Cannabis Control Commission
STATE OF RHODE ISLAND

CCC RI METRC COMBINED GUIDANCE

Effective: October 1, 2025

The CCC RI Metrc Combined Guidance replaces the RI Metrc Implementation Guidance and is effective at issuance.

The CCC Metrc Combined Guidance contains Rhode Island specific guidance based on frequently asked questions and issues identified to assist licensees with transparent reporting. This document does not replace trainings or documents required or issued by Metrc. This document does not replace a thorough reading of the rules and regulations. For basic functionality information, please review the Metrc Manual User Guide and Metrc Rhode Island Supplemental Guide located in Metrc under the "Support" tab.

The Cannabis Office will continue to update this document as questions arise. Please continue to check for updates and clarity regarding operational executions within Metrc. See amended dates below for changes.

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Adding/Removing/Editing Employees

Adding Employees

To add an employee please refer to page 36 of the Metrc Rhode Island Supplement Guide.

Begin by going to the "Employees" area under the Admin tab and click "Add Employee." Fill out the required fields, including an accurate and complete email address for the employee. The "Welcome to Metrc" email will be sent to the entered email address and is required for them to activate their account. The email log-in link expires within 24 hours of it being sent.

- If the employee fails to log-in for the first time within the 24-hour window, a new "Welcome Email" must be requested. This can be done by returning to the "Employees" area, selecting the correct employee, and clicking the "Resend Welcome Email" box.

Updating Employee Email

Metrc Admin's and Employee users can now update emails within Metrc. Emails used should be an email an employee uses regularly enough that they would be able to quickly find the "Welcome to Metrc" notification sent.

For a Metrc Admin to Change an Email

- Begin by going to the "Employees" area under the Admin tab and select the employees email that needs to be changed, ensure it is highlighted in orange, then select the "Edit Employee" button.
- Once the employee information card opens, please update the email field.

For an employee-user to Change an Email

- Begin by selecting the arow next to your username in the top right corner of the screen. Select "User Profile."
- Edit the "Login & Account E-mail" field.

Removing Employees

To remove an employee, return to the "Employees" area, select the correct employee and click either the "trash can" icon, or the "All" icon button.

This button removes the employee just from the current license you are working under.

This button removes the employee from **all licenses** associated with that Metrc Administrator that the employee is also associated with.

Troubleshooting an Employee Metrc Access Issue

- Is the "Employee Lic. Number" exactly as it appears on the employee's Commercial Cannabis Card?
- Is the email within the system an email the employee has access to?
- After providing self-help, please reach out to our office at CCC.CannabisCompliance@ccc.ri.gov for continued support.

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Location & Rooms

General Requirements

Any room that is physically used to cultivate, manufacture, process, package, store and/or dispense of cannabis must be reflected within Metrc via a virtual room. The name given to the room in Metrc should be as descriptive as possible and should allow inspectors to easily identify the proposed use of the space.

The Cannabis Control Commission advises the creation of an additional room, "Quarantine" to facility locations in Metrc.

"Quarantine" Room

The **"Quarantine"** room will be used to identify a space in Metrc where packages that have been recalled, failed testing, or a parent package to a test sample that is awaiting results are placed separate and apart from other packages.

Tagging Plants

Propagation Requirements

- Tagging is not required for immature plants, such as clones or tissue cultures. However, the total count per strain must be tracked as Plant Batches in Metrc. Additionally, a licensee shall place a label that includes the strain name, date and quantity for each batch physically near the clones or tissue cultures.
    - Plant Batch names should be formatted as strain name and date (MMDDYYYY) the plant batch was planted.
    - Example: Blue Dream 01022025

Vegetative Requirements

- Every cannabis plant measuring 8 inches or above **must** have a METRC tag. Plants can be tagged by using the accompanying zip ties as stakes, until the plant is strong enough to withstand the tag weight.

Plant Requirements

- Metrc tags should not be lying flat on the soil or hidden within the canopy. They should be easily readable hanging on the lowest defoliated branch/stem of the plant. Examples for appropriate staking and hanging of tags are included in the images above.

Tagging Post Harvest

- Plant tags must remain with the associated plant/plant material after harvest and until such time that a package tag is created in Metrc. The newly created package tag will then replace the plant tag physically to ensure full and transparent traceability of the cannabis. All cannabis on a licensed premises must be easily and accurately associated with a Metrc tag at all times.

Time Frame for Harvests

Plants Harvested to Be Dried

All cannabis plant, flower, or trim that has been hung to dry/cure must be turned into a package within 60 days of the initial day of the harvest. Licensees will create a bulk flower package from the harvest batch. It can then be repackaged into a trim package and report waste directly from the package for stems, etc. that may be wasted.

Plants Harvested to be Frozen

All cannabis plant, flower, or trim that has been or is intended to be frozen upon harvest shall be turned into a package **immediately.** Licensees will create a bulk flower package from the harvest batch. It can then be repackaged into a trim package and report waste directly from the package for stems, etc. that may be wasted.

Separation of Medical v. Adult Use Packages

Cannabis plants and products are not required to be separated by adult use or medical use except for medical use only products (see Product Designation List) above the allowable THC limit for adult-use sale. These must be in a designated "Medical Only" space within a licensee's facility. Any product that can be purchased by patients/caregivers/authorized purchasers AND by adult use consumers does not have to be designated until the Point of Sale.

Naming Conventions

Naming conventions of plant batches, harvests, and other packages assist in creating a transparent and consistent industry, assist the enforcement team in searchability and finding packages, as well as offer identifiability across facilities.

- **Plant Batch** names should follow the following formula:
  - Strain Name MMDDYYYY
  - Example: Blue Dream 01012025
- **Clones**
  - Clones do not have to be tagged, but a group of clones must be entered as a plant batch, with counts of immature plants within the batch entered into Metrc. At a minimum clone trays should be physically labeled with:
    - Strain Name
    - Plantings Date

    - The number or lot identification of the tray to a larger plant batch (i.e., Lot A of Watermelon Gelato 2132023 or Tray 1 of Watermelon Gelato 2132023)

- **Harvest** names should match the plant batch that the plant material derives from and include an updated harvest date.
    - Strain Name MMDDYYYY
    - Example: Blue Dream 05032025.
- **Packages**
    - Products intended for retail sale should include the net weight of the product. For example, "Runtz 1g joint" should be "Runtz Pre-Roll 1g" or "Watermelon Gelato Eighth" should be "Watermelon Gelato 3.5g".
- **During Processing and Final Form**
    - Name of products should clearly identify the product. Names for packaged products should include:
        - Item type, if not flower (I.e. cookies, drink, gummies)
        - Strain Name or Flavor
        - Weight of package (I.e. 1g, 3.5g, or 14g) or Total Count

Waste/Destruction

Best Practice

- It is a best practice to also have a hard copy of a waste log that includes date, time, room, and which commercial card holders were present at the time of waste destruction.

Examples of cannabis waste includes roots, stalks, leaves, and stems of the cannabis plant.

It is important to remember all "waste" is required to be indistinguishable from other plant material. This may be accomplished by grinding and incorporating the cannabis plant waste with other non-consumable solid waste or other ground materials, so the resulting mixture is at least fifty percent non-cannabis waste by volume. There are several ways to record "waste" in Metrc. Below we outline the best ways to navigate each.

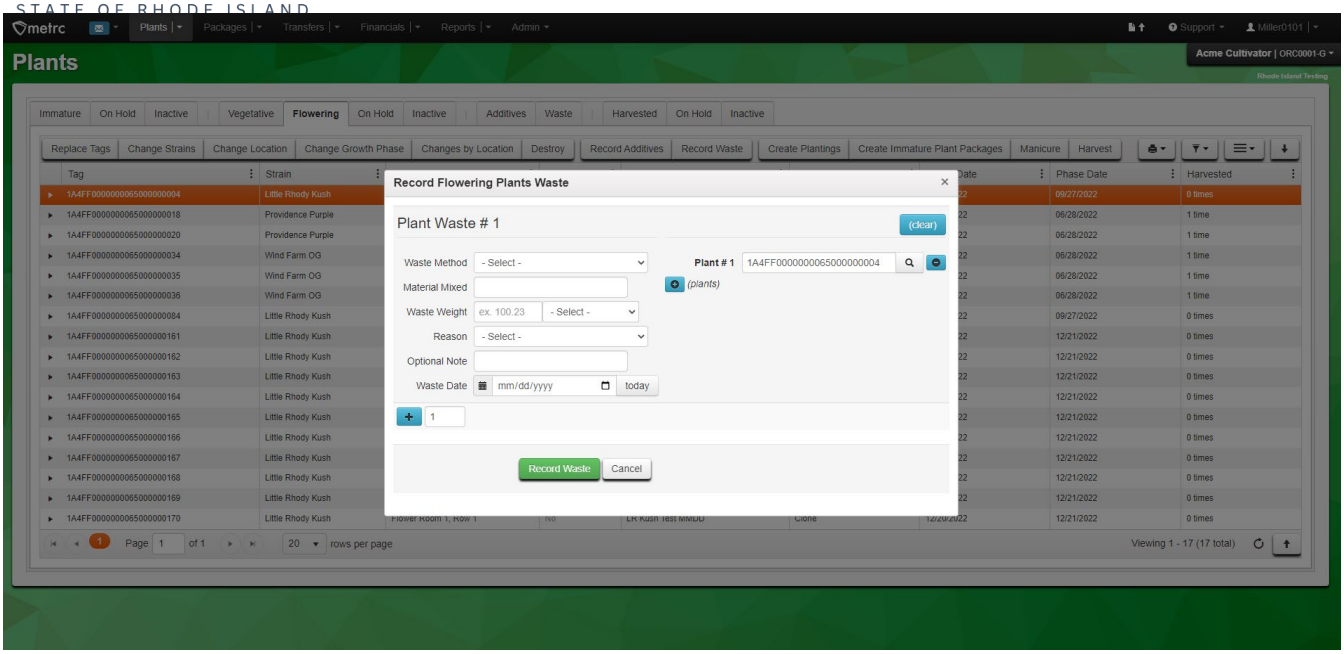
Reporting Waste by Individual Plant (Immature, Vegetative, or Flowering)

The first way to report waste is to report it by each unique Metrc tag.

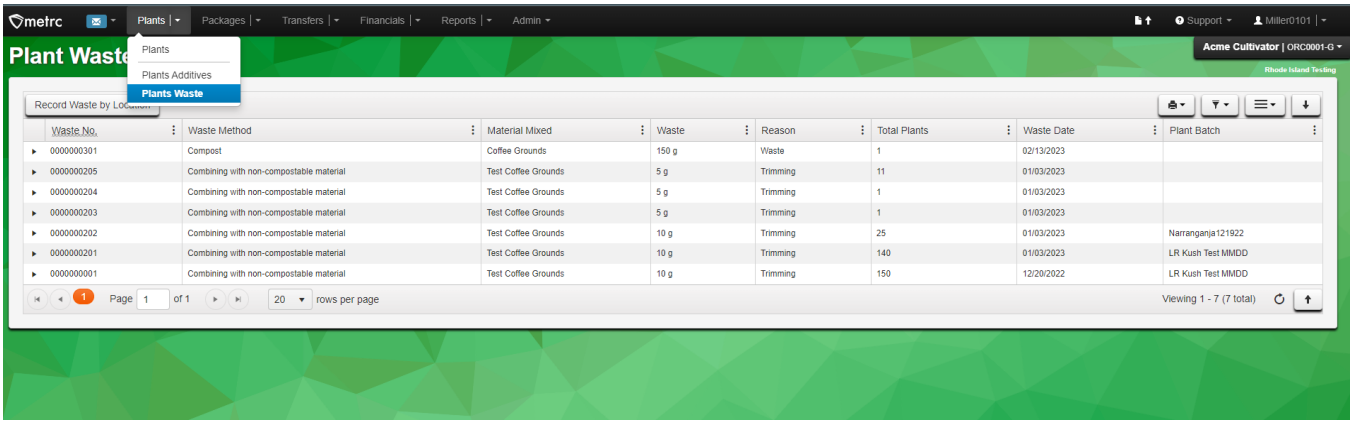
- While trimming a plant you will separate, set aside, and weigh each plant's waste and enter in the final weight for each plant's waste once the plant has been completely manicured.

- To record waste, you can select the correct plant tag directly from the "active plant" table and then click "Record Waste." Or you can click "Record Waste" and the plant tag can be selected.

    - In the below screenshot, a plant was selected from the "active plant" table and highlighted in orange. That plants tag is then auto populated for a waste entry in the "Record Flowering Plant Waste" form.



- Complete all required fields and select "Record Waste." The waste created should then populate under the "Plants Waste" section under the plants tab.

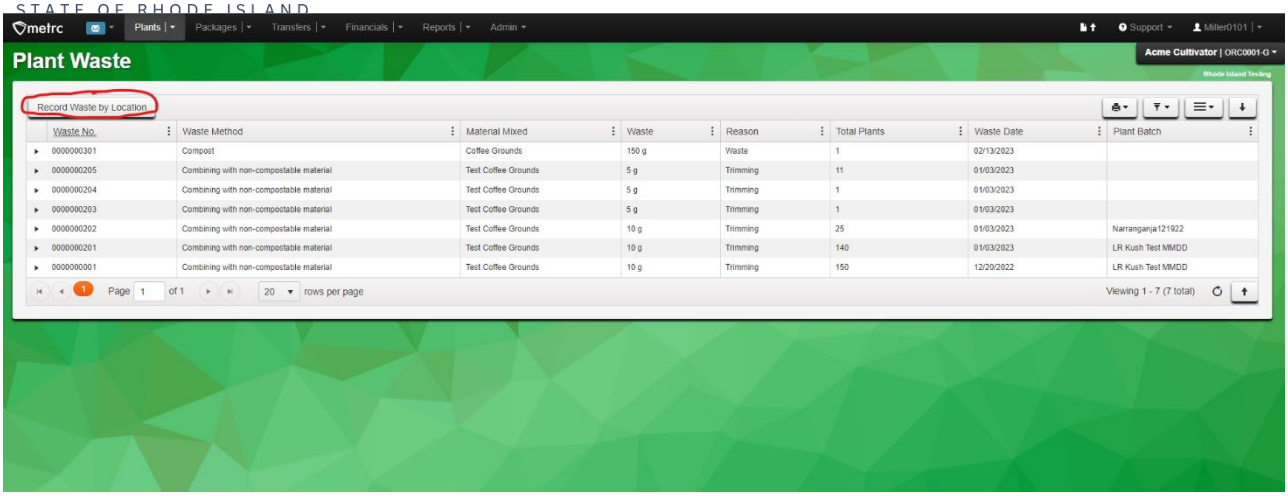


- It is important to remember that whether selecting "trimming" or "waste" as a reason, the weight entered in Metrc will be "waste" and therefore, cannot be used to create any future packages (including trim).
    - For example: A licensee may plan to use the trim after manicuring a plant, as live frozen. This **should not** be entered as waste with a reason of "trimming."

Reporting Waste by Plant location

The second way to report waste is according to each location in which the waste is created.

- Under the "Plant Waste" section under the "Plants Tab", there is a button, "Record Waste by Location." When that is clicked a "Record Location Plant Waste" form opens.



- Use the magnifying glass next to the "Location" field to locate the room where the waste is being created.
- Select your waste type of "trimmings" or "plant material."
- Complete the form with the correct weight and select "Record Waste." The waste created should then populate within the waste table.
- If a licensee plans to use the trim after manicuring a plant as live/fresh frozen this **should not** be entered as waste with a reason of "trimming."

Reporting Waste by Package Adjustment

The third way to report waste is specific to material that has been packaged.

- Select the package from the populated packages table and click the "adjust" button at the top of that table.
- Fill in the "Adj. Quantity" field with a negative amount as you are reporting waste.
- Metrc does the math for you, and you will see the "New Quantity" field auto populated with your new current weight.
- In this "Adjust Packages" scenario you would select "waste" as your "reason" unless another "reason" is a better fit. Just as with the waste reporting options above, the weight entered as an adjustment will no longer be available to be used in the chain of processing.
- Complete the form and select "Adjust Packages."

Licensed Testing Facilities Reporting Waste

When a licensed lab has finished with a sample, the sample package must be adjusted down to zero.

- Please follow the instruction from "Reporting Waste by Package Adjustment" above.
- All waste is required to be rendered indistinguishable from other plant material. This may be

accomplished by grinding and incorporating the cannabis plant waste with other non-consumable solid waste or other ground materials, so the resulting mixture is at least fifty percent non-cannabis waste by volume.

Transfers

- **Affiliated** transfers should only be used for vertically integrated licensed Compassion Centers/Hybrid Retailers, transferring product from their own cultivation to their own retail.

- **Unaffiliated** transfers must be used for selling products from one licensed facility to another. For example, Cultivator to Compassion Center or Cultivator to Cultivator. If you are transferring clones between licensed facilities, please use the "Clone Transfers" as detailed below. If you are transferring product for remediation, please use "Remediated Transfers" as detailed below.

    - **Wholesale Price is required for all unaffiliated transfers**. This will require the Purchase Order/Pricing agreement to be entered into the "wholesale price" field. Please enter the total price for the package, not price per unit.

    - In accordance with 560-RICR-10-10-2.16 "Transportation of Cannabis Products," and in addition to a purchase order accompanying a transport manifest, licensees are required to enter the wholesale price of unaffiliated transfers. This price should be the total sale price, **not** price per unit. This price should reflect the true and accurate price agreed upon by Cultivator and/or Compassion Center/Hybrid Retailer.

- **Clone Transfers** must be used when a licensee transfers clones to another licensee. Licensees must notify the Cannabis Office via email prior to transfer.

- **Remediated Transfers** must be used when a licensee transfers product to another licensee for approved remediation purposes. Remediation is any process of reducing or eliminating contaminants from cannabis or cannabis products using physical, chemical, or biological means.

- **External Transfers** may be requested through the Cannabis Office. These transfers are for specific instances only and include transferring seeds, terpenes, other non-psychoactive/non-synthetic cannabinoids that are hemp-derived and are accompanied by a valid Certificate of Analysis, or clones.

- **External Hemp Transfers** may be requested through the Cannabis Office. These transfer are for licensed cannabis establishments, who would like to process hemp. Please see page 12 "Licensed Cannabis Establishments with Hemp Handler License" for further instruction on how to remain compliant.

Transferring Product between Unaffiliated Licenses

Below is guidance regarding transferring, manifesting, and receiving wholesaled goods from cultivator to retailer or cultivator to cultivator for all cannabis products.

Vehicles

All Vehicles used in the transportation of cannabis **must be approved** for use by an Inspector from the Cannabis Office.

- The vehicle will have no markings, no name of the licensee, and no indication that it is being used

to transport cannabis;

- The vehicle must have GPS with the capability of being remotely monitored by the originating marijuana establishment during a transport;
- The vehicle must have functioning heating and air conditioning;
- No cannabis products can be visible from the outside of the vehicle;
- Cannabis products must be kept in a locked compartment of the vehicle. (For example: opaque storage totes with locks may be used in the backseat of the vehicle);
- While transporting cannabis no other products may be transported or stored in the same vehicle;
- No firearms may be located within the vehicle or on the person of the authorized transport cardholder; and
- Hard copies of the Transport manifests as produced by Metrc will travel with product and with the driver/transporter as the cannabis moves between licensees.

Transport Manifests & Receiving with METRC

All transportation of cannabis must be documented on a transport manifest. This can easily be accomplished through Metrc. All required information for a Metrc manifest is below.

The originating cannabis facility is responsible for:

- Accurate counts (with weights) agreed upon in the sales transaction.
- **Wholesale price,** agreed upon at the time of purchase must be entered in the "wholesale price" field in Metrc when creating a manifest.
    - This is entered as a total sale price, not price per unit.
- Route to be traveled should be completed. These can be copied and pasted from Google Maps, Maptive, Speedy Route, Flightmap, etc.
    - If the manifest created is for a Lab Sampling Transfer, please include in place of the route "Lab Sample Pick-Up."
- Driver(s) must be identified on every manifest. If there is more than one authorized commercial cardholder present, additional transporters-drivers can be added by using the "+" sign after the first driver is entered.
- All vehicles used in a transport must also be identified on the manifest. Adding additional vehicles can be done by using the "+" sign after the first vehicle is entered. The destination cannabis facility is responsible for:
- Ensuring accurate package quantities are received while under video surveillance.
- (Best Practice) Initialing each package on a manifest after an accurate count of the package has been confirmed in the presence of the transporting parties from the original cannabis establishment.
- Addressing and adjusting any errors in receiving as necessary at the time of receiving a delivery.
- Receiving packages in METRC upon verification of the above information.
- Reporting any unusual discrepancies in the quantity described on the manifest to the Cannabis Office within (24) hours of identification.

Authorized Transportation Requirements

- All routes must remain within the State of RI.
- Transports shall be made only by commercial registry cardholders affiliated with the originating Cannabis Establishment License.
- Transport must be made with authorized transporters. If using two separate vehicles for a transport, both vehicles must travel together, and be identified on the manifest.
- The authorized commercial cardholder(s) must have their valid cannabis establishment commercial card(s) and the detailed transport manifest on their person(s) at all times; and a copy of the detailed transport manifest shall also accompany the cannabis and cannabis products in the locked storage compartment of the authorized transport vehicle.
- All transports must travel directly from the originating facility to the destination facility. If an emergency stop is made it should be documented in detail, and a note added to the "extenuating circumstances" section of the manifest.
- Any vehicle accident, diversions, or losses during transports shall be reported to the Cannabis Office and law enforcement pursuant to §2.13(I) as an "emergency event."

Transfer of clones between licensed facilities

There are no limitations on the number of clones that can be transferred between licensed facilities. However, a notification must be sent to The Cannabis Office prior to a clone transfer. Licensee must select "Clone Transfer" as the transfer type. An email notification should be sent to CCC.CannabisCompliance@ccc.ri.gov that includes:

- Subject Line: Clone Transfer Notification
- Transfer date;
- Quantity; and
- Strain(s).

Once a clone transfer has been approved, the Metrc transfer type selected should be a "clone transfer"

External Transfer Requests

Transferring in Seeds

If you would like to bring seeds into your licensed facility and Metrc, the Cannabis Office requires the following process:

An email request is sent to CCC.CannabisCompliance@ccc.ri.gov that includes:

- Subject Line: External Transfer Request
- Transfer request date;
- Quantity; and
- Strain(s).

The Cannabis Office will review the request and if approved will allow for an External Transfer. The

Cannabis Office will reach out to the licensee to schedule an External Transfer time for the licensee to bring in the seeds both physically and in Metrc. An inspection may also be required. **The transfer request date should be at least 3 business days from the date the request was submitted to the Cannabis Office.** Once a seed transfer has been approved, the Metrc transfer type selected should be an "external transfer"

The below external transfer requests require an External Transfer Attestation be submitted with the external transfer request. The External Transfer Attestation can be found here.

Transferring in Clones

The CCC is permitting the External Transfer of clones. An External Transfer Request may be submitted to the Cannabis Office. External Transfers of clones may include up to the allowable limit for adult-use possession which for the purpose of this request is six (6) total clones. Each licensed cultivator may request up to four (4) external clone requests per month. This totals 24 clones in a month.

An email request is sent to CCC.CannabisCompliance@ccc.ri.gov that includes:

- Subject Line: External Transfer Request
- Transfer request date;
- Quantity; and
- Strain

The Cannabis Office will review the request and if approved will allow for an External Transfer. The Cannabis Office will reach out to the licensee to schedule an External Transfer time for the licensee to bring in the clones both physically and in Metrc. An inspection may also be required. **The transfer request date should be at least 3 business days from the date the request was submitted to the Cannabis Office.** Once a clone transfer has been approved, the Metrc transfer type selected should be a "clone transfer"

Transferring in CBD or non-psychoactive/non-synthetic cannabinoids

If you would like to bring in CBD or non-psychoactive/non-synthetic cannabinoids derived from hemp to your licensed facility and Metrc, the Commission requires the following process.
An email request is sent to CCC.CannabisCompliance@ccc.ri.gov that includes:

- Subject Line: External Transfer Request
- Transfer request date;
- Quantity; and
- Cannabinoid profile as displayed by a Certificate of Analysis by a licensed lab.

The Cannabis Office will review the request and if approved, will allow for an External Transfer. The Cannabis Office will reach out to the licensee to schedule an External Transfer time for the licensee to bring in the hemp-derived cannabinoids both physically into their facility and into Metrc. An inspection may also be required. **The transfer request date should be at least 3 business days from the date the request was submitted to the Cannabis Office.** Once a CBD or non-psychoactive/non-synthetic cannabinoid transfer has been approved, the Metrc transfer type selected should be an "external transfer"

Transferring in cannabis/hemp derived terpenes

If you would like to bring in cannabis-derived terpenes to your licensed facility and Metrc, the Commission requires the following process:
An email request is sent to CCC.CannabisCompliance@ccc.ri.gov that includes:

- Subject Line: External Transfer Request
- Transfer request date;
- Quantity; and
- Terpene and Cannabinoid profile as displayed by a Certificate of Analysis by a licensed lab.

The Cannabis Office will review the request and if approved will allow for an External Transfer. The Cannabis Office will reach out to the licensee to schedule an External Transfer time for the licensee to bring in the cannabis-derived terpenes both physically into their facility and into Metrc. An inspection may also be required. **The transfer request date should be at least 3 business days from the date the request was submitted to the Cannabis Office.** Once a cannabis/hemp derived terpenes transfer has been approved, the Metrc transfer type selected should be an "external transfer"

Any approved external transfer must be tagged immediately when entering the facility with a unique Metrc identifier. Additionally, terpenes that are extracted from cannabis grown at your licensed facility must be tracked by a Metrc unique identifier and include "Terpene" in the naming convention.

Licensed Cannabis Establishments with Hemp Handler Licenses

Licensed cultivators and vertically integrated compassion centers are permitted to apply for hemp handler licenses. Prior to the issuance of a hemp handler license to a licensed cultivator or vertically integrated compassion center, the applicant must:

1. Order Hemp Metrc tags (pink tags) and track all hemp as they would cannabis.
2. Establish a room in Metrc for hemp products. (See page 3 of this guidance)
3. The Metrc Administrator will need to create new items within licensee Metrc environment that can be easily identifiable as hemp.
    a. A "Hemp" category has been added within the Metrc environment to assist in appropriate virtual identification of hemp products
4. Separate cannabis and hemp products physically onsite at all times. Standard Operating Procedures reflecting such processes should be kept by the licensee and made available to the Office upon request.

Once a hemp handler license has been issued, all requests for hemp products to enter a licensed cannabis establishment must be accompanied by the [HEMP EXTERNAL TRANSFER REQUEST FORM]. Once a hemp transfer has been approved, the Metrc transfer type selected should be an "external hemp transfer." To bring hemp into a licensed establishment the licensee must:

1. Request an External Transfer from the Cannabis Office in order to bring hemp into their facility and into Metrc. An inspector will be required to be onsite for this physical transfer. It is the licensee's responsibility to schedule this inspection. **The transfer request date should be at least 3 business days from the date the request was submitted to the Cannabis Office.** For the external transfer request, the Office will require:

   a. **Flower-**COAs showing that hemp coming into the facility was certified as hemp prior to harvest (no more than .3% total THC) and that it is less than 1% total THC post-harvest.
   b. **Hemp Distillate/Isolate-** COA showing the total THC along with other cannabinoids of the distillate/isolate **and** the COA from the hemp flower/trim it was processed from ensuring the flower/trim was certified as hemp.
2. A cannabis licensee would be permitted to manufacture, process, and package hemp-derived products compliant with all rules and regulations.

To move hemp-derived products out of a licensed establishment the licensee must:

3. Request an External Transfer from the Cannabis Office in order to manifest out any hemp-derived products from their facility and Metrc. An inspector will be required to be onsite for this physical transfer. It is the licensee's responsibility to schedule this inspection. **The transfer request date should be at least 3 business days from the date the request was submitted to the Cannabis Office.** For the external transfer request, the Office will require:
   a. **Final Products-** Potency at a minimum is required prior to the external transfer request to ensure the products meet the per serving and per package total THC requirements pursuant to the hemp rules and regulations.
   b. **Distillate/Isolate** from an external transfer of hemp flower: potency test required.
   c. **Distillate/Isolate** from an external transfer of distillate/isolate: case by case basis prior to approving the external transfer to view camera footage, review Metrc data and potentially talking with the licensee to gain a better understanding of their operational strategy.

Once hemp products and cannabis products have been combined it is considered a cannabis product and will require a cannabis tag (blue or yellow) to be physically affixed to the product at the licensed facility.

Recording Tissue Cultures in Metrc

Tissue Cultures are permitted. Cultures must come from a licensed Rhode Island Cannabis Establishment and must be traceable back to the plant the culture it was taken from. To do so:

- Go into the "Plants" screen in Metrc
- Highlight the tracked plant being used to create the culture
- Select the "Create Plantings" button
- Create a Plant Batch using the "Plant Type" "TISSUE CULTURE"
- Enter the number of cultures taken and complete the "Create Plantings" form.

Lab Sampling from Multiple Container Batches

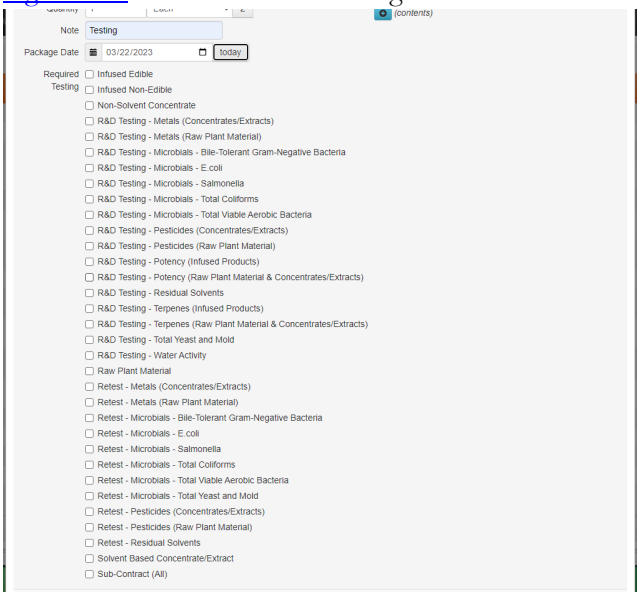
When a licensed lab comes to collect a sample from a source batch and the source batch has one Metrc tag, but is split into multiple containers, the following is expected to ensure quality sampling and testing:

- Any containers associated with that source batch must have a label on it containing:
  - The last 4 digits of the Metrc Tag from the source batch
  - Total quantity of the source batch (from all containers)
  - The number of the container formatted as # of # (example: 1 of 5)
- The licensed lab will need to take a picture of the complete source batch as this assists them in visualizing that the total source batch is present at the time of sampling.

Enforced Testing in Metrc

Selecting Test Batches in Metrc

- As a licensed cultivator or compassion center it is essential that you **only** select the tests you need performed on your cannabis product.
- Test Batches with all enforced tests have already been created and should be used unless you are retesting or performing R&D testing.
- Enforced Compliance test batches include:
    - Infused edibles;
    - Infused non-edibles;
    - Non-solvent concentrate;
    - Solvent-based concentrate;
    - Raw plant material;
    - Raw Pre-Rolls Bulk;
    - Raw Pre-Rolls (Final Form); and
    - Infused Pre-Roll (Solvent-based concentrate).
    - Infused Pre-Rolls (Non-Solvent based concentrate)
    - Tincture (Adult Use)
    - Tincture (Medical)
    - RSO Adult Use (Non-Solvent Based Concentrate/Extract)
    - RSO Adult Use (Solvent Based Concentrate/Extract)
    - RSO Medical (Non-Solvent Based Concentrate/Extract))
    - RSO Adult Use (Solvent Based Concentrate/Extract)
- **Do not select anything other than the associated test batch for compliance testing.**
- **R&D testing** should only be selected if you are in fact sampling for research purposes. If any sample does not have test results applied to it (even if the test was requested in error) the parent/source batch will remain stuck in "TestinginProgress."
- **Retest** selections should first and foremost follow the retesting procedures outlined in the regulations and detailed out on Page 17 in this document.



- A testing facility must upload results based on the Test Batch selected by the licensee. If the testing

facility feels an error has been made, they must contact the licensee and potentially Metrc support to resolve the issue **prior to accepting the sample into their inventory.** Failure to report results for every selected Test Batch will result in the parent batch remaining in "TestinginProgress."

- If after the receiving lab has run through all potential issues on their end, the cultivator may need to reach out to Metrc support to get the package testing status changed.

Enforced Compliance Testing Per Product Type

Flower/Bud (Raw Plant Material)

What is required?

1. Flower is required to undergo enforced compliance testing, which includes pesticides, metals, water activity, microbiological contaminants and potency.
2. Flower packaged for enforced compliance testing must be of the same strain and sampled from a batch that is no more than 15lbs.
3. Raw Plant Material should be selected as the Test Batch Category.

Infused Cannabis Products (Infused Edible or Infused Non-Edible)

What is required?

1. The concentrate/extract/distillate that will infuse the cannabis edible or non-edible product must pass all required testing for concentrates, including pesticides, heavy metals, residual solvents (if solvents were used) and potency, as was previously required.
2. The final product will then need to be tested for Delta-8 THC, Delta-9 THC, THCa, CBD and CBDa to ensure:
    a. The label on the product matches the test results from a licensed testing facility;
    b. If the product is an Infused Edible or if it is an Infused Non-Edible intended for Adult-Use sales, each serving is equal to or less than 10mgs of THC and that the licensee is labeling the product with the correct values pursuant to the labeling rules in Section 2.7 of the Operational Requirements for Cannabis Establishments regulations.
    c. There is a 10% allowable variance for THC cannabinoid results for infused cannabis products.
    d. *If a product's potency is over the 10% variance, the product will be "testfailed." It will then be up to the licensee to remediate the product and submit as a completely new sample for testing.* ***(NOTE: Any test after a remediation is not considered a "Retest")***
3. **Infused Edible** should be selected as the Test Batch Category for product types designated as "Infused Edibles" per the Product Designation List to ensure the correct tests are being applied to this product. Please note, regardless of whether this product type is being sold to an adult-use consumer or medical patient, there is a 10mg THC per serving limit.
4. **Infused non-edible** should be selected as the Test Batch Category for products designated "Infused non-edible" per the Product Designation List to ensure the correct tests are being applied to this product. Any Infused non-edible product sold to an adult-use consumer must comply with the 10mgs of THC per serving limit. There is no per serving THC limit for these product types if they are being sold to a medical patient.

Pre-Rolls (Raw Plant Material)

What is required?

1. (a) Raw plant material pre-rolls may be tested in their final form for enforced compliance testing, which includes pesticides, metals, water activity, microbiological contaminants, and potency.
    - Raw-Pre-Rolls (Final Form) should be selected as the Test Batch Category if all pre-rolls are

the same weight.

- Raw Pre-Rolls (Bulk) should be selected as the Test Batch Category if the pre-rolls are of different weights.

OR

(b) Cannabis intended to be processed into raw plant material pre-rolls can be ground then sampled and tested for all enforced tests as stated above prior to being rolled into final pre-roll form.

- The batch sampled for testing should be no more than 15lbs but does not have to be of the same strain.
- A licensee is not required to test at both stages.
- Raw Pre-Rolls (Bulk) should be selected as the Test Batch Category.

Infused Pre-Roll or Pre-Ground Flower (with a solvent extract/resin/concentrate)

What is required

1. Final form testing for all enforced tests which include pesticides, metals, water activity, microbiological contaminants, residual solvents, and potency. This is required even if all components of the product were tested prior to being combined into its final form.
    - Infused Pre-Roll should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

Concentrates (Non-Solvent Based)

What is required?

1. (a) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests which include pesticides, heavy metals and potency in the final form (cartridge/container);

OR

(b) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests as stated above from a homogenized batch immediately prior to being put into its final package.

- Enforced compliance testing is required when no further processing of the extract/resin/concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- Non-Solvent Concentrate should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

Concentrates (Solvent Based)

What is required?

1. (a) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests which include pesticides, metals, residual solvents and potency in the final form (cartridge/container);

OR

(b) A licensee may have the extract/resin/concentrate sampled and tested for all enforced tests as stated above from a homogenized batch immediately prior to being put into its final package.

- Enforced compliance testing is required when no further processing of the extract/resin/concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including ethanol/alcohol used in your CO2 extraction process, Solvent-Based Extract/Concentrate is required to be selected.
- Solvent-Based Extract/Concentrate should be selected as the Lab Test Batch Category.

Tinctures (Adult Use)

What is required?

- A tincture is required to undergo enforced testing for pesticides, metals, residual solvents, and potency.
- Enforced compliance testing is required when no further processing of the concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- A tincture may have no more than 500mgs of THC per packaged unit if intended for Adult Use purchase.
- Tincture (AU) should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

Tinctures (Medical)

What is required?

- A tincture is required to undergo enforced testing for pesticides, metals, residual solvents, and potency.
- Enforced compliance testing is required when no further processing of the concentrate will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- A tincture may contain THC amounts greater than 500 mgs per package when ONLY available to medical patients.
- Tincture (Medical) should be selected as the Test Batch Category to ensure the correct tests are being applied to this product.

RSO/Edible Concentrates

- If you are creating RSO from a batch of concentrate which has already passed all enforced testing, only potency testing is required for the final form. You will need to select the Infused Non-Edible Lab Batch Type, as described on page 13.

- If you are creating RSO directly from flower or from an untested concentrate batch, please select one of the below Lab Test Batches.

RSO Solvent Based (Adult-Use)

What is required?

- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including but not limited to ethanol/alcohol used in your CO2 extraction process, RSO Solvent-Based is required to be selected.
- If the product is intended for Adult-Use consumers, the product must comply with the 100mgs of THC per package limit.
- RSO Solvent Based (Adult-Use) should be selected as the test batch category and is required to be

  tested for pesticides, heavy metals, residual solvents and potency.

RSO Solvent Based (Medical)

What is required?

- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including but not limited to ethanol, alcohol, butane or CO2, RSO Solvent-Based is required to be selected.
- If the product is intended for medical patients, the product may include more than 100mgs of THC per package limit.
- RSO Solvent Based (Medical) should be selected as the test batch category and is required to be tested for pesticides, heavy metals, residual solvents and potency.

RSO Non-Solvent Based (Adult-Use)

What is required?

- If this category is selected, the Cannabis Office will follow-up with certification required by the licensee validating that RSO without the use of solvents.
- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If the product is intended for Adult-Use consumers, the product must comply with the 100mgs of THC per package limit.
- RSO Non-Solvent Based (Adult-Use) should be selected as the test batch category and is required to be tested for pesticides, heavy metals, microbiological contaminants and potency.

RSO Non-Solvent Based (Medical)

What is required?

- If this category is selected, the Cannabis Office will follow-up with certification required by the licensee validating that RSO without the use of solvents.
- Enforced compliance testing is required when no further processing of the RSO will occur including, but not limited to, winterization, addition of compliant terpenes, or other cannabinoids.
- If a solvent is used in any part of your manufacturing process, including but not limited to ethanol, alcohol, butane or CO2, RSO Solvent-Based is required to be selected.
- If the product is intended for medical patients, the product may include more than 100mgs of THC per package limit.
- RSO Non-Solvent Based (Adult-Use) should be selected as the test batch category and is required to be tested for pesticides, heavy metals, microbiological contaminants and potency.

Retesting & Remediation

Retesting

- A licensee is required to report failed tests to the Cannabis Office. The use of Metrc fulfills this requirement.
- A licensed testing facility may perform a retest on any **failed** test without notifying the Cannabis Office so long as enough cannabis material remains to perform the test. Potency on all products EXCEPT infused edibles/non-edibles and tincture is not considered a pass/fail test. Potency is not permitted to be retested.
- All retests must be accurately and timely tracked in Metrc.
- **A licensee is required to request permission to resample a batch for a retest if there is not enough remaining material to perform the retest.**

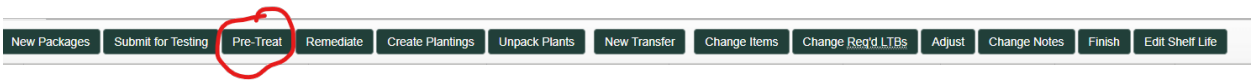
- Please submit the request to CCC.CannabisCompliance@ccc.ri.gov.
- For retests in accordance with the above requirements, the following protocol shall be followed pursuant to 560-RICR-10-10-2.26(H):
    1. If there is enough remaining material from the initial sample to retest, the testing facility will use that sample material.
    2. If there is not enough material from the initial sample, the laboratory sample collector will collect another sample from the same batch using the same collection process.
- The same testing facility who performed the initial test must perform the retest. This includes if a batch is permitted to be resampled and retested.
- One (1) retest is permitted. If the retest results in a second failure, the cannabis batch must be remediated or destroyed.

Remediation

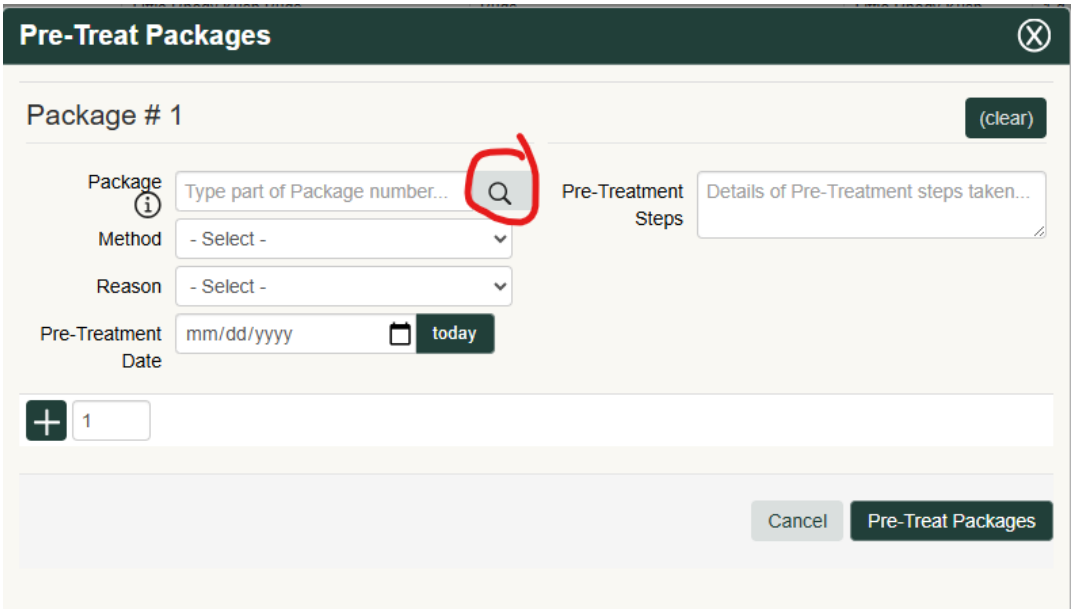
- A licensee is required to request permission to remediate their cannabis in writing from the Cannabis Office pursuant to 560-RICR-10-10-2.26. For remediation methods already in use for microbiological contaminants, water activity and residual solvent failures, no request is required at this time. See Approved Remediation Processes.
- All remediation activity must be accurately and timely tracked in Metrc.
- **The Commission does require a remediation request from a licensee to remediate a batch of product that failed for pesticides and/or heavy metals.**
- Please submit the request to CCC.CannabisCompliance@ccc.ri.gov.
- Post any approved remediation method, a full enforced compliance test, which includes a new sample is required post remediation. A licensee is not required to have the original lab sample and perform the enforced compliance tests.

Licensees Performing Remediation and Disinfection via Ozone, Xray, Hydrogen Peroxide, etc.

- Licensees with remediation machines may contract with another licensee for remediation of contaminated product. In an effort to gather data related to remediated packages, the Commission requires all packages of flower that have been altered post-harvest be captured within Metrc. Licensees who perform this type of service **must** ensure all products run through a remediation machine are identified as such in Metrc using one of the following process.
- To remediate packages with a testing status of "Not Submitted":
    - Create a transfer manifest in Metrc, selecting the transfer type as "remediation"
        - The licensee sending a package simply transfers the product.
    - The receiving licensee will accept the packages into their inventory.
    - The receiving licensee will then select the "Pre-Treat" button at the top of the "Packages" grid prior to the package being put into the machine.

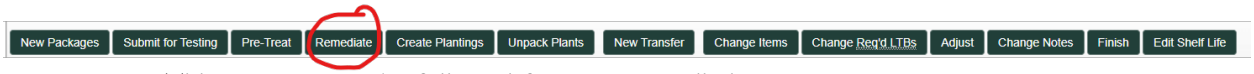


    - The following Pre-Treat window will appear, to select a package for pre-treatment, select the magnifying glass icon, and a list of packages eligible for pre-treatment will appear.



- This process must be followed for every package that is treated prior to testing.

- To "remediate" packages with a lab status of "Test Failed":
  - Create a transfer manifest in Metrc, selecting the transfer type as "remediation"
    - The licensee sending a package simply transfers the product.
  - The receiving licensee will accept the packages into their inventory.
  - The receiving licensee will then select the package that will be remediated and select the "remediate" button at the top of the "Packages" grid prior to the package being put into the machine.



  - This process must be followed for every remediation.

- If a licensee is remediating a package in-house, they simply select the "remediate" button for packages that have been previously tested, or the "pre-treat" button for packages with testing statuses of "not submitted." These buttons are located at the top of the packages grid as depicted above. This process must be followed for every remediation, including when a product is being **REMEDIATED PRIOR TO ANY COMPLIANCE TESTING.**

Licensees Performing Further Processing and Manufacturing

- The Commission has approved extraction of contaminated material as a remediation method.
- Cultivator licensee's may contract with another cultivator for further processing of their cannabis product.
- Cultivator licensee's may contract with a compassion center for further processing via butane extraction only of their cannabis product.
- Compassion Center licensees who contract for further processing or manufacturing of cannabis material via butane must ensure only the cultivator's biomass has been used in producing the concentrate in which they were contracted to create.
- Compassion Center's may develop contracts that mix their own cannabis biomass with a cultivator's

only if it is intended to be sold exclusively at the Compassion Center where the cannabis material was combined and extracted.

Research and Development Testing

New Product Research

Prior to running compliance tests on a new strain or cannabis products, a licensee may perform research and development tests or "R&D" tests to get a better understanding of the new strain/product. This can be done by selecting one of the "R&D Testing" lab test batches at the time the sample is collected. Please note, a R&D test will not be considered a compliance test for distribution to consumers or employees via the quality control sample program outlined below.

Wet Plant Material R&D

R&D testing may be performed on **wet plant material**. After harvesting, a wet whole plant may be sent for R&D testing. The harvested plants will need to be put into a package using the item category of "wet whole plant." The licensee should follow the same procedure outlined in 216-RICR-60-05-6.17 Sample Collection - General Requirements and 6.18 Sample Collection Procedures.

- When creating the test sample please select "R&D: Metals (Raw Plant Material)", "R&D: Pesticides (Raw Plant Material)", "R&D: Potency (Raw Plant Material)", or "R&D: Terpenes (Raw Plant Material)" as lab test batches in Metrc.

Quality Control & Trade Sampling

Quality Control Sampling

Licensees may adjust out "Quality Control Samples" of designated products to active and valid commercial cannabis card holders of their licensed entity. Please note, it is prohibited to consume cannabis on the licensed premises. This adjustment shall occur once the product is in its final form and has undergone all required and enforced compliance testing.

- Each "Quality Control Sample" recorded in Metrc shall be for a single commercial cannabis card holder.
- No cannabis establishment shall dispense quality control samples of cannabis that total more than one (1) ounce of dried cannabis or its equivalent per day.
- No individual commercial cardholder shall be dispensed an amount of cannabis in the form of quality control samples or trade samples which combined totals more than one (1) ounce of dried cannabis or its equivalent.
- No cannabis establishment shall dispense quality control samples to an employee in excess of one (1) ounce of dried cannabis or its equivalent per month.

In Metrc, a quality control sample may be adjusted from its parent package following these required steps:

- Select the package you would like to adjust, then select "Adjust"
- Complete the "Adj Quantity" and "New Quantity" fields
- For reason select "Quality Control Sample"
- In "Required Note" include the Employee's badge number who is receiving the sample
- Complete the date field
- Finish by selecting the green "Adjust Package Button"

Trade Sampling

Cultivator Licensee's may utilize "trade samples" to market their product to licensed Compassion Centers. They are not required to sell the trade sample. Trade samples will need to be manifested separately under the "trade sample" transfer type. Trade samples cannot be added to manifests with other products. The receiver establishment should then adjust the sample out of the system pursuant to the Quality Control requirements.

Once a trade sample has been received by a dispensary or compassion center, the dispensary or compassion center should follow the Quality Control sampling procedures outlined above to dispense to an individual commercial cardholder.

Finishing: Harvests & Packages

Finishing harvests and packages within Metrc assists in monitoring processing losses and ensures an accurate reflection of your physical onsite inventory in Metrc.

Finishing a harvest should only occur after all the material from that harvest has been packaged. All harvests must be finished within 60 days from the initial harvest date. To finish a harvest:

- Highlight the harvest within the plants grid.
- Select the "finish" button

A Package can be finished multiple ways:

Option #1:

- Highlight the package within the package grid
- If the package is empty, showing zero (0) within the quantity, the "finish" button can be selected

Option #2:

- If the package still has product in it, but there is no product physically onsite associated with it, an adjustment needs to be made in Metrc prior to finishing the package.
    - A package may still show a quantity due to processing loss during final packaging, or an error in reporting, be sure to go back and double check all child packages and final counts.
    - The adjustment made should clear any remaining quantity from the package and now show zero (0) within the quantity
    - Once the package has a quantity of zero (0), the "finish" button can be selected.

Option #3:

- A package can be finished while combining packages or making a new package off of an existing package, by putting the remining contents of the package you wish to finish in the new package, a

  check box will appear within your "create package" window. Check that box if you wish to finish the package

Finishing: Lab Packages

A Metrc package does not intuitively "consume" the amount of product needed to run test batches on cannabis material within a testing facility. This requires a manual adjustment of every package worked on within a testing facility. To do this:

1. As material is being weighted to run a test, the weights or counts will need to be adjusted down to the package. Please follow "Reporting waste by Package Adjustment" found on page 8.
2. When all analysis has occurred and the testing facility no longer needs ay of the reserved material for potential retesting, all packages must be adjusted down to zero.
3. Once all packages have been adjusted to zero, please follow either Option #1 or Option #2 from the

"Finishing: Harvest and Packages" section.

Process Validation

"Process Validation" is the collection and evaluation of data from the process design stage throughout production, which establishes scientific evidence that a process is capable of consistently delivering quality products.

A licensee may request to have their cannabis infused product process validated in order achieve "process validation" and subsequently be approved for reduced compliance cannabinoid testing. This request can only be submitted for designated cannabis infused products and if qualified, the reduced compliance cannabinoid testing approval **ONLY** applies to that specific cannabis infused product.

An email request must be sent to CCC.CannabisCompliance@ccc.ri.gov that includes:

1. The Standard Operating Procedure for the production of the cannabis infused product;
2. A list of ingredients; and
3. Consistent compliance cannabinoid testing results for every batch of product produced over the course of 4-8 weeks with a minimum of four (4) unique batches produced on distinct, different days.
    a. All submitted compliance cannabinoid results must be within a 10 percent variance.

Upon successful completion of the above requirements, the Cannabis Office will issue an approval letter for reduced testing to the licensee for the specific submitted product type which will be valid for one year from the date the letter is issued.

The licensee will be required to submit to quarterly consistent cannabinoid testing results. The licensee is required to report those quarterly compliance potency results directly to the Cannabis Office via email. It is the licensee's responsibility to determine a schedule with a licensed testing facility for quarterly testing.

Failure to submit to quarterly compliance testing will result in the revocation of approval for reduced compliance cannabinoid testing. Failure to continue to meet the requirements as stated above including but not limited to quarterly testing and the 10 percent variance for all cannabinoid results will result in revocation of the approval for reduced testing and the process will no longer be validated.

Product Designation

The Commission will regularly update a public list of products eligible for sale at a compassion center/hybrid retailer. Any new products must be submitted to the Commission for review and approval prior to manufacturing and/or displayed for sale at a compassion center. Pursuant to 560- RICR-10-10-2.4, product designation(s) may be withdrawn, denied or revoked by the Commission if the product fails to satisfy any provision of the Act or the CCC Regulations or if the product deviates or is altered from its previously approved form. The Product Designation list can be found here.

Support with Problem Solving

As always, the Cannabis Office is here to support you through issues relating to your license. Please contact Metrc at support@metrc.com or 1-877-566-6506 to submit tickets for any issues you are experiencing with the software. Additionally, all licensees are encouraged to register for Metrc Learn, which can be accessed on the bottom right corner of the log in box on Metrc's landing page. For convenience and encouragement, it can also be accessed here.