Division of Cannabis Regulation Guidance Document – 07.20.23 Topics: Naming Items in Metrc

Please note all rules referenced herein are from the proposed rules filed on May 15, 2023. The proposed final rules are located at health.mo.gov/safety/cannabis/pdf/19csr100-proposed-rules-filed-051523.pdf.

As licensees begin to make changes to marijuana product item categories in the statewide track and trace system, Metrc, the Division of Cannabis Regulation (DCR) would like to take this opportunity to remind licensees that Metrc is each licensee's official system of record per 19 CSR 100-1.130(1)(D). The system of record should accurately reflect each licensee's inventory at the end of each day including work in progress per 19 CSR 100-1.130(1)(F) and 19 CSR 100-1.130(1)(M). Licensees shall name items in a manner that adequately identifies what the marijuana product is in Metrc whether the marijuana product is in a process, a formulation or a final product.

For example, "Patch" or "Vape" does not adequately identify a marijuana product because these types of products come in a variety of milligrams and cannabinoid ratios, or this identifier could possibly indicate a formulation. Licensees should utilize identifying words when naming items in Metrc to improve the ready identification of marijuana product, where applicable. If licensees do not use adequate identifiers in the various stages of production, the licensee will be required to make corrections.

DCR provides examples for item name identifiers in the Packaging, Labeling and Product Design Guide updated July 2023.

DCR will provide licensees with an updated Packaging, Labeling and Product Design Guide this month to assist licensees with the new requirements. DCR will email this guide to the license's designated contact and it will be available on our website at https://health.mo.gov/safety/cannabis/facility-comms-guidance.php. In addition, licensees may contact DCR at CannabisProductCompliance@health.mo.gov for questions regarding this rule requirement.