Inhalable Cannabinoid Products and Metrc Tracking

On December 22, 2020, the OLCC adopted rules to regulate non-cannabis additives in inhalable cannabinoid products. These rules create additional requirements for processors, but many of the provisions are applicable to all licensees. Detailed information regarding how these rule changes impact tracking and labeling can be found in Bulletin CE2020-07.

Included in the changes are the ways that Inhalable Cannabinoid Products (ICP) with Non-cannabis Additives (marijuana items) and Inhalable Hemp Cannabinoid Products (IHCP) with Non-cannabis Additives (hemp items) are tracked in Metrc.

What are Inhalable Cannabinoid Products with Non-cannabis Additives? Generally speaking, they are cannabinoid products that are meant for human inhalation and have been combined with non-cannabis ingredients like non-cannabis terpenes or flavorings. The most common example is a vape cartridge with non-cannabis derived terpenes. Here are the relevant definitions from OAR 845-025-1015:

"Inhalable cannabinoid product" means a cannabinoid product or hemp cannabinoid product that is intended for human inhalation.

"Non-cannabis additive" means a substance or group of substances that are derived from a source other than marijuana or industrial hemp.
>   (a) "Non-cannabis additive" includes but is not limited to purified compounds, essential oils, oleoresins, essences or extractives, protein hydrolysates, distillates, or isolates.
>   (b) "Non-cannabis additive" does not include plant material that is in the whole, broken, or ground form.

This guide covers the following content:

New Inhalable Item Categories

On and after April 1, 2021, OAR 845-025-3270 requires all Inhalable Cannabinoid Products with Non-cannabis Additives to be explicitly categorized in Metrc under one of two categories:

- "Inhalable Cannabinoid Product with Non-Cannabis Additives" (marijuana items); and
- "Inhalable Hemp Cannabinoid Product with Non-Cannabis Additives" (hemp items).

These item categories are still considered "other cannabinoid products" and Metrc will have a weight-based and a count-based "each" option for creating items.

> *Reminder: If an item co-mingles hemp-derived extract or concentrate with marijuana-derived extract or concentrate, the resulting item is a marijuana item.*

In order to be compliant, existing packages meeting the definitions above will need to be listed in Metrc under new items created with the new category types. This step generally cannot be done by editing package in Metrc and will require repackaging in most cases. Please refer to Bulletin CE2020-07 on options available to licensees to complete this task.

Item Creation and Ingredients Tracking for Processors

OAR 845-025-3270(2) requires that processor licenses record the manufacturer and mix name of any non-cannabis additive(s) used in the inhalable cannabinoid product. This information will be recorded at the item creation level in Metrc.

> *In order to avoid other businesses from accessing the processor's proprietary information, ingredient information in Metrc will be accessible only to the OLCC and employees at the processor given access to the license's administrative area of Metrc.*

METRC EXAMPLES

Item Creation for Processors

Processors will have the ability to create "Inhalable Cannabinoid Product with Non-Cannabis Additives (each)" or "Inhalable Cannabinoid Product with Non-Cannabis Additives." The only difference between these two categories is that one is tracked by weight (figure 1) whereas the "each" category (figure 2) is tracked by number of units (with a weight per unit).

Item choices (item by weight is highlighted)

Figure 1

Ingredient entry area (example is an Item by Count)

Once the item details are completed (Item Name, Category, Unit of Measure, and Unit Weight), the item ingredients should be entered. An item created in this category requires at least one entry in the **Public Ingredients** box.

Public Ingredients vs Item Ingredients

Ingredients listed in the Public Ingredients area (Figure 2 (1)) are visible via the API by whichever license is holding a particular package in their inventory. The second **Item Ingredients** area *(Figure 2 (2))* was created to allow processors to track ingredients as required by this rule without providing visibility to other licensees; ingredients entered in this new ingredients area are only visible within Metrc at the item level for that particular license (and to users with the requisite permission). Components listed in the item ingredients area should match the additive's name listed in the "Non-cannabis Additive Documentation" that was submitted as part of your label application.

To comply with OAR 845-025-3270, processors must enter the name of the additive mix and manufacturer – for each additive used – in either the "Public Ingredients" or "Item Ingredients" section of the item in Metrc.

Figure 2

View Item Details

Once the item has been created, it will appear in the item list for the facility in which it was created and details can be viewed by drilling down into the item tabs as shown in Figure 3a and Figure 3b.

Item Ingredients Tab: Figure 3a

Item History Tab: Figure 3b

Edit Item Details

If ingredients need to edited, this can be done by selecting the item from the item list and clicking the "Edit Items" button to open the dialog box (figure 4). If you are deleting an ingredient, click the minus "-" button from the line of the ingredient that needs to be removed. Metrc will prompt for confirmation prior to deleting the ingredient. If an ingredient needs to be added, select the black plus "+" sign as needed to complete the ingredient list. Click save to complete the change.

Please note that the editing area is meant for corrections. **A change in additives, additive formulation, or manufacturer requires adherence with 845-025-3265 and label resubmission and pre-approval before the label can be compliantly used (see OAR 845-025-7160(8)).**

Figure 4

USE CAUTION:
An ingredient line may be edited directly, but you will not be prompted about the change.

Any ingredient changes will be reflected in the item history screen (figure 5):

Figure 5

Repacking an existing package for non-Processors

Creation of "Inhalable Cannabinoid Product with Non-Cannabis Additives (*no ingredients*)" or "Inhalable Cannabinoid Product with Non-Cannabis Additives (each) (*no ingredients*)" categories will be available for other license types (like Wholesalers and Retailers) who may need to repack items previously sent by processors under the prior "Combined Category" designation. As with other items, before it can be repackaged under a facility's own UID tags, the item will need to be created in Metrc by that facility. An example of the dropdown category choices for these licenses is shown below (Figure 6).

Item Category Choices:

Figure 6

Once the item has been added to the facility's item list, existing products can be repackaged under the new category. This process is illustrated below.

The package below contains 1g flavored vape cartridges that are currently designated as Combined Category items (Figure 6). It will need to be repackaged under the new category of "Inhalable Cannabinoid Product with Non-Cannabis Additives (each) (no ingredients)" (Figures 7-9).

Figure 7 – Existing Item:

Figure 8 – Repackaging under new item:

Figure 9 – Completed repackaging under new item with correct category