

**Missouri Section for Medical Marijuana
Facility License & Compliance Section
Guidance Document 8
Product Manufacturing and Pre-Rolls**

Dear Medical Marijuana Licensee,

Article XIV establishes that Missouri patients have the right to administer medical marijuana via every method for doing so. The variety of methods of administration include methods that do not fall within the specific authority of any medical marijuana facility type to produce. For instance, patients may administer medical marijuana via transdermal patches. Cultivation and dispensary facilities are clearly not equipped or authorized to produce transdermal patches, yet manufacturing facilities are only explicitly authorized to manufacture infused products, which does not clearly cover transdermal patches. Article XIV also provides patients may administer medical marijuana via “any other method recommended by a qualifying patient’s physician,” which may include methods as yet unknown. The Department believes the law would not establish the right to administer medical marijuana and then not provide an avenue for the regulated industry to fill that need.

In its simplest form, “manufacture” means to make something from something else. The Department has reviewed Article XIV as a whole and determined manufacturing facilities are the only facility type authorized to make any products from the dried, unprocessed marijuana provided by cultivators. As such, although pre-rolls are not infused – and by definition, manufacturers in Missouri could not make infused products intended for use by smoking – they are still manufactured products and should only be produced by a licensed manufacturing facility.

We understand there were some dispensaries in Missouri that had hoped to offer this service to their customers. While we do not see a specific prohibition in Article XIV on this point, the absence of authority is much more evident for dispensaries; they are not authorized to make anything from medical marijuana. On the contrary, they are required to sell medical marijuana or medical marijuana products in their final, tested form. Allowing dispensaries to grind and handle medical marijuana to the extent necessary to produce a pre-roll, even adding components such as paper and a filter, runs contrary to the intent of testing a product in its final form before it reaches the dispensary.