STATE OF RHODE ISLAND
DEPARTMENT OF BUSINESS REGULATION
Office of Cannabis Regulation
560 Jefferson Blvd. Ste. 204
Warwick, Rhode Island 02886

RI METRC COMBINED GUIDANCE

Amended: February 29, 2024

The RI Metrc Combined Guidance contains Rhode Island specific guidance based on frequently asked questions and issues identified to assist licensees with transparent reporting. This document does not replace trainings or documents required or issued by Metrc. This document does not replace a thorough reading of the rules and regulations. For basic functionality information, please review the Metrc Manual User Guide and Metrc Rhode Island Supplemental Guide located in Metrc under the "Support" tab.

The Office of Cannabis Regulation will continue to update this document as questions arise. Please continue to check for updates and clarity regarding operational executions within Metrc. See amended dates below for changes.

Adding/Removing Employees

Adding Employees
To add an employee please refer to page 36 of the Metrc Rhode Island Supplement Guide.

Begin by going to the "Employees" area under the Admin tab and click "Add Employee." Fill out the required fields, including an accurate and complete email address for the employee. The "Welcome to Metrc" email will be sent to the entered email address and is required for them to activate their account. The email log-in link expires within 24 hours of it being sent.

- If the employee fails to log-in for the first time within the 24-hour window, a new "Welcome Email" must be requested. This can be done by returning to the "Employees" area, selecting the correct employee, and clicking the "Resend Welcome Email" box.

Removing Employees
To remove an employee, return to the "Employees" area, select the correct employee and click either the "trash can" icon, or the "All" icon button.


This button removes the employee just from the current license you are working under.

This button removes the employee from **all licenses** associated with that Metrc Administrator that the employee is also associated with.

Location & Rooms

General Requirements
Any room that is physically used to cultivate, manufacture, process, package, store and/or dispense of marijuana must be reflected within Metrc via a virtual room. The name given to the room in Metrc should be as descriptive as possible and should allow inspectors to easily identify the proposed use of the space.

The Office of Cannabis Regulation advises the creation of an additional room to facility locations in Metrc.

"Quarantine" Room
The **"Quarantine"** room will be used to identify a space separate from active packages, that have been recalled, failed testing, or a parent package to a test sample that is awaiting results.

Tagging Plants

Propagation Requirements

- Tagging is not required for immature plants, such as clones or tissue culture. The total count per strain must be tracked as Plant Batches in Metrc. However, a licensee should have a label that includes the strain name, MMDDYYYY and quantity for each batch physically near the clones or tissue cultures.

Vegetative Requirements

- Every cannabis plant measuring 8 inches or above **must** have a METRC tag. Plants can be tagged by using the accompanying zip ties as stakes, until the plant is strong enough to withstand the tag weight.

Plant Requirements

- Metrc tags should not be lying flat on the soil or hidden within the canopy. They should be easily readable hanging on the lowest defoliated branch/stem of the plant. Examples for appropriate staking and hanging of tags are included in the images above.

Tagging Post Harvest

- Plant tags should stay with the plant when moved to the dry room. It is important for the correct RFID tag to be associated with correct plant while drying so that OCR inspectors can easily scan a harvest room.

- Plant tags should remain with the associated plant/plant material until such time that a package is created in Metrc. The newly created package tag will then replace the plant tag physically to ensure full and transparent traceability of the cannabis. All cannabis on a licensed premises must be easily and accurately associated with a Metrc tag.

Time Frame for Harvests

Plants Harvested to Be Dried

All cannabis plant, flower, or trim that has been hung to dry/cure must be turned into a package within 60 days of the initial day of the harvest. Licensees will create a bulk flower package from the harvest batch. It can then be repackaged into a trim package and report waste directly from the package for stems, etc. that maybe wasted.

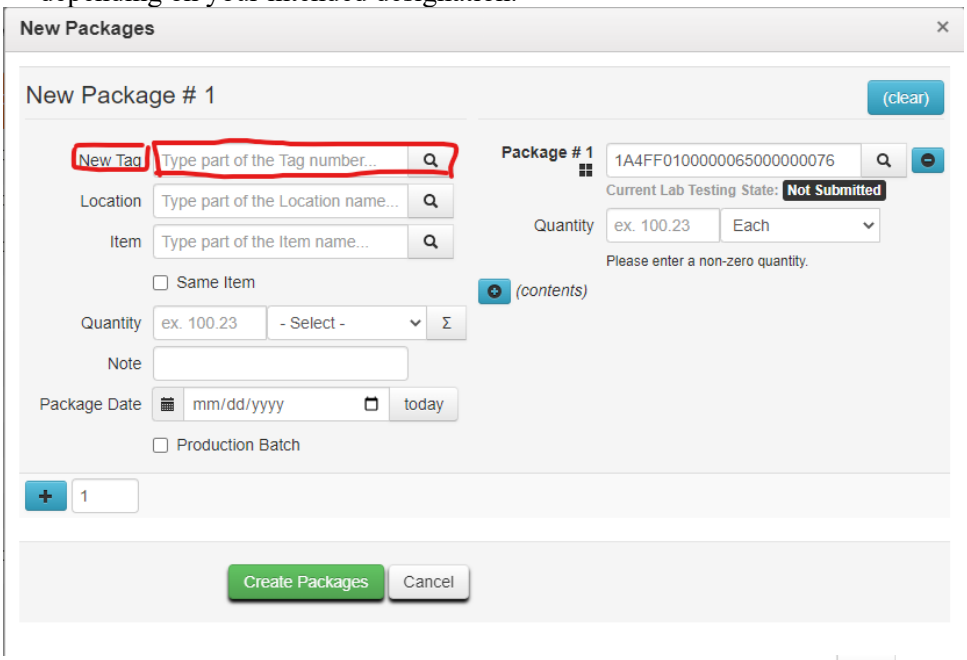
Plants Harvested to be Frozen

All cannabis plant, flower, or trim that has been or is intended to be frozen upon harvest shall be turned into a package immediately. Licensees will create a bulk flower package from the harvest batch. It can then be repackaged into a trim package and report waste directly from the package for stems, etc. that may be wasted.

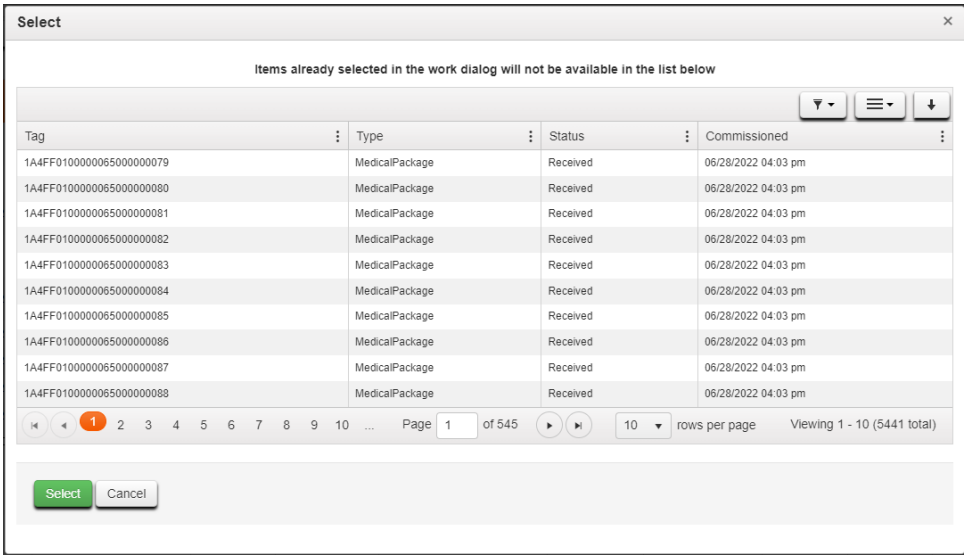
Separation of Medical v. Adult Use at Final Pack

Cannabis products are required to be separated as intended for adult-use or medical use prior to transfer to a Compassion Center for retail sale. Using the Metrc tags (Cannabis vs. Medical) meets the requirement, however, in order to streamline transfers, OCR suggests that both the transferring entity and receiving entity follow the process outlined below.

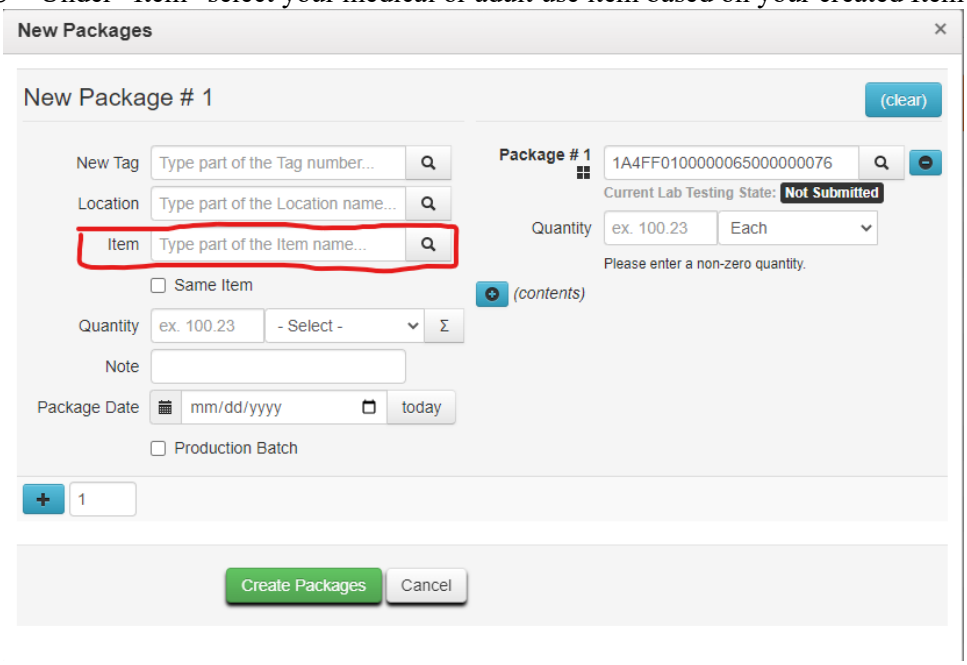
1. Create two of every item intended for retail sale. Identify one as REC and one as MED.
    i. EX: "Blue Dream Vape Cart .5g-MED" or "Blue Dream Vape Cart .5g-REC"
2. Once the bulk package (which does not have to have a designation) is ready to be designated as medical or adult-use, or if you need to redesignate prior to transfer to a Compassion Center for retail sale, you will use the "New package" functionality and select new tags (Cannabis or Medical) for each of your newly split packages or redesignated packages.
    - Under "New Tag" select either a "CannabisPackage" tag or a "MedicalPackage" tag depending on your intended designation.



    - To view all available tags, select the magnifying glass icon 



- Under “Item” select your medical or adult use item based on your created Item list.



- To select from a list of your facilities items select the magnifying glass icon 

3. A licensee may redesignate packages at any point prior to transferring the product to a Compassion Center for retail sale.

Naming Conventions

In addition to assisting in identification of adult use products or medical products, the naming conventions of plant batches, harvests, and other packages is helpful in assisting with transparency and reporting.

- **Plant Batches** names should follow the following formula:

    - Strain Name MMDDYYYY
- **Harvests** names should match the plant batch name above.
- **Clones**
    - While clones do not have to be tagged, it is important for OCR to be able to identify by looking at a tray:
        - Strain Name
        - Plantings Date
        - The number or lot identification of the tray to a larger plant batch (i.e., Lot A of Watermelon Gelato 2132023 or Tray 1 of Watermelon Gelato 2132023)
- **Packages**
    - Products intended for retail sale in addition to having a MED or AU designation should include the net weight of the product. For example, "Runtz 1g joint" should be "Runtz Pre-Roll 1g" or "Watermelon Gelato Eighth" should be "Watermelon Gelato 3.5g".
- **During Processing and Final Form**
    - Name of products should clearly identify the product. Names for packaged products should include:
        - Item, if not flower (I.e. cookies, drink, gummies)
        - Strain Name or Flavor
        - Weight of package (I.e. 1g, 3.5g, or 14g) or Total Count

Waste/Destruction

Best Practice Suggestion

- It is a best practice to also have a hard copy of a waste log that includes date, time, room, and which agents were present at the time of waste destruction.

It is important to remember all "waste" is required to be rendered unusable by mixing all cannabis material with an inert material, such as soil, coco, or coffee grounds. This is accomplished by using a 50/50 mix before disposal into a dumpster. There are several ways to record "waste" in Metrc. Below we outline the best ways to navigate each.

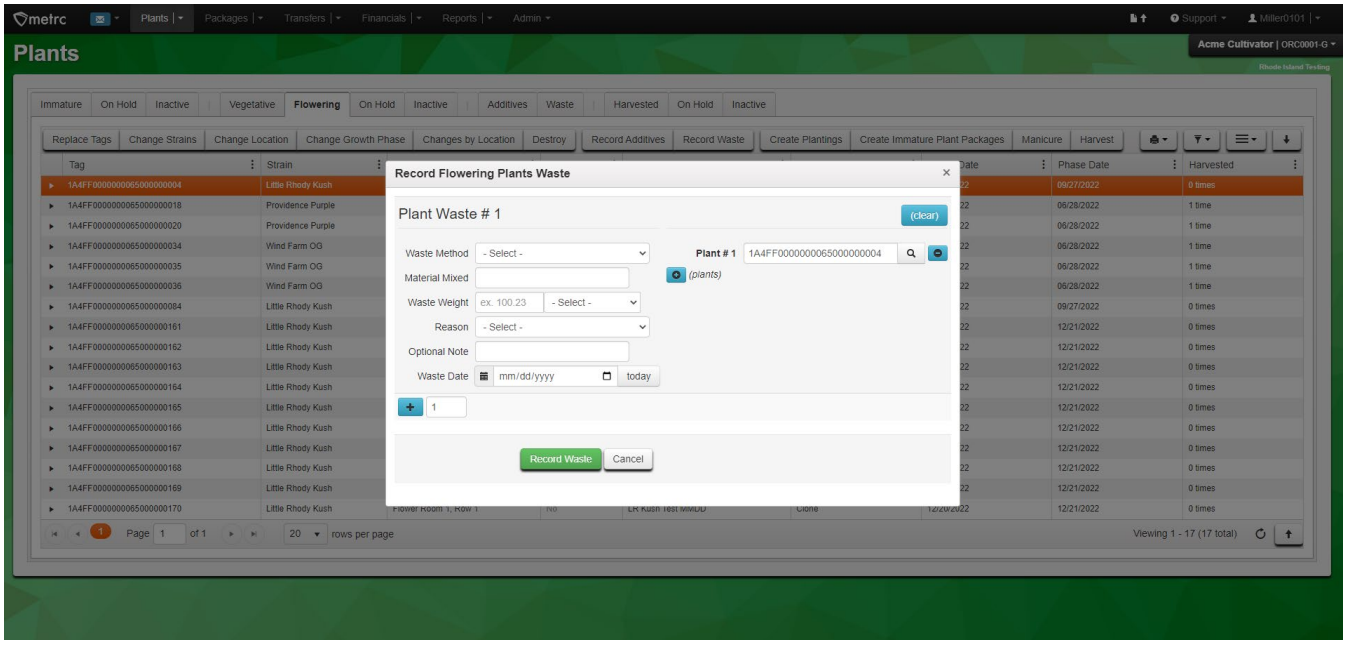
Reporting Waste by Individual Plant (Immature, Vegetative, or Flowering)

The first way to report waste is to report it by each unique Metrc tag.

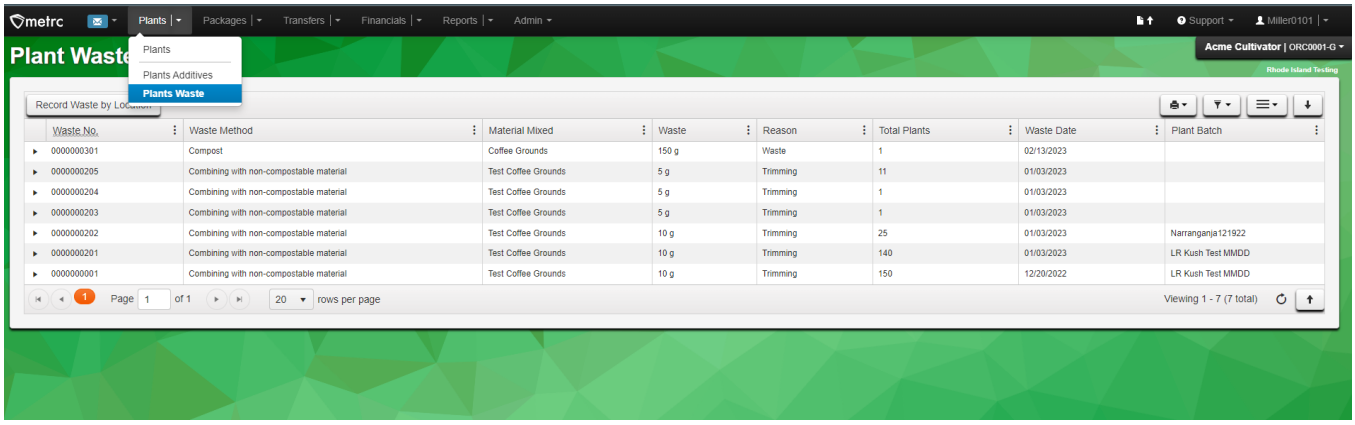
- While trimming a plant you will separate, set aside, and weigh each plant's waste and enter in the final weight for each plant's waste once the plant has been completely manicured.

- To record waste, you can select the correct plant tag directly from the "active plant" table and then click "Record Waste." Or you can click "Record Waste" and the plant tag can be selected.

    - In the below screenshot, a plant was selected from the "active plant" table and highlighted in orange. That plants tag is then auto populated for a waste entry in the "Record Flowering Plant Waste" form.



- Complete all required fields and select "Record Waste." The waste created should then populate under the "Plants Waste" section under the plants tab.

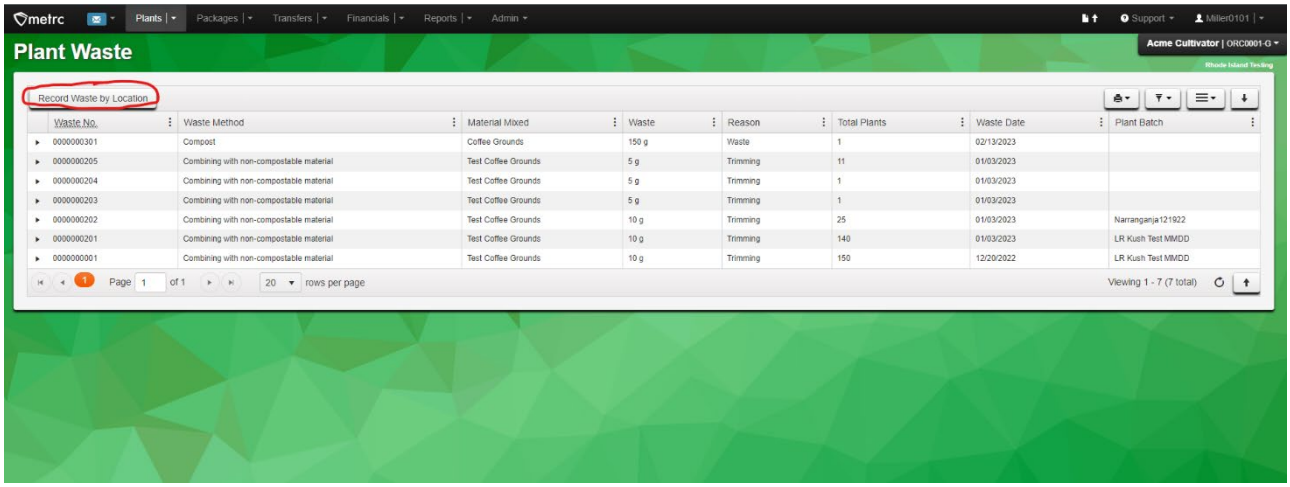


- It is important to remember that whether selecting "trimming" or "waste" as a reason, the weight entered in Metrc will be "waste" and therefore, cannot be used to create any future packages (including trim).
    - For example: A licensee may plan to use the trim after manicuring a plant, as live frozen. This should not be entered as waste with a reason of "trimming."

Reporting Waste by Plant location

The second way to report waste is according to each location in which the waste is created.

- Under the "Plant Waste" section under the "Plants Tab", there is a button, "Record Waste by Location".. When that is clicked a "Record Location Plant Waste" form opens.



- Use the magnifying glass next to the “Location” field to locate the room where the waste is being created.
- Select your waste type of “trimmings” or “plant material.”
- Complete the form with the correct weight and select “Record Waste.” The waste created should then populate within the waste table.
- If a licensee plans to use the trim after manicuring a plant as live/fresh frozen this should not be entered as waste with a reason of “trimming.”

Reporting Waste by Package Adjustment (Plants)

The third way to report waste is specific to plants that have been packaged.

- Select the package from the populated packages table and click the “adjust” button at the top of that table.
- Fill in the “Adj. Quantity” field with a negative amount as you are reporting waste.
- Metrc does the math for you, and you will see the “New Quantity" field auto populated with your new current weight.
- In this “Adjust Packages” scenario you would select “waste” as your “reason” unless another "reason” is a better fit. Just as with the waste reporting options above, the weight entered as an adjustment will no longer be available to be used in the chain of processing.
- Complete the form and select “Adjust Packages.”

Licensed Labs reporting Waste

When a licensed lab has finished with a sample, the sample package should be adjusted down to zero.

- Please follow the instruction from “Reporting Waste by Package Adjustment” above.
- All waste is required to be rendered unusable by mixing all cannabis material with an inert material,

such as soil, coco, or coffee grounds. This is accomplished by using a 50/50 mix before disposal into a dumpster.

Transfers

- **Affiliated** transfers should only be used for vertically integrated licensed Compassion Centers

- **Unaffiliated** transfers must be used for selling products from one licensed facility to another. For example, Cultivator to Compassion Center, Cultivator to Cultivator, Compassion Center to Compassion Center, except for approved remediation processes.

    - **Wholesale Price is required for all unaffiliated transfers**. This will require the Purchase Order/Pricing agreement to be entered into the "wholesale price" field. Please enter the total price for the package, not price per unit.

    - In accordance with 230-RICR-80-05-1.6.8 "Transportation of Medical Marijuana Products," and in addition to a purchase order accompanying a transport manifest, licensees are required to enter the wholesale price of unaffiliated transfers. This price should be the total sale price, not price per unit. This price should reflect the true and accurate price agreed upon by Cultivator and Compassion Center.

- **Remediated Transfers** must be used when a licensee transfers product to another licensee for approved remediation purposes.

- **External Transfer** may be requested through OCR. These transfers are for specific instances only, of transferring seeds, terpenes, or other non-psychoactive/non-synthetic cannabinoids.

Transferring Product between Unaffiliated Licenses

The implementation of METRC is now being enforced, which may change some processes and procedures within the industry. Below is guidance regarding transferring, manifesting, and receiving wholesaled goods from cultivator to retailer for both medical and adult-use cannabis.

Vehicles

All Vehicles used in the transportation of marijuana must be approved for use by an Inspector from the Office of Cannabis Regulation.

- The vehicle will have no markings, no name of the licensee, and noindication that it is being used to transport marijuana;
- The vehicle must have GPS with the capability of being remotely monitored by the originating marijuana establishment during a transport;
- The vehicle must have functioning heating and air conditioning;
- No marijuana products can be visible from the outside of the vehicle;
- Marijuana products must be kept in a locked compartment of the vehicle. (For example: opaque storage totes with locks may be used in the backseat of the vehicle);
- While transporting marijuana no other products may be transported or stored in the same vehicle;
- No firearms may be located within the vehicle or on the person of the authorized transport cardholder; and

- Hard copies of the Transport manifests as produced by Metrc will travel with product as it moves between licensees.

Transport Manifests & Receiving with METRC

All transportation of marijuana must be documented on a transport manifest. This can easily be accomplished through METRC. All required information for a METRC manifest is below.

The originating marijuana facility is responsible for:

- Accurate counts (with weights) agreed upon in the sales transaction.
- **Wholesale price,** agreed upon at the time of purchase must be entered in "wholesale price" field in Metrc when creating a manifest.
    - This should be done as a total sale price, not price per unit.
- Route to be traveled should be completed. These can be copied and pasted from Google Maps, Maptive, Speedy Route, Flightmap, etc.
    - If the manifest created is for a Lab Sampling Transfer, please include in place of the route "Lab Sample Pick-Up."
- Two drivers must be identified on every manifest, as two registry card holders are needed for every transport. This can be done by using the "+" sign after the first driver is entered.
- All vehicles used in a transport must also be identified on the manifest. Adding additional vehicles can be done by using the "+" sign after the first vehicle is entered.

The destination marijuana facility is responsible for:

- Ensuring accurate counts and weights for packages received.
- Ensuring each package should be initialed after an accurate count of the package has been confirmed in the presence of the transporting parties from the original marijuana establishment.
- Addressing and adjusting any errors in receiving as necessary at the time of receiving a delivery.
- Receiving packages in METRC upon verification of the above information.
- Reporting any unusual discrepancies in the quantity described on the manifest to OCR within (24) hours of identification.

Authorized Transportation Requirements

- All routes must remain within the State of RI.
- Transports may be made only by transport cardholders affiliated with the originating Marijuana Establishment License.
- Transport must be made with two authorized transporters. If using two separate vehicles for a transport, both vehicles must travel together, and be identified on the manifest.
- All transports must travel directly from the originating facility to the destination facility. If an emergency stop is made it should be documented in detail, and a note added to the "extenuating circumstances" section of the manifest.
- Any vehicle accident, diversions, or losses during transports shall be reported to OCR and law enforcement pursuant to §1.6.5(I) as an "emergency event."

External Transfer Requests

Transferring in Seeds

If you would like to bring seeds into your licensed facility and Metrc OCR requires the following process:

An email request is sent to DBR.MMPCompliance@dbr.ri.gov that includes:

- Transfer request date;
- Quantity; and
- Strain.

OCR will review the request and if approved will allow for an External Transfer. OCR will reach out to the licensee to schedule an External Transfer time for the licensee to bring in the seeds both physically and in Metrc. An inspection may also be required. **The transfer request date should be at least 3 business days from the date the request was submitted to OCR.**

Transferring in CBD or non-psychoactive/non-synthetic cannabinoids

All external transfers of non-synthetic/non-psychoactive cannabinoids now require an attestation be submitted with the external transfer request. This attestation can be found here.

If you would like to bring in CBD or non-psychoactive/non-synthetic cannabinoids derived from hemp to your licensed facility and Metrc, OCR requires the following process.
An email request is sent to DBR.MMPCompliance@dbr.ri.gov that includes:

- Transfer request date;
- Quantity; and
- Cannabinoid profile as displayed by a Certificate of Analysis by a licensed lab.

OCR will review the request and if approved will allow for an External Transfer. OCR will reach out to the licensee to schedule an External Transfer time for the licensee to bring in the hemp-derived cannabinoids both physically and into Metrc. An inspection may also be required. **The transfer request date should be at least 3 business days from the date the request was submitted to OCR.**

Transferring in cannabis derived terpenes

All external transfers of non-synthetic/non-psychoactive terpenes now require an attestation be submitted with the external transfer request. This attestation can be found here.

If you would like to bring in cannabis-derived terpenes to your licensed facility and Metrc, OCR requires the following process:
An email request is sent to DBR.MMPCompliance@dbr.ri.gov that includes:

- Transfer request date;
- Quantity; and
- Terpene and Cannabinoid profile as displayed by a Certificate of Analysis by a licensed lab.

OCR will review the request and if approved will allow for an External Transfer. OCR will reach out to the licensee to schedule an External Transfer time for the licensee to bring in the cannabis-derived terpenes both physically and into Metrc. An inspection may also be required. **The transfer request date should be at least 3 business days from the date the request was submitted to OCR.**

*Terpenes that are extracted from cannabis grown at your licensed facility must be tracked by a Metrc unique identifier and should include "Terpene" in the naming convention.

Recording Tissue Cultures in Metrc

Tissue Cultures are permitted. Cultures must come from a licensed Rhode Island Cannabis Entity and must be traceable back to the plant the culture was taken from. To do so:

- Go into the "Plants" screen in Metrc
- Highlight the tracked plant being used to create the culture
- Select the "Create Plantings" button
- Create a Plant Batch using the "Plant Type" "**TISSUE CULTURE**"
- Enter the number of cultures taken and complete the "Create Plantings" form.

Lab Sampling from Multiple Container Batches

When a licensed lab comes out to collect a sample from a source batch and the source batch has one metrc tag, but is split into multiple containers, the following is expected to ensure quality sampling and testing:

- Any containers associated with that source batch should have a label on it containing.
    - The last 4 digits of the Metrc Tag from the source batch
    - Total quantity of the source batch (from all containers)
    - The number of the container formatted as # of # (example: 1 of 5)
- The licensed lab will need to take a picture of the complete source batch as this assists them in visualizing that the total source batch is present at the time of sampling.

Enforced Testing in Metrc

Selecting Test Batches in Metrc

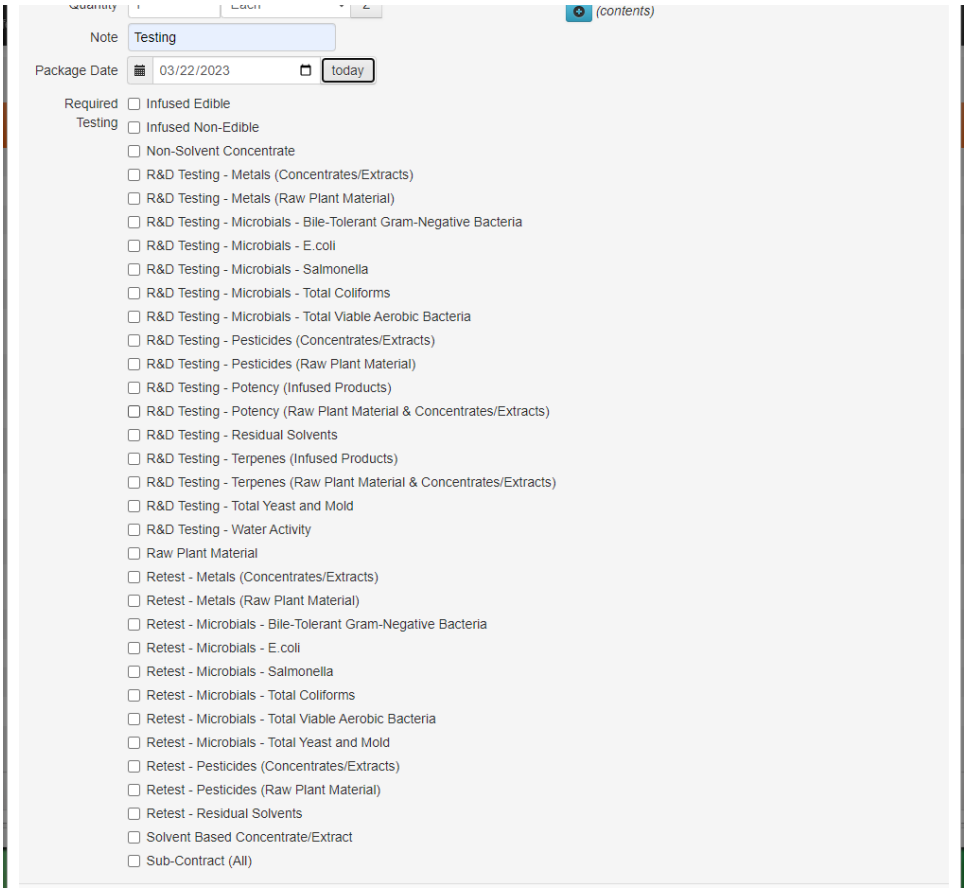
- As a licensed cultivator or compassion center it is essential that you **only** select the tests you need performed on your marijuana product.
- Test Batches with all enforced tests have already been created and should be used unless you are retesting or performing R&D testing.
- Enforced Compliance test batches include:
    - Infused edibles;
    - Infused non-edibles;
    - Non-solvent concentrate;
    - Solvent-based concentrate;
    - Raw plant material;
    - Raw Pre-Rolls Bulk;
    - Raw Pre-Rolls (Final Form); and
    - Infused Pre-Roll (solvent-based concentrate).
    - Infused Pre-Rolls (Non-Solvent based concentrate)

- Tincture (Adult Use)
- Tincture (Medical)
- RSO Adult Use (Non-Solvent Based Concentrate/Extract) *(Anticipated release 3/4/24)*
- RSO Adult Use (Solvent Based Concentrate/Extract) *(Anticipated release 3/4/24)*
- RSO Medical (Non-Solvent Based Concentrate/Extract) *(Anticipated release 3/4/24)*
- RSO Adult Use (Solvent Based Concentrate/Extract) *(Anticipated release 3/4/24)*

- **<u>You do not need to select anything other than the associated test batch for compliance testing.</u>**

- **R&D testing** should only be selected if you are in fact sampling for research purposes. If any sample does not have test results applied to it (even if the test was requested in error) the parent/source batch will remain stuck in "TestinginProgress."

- **Retest** selections should first and foremost follow the retesting procedures outlined in the regulations and detailed out on Page 14 in this document. If a licensee has failed for an individual test that falls under microbiological contaminants such as total yeast and mold, all required tests under microbiological contaminants which include Bile-Tolerant Gram Negative, E. coli, Salmonella, Total Viable Aerobic Bacteria, Total Coliforms) must be selected and all must receive passing results. **OCR is working with Metrc to group all these retests for Micro under one category.*



- A testing facility must upload results based on the Test Batch selected by the licensee. If the testing facility feels an error has been made, they must contact the licensee and potentially Metrc support

to resolve the issue **prior to accepting the sample into their inventory.** Failure to report results for every selected Test Batch will result in the parent batch remaining in "TestinginProgress."

- If after the receiving lab has run through all potential issues on their end, the cultivator may need to reach out to Metrc support to get the package testing status changed.

Enforced Compliance Testing Per Product Type

Flower/Bud (Raw Plant Material)

What is required?

1. Flower is required to undergo enforced compliance testing, which includes pesticides, metals, water activity, microbiological contaminants and potency.
2. Flower packaged for enforced compliance testing must be of the same strain and sampled from a batch that is no more than 10lbs.
3. Raw Plant Material should be selected as the Test Batch Category.

Infused Marijuana Products (Infused Edible or Infused Non-Edible)

What is required?

1. The concentrate/extract/distillate that will infuse the marijuana edible or non-edible product must pass all required testing for concentrates, including pesticides, heavy metals, residual solvents (if solvents were used), and potency, as was previously required.
2. The final product will then need to be tested for THC, THCa, CBD and CBDa to ensure:
    a. The label on the product matches the test results from a licensed testing facility;
    b. If the product is an Infused Edible or if it is an Infused Non-Edible intended for Adult-Use sales, each serving is equal to or less than 10mgs of THC and that the licensee is labeling the product with the correct values pursuant to the labeling rules in Section 1.5 of the Regulation.
    c. There is a 10% allowable variance for THC cannabinoid results for infused cannabis products.
    d. *If a product's potency is over the 10% variance, the product will be "testfailed." It will then be up to the licensee to remediate the product and submit as a completely new sample for testing.* ***(NOTE: Any test after a remediation is not considered a "Retest")***
3. **Infused Edible** should be selected as the Test Batch Category for product types designated as "Infused Edibles" per the Product Designation List to ensure the correct tests are being applied to this product. Please note, regardless of whether this product type is being sold to an adult-use consumer or medical patient, there is a 10mg THC per serving limit.
4. **Infused non-edible** should be selected as the Test Batch Category for products designated "Infused non-edible" per the Product Designation List to ensure the correct tests are being applied to this product. Any Infused non-edible product sold to an adult-use consumer must comply with the 10mgs of THC per serving limit. There is no per serving THC limit for these product types if they are being sold to a medical patient.

Pre-Rolls (Raw Plant Material)

What is required?

1. (a) Raw plant material pre-rolls may be tested in their final form for enforced compliance testing, which includes pesticides, metals, water activity, microbiological contaminants, and potency.
    - Raw-Pre-Rolls (Final Form) should be selected as the Test Batch Category if all pre-rolls are the same weight.
    - Raw Pre-Rolls (Bulk) should be selected as the Test Batch Category if the pre-rolls are of different weights.

OR

(b) Cannabis intended to be processed into raw plant material pre-rolls can be ground then sampled and tested for all enforced tests as stated above prior to being rolled into final pre-roll form.

- The batch sampled for testing should be no more than 15lbs but does not have to be of the same strain.
- A licensee is not required to test at both stages.
- Raw Pre-Rolls (Bulk) should be selected as the Test Batch Category.

Infused Pre-Roll or Pre-Ground Flower (with a solvent extract/resin/concentrate)

What is required

1. Final form testing for all enforced tests which include pesticides, metals, water activity, microbiological contaminants, residual solvents, and potency. This is required even if all components of the product were tested prior to being combined into its final form.
    - Infused Pre-Roll should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

Concentrates intended to be inhaled (Non-Solvent Based)

What is required?

1. (a) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests which include pesticides, metals and potency in the final form (cartridge/container);

OR

(b) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests as stated above from a homogenized batch immediately prior to being put into its final package.

- Enforced compliance testing is required when no further processing of the extract/resin/concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- Non-Solvent Concentrate should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

Concentrates intended to be inhaled (Solvent Based)

What is required?

1. (a) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests which include pesticides, metals, residual solvents and potency in the final form (cartridge/container);

OR

(b) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests as stated above from a homogenized batch immediately prior to being put into its final package.

- Enforced compliance testing is required when no further processing of the extract/resin/concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including but not limited to ethanol/alcohol used in your CO2 extraction process, Solvent-Based Extract/Concentrate is required to be selected.

- Solvent-Based Extract/Concentrate should be selected as the Lab Test Batch Category.

Tinctures (Adult Use)
What is required?

- A tincture is required to undergo enforced testing for pesticides, metals, residual solvents, and potency.
- Enforced compliance testing is required when no further processing of the concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- A tincture may have no more than 500mgs of THC per packaged unit if intended for Adult Use purchase.
- Tincture (AU) should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

Tinctures (Medical)
What is required?

- A tincture is required to undergo enforced testing for pesticides, metals, residual solvents, and potency.
- Enforced compliance testing is required when no further processing of the concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- A tincture may contain THC amounts greater than 500 mgs per package when ONLY available to medical patients.
- Tincture (Medical) should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

RSO Solvent Based (Adult-Use)
What is required?

- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including but not limited to ethanol/alcohol used in your CO2 extraction process, RSO Solvent-Based is required to be selected.
- If the product is intended for Adult-Use consumers, the product must comply with the 100mgs of THC per package limit.
- RSO Solvent Based (Adult-Use) should be selected as the test batch category.

RSO Solvent Based (Medical)
What is required?

- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including but not limited to ethanol, alcohol, butane or CO2, RSO Solvent-Based is required to be selected.
- If the product is intended for medical patients, the product may include more than 100mgs of THC per package limit.
- RSO Solvent Based (Medical) should be selected as the test batch category.

RSO Non-Solvent Based (Adult-Use)
What is required?

- IF this category is selected, OCR will follow-up with certification required by the licensee validating that RSO without the use of solvents.
- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If the product is intended for Adult-Use consumers, the product must comply with the 100mgs of THC per package limit.
- RSO Non-Solvent Based (Adult-Use) should be selected as the test batch category.

RSO Non-Solvent Based (Medical)
What is required?

- IF this category is selected, OCR will follow-up with certification required by the licensee validating that RSO without the use of solvents.
- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including but not limited to ethanol, alcohol, butane or CO2, RSO Solvent-Based is required to be selected.
- If the product is intended for medical patients, the product may include more than 100mgs of THC per package limit.
- RSO Non-Solvent Based (Adult-Use) should be selected as the test batch category.

Retesting & Remediation

Retesting

- A licensee is required to request permission for a retest in writing from OCR pursuant to 230-RICR-80-05-1.11(D)(2). For failed heavy metals, microbiological, water activity and residual solvent failures, no request is required at this time. Potency retest requests will not be granted at this time as potency is not a pass/fail test. All retests must be accurately and timely tracked in Metrc.
- **OCR does require a retest request from a licensee to retest a sample or batch that failed for pesticides**. Please submit the request to DBR.MMPCompliance@dbr.ri.gov.

- For approved retests in accordance with the above requirements, the following protocol shall be followed pursuant to 230-RICR-80-05-1.11(E):
    1. If there is enough remaining material from the initial sample to retest, the testing facility will use that sample material.
    2. If there is not enough material from the initial sample, the laboratory sample collector will collect another sample from the same batch using the same collection process.

  *If the collected sample was potentially contaminated, OCR requires an email from the licensed lab in order for a new sample to be collected in order to perform the retest.

Retesting with a New Lab

- If you would like to retest a sample that received a failure for pesticides, microbials, heavy metals, water activity, or residual solvents with another lab:
- An email request is sent to DBR.MMPCompliance@dbr.ri.gov that includes:
    - Failed source package and test package numbers

- OCR will review the request and if approved will allow for a retest at another licensed laboratory and work with Metrc to ensure that the source package does not get stuck in "TestinginProgress." Please allow three business days for full review from OCR

Remediation

- A licensee is required to request permission for a remediation in writing from OCR pursuant to 1.11(F)(1). For remediation methods already in use for microbiological contaminants, water activity and residual solvent failures, no request is required at this time. All remediation activity must be accurately and timely tracked in Metrc.
- **OCR does require a remediation request from a licensee to remediate a batch of product that failed for both pesticides and heavy metals.** Please submit the request to DBR.MMPCompliance@dbr.ri.gov.
- For any approved remediation methods, a full enforced compliance test, which includes a new sample is required post remediation. A licensee is not required to have the original lab sample and perform the enforced compliance tests.

Research and Development Testing

R&D testing maybe performed on **wet plant material**. After harvesting, a wet whole plant may be sent for R&D testing. The harvest plants will need to be put into a package using the item category of "wet whole plant." The licensee should follow the same procedure outlined in 216-RICR-60-05-6.17 Sample Collection - General Requirements and 6.18 Sample Collection Procedures.

- When creating the test sample please select "R&D: Metals (Raw Plant Material)", "R&D: Pesticides (Raw Plant Material)","R&D: Potency (Raw Plant Material)", or "R&D: Terpenes (Raw Plant Material)" as lab test batches in Metrc.

Quality Control & Trade Sampling

Quality Control Sampling

Licensees may adjust out "Quality Control Samples" of designated **adult-use products only** to active and valid registry card holders of their licensed entity. Please note, it is prohibited to consume cannabis on the licensed premises. This adjustment shall occur once the product is in its final form and has undergone all required and enforced compliance testing. Each "Quality Control Sample" recorded in Metrc shall be for a single registry card holder and shall not total more than the 1-ounce possession limit or its equivalent per employee, per day.

In Metrc, a quality control sample may be adjusted from its parent package following these required steps:

- Select the package you would like to adjust, then select "Adjust"
- Complete the "Adj Quantity" and "New Quantity" fields
- For reason select "Quality Control Sample"
- In "Required Note" include the Employee's badge number who is receiving the sample
- Complete the date field
- Finish by selecting the green "Adjust Package Button"

Trade Sampling

Cultivator Licensee's may utilize "trade samples" to market their product to licensed Compassion Centers.

They are not required to sell the trade sample. Trade samples will need to be manifested separately under the "trade sample" transfer type. Trade samples cannot be added to manifests with other products. A licensee should then adjust the sample out of the system pursuant to the Quality Control requirements.

Finishing: Harvests & Packages

Finishing harvests and packages within Metrc assists in monitoring processing losses and ensuring an accurate reflection of your physical onsite inventory in Metrc.

Finishing a harvest should only occur after all the material from that harvest has been packaged. To finish a harvest:

- Highlight the harvest within the plants grid.
- Select the "finish" button

A Package can be finished multiple ways:

Option #1:

- Highlight the package within the package grid
- If the package is empty, showing zero (0) within the quantity, the "finish" button can be selected

Option #2:

- If the package still has product in it, but does not physically, an adjustment will need to be made prior to finishing the package.
    - A package may still show a quantity due to processing loss during final packaging, or an error in reporting, be sure to go back and double check all child packages and final counts.
    - The adjustment made should clear any remaining quantity from the package and now show zero (0) within the quantity
    - Once the package has a quantity of zero (0), the "finish" button can be selected.

Option #3:

- A package can be finished while combining packages or making a new package off of an existing package, by putting the remining contents of the package you wish to finish in the new package, a check box will appear within your "create package" window. Check that box if you wish to finish the package

Process Validation

A licensee may request to have their cannabis infused product process validated in order achieve "process validation" and subsequently be approved for reduced compliance potency testing. This request can only be submitted for designated cannabis infused products and if qualified, the reduced compliance potency testing approval **ONLY** applies to that specific cannabis infused product.

An email request must be sent to DBR.MMPCompliance@dbr.ri.gov that includes:

1. The Standard Operating Procedure for the production of the cannabis infused product;
2. A list of ingredients; and
3. Compliance potency results for every batch of product produced over the course of 4-8 weeks with a minimum of four (4) unique batches produced on distinct, different days.
    a. All submitted compliance potency results must be within a 10 percent variance.

Upon successful completion of the above requirements, OCR will issue an approval letter for reduced testing to the licensee for the specific submitted product type which will be valid for one year from the date the letter is issued.

The licensee will be required to submit to quarterly compliance potency testing. The licensee is required to

report those quarterly compliance potency results directly to OCR via email. It is the licensee's responsibility to determine a schedule with a licensed testing facility for quarterly testing.

Failure to submit to quarterly compliance testing will result in the revocation of approval for reduced compliance potency testing. Failure to continue to meet the requirements as stated above including but not limited to quarterly testing and the 10 percent variance for potency results will result in revocation of the approval for reduced testing and the process will no longer be validated.

Product Designation

OCR has a regularly updated public list of products eligible for sale at a compassion center. Any new products must be submitted to OCR for review and approval prior to manufacturing and/or displayed for sale at a compassion center. Pursuant to § 1.7(G) of 230- RICR-80-05-1, product designation(s) may be withdrawn, denied or revoked by DBR if the product fails to satisfy any provision of the Act or the DBR Regulations or if the product deviates or is altered from its previously approved form.

The Product Designation List can be found here.

Support with Problem Solving

As always, OCR is here to support you through issues relating to your license. Please contact Metrc at support@metrc.com or 1-877-566-6506 to submit tickets for any issues you are experiencing with the software. Additionally, all licensees are encouraged to register for Metrc Learn, which can be accessed on the bottom right corner of the log in box on Metrc's landing page. For convenience and encouragement, it can also be accessed here.