



LICENSING, TRACKING AND SALE OF ADULT-USE MARIJUANA IN MASSACHUSETTS

112117CNBBFRv1

Real-time Inventory shall be maintained as specified by the Commission and in 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, and flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.

Real-time Inventory or Seed-to-sale Tracking means an electronic system that provides the electronic tracking of an individual cannabis or marijuana plant, including its cultivation, growth, harvest and preparation of cannabis or marijuana products, if any, and final sale. This system shall utilize a unique-plant identification and unique-batch identification. It will also be able to track agents' and licensees' involvement with the marijuana product.

A Marijuana Establishment shall

1. Establish inventory controls and procedures for the conduct of inventory reviews, and comprehensive inventories of marijuana products in the process of cultivation, and finished, stored marijuana;
2. Conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana;
3. Conduct a comprehensive annual inventory at least once every year after the date of the previous comprehensive inventory; and
4. Promptly transcribe inventories if taken by use of an oral recording device

(d) The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.



(e) A Marijuana Establishment shall tag and track all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.

(f) No marijuana product, including marijuana, may be sold or otherwise marketed for adult use that is not capable of being tested by Independent Testing Laboratories, except as allowed under 935 CMR 500.000.

(g) A Marijuana Establishment that is cultivating, processing or selling marijuana products for medical use as well as marijuana products for adult use must create virtual separation of the products.

At the point of sale, a Marijuana Retailer that is also a RMD must designate whether marijuana products are intended for sale for adult use or medical use through tracking methodology approved by the Commission under 935 CMR 500.000.

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*The Cannabis Control Commission (CCC) states licensees must utilize the seed-to-sale system to track all marijuana products being cultivated, manufactured, transported, tested, and sold in the Commonwealth.*



The national database METRC Portal (<https://www.metrc.com>) contains important resources, training, and updates for Marijuana Establishments and their agents. The information and tools provided are critical in ensuring that establishments remains in compliance with the laws and regulations.

Track: Monitor and verify reported cannabis inventories in real time for all licensed cannabis businesses and for all license types in the industry.

Trace: Follow a product back to its origins should it become a public health concern, hold it in the system and alert licensees of the problem until it is resolved.

Trend: Proactively analyze inventory data to assess risk, distinguish between compliant and non-compliant behavior, identify taxable events and evaluate public policy.

Report: Utilize trended data to brief stakeholders, construct regulatory and criminal cases and



share aggregate data with the public.

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MARIJUANA HANDLERS™ Key Points:

- Real-time Inventory or Seed-to-sale Tracking means an electronic system that provides the electronic tracking of an individual cannabis or marijuana plant, including its cultivation, growth, harvest and preparation of cannabis or marijuana products, if any, and final sale.
- The Cannabis Control Commission (CCC) states licensees must utilize the seed-to-sale system to track all marijuana products being cultivated, manufactured, transported, tested, and sold in the Commonwealth.
- A Marijuana Establishment that is cultivating, processing or selling marijuana products for medical use as well as marijuana products for adult use must create virtual separation of the products.
- Real-time Inventory shall be maintained as specified by the Commission and in 935 CMR 500.105(8)(c) and (d), including, at a minimum, an inventory of marijuana plants; marijuana plant-seeds and clones in any phase of development such as propagation, vegetation, and flowering; marijuana ready for dispensing; all marijuana products; and all damaged, defective, expired, or contaminated marijuana and marijuana products awaiting disposal.
- Conduct a monthly inventory of marijuana in the process of cultivation and finished, stored marijuana;
- A Marijuana Establishment shall tag and track all marijuana seeds, clones, plants, and marijuana products, using a seed-to-sale methodology in a form and manner to be approved by the Commission.
- The record of each inventory shall include, at a minimum, the date of the inventory, a summary of the inventory findings, and the names, signatures, and titles of the individuals who conducted the inventory.
- The national database METRC Portal (<https://www.metrc.com>) contains important resources, training, and updates for Marijuana Establishments and their agents. The information and tools provided are critical in ensuring that establishments remains in compliance with the laws and regulations.