

Division of Cannabis Regulation

Guidance Document – 08.16.24 REVISED

Topic: Product Returns and Storage; Products on Administrative Hold FAQ

The Division of Cannabis Regulation (DCR) has received questions related to the return, quarantine and storage of final marijuana products on administrative hold at dispensary facilities.

Is a dispensary licensee required to store marijuana product returned by a patient or consumer?

No. Dispensary licensees may not store any marijuana product returned by a patient or consumer. Pursuant to 19 CSR 100-1.180(2)(G), returns of marijuana product may only be accepted for purposes of disposal.

How does a dispensary licensee compliantly process the receipt of recalled product for disposal?

A dispensary licensee should review [MO Bulletin 24 – Receiving Recalled Product](#) for assistance with returning recalled marijuana product. If additional assistance is needed, please reach out to [Metrc Support](#). Patients who return recalled product within 30 days of initial purchase will have their patient allotment credited for the return.

Are licensees required to store marijuana product that is on administrative hold?

Yes. Licensees are required to quarantine and store all marijuana product until receiving written guidance from DCR. Pursuant to 19 CSR 100-1.100(4)(P) recalled items must be immediately pulled from production or inventory and quarantined until DCR determines the item is safe, may be remediated, or must be destroyed. “Quarantine” means to isolate a marijuana product when it is deemed potentially unfit for use.

DCR provides additional options for licensees with marijuana product on administrative hold. A licensee may submit a request to:

- Transfer marijuana product on administrative hold to another licensed facility for quarantine and storage; or
- Voluntarily destroy marijuana product on administrative hold.

Licensees wishing to transfer product on administrative hold should fill out the [Administrative Hold Product Transfer Request](#) document. Licensees should email the completed document to their assigned compliance officer and copy CannabisCompliance@health.mo.gov.

Licensees wishing to voluntarily destroy marijuana product on administrative hold should fill out the [Administrative Hold Product Voluntary Destruction Request](#) document. Licensees should email the completed document to their assigned compliance officer and copy CannabisCompliance@health.mo.gov.

For questions, please contact the licensee’s assigned compliance officer or CannabisCompliance@health.mo.gov. Licensees may find additional information on our website: <https://health.mo.gov/safety/cannabis/facility-comms-guidance.php>.