of marihuana-infused product if in a gaseous form.

(3) 36 fluid ounces of marihuana-infused product if in a liquid form.

Please note: The CRA has not approved any products which would be considered gaseous.

According to Rule 420.804(1), licensees shall notify the CRA and local law enforcement authorities within 24 hours of becoming aware of, or within 24 hours of when the licensee should have been aware of, the theft or loss of any marijuana product or criminal activity at the marijuana business. This includes, but is not limited to, individual possession of more than twice the amount of marijuana allowed under the Michigan Regulation and Taxation of Marihuana Act and other activities as described in MCL 333.27965.

Packaging and Billboard Review

Licensees are now able to request informal packaging and billboard 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 and send to CRA-Amendments@michigan.gov.

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

New Product Review

The CRA can assist with providing rules and guidance for classifying new products in Metrc. Please submit any requests to CRA-Compliance@michigan.gov.

Please include the following items in your request:

- The standard operating procedure which includes all ingredients for producing the product.
- The record of formulation for the product
- Any other information which may assist the CRA with properly categorizing the product, for example, intended consumption method.

Multi-Packs

In response to requests from licensees, the CRA has issued a technical bulletin which allows licensees to compliantly create packages containing multiple flavors, colors, and strains of infused-edibles and vape cartridges.

A multi-pack is a package containing two or more varieties of the same item – either infused edibles or vape cartridges – packaged together and sold in a single package under one Metrc package tag. Multi-packs will allow licensees to package and sell multiple varieties of an item in one package without the need to attach or scan multiple labels.

Temporary Marijuana Events

CRA rules require a person who allows consumption of marijuana products on the premises of a non-residential location – and charges a fee for entry, sells goods or services while individuals are consuming on the premises, or requires membership for entry – to acquire either a designated consumption establishment license or a temporary marijuana event license.

Only marijuana event organizers may apply for temporary marijuana event licenses, and they must do so at least 90 days prior to the event.

Some important reminders regarding temporary marijuana events:

- A temporary marijuana event (TME) license may be issued only to a person who holds a marijuana event organizer (MEO) license issued by the CRA. An MEO is not authorized to engage in the operations of a marijuana establishment licensee without first obtaining the appropriate licenses.
- A TME license may be issued only for a single day or up to 7 consecutive days and the event must be held at a venue expressly approved by a municipality for the purpose of holding an event where sales to, or consumption of marijuana by, persons 21 years of age or older will occur.
- Each marijuana retailer or marijuana microbusiness or class A marijuana microbusiness licensee participating in a TME must be identified with an assigned TME location number.
- An MEO must provide a list of all licensees and employees who will be providing onsite sales of marijuana products at the TME. If the list of licensees and employees participating changes after the application is submitted or after the event license is issued, the applicant must submit an updated list and an updated diagram to the CRA not less than 72 hours before the event.
- Licensees not on the list submitted to the CRA may not sell marijuana products at the TME.
- The MEO licensee who holds the TME license must ensure that access to the event is restricted to persons 21 years of age or older and ensure that marijuana sales or

consumption is not visible from any public place or non-age-restricted area. The MEO is also responsible for ensuring that all rules and requirements for the onsite consumption of marijuana products are followed.

- Prior to selling marijuana products to a customer, the licensee making the sale must confirm the age and identity of the customer. All sales of marijuana products at a TME shall occur in a retail area as designated in the premises diagram.
- Each sale at a TME must be performed by a licensed marijuana retailer, a marijuana microbusiness, or a class A marijuana microbusiness that is authorized to sell marijuana products to customers. Sales activities may only occur within the specifically assigned area, identified in the diagram of the physical layout of the TME.
- Mobile sales activities via wagon, cart, or similar means are prohibited.
- The marijuana products sold onsite at a TME must be compliantly transported to the site by a licensed secure transporter. A licensed transporter is not required if less than 15 ounces of marijuana or 60 grams of concentrate is transported at one time.
- Except small amounts of products used for display, all marijuana products for sale at a TME must be stored in a secure, locked container that is not accessible to the public. Marijuana products stored by a licensee at a TME must not be left unattended.
- All marijuana products made available for sale at a TME by a licensee must comply with all requirements of state law and administrative rules for the sale and tracking of marijuana products.
- An MEO licensee, or a licensee participating in a TME, must comply with the notification requirements for theft, loss, or criminal activity pertaining to marijuana product. A licensee selling marijuana products at a TME shall comply with the requirements of the administrative rules regarding the sale or transfer of marijuana and the purchasing limits in a single transaction.
- MEOs and participating licensees are required to adhere to applicable administrative rules and statutes. The MEO or licensees may be subject to fines, disciplinary actions, or sanctions If non-adherence is present or occurs.
- For an applicant seeking licensure for a marijuana event organizer license under the MRTMA, proof of financial responsibility for liability for bodily injury is not required. However, a marijuana event organizer licensee must file a proof of financial responsibility for liability for bodily injury when applying for a temporary marijuana event

license or proof that each marijuana microbusiness, class A marijuana microbusiness, and marijuana retailer participating in the temporary marijuana event has coverage for liability for bodily injury when applying for a temporary marijuana event license.

An application for a temporary marijuana event license must be submitted 90 days prior to the date of the event.

How to Make Compliance Order Payments Online

This bulletin provides instruction on how to make a payment online for disciplinary action fines.

If you have any questions, please email CRA-Legal@michigan.gov, or call 517-284-8599.

AFS Requirements and Required AFS Report Form

The Annual Financial Statement (AFS) requirements and the required AFS report form may be accessed at michigan.gov/afs.

For questions regarding the AFS requirements, please email CRA-AFS@michigan.gov or contact the CRA by phone at 517-284-8599.

Contingency Planning: Power Outages

The CRA is aware licensees may experience prolonged power outages after a severe weather event and advises licensees to have the emergency protocols below in place.

The MMFLA and the MRTMA require marijuana businesses to have at minimum:

- Maintain an active alarm system at their business
- Have video surveillance that covers and records all required areas, and maintain those recordings for a minimum of 30 days
- Accurately enter all transactions and maintain their current inventory in Metrc

Provisioning centers licensed under the MMFLA are required to verify that any caregiver or patient purchasing product has a valid, current, unexpired, and unrevoked registry identification card and that the sale or transfer will not exceed the daily or monthly purchasing limits.

In the event any licensed marijuana business experiences a power outage and is unable to comply with the administrative rules, they should proceed under the following guidance:

- Licensees should notify the CRA via submission of a reporting form, email, and/or telephone call and provide details of the power outage and expected restoration times
- Licensees should ensure their business is monitored and secured to prevent break-ins and/or theft
- Licensees should ensure all locking mechanisms are effective on doors and gates
- Licensees should record the transfers or transactions during this time outside of the Metrc system either within their own third-party system used to integrate with Metrc or a stand-alone tracking system
- Licensees will need to record all the information normally recorded within Metrc during transfers and transactions – including, but not limited to, licensee number, package source tag number, package number, patient number, caregiver number, amount from purchase, date and time of purchase or transfer
- Licensees should update Metrc with all transfer and transaction information within 24 hours of power restoration
- Provisioning Center licensees must review the data uploaded to Metrc and determine if there were any over-sales transactions to include sales over 2.5 ounces of marijuana in one day or 10 ounces of marijuana in 30 days – if there were any sales that exceeded the allowable amount for purchase, the licensee should submit the sale information to the CRA within 72 hours at CRA-Compliance@michigan.gov. More guidance can be found in this bulletin.

This information is for contingency purposes only.

MRTMA & MMFLA Employee Requirements

When hiring individuals to work in a licensed marijuana business in Michigan – whether under the adult-use (MRTMA) or medical (MMFLA) framework – it's important to understand how "employees" are defined and what is required before they begin work.

Who is Considered an Employee?

An "employee" includes any individual who performs work or provides services for compensation at the licensed business. This applies to:

- Full-time or part-time staff
- Temporary workers
- Independent contractors or individuals supplied through third-party staffing agencies

If a person handles marijuana products or participates in the daily operations of the business, they are considered an employee—regardless of how they were hired or paid.

Pre-Employment Requirements

- **Criminal Background Check**
  - ▸ Conduct a criminal history background check on all prospective employees prior to hire.
  - ▸ Retain documentation of the results for the duration of the individual's employment.

NOTE: If an employee is charged with or convicted of a controlled substance-related felony or any other felony, the licensee shall immediately report the charge or conviction to the agency. If an employee of a licensee under the MRTMA is convicted of an offense involving distribution of a controlled substance to a minor, the licensee shall immediately report the conviction to the agency.

For more information see Employee Background Checks - Pending Charges and Convictions.

- **Excluded Employee Verification**
  - ▸ Screen each candidate against the CRA's list of excluded individuals (per R 420.808a(6)).
- **Caregiver Status (MMFLA Only)**
  - ▸ If hiring a registered caregiver, confirm that the individual formally withdraws their caregiver registration in accordance with agency procedures.
- **Age & Eligibility (MRTMA Only)**
  - ▸ Do not employ or allow anyone under the age of 21 to work or volunteer.
  - ▸ Do not employ individuals convicted of distributing controlled substances to minors.

Onboarding & Recordkeeping

- **Statewide Monitoring System (Metrc) Enrollment**
  - Enter new employee information and assign system access levels within **7 business days of hire**.
  - Update employee details or access permissions within **7 business days** of any changes.
- **Employee Training Manual**
  - Provide all employees with a training manual that includes:
    - Safety protocols
    - Operational and conduct standards
    - Security procedures
    - Marijuana product knowledge (including dosage and purchasing limits)
    - Consumer health and education materials
- **Responsible Operations Plan**
  - Maintain a written plan that outlines how staff will monitor and prevent:
    - Over-intoxication
    - Underage access
    - Unlawful sale or distribution
    - Criminal activity on the premises
- **Point-of-Sale (POS) Procedure Documentation**
  - Develop documented POS procedures covering:
    - Dosage and serving size training
    - THC/CBD content education
    - Product labeling and warnings
    - Legal purchasing limits

Employment Oversight

- **Criminal Charge Notification**
  - ▸ Maintain a written policy requiring employees to report any new or pending criminal charges or convictions.
  - ▸ Immediately notify the CRA if an employee is charged with or convicted of any felony, including controlled substance-related offenses.
- **Compliance with Federal Safety Standards**
  - ▸ Ensure employees who handle marijuana products follow Good Manufacturing Practices (21 CFR 117).
- **Food & Beverage Consumption Restrictions**
  - ▸ Prohibit consumption of food or beverages in any area where marijuana is stored, processed, or packaged.
  - ▸ If applicable, provide a designated break area that is fully separated from these spaces.

Separation from Employment

- **System Access Termination**
  - ▸ Revoke all facility and Metrc access permissions within **7 business days** of an employee's departure.

Visitors & Non-Employee Access

- **Visitor Protocol**
  - ▸ Ensure all visitors are signed in, monitored, and escorted in limited access areas.
- **Professional Services Providers**
  - ▸ Individuals not regularly engaged in operations (e.g., contractors or service techs) must be logged, monitored, and escorted unless otherwise credentialed.
- **Restricted Areas**
  - ▸ Prohibit visitor access to hazardous material storage and processing areas unless strictly necessary.

Recordkeeping & Agency Access

- Maintain all employee records in a secure, organized manner.

- Ensure records are readily available for inspection by the CRA at any time.

Plant and Package Tagging

Metrc tags are single-use and cannot be reassigned once assigned to a package or plant. To prohibit unlicensed businesses from obtaining Metrc tags, the tags should be destroyed, preferably by shredding.

Immature Plant Batches

To create an immature plant batch, please follow the instructions found here.

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 plants reach 8” in height or width, they are, by administrative rule, mature plants. They will be assigned a plant tag in Metrc and physically and electronically moved to the vegetative growth phase.

How to properly physically tag a vegetative plant:

- 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.
- 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.

- 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.” Example:

When a vegetative plant is determined to be hearty enough to withstand the weight of the plant

tag, the tag can be removed from the growing medium and attached to the physical plant. Here is how to attach the Metrc plant tag to the actual plant:

- The staked plant tag is removed from the plant’s growing material.
- The strap is removed from the lower hole of the Metrc plant tag (the notched end of the strap).
- 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 not in the growing material. This is crucial to easily identify that all plants are tagged properly for inventory control.

Tags must always remain visible and in clear view like the images below.

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.

Manicure Harvest

To perform a manicure harvest, please follow the instructions found in this video.

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

Plant Harvest/Creating a Harvest Batch

To perform a plant harvest, please follow the instructions found in this video. It is imperative that the weight of each plant part of the harvest batch is accurately weighed and the weight entered into Metrc.

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

The plant tag can also be placed on the hangers used to hold the plants if the plants can be individually identified.

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 be 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 container is re-used the first tag should be removed before placing a new tag.

Repackaging

To repackage a product, please follow the instructions found in this video.

Please note, if repackaging electronically – meaning the physical product or packaging is not changing – only the Metrc tag number listed on the items will need to be updated. For licensees acting as distribution centers, if the package is physically not being altered, the distribution center does not need to have their license included on the compliance label if they did not create or package the products.

If a licensee is changing the packaging, then the 'packaged by business name' should be the one who is performing the physical repackaging.

Waste

The rules require all marijuana to be tracked in Metrc and have a Metrc tag affixed. Licensees who wish to perform destruction on a scheduled frequency may do so if the products bear the Metrc package tag number and are accurately tracked in Metrc.

Immature Plant Sales Approval Process

Approval Process for Growers/Cultivators

Once a cultivator has achieved certification for GACP-GMP, they must submit a plan for the sale of immature plants to the CRA to CRA-Compliance@michigan.gov before selling any immature plants to a sales location.

The plan must include, at a minimum:

1. The name of the business and the cultivator's license number

2. Proof the cultivator is GACP-GMP certified

3. A copy of the general care instructions the cultivator will provide to sales locations

4. Standard Operating Procedures (SOPs) that include the following, at a minimum:

- How the cultivator will ensure plants have been pre-ordered or determine how many plants are needed at the sales location and how plants will be packaged for transfer
    - Plants will need to be packaged in plant packages for each transfer to sales location
    - The number of immature plants in a plant package will be determined by the number of immature plants pre-ordered by the sales location or the predetermined number of immature plants that will be transferred. Immature plant packages can consist of one to 100 plants depending on the individual sales location's pre-order. However, the sales location is only permitted to sell three immature plants to a customer per transaction
    - Plant package labels must include the license number of the cultivator, plant strain name, and sell-by date
- A detailed description of the method of transportation to sales locations
    - A secure transporter is not necessary for these transfers
    - The wholesale transfer type will be used in the transfer manifest
    - The means by which the cultivator will ensure the plants are not exposed to contaminants or hazards during the transport must be
    - The procedure that will be followed during transportation of the immature plants
- Refund and return policies if sales locations request to return immature plants in their inventory
    - Provisioning centers are not permitted to return products to growers
    - Only adult-use retailers can return immature plants to growers

The CRA will review the plan and provide approval, request additional information, or request changes to the proposed plan. Once the plan has been approved, the cultivator may begin the sale of immature plants to marijuana sales locations.

Requirements for Sales Locations

Sales locations are permitted to accept transfers of immature plants from cultivators approved by the CRA to sell immature plants to a sales location. Sales locations should adhere to the basic care instructions provided by the cultivators. These may include instructions for adequate lighting, water, and temperature control but should not include advanced care instructions such as application of fertilizers, pesticides, etc.

- Sales locations do not need to obtain approval from the CRA to sell immature plants, but they must adhere to the administrative rules and the following requirements:
- Sales locations must have a procedure in place for either:
    - pre-orders of immature plants, or
    - the number of plants they will order for a 7-day period
- Each plant a sales location orders from a cultivator must be accounted for in a preordered sale or in a distinct plant numbered order.
- If a pre-ordered sale occurs but the customer does not attempt to collect the immature plant(s) purchased, the sales location is responsible for initiating the return/refund policy set by the cultivator and destruction of any plants that remain beyond the sell-by date
- If the sales location orders a distinct number of immature plants to be sold at the licensed location, the sales location is responsible for the destruction of any immature plants that are not sold after 7 days from the date the plant package was created at the cultivator.
- Sales locations must ensure customers are provided with a copy of the information provided by the cultivator that attests that only approved active ingredients for growers were used on the immature plants
- Upon sale of the immature plants to a customer, the plants must be placed in a sealed package/bag to exit the sales location
- Sales locations must notify customers that the plants are not required to be, and have not been, safety compliance tested.

Stacked Class C Growers/License Collapse

Co-located stacked C cultivators have the option to track their inventory for all grow licenses from the same market under one license in Metrc. The CRA prefers tracking under the lowest

license number as this is the license number where inspection information will be housed. The licensee only needs to purchase Metrc tags for the single license used to track their inventory.

When renewing a license, please ensure that the license currently tracking inventory is renewed. 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.

Required Testing Points

There are several points where testing is required. Marihuana businesses may choose to test their products at additional points although this is not a requirement.

- Before a cultivator transfers or sells marihuana product to a marihuana sales location a sample of the harvest batch must be tested by a licensed laboratory and pass all required safety tests.
- A producer of marihuana product in its final form shall have the sample tested.
- Untested products transferred to a producer for extraction are required to be tested post extraction.

Detailed information for required testing and action limits can be found here.

Marihuana flower products that will not be processed into a different product form only require the initial compliance testing from the harvest batch.

Guidance for Tinctures and Oil-based drops

Tinctures and oil-based drops should use containers that ensure serving size limits are depicted or adhered to per rule 420.404 by having servings or doses measured as the product is dispensed such as:

- Calibrated dropper.
- Calibrated oral syringe.

Sugar, natural sweetener, or synthetic sweetener should not be added to tinctures or oil-based drops. (This includes sweeteners used as secondary ingredients from flavoring additives.)

Flavoring additives should be plant-based derived from an extraction method. Food grade ethanol or oil base ingredients should be used.

Any other necessary information regarding appropriate dosage/serving or consumption method should be provided per rule 420.602 (2)(f).

MCT (medium-chain triglyceride) Oil

Effective October 1, 2024, MCT oil testing is required for all vape products.

MCT oil, commonly derived from coconut or palm oil, is primarily used in oral supplements and food products. However, when aerosolized and inhaled, MCT oil may pose dangers to respiratory health. Inhalable marijuana products that fail testing for MCT oil cannot be remediated.

Remediation Protocol

All remediation requests must be submitted to the CRA for approval. To request approval to remediate eligible failed marijuana product, a licensee must do the following:

- Email CRA-Compliance@michigan.gov with the subject line “Request for Remediation”, including a spreadsheet which includes the information below:
    - License number and name of submitting facility
    - License number and name of receiving facility
    - Metrc package tag number(s)
    - Product testing status and test failure information for all failures (example package XYZ failed for Total Coliforms 20,000 CFU/g)
    - Remediation method
    - Total quantity for each package with a sum of the total quantity from all packages.
- Wait to receive CRA approval via email within 72 business hours from the time the request is received by the CRA.
- Once approved, the licensee is authorized to transfer the failed product for remediation.

If the status is “TestinginProgress” due to R&D testing, the licensee may request a status update by contacting Metrc support (Support@Metrc.com) prior to requesting remediation.

Remediated marihuana product must pass the previous failed test with two consecutive passing retest samples to receive a retest passed test status and be eligible for sale or transfer.

Product Samples

Trade Samples

The following licensees may provide trade samples:

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

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

- 15 ounces of marijuana
- 60 grams of marijuana concentrate

An employee conducting a trade sample transfer should verify the accepting facility electronically accepts the transfer manifest in Metrc 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:

- 2.5 ounces of marijuana
- 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:

- 16 ounces of marijuana-infused product if in a solid form

- 36 fluid ounces of marijuana-infused product if in a liquid form

In this case, the samples will 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, the licensee 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 6 grams 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.

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 the administrative rules.

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

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

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.

Donations

All cultivators, producers, and microbusiness license types may designate marijuana or marijuana products that they hold in their inventory for donation to retailers, who in turn can donate to consumers. To use this functionality in Metrc, please follow the instructions found here.

Product Giveaways

The administrative rules do not require specific pricing for marijuana products. If a sales location or microbusiness chooses to provide marijuana product to customers at no cost, the transaction must be recorded in Metrc and cannot exceed the purchasing limits. Please follow the instructions in this bulletin.

When to Use Production Batches

A production batch is the compliant way of creating new products that change categories. To create a production batch, please follow the instructions found in this video.

For example, a package of vape carts cannot be created directly from shake/trim; a new production batch of oil must first be created and then pulled from the production batch of oil to make the vape carts. Refer to Figure 1 for an illustration.

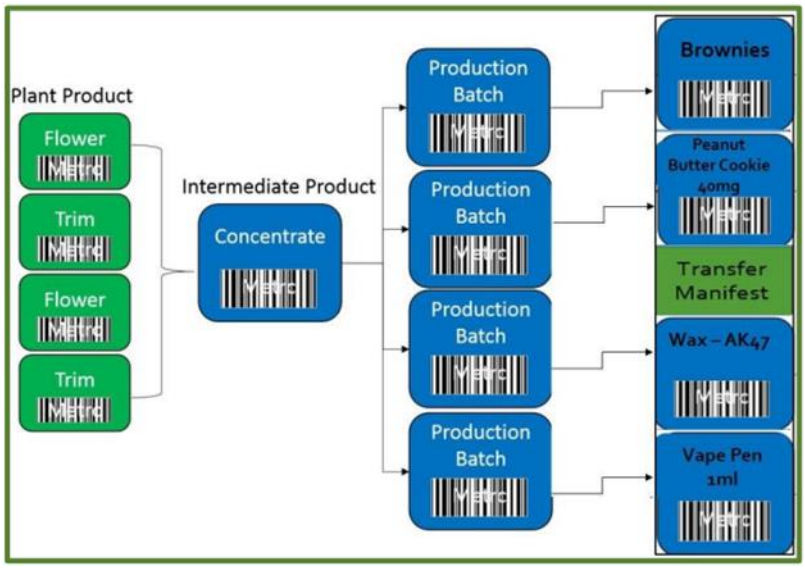


Figure 1: Product creation from flower to finished product

To create an intermediate product, like a production batch of concentrate, pull the starting material weight 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 is being used.

To create a second production batch (e.g., infused edible products), follow the same process above pulling the weight used from the package of concentrate (distillate, live resin, etc.) to create the next product. All products in their final form are required to be tested in compliance with the administrative rules.

Each new production batch will be a new package and be marked as a production batch. It is imperative that the process is documented transparently including documenting waste from processing.

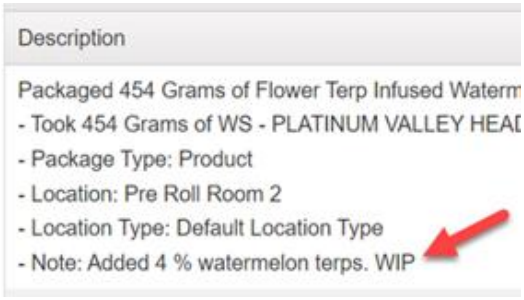
Requirements for All Non-Marijuana Ingredients

As a reminder all non-marijuana inactive ingredients must be clearly listed on the product label. Inactive ingredients, other than botanically derived flavonoids, terpenoids, and terpenes that are chemically identical to the terpenes derived from the plant Cannabis sativa L., must be approved by the FDA for the intended use, and the concentration must be less than the maximum concentration listed in the FDA Inactive Ingredient database for the intended use.

All marijuana products are required to have a record of formulation, which is the documentation that includes, at a minimum, the ingredients, recipe, processing in order to be shelf stable, Certificates of Analysis for any ingredient used, and description of the process in which all ingredients are combined to produce a final form.

When creating non-marijuana infused products, these should be created as a production batch listing the grams of non-marijuana infused (terpenes) added in the notes.

Please see example below:



Compliant Use of Inactive Ingredients

Inactive ingredients are any ingredient used in a marijuana product that is not derived from the plant *Cannabis sativa L.* Inactive ingredients must be shown to be safe for their intended use. To ensure safety, the CRA requires inactive ingredients used in marijuana products to be recognized as safe by the Food and Drug Administration (FDA).

Producers manufacturing non-edible marijuana products (topicals, vapes, etc.) shall verify inactive ingredients are safe by utilizing the Inactive Ingredient Database (IID). This database contains inactive ingredients, their concentrations, dosages, and administration routes that are considered safe by the FDA. All inactive ingredients utilized in your products must not differ from or exceed any specifications listed in the IID. Inactive ingredients that exceed the listed dosage or concentration, or that are administered in a way other than the route listed in the IID, are considered noncompliant.

Processors manufacturing ingestible marijuana products (edibles, tinctures, etc) shall verify inactive ingredients are safe by utilizing the Inactive Ingredient Database (IID) OR the applicable Food Ingredient Databases. Ingredients that are not found in the IID, but are listed in the applicable food ingredient database, shall be considered safe for use and compliant

providing they match any specifications listed in the database entry. Inactive ingredients used in ingestible products need not be listed in both the IID and food ingredient databases to be considered compliant.

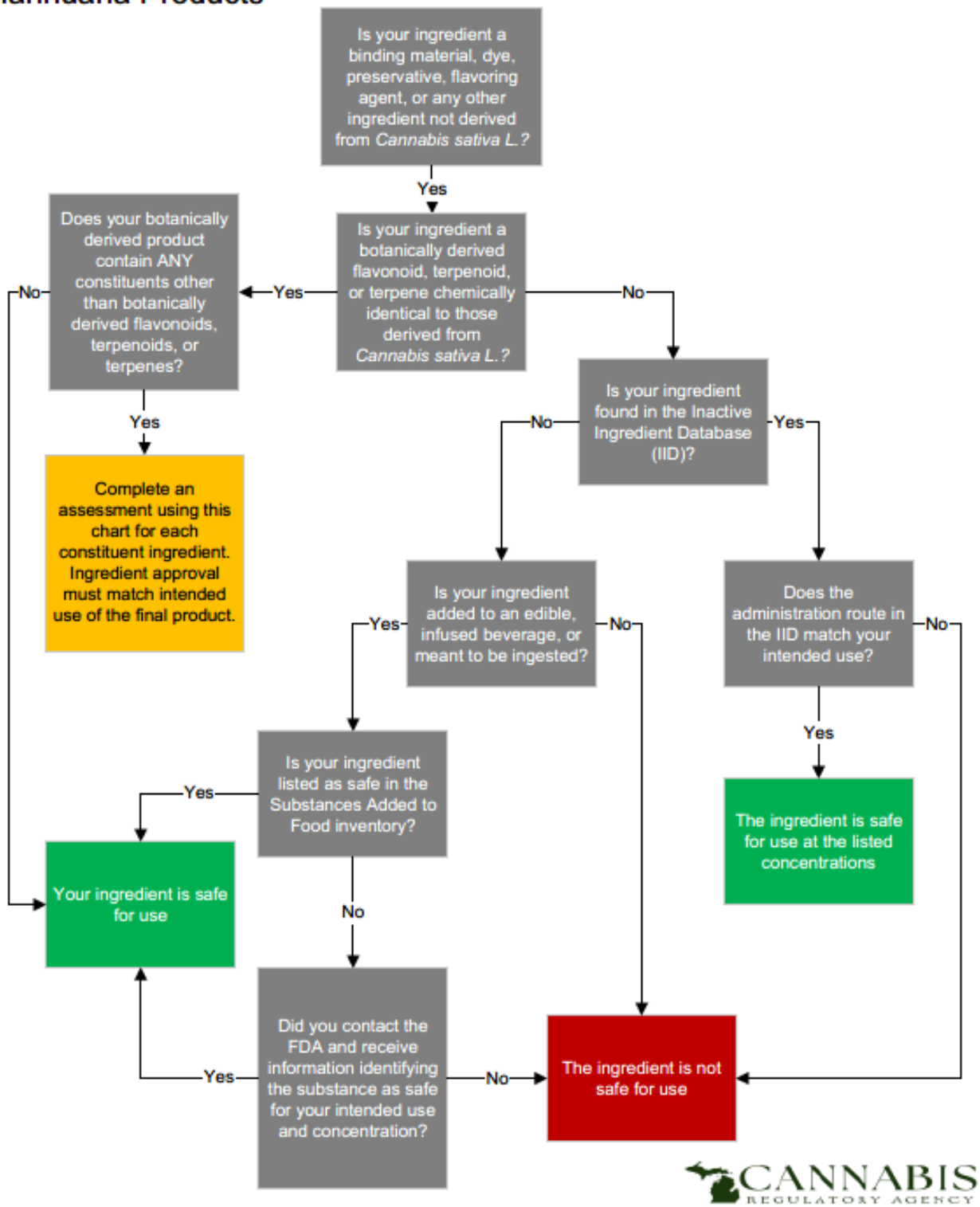
Unlike the IID, there are multiple food ingredients and packaging inventories. You have the ability to search multiple inventories at once. Some of the more commonly used inventories include:

- Substances Added to Food: Includes all listed food and color additives, FEMA/JECFA evaluated flavors, listed GRAS substances, prior sanctioned substances, formerly used substances (prohibited or delisted substances).
- GRAS Notices: All received GRAS notices filed since 1998.

Ingredients marketed as conventional dietary supplements, produced by a licensed dietary supplement manufacturer, may be added to edible marijuana products if all the ingredients (and constituent ingredients) utilized in the supplement are listed in IID or food ingredient databases as safe for the intended use and concentration.

If an ingredient utilized in an ingestible marijuana product is not included in the above-mentioned databases, it may still be safe for use; the FDA does not list all GRAS substances. If your ingredient is not found in any of the above inventories or databases, contact the FDA to determine if it is an unlisted, safe ingredient. Ensure you maintain any documentation you receive from the FDA regarding the safety of your ingredient. Ingredients that are unlisted for which no supplemental safety information from the FDA can be provided are noncompliant.

Determining Safe Usage of Inactive Ingredients Added to Marihuana Products



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 four 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, create the production batch in Metrc pulling from the four packages of flower/bud. This step is critical to ensure that the physical product, which was combined, is also electronically combined to transparently show which packages were used in the creation of the new product.

If on Tuesday, the crude oil is refined twice, 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 the 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.

Please contact CRA-Compliance@michigan.gov with any questions regarding this process.

Raw Plant Material to Butane Hash Oil (BHO)

Example:

If we take five 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 the total weight of the yield reflects 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.

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.
- **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 requires a new package/transfer tag which will carry the source package in its history, ensuring accurate product tracking throughout the supply chain.

Labeling Requirements for Cultivator to Cultivator/Producer Transfer:

- Business or trade name
- License number
- Package/transfer tag assigned by Metrc
- Name of the strain
- Date of harvest
- Seed strain (if applicable)
- Universal symbol

Labeling Requirements for Producer-to-Producer Transfer:

- Business or trade name
- License number
- Package/transfer tag assigned by Metrc
- Universal symbol

Labeling Requirements for Cultivator or Producer to Sales Location:

- Business or trade name.
- License number.
- Package/transfer tag assigned by Metrc.

- The name and the marijuana license number of the licensee who packaged the product, including business or trade name, if different from the producer of the marijuana product.
- Date of harvest, if applicable.
- Name of strain, if applicable.
- Net weight in the United States customary or metric units.
- 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%.
- Activation time is expressed in words or through a pictogram. Distinct or unique name of the laboratory which performed passing compliance testing on the product in final form and any test analysis date.
- Universal symbol.
- A warning that includes all the following statements:

  (i) "It is illegal to drive a motor vehicle while under the influence of marihuana."
  (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 if they are not repackaged. Please note that all products must bear the required labeling under R 420.504.

Compliance Labeling Requirements by Product Type

Flower (buds/shake/trim/kief)

- Business or trade name.
- License number.
- Package/transfer tag assigned by Metrc.
- The name and the marijuana license number of the licensee who packaged the product, including business or trade name, if different from the producer of the marijuana product.
- Date of harvest.
- Name of strain.
- Net weight in the United States customary or metric units.
- 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%.
- Activation time is expressed in words or through a pictogram.
- Distinct or unique name of the laboratory which performed passing compliance testing on the product in final form and any test analysis date.
- Universal symbol.
- A warning that includes all the following statements:

  (vi) "It is illegal to drive a motor vehicle while under the influence of marihuana."

  (vii) “National Poison Control Center 1-800-222-1222.”

  (viii) 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.”

  (ix) 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.”

  (x) 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."

Concentrate – Inhalable compound concentrate, shatter, batter, sauce, sugar, vape carts etc.

- Business or trade name.
- License number.
- Package/transfer tag assigned by Metrc.
- The name and the marijuana license number of the licensee who packaged the product, including business or trade name, if different from the producer of the marijuana product.
- Date of harvest, only applicable on products which include flower.
- Name of strain, only applicable on products which include flower.
- Net weight in the United States customary or metric units.
- 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%.
- Activation time is expressed in words or through a pictogram.
- Distinct or unique name of the laboratory which performed passing compliance testing on the product in final form and any test analysis date.
- Universal symbol.
- A warning that includes all the following statements:

  (xi) "It is illegal to drive a motor vehicle while under the influence of marihuana."

  (xii) "National Poison Control Center 1-800-222-1222."

  (xiii) 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."

(xiv) 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.”

(xv) 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.”

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

- Business or trade name.
- License number.
- Package/transfer tag assigned by Metrc.
- The name and the marijuana license number of the licensee who packaged the product, including business or trade name, if different from the producer of the marijuana product.
- Net weight in the United States customary or metric units.
- 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%.
- Activation time is expressed in words or through a pictogram.
- Distinct or unique name of the laboratory which performed passing compliance testing on the product in final form and any test analysis date.
- Universal symbol.
- A warning that includes all the following statements:

  (xvi) "It is illegal to drive a motor vehicle while under the influence of marihuana."

  (xvii) “National Poison Control Center 1-800-222-1222.”

(xviii) 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.”

(xix) 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.”

(xx) 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.”

- All non-marihuana inactive ingredients must be clearly listed on the product label. Inactive ingredients must be approved by the FDA for the intended use, and the concentration must be less than the maximum concentration listed in the FDA Inactive Ingredient database for the intended use.
- A producer shall label all marihuana-infused products with all of the following:

  (a) The name of the marihuana-infused product that includes a product modifier such as “marijuana product,” “THC product,” or “cannabis product” using the same or larger font than the product name.
  (b) The ingredients, including excipients and diluents, of the marihuana-infused product, in descending order of predominance by weight.
  (c) The net weight or net volume of the product.
  (d) For an edible marihuana product, both of the following must be included:
  (i) Allergen labeling as specified by the Food and Drug Administration (FDA), Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA), 21 USC 343.
  (ii) If any health or nutritional claim is made, appropriate labeling as specified by the federal regulations regarding Food Labeling, 21 CFR part 101.

  (e) The date the marihuana product was produced.

Infused Non-Edible Liquid – Topicals such as lotion or balm

- Business or trade name.

- License number.
- Package/transfer tag assigned by Metrc.
- The name and the marijuana license number of the licensee who packaged the product, including business or trade name, if different from the producer of the marijuana product.
- Net weight in the United States customary or metric units.
- 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%.
- Activation time is expressed in words or through a pictogram.
- Distinct or unique name of the laboratory which performed passing compliance testing on the product in final form and any test analysis date.
- Universal symbol.
- A warning that includes all the following statements:

  (xxi) "It is illegal to drive a motor vehicle while under the influence of marihuana."

  (xxii) “National Poison Control Center 1-800-222-1222.”

  (xxiii) 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.”

  (xxiv) 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.”

  (xxv) 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.”

- All non-marihuana inactive ingredients must be clearly listed on the product label. Inactive ingredients must be approved by the FDA for the intended use, and the concentration must be less than the maximum concentration listed in the FDA Inactive Ingredient database for the intended use.
- A producer shall label all marihuana-infused products with all of the following:

  (a) The name of the marihuana-infused product that includes a product modifier such as “marijuana product,” “THC product,” or “cannabis product” using the same or larger font than the product name.
  (b) The ingredients, including excipients and diluents, of the marihuana-infused product, in descending order of predominance by weight.
  (c) The net weight or net volume of the product.
  (d) The date the marihuana product was produced.

Creating Homogenous Products

Marihuana-infused products processed under these rules must be homogenous. The allowable variation for weight and THC and CBD concentrations between the actual results and the intended serving is to be + or – 15%.

The agency shall publish guidelines for a producer to follow to verify the marihuana-infused product is homogeneous.

Child-Resistant Packaging

No marihuana retailer may sell or otherwise transfer marihuana that is not contained in an opaque, resealable, child-resistant package designed to be significantly difficult for children under 5 years of age to open and not difficult for normal adults to use properly as defined by 16 C.F.R. 1700.20 (1995), unless the marihuana is transferred for consumption on the premises where sold. All products must be in opaque, child-resistant packages or containers that meet the effectiveness specifications outlined in 16 CFR 1700.15.

Universal Agency Symbol for Marijuana Product

The administrative rules require the use of the universal symbol, you can find the most current version here

Avoiding Testing Delays

Additional Testing After Passing Full Compliance

Metrc was designed to track products 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.

Example:
A package passing full compliance testing later 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. Metrc support can be reached via email at support@Metrc.com.

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 source package the retest samples are pulled from.

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. Metrc support can be reached via email at support@Metrc.com.

Incorrect Test Panels Selected at Sampling

When a licensee selects an incorrect test panel at the time of sampling, the testing status will not update correctly if the selected panel does not have results in Metrc. If the laboratory completes and enters the correct results the package will remain locked until the incorrect test panel has results entered or the licensee requests a status update. The laboratory should confirm the selected testing batches match the product type before accepting the samples for

transport. If an incorrect panel is selected, the samples should be discontinued and remade, selecting the correct test batch.

Example:

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 types. If all test types do not have a numerical value entered in the required field, the panel will remain in testing in progress.

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 for 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.

The CRA will request documentation to support any electronic sample corrections or incorrect source package requests. The documentation will typically be the chain of custody from the sampling event to verify the laboratory sampled from the stated package.

Retesting

Approval is not needed from the CRA to retest a product unless the product was quarantined, placed on administrative hold, or recalled. For products which are under investigation, retesting will require approval.

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.

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 and are ineligible for sale.

Certificates of Analysis (COA)

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.

For more information, please review the Metrc bulletin.

Product Categorization

Item Categories in Metrc

- **Buds** – Whole dried/cured buds
- **Concentrate** – Shatter, batter, sauce, sugar etc.
- **Infused Liquids** –Beverages that 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 or 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.
- **Kief –** Only kief should be included.

This is a non-exhaustive list. Please contact 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.

Pre-Rolls with Non-Marijuana Terpenes

All pre-rolls with the addition of non-marijuana terpenes should be categorized as an inhalable compound concentrate (ICC), and the final form testing should be for an ICC.

Rick Simpson Oil (RSO) and Distillate Darts

RSO and distillate darts are subject to all rules and regulations for concentrates, including transportation, labeling, transaction limits, etc. If intended for oral consumption, it must adhere to the labeling and other requirements for an edible product.

Metrc Item Creation

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

Example:

A cultivator creates a 1g pre-roll but instead of using 1g in the item weight, they enter 28g, so 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.

Inhalable Compound Concentrate (ICC) 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.

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.

Infused Edible THC Serving and Package Information

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

Infused Edible Expiration Date Function

Infused edible packages now have an optional feature during new package creation to include an expiration date to assist with better inventory management. Once the new package is created with an expiration date, this information will now be available in the packages grid in Metrc.

The expiration date will provide indicators as it approaches the product's expiration. When a package's expiration date is within 10 days, the expiration date column will be highlighted in orange. Once the expiration date has passed, the package's font will turn red, and the expiration date will also be highlighted in red, signaling that the product is past the expiration date.

The additional data has also been added to the following Metrc reports:

- Packaged sales
- Inventory point in time
- Packages inventory

For more information, please review the Metrc bulletin.

Marijuana Product Destruction

When destroying marijuana 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 the 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, it is not required to be sent 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.

When disposing of marijuana product, please reference this bulletin.

Video and Photo Evidence in 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:

- Ensure that the destruction is taking place where there is a clear camera view. The frame should be free of obstruction and all staff completing the destruction should be behind the product so as not to obstruct the view of the product.
- The product should be shown in its storage container before any product is removed.
- The Metrc tag number should be visible and if possible, held up to the camera.
- 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, 10, etc.) to clearly show the number of products on hand that are being destroyed.

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

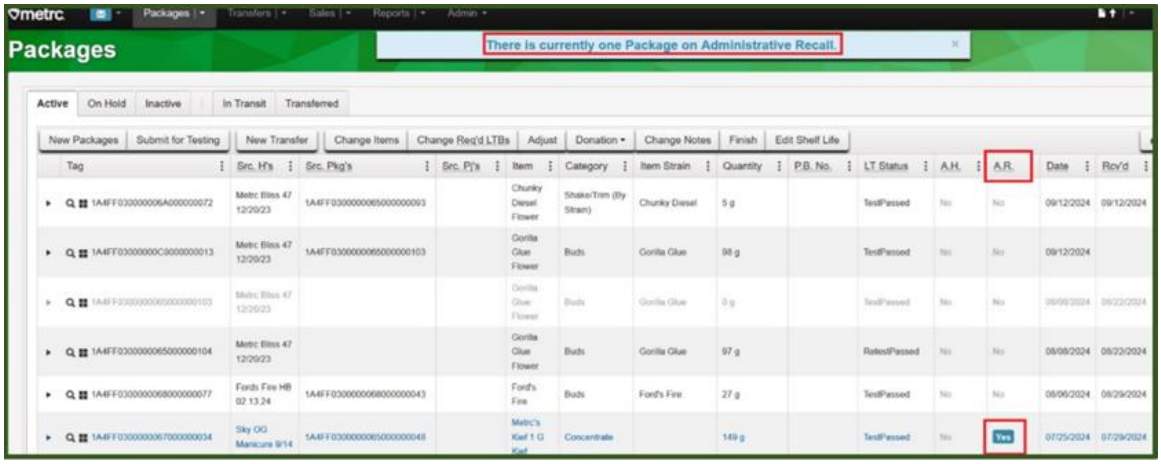
All questions related to compliant waste practices should be directed to CRA-Enforcement@michigan.gov.

Administrative Recall Function

This feature allows the Cannabis Regulatory Agency (CRA) to apply an administrative recall status to packages within Metrc. When a package is placed under recall, administrators and owners listed in Metrc will automatically receive an email notification.

Recalled products can be identified in the following ways:

- The package information's font will be blue
- The administrative recall (A.R.) column will show a "Yes" with a blue rectangle around the text
- A banner will be visible at the top to notify users that a package has been recalled



Transferring Packages on Administrative Recall

Users can transfer packages with an administrative recall status; however, these recalled packages cannot be combined, remediated, or submitted for further lab testing.

Retailers are permitted to repackage the remaining recalled product into a new package to retain sales data within their facility and to process returns.

For more information, please review the Metrc bulletin.

Notices of Potential Noncompliance

To further the goal of education before regulation, the CRA has created a compliance monitoring program which looks for potential rule violations by license type. The data is pulled, and notices are issued to licensees with the specific rule and list of packages, manifest, etc., which appear to be out of compliance. It is the responsibility of the licensee to investigate these notices and identify whether there is noncompliance. If identified, corrections should be made.

Creating a Transfer Manifest

To create a transfer manifest in Metrc, please follow the instructions found here.

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 either a Michigan licensed hemp processor handler or from a source licensed to grow, handle, and produce cannabinoids

under a license issued by a governmental authority, and MUST contain less than 0.3% Total THC. Total THC = THCA (%wt.)× 0.877+∆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 and adult-use licenses under the same ownership.

Infusion Transfer

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

Medical Affiliated Transfer

For transfers between medical licenses with the same ownership.

Microbusiness Transfer

For 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 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 Facility

For transfers to safety compliance facilities where the safety compliance facility is the transporter.

Tolling Transfer

Tolling Agreements involve a transfer of raw goods to another marijuana business to be processed for a fee or toll.

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

The sender of the product will select themselves as the secure transporter and enter the “walking transfer” for the route, driver, and vehicle information. Gross weight, etc. is the same as the package weight.

Virtual Transfers

All transfers where no physical transfer is occurring must be approved by the CRA through Metrc Support. If an error is made and a manifest is accepted with the incorrect inventory, contact Metrc support to request a correction.

Trade Sample Transfers

The sender of the product will select themselves as the secure transporter. The driver and vehicle information will be from the employee delivering the product.

Temporary Event Transfers

The sender will void the transfer after the manifest has been printed.

External Cannabinoid Transfers

It is the responsibility of the licensee to ensure that any external cannabinoids do not meet the definition of marijuana, meaning the total THC cannot exceed 0.3%. Licensed Producers should retain COAs and invoices for all products obtained from outside the regulated market. The Total THC should be entered onto the manifest for each package as detailed in this bulletin

Equivalent License Transfers

Equivalent license transfers – as defined below – are allowed 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.

“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.

Licensees may transfer marijuana products to their equivalent licenses without CRA approval for the following circumstances:

- Test Passed marijuana product which has a source harvest and was not derived from caregiver product which passes total yeast and mold testing in the adult-use market, meaning less than 100,000 CFU/g.

- Test Failed 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 testing status update from Metrc support (support@metrc.com) to change the previously failing results to passing in the adult-use market.
- Untested flower, flower grown in one market can be flipped to the other market before testing.
- Infused products which do not exceed the serving and package maximum THC concentrations in the transferring market.

All transferred marijuana products must be labeled in accordance with the administrative rules.

Internal Analytical Sample Tracking

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 in Metrc.

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. This applies to all non-cannabis ingredients including the addition of compliant non-marijuana terpenes.

Negative adjustments which include destruction should include the date of destruction and method.

Adjustment Reasons include the following:

- **Drying-** Used to account for waste for loss on drying
- **Entry error-** Used when a data entry error is made, this needs to have a note with more details included.
- **Internal Product Testing Samples-** For use when a business is performing internal testing to account for the loss of material.
- **Scale Variance-** To account for a small difference in package weight from scale to scale, this should not be used if the variance is greater than 10%.
- **Spoilage-** Used for expired products.
- **Theft-** Used when products have been stolen to adjust the inventory.
- **Trade Sample-** For use when a business is performing internal product testing to account for the loss of material given to the employee.

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. Metrc support can be reached via email at support@Metrc.com.

Facility Inventory Errors

All inventory errors must be corrected. Physical and electronic inventory must match exactly to be compliant.

Example:

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.

If support is received from Metrc, the Metrc support ticket number should be included in the notes.

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

Correcting Inaccurate Sales

To correct an inaccurate sale in Metrc, a receipt correction is needed. Please follow the instructions found in this video.

Packages: Discontinue or Finish

Packages with errors should be discontinued. These packages cannot be made active again. An example would be that the incorrect source package was used to create the product in Metrc. Since the wrong material is electronically used to create the product, the resulting child package of new product should be discontinued, this restores the material back to the source so that the package can be remade compliantly.

Packages which are empty should be finished. Finishing the packages is a housekeeping procedure to move the packages to the inactive tab so that only the active inventory is in view on the active packages screen. A package may be unfinished if an error is made.

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.

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.

Additional Regulatory Requirements* & Opportunities

Michigan Occupational Safety and Health Administration (MIOSHA)

MIOSHA Fact Sheet – Marijuana Industry: Workplace Safety

Grant funds to purchase safety and health related equipment.

Michigan Department of Agriculture & Rural Development (MDARD)

The Michigan Department of Agriculture & Rural Development (MDARD) works to assure the food safety, agricultural, environmental, and economic interests of Michigan are met through service, partnership, and collaboration. MDARD's Pesticide & Plant Pest Management Division regulates pesticide use and distribution.

Looking for assistance? Sign up for a voluntary compliance check:
MDARD helps businesses identify practices that are not in compliance with pesticide laws and regulations. Inspectors can help correct non-compliance through a Planned Use Inspection (PUI). To schedule a PUI, contact MDARD at 800-292-3939 or MDARD-Pesticide@Michigan.gov.

Michigan Regulatory Authority

- Natural Resources and Environmental Protection Act, Act 451 of 1994, Part 83, Pesticide Control
- Regulation 637, Pesticide Use
- Regulation 636, Pesticide Applicators
- Public Act 220 of 2020, the Industrial Hemp Growers Act, as amended

Federal Regulatory Authority

- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).
- Code of Federal Regulations, Title 40 (CFR).

Pesticides Approved for Use on Marijuana

MDARD's policy for evaluation of products includes ensuring label language is appropriate and a toxicological assessment.

- Michigan Marijuana Pesticide List
- FAQ - Using Pesticides on Marijuana

Certification

Owners and employees of private farms growing agricultural commodities are exempt from certification if they are only applying general use products. Persons who apply Restricted Use Pesticides (aka RUPs) for an agricultural purpose are required to obtain applicator certification or be supervised by a certified applicator.

Certification is obtained by studying certification training manuals and taking exam(s). More information about pesticide applicator certification can be found at Michigan.gov/MDARDPestCert.

Commercial pesticide applicators applying pesticides for hire may be required to obtain a pesticide applicator business license (PABL). More information about PABL requirements can be found at Michigan.gov/MDARDPABL.

For further information regarding pesticides and other areas regulated by MDARD, visit Michigan.gov/MDARDPest, or call 800-292-3939 and ask to be referred to your local pesticide inspector. MDARD inspectors can visit your operation to provide compliance assistance.

Worker Protection Standard

The Worker Protection Standard (WPS) is a federal regulation intended to reduce the risks of illness or injury from pesticide exposure in the production of an agriculture commodity. In Michigan, cannabis is considered an agricultural commodity. When the WPS applies,

agricultural employers are required to provide safety education and protection to workers, handlers, and other people onsite. This may include but is not limited to:

- Training for workers and handlers
- Decontamination stations
- PPE
- Pesticide application information
- Emergency medical transportation
- Posting treated areas
- Hazard communication

WPS is applicable when the pesticide product labeling contains an "Agricultural-Use Requirements" box, and the product is used at an agricultural establishment to produce an agricultural commodity.

The Pesticide Educational Resource Collaborative is a resource for compliance assistance materials. The website can assist in determining if WPS is applicable to your establishment.

More information on Worker Protection Standards. Click here for the Spanish version.

This is a partial summary. Refer to the public acts and rules for applicable requirements:

Michigan Department of Environment, Great Lakes, and Energy (EGLE)

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) wants to remind you of your regulatory obligations as part of the cannabis industry. Regardless of your license status under the state's Cannabis Regulatory Agency, you may need environmental permits to operate your growing or processing facility safely and to comply with the state’s environmental regulations. EGLE is responsible for regulating sources of pollution. To do this, we enforce a set of regulations. These regulations ensure that our state’s resources are managed

appropriately and that communities are kept safe. Much of this work is done by permitting pollution sources, limiting the amount of pollution released into the environment, or regulating how resources are managed.

This reminder provides a high-level look at things you should know and the resources available to help your business comply. The cannabis industry is subject to EGLE's regulatory requirements. Take action today to ensure you are compliant!

What Processes Are Regulated?

Many activities are regulated, for instance, wastewater discharges, wetlands, waste disposal, composting, and even air pollution are regulated under EGLE's rules and regulations. Some of these activities need to meet certain standards to be considered compliant. Many of these activities require permits prior to the start of operation, certifications, and records submittals.

Environmental Compliance for Growers and Processors of Marijuana

What Do You Need to Do?

Chances are, if you grow, process, do oil extraction, or dispose of marijuana waste you have environmental obligations you may not be compliant with. The best thing to do is familiarize yourself with the available resources, take steps to determine your compliance status and reach out to EGLE staff with questions.

Water Use, Disposal, and Wetlands Guidance:

Protecting Water Resources when Growing and Processing Marijuana

This guide covers how water use is regulated and what to do if wetlands are on your property. For instance, did you know that most wastewater from marijuana growing should not be discharged to a septic system? Or that certain requirements exist for lands with wetlands? This guide will help you determine if you need to take additional steps or apply for permits for these activities.

Materials Management / Waste Guidance

Solid and Hazardous Waste Regulations and Composting Marijuana Waste Website

Marijuana plant waste disposal is regulated by EGLE. Proper composting and knowing when you need to send waste to the landfill is important. Activities like what to do with your used solvent and how to handle your used lightbulbs must be done correctly. This guide will help you determine what to do with your waste.

Air Permitting and Emissions Guidance

Protecting Air Quality When Growing and Processing Marijuana

If you are processing marijuana and doing oil extraction, you need to either determine whether your activities are exempt from permitting or need an air permit (Calculating Air Emissions from Processing Operations). You may also need an air permit if you have any boilers, engines, turbines, or a source-specific power plant.

Check out Michigan.gov/EGLECannabis for more information on environmental regulations for the cannabis industry and how to contact EGLE.,

*This is not an exhaustive list.

Available Metrc Training

All licensed businesses are able to access training modules specific to the actions performed for their license type. These trainings can be found by following the instructions in this bulletin.

Additional Resources

- Metrc support can be reached by calling 1-877-566-6506.
- Contact Metrc Support Navigate to Support.Metrc.com, or from the Metrc System, click Support and navigate to support.metrc.com and it will redirect to the portal.
- Please note: If accessing the portal for the first time, a username (which is established when logging in), the respective state and “Facility license number”, and a valid email to set a password is required. Access additional resources In the Metrc system, click on the Support area dropdown on the navigational toolbar and select the appropriate resource, including educational guides, manuals, and more.

- Metrc Knowledge Center