

Bulletin Number: LA_IB_0013	Distribution Date: 3/24/20	Effective Date: Ongoing
Contact Point: Metrc® Support	Subject: Remediation Best Practices	
Reason: Metrc is providing best practices for remediating product		

Greetings Metrc® Users,

The LDAF and Metrc would like to provide further guidance on properly remediating items that has failed testing using the LDAF approved remediation methods. Those remediation methods are: High Heat and/or Further Extraction, and Repackaging/Remixing.

****Note:** If a product fails testing and that product is allowed to be remediated for potency by the LDAF, it should be repackaged into a new package of a new item with the correct Unit THC and CBD content to be retested. If a package fails for residual solvents, it will require the user to be repackaged through a production batch. If a package fails for homogeneity, it will require the user to remediate without repackaging prior to retesting.

Please see the following pages for the guidance on Remediation for these remediation methods:

Step 1: Navigate to the active Packages screen

The user will select the packages area on the top navigational bar and then select the active tab on the Packages screen.

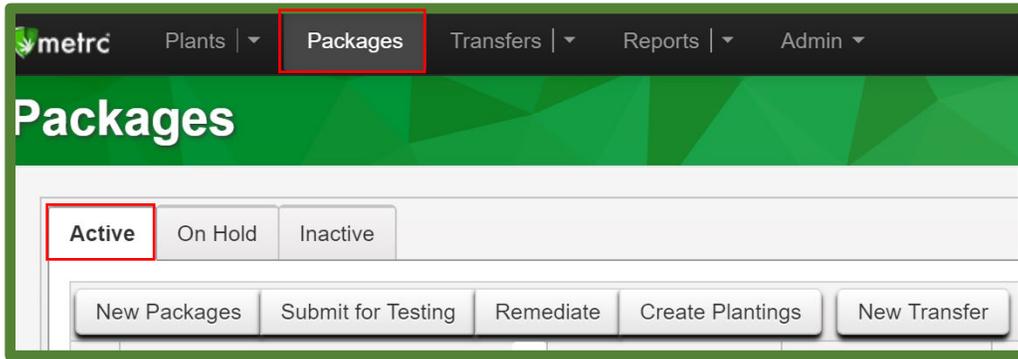


Figure 1: Navigation to Active Packages

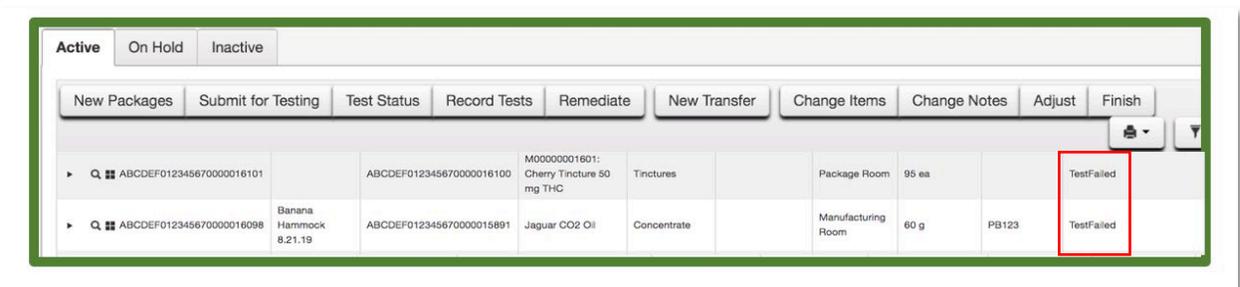
Step 2: Identify the package that requires Remediation

The user will identify the package with a “TestFailed” testing status that is going to be remediated. It is important to understand the reason the product failed testing and identify the appropriate method for remediation.

In **Figure 2**, two packages are shown:

1. A package of tincture that failed for high levels of the extraction solvent.
2. A package of tinctures that failed for incorrect potency.

Both packages can be remediated but it will require **different** methods to perform each task. (**Figure 3**).



The screenshot shows the metrc interface with the 'Active' tab selected. Below the tabs, there are several buttons: 'New Packages', 'Submit for Testing', 'Test Status', 'Record Tests', 'Remediate', 'New Transfer', 'Change Items', 'Change Notes', 'Adjust', and 'Finish'. Below the buttons, there is a table with two rows of data. The first row has a 'TestFailed' status highlighted with a red box. The second row has a 'TestFailed' status highlighted with a red box.

Package ID	Plant Name	Package ID	Product Name	Concentration	Room	Quantity	Batch ID	Testing Status
ABCDEF012345670000016101		ABCDEF012345670000016100	M0000001601: Cherry Tincture 50 mg THC	Tinctures	Package Room	95 ea		TestFailed
ABCDEF012345670000016098	Banana Hammock 8.21.19	ABCDEF012345670000015891	Jaguar CO2 Oil	Concentrate	Manufacturing Room	60 g	PB123	TestFailed

Figure 2: Two Testing Failed Package Examples



Figure 3: Remediation Methods

Step 3: Perform Remediation Actions

If a product fails because the levels of solvent used for extraction exceeds LDAF testing regulations, the user has the ability to remediate through further extraction.

***Please note that selecting the Remediate button for any item other than “Test Failed” will open a new Remediate Package window.**

Some products in order to be remediated must undergo a process changing the product's physical/chemical form which may include adding an additive, lipid or flavoring. To record this process, the user would create a new production batch in Metrc and select the Remediate Product box and complete the required information as described and illustrated below.

This step must be done in Metrc and cannot be done via the API.

To properly repackage into a Production Batch and Remediate simultaneously, the user would first select the product to be extracted and then click on the New Packages button (**Figure 5**). This will trigger an action window to appear.



Figure 4: Select Package for Extraction

Once the action window appears, the user should ensure that:

- “Production Batch” and “Remediate Product” boxes are checked.
- All form fields must be populated, including the **Remediation Method, Remediation Date, and Remediation Steps.**

- Remediation Steps should be written clearly to show the steps taken in the remediation process.
- Once the information is entered, the user would select Create Packages to complete the process (**Figure 6**).

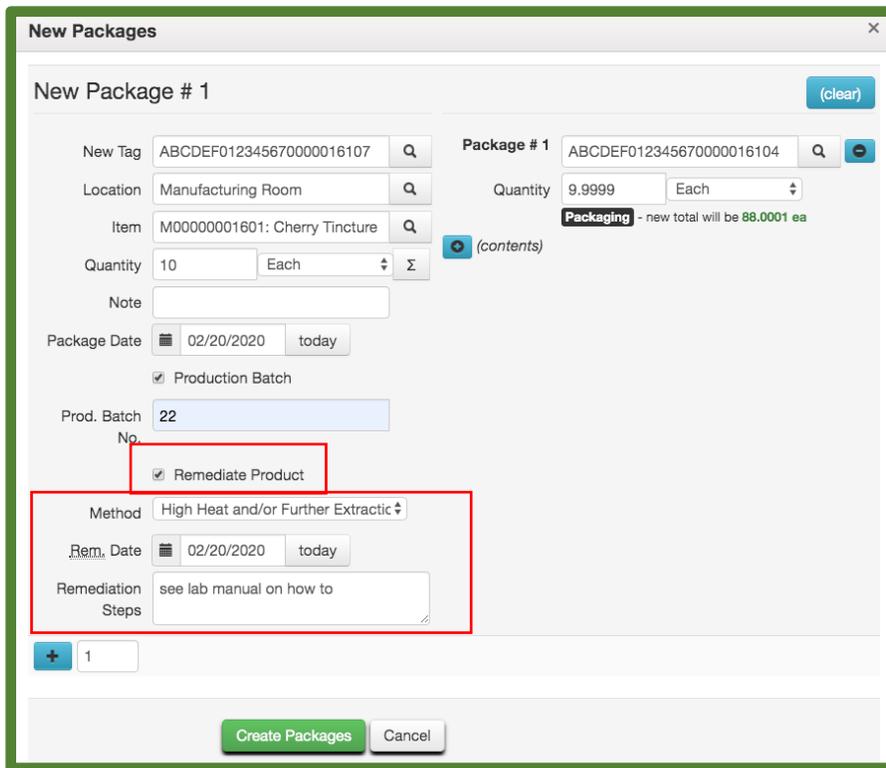


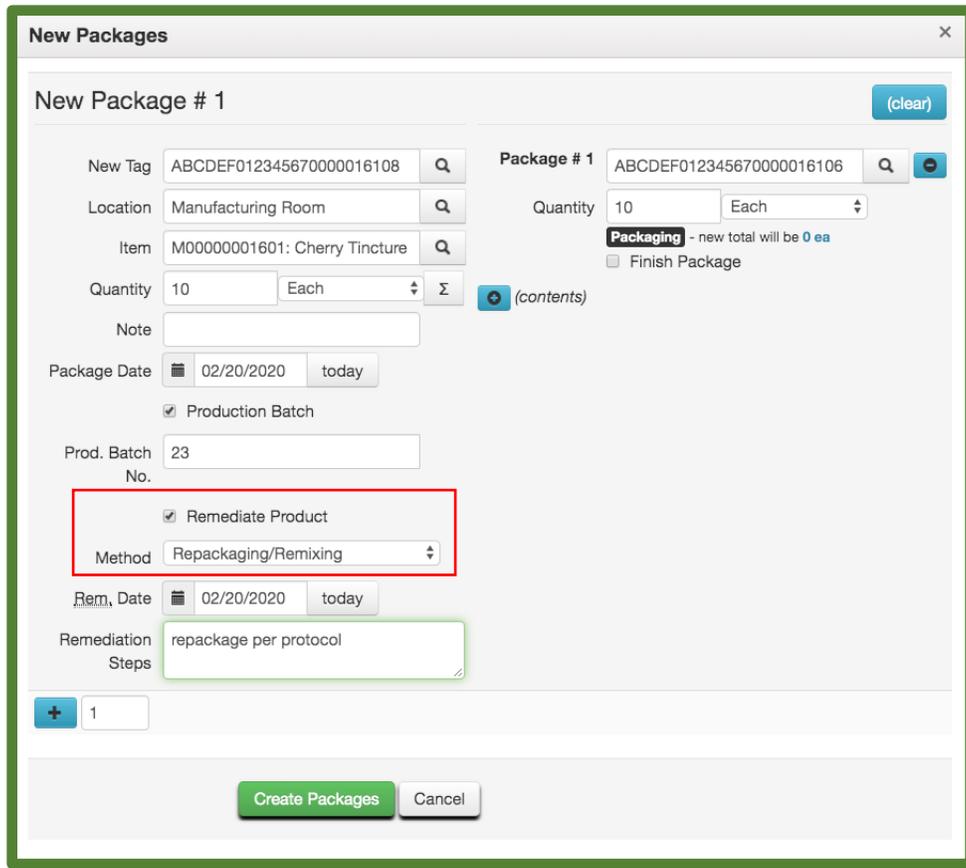
Figure 5: Creating a Production Batch Package to Remediate Product

Remediation Via Repackaging/Remixing

For items requiring repackaging and remixing, the steps will be the same, *except the user will instead select the “Repackaging/Remixing” method.*

- This method would be used in the case of a **tincture** that failed the acceptable potency range or homogeneity. With prior approval of the department, the product can be remediated by re-sizing or re-formulating.

Figure 7 illustrates the action window for creating the production batch and remediating tincture that failed potency testing.



New Packages

New Package # 1 (clear)

New Tag: ABCDEF012345670000016108

Location: Manufacturing Room

Item: M00000001601: Cherry Tincture

Quantity: 10 Each

Note:

Package Date: 02/20/2020 today

Production Batch

Prod. Batch No.: 23

Remediate Product

Method: Repackaging/Remixing

Rem. Date: 02/20/2020 today

Remediation Steps: repackage per protocol

+ 1

Create Packages Cancel

Figure 6: Verify Remediation Method

For items requiring remixing to remediate for homogeneity, the steps will be the same, *except the user will not repackage or select production batch.*

This method would be used in the case of a **tincture** that failed the acceptable range for homogeneity. With prior approval of the department, the product can be remediated by re-mixing. The user will first select the product to be remixed and then click on the Remediate button as shown in **Figure 7**. This will trigger an action window to appear as seen in **Figure 8** below.

Tag	Src. H's	Src. Pkg's	Location	Item	Category	Item Strain	Quantity	P.B. No.	Lab Testing
ABCDEF012345670000016106			Manufacturing Room	M00000001601: Cherry Tincture 50 mg THC	Tinctures		9,988 ea		TestFailed

Figure 7: Select Item Package with Test Failed Status to be Remediated

Once the action window is opened, the user will choose the Remediation Method, Remediation Date and then enter the Remediation Steps clearly for how the product was remediated.

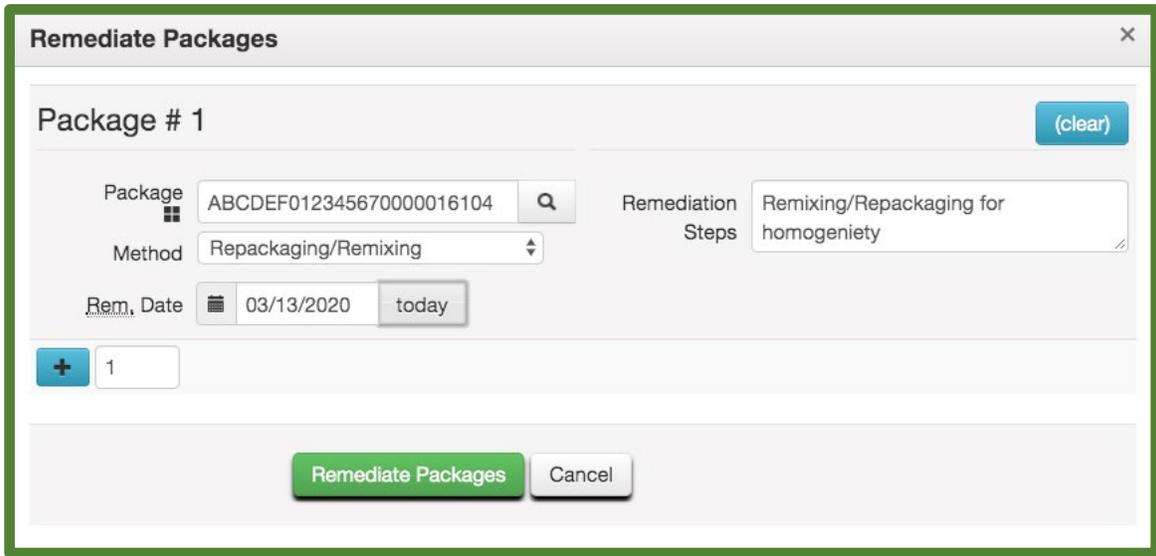


Figure 8: Remediate package with Remixing/Repackaging Method

The importance of using the remixing method for packages is to ensure the THC/CBD content is consistent throughout the product to aid in dosing recommendations. The difference between remixing and repackaging is that repackaging allows for the reduction of package size to ensure the THC/CBD content is within the LDAF acceptable range. If the product is being remixed and no changes are being made to the package, it would not be considered a production batch and would not need to be repackaged.

Step 4: Verify that the Remediated Products are in a “Remediated” Testing State

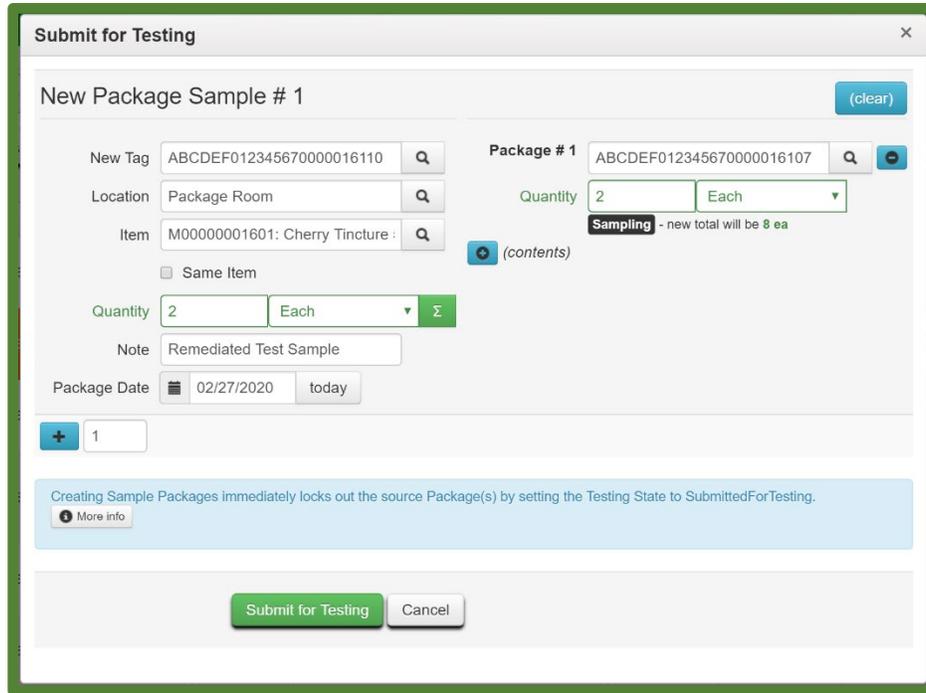
The user should now check that the package(s) on which the remediation was performed correctly show “Remediated” in the “Lab Testing” column. The user should also see the triangular symbol next to the tag number denoting that the package contains the remediated product (**Figure 9**).

▶ 🔍 ABCDEF012345670000016104	⚠️	ABCDEF012345670000016104	M00000001601: Cherry Tincture 50 mg THC	Tinctures	Manufacturing Room	10 ea	22	Remediated
▶ 🔍 ABCDEF012345670000016104	⚠️	ABCDEF012345670000016100	M00000001601: Cherry Tincture 50 mg THC	Tinctures	Package Room	85 ea		Remediated

Figure 9: Verify Product is in a Remediated Testing State

Step 5: Create New Test Samples

Once the product has been remediated, the user can submit the remediated product for testing. The test sample action window is illustrated in **Figure 10**. **It is important that the user ensures the product is listed as remediated before any new samples are pulled.** If the samples are pulled before the product is remediated, the item will need to be retested (as in the case of a suspected false-positive).



The screenshot shows a web application window titled "Submit for Testing". The window contains a form for creating a new package sample. The form has the following fields and controls:

- New Package Sample # 1** (with a "(clear)" button)
- New Tag**: Text input with value "ABCDEF012345670000016110" and a search icon.
- Location**: Text input with value "Package Room" and a search icon.
- Item**: Text input with value "M00000001601: Cherry Tincture" and a search icon.
- Package # 1**: Text input with value "ABCDEF012345670000016107" and a search icon.
- Quantity**: Text input with value "2" and a dropdown menu with "Each" selected.
- Package Date**: Calendar icon and text input with value "02/27/2020" and a "today" button.
- Quantity**: Text input with value "2" and a dropdown menu with "Each" selected, followed by a green "Σ" button.
- Note**: Text input with value "Remediated Test Sample".
- Package Date**: Calendar icon and text input with value "02/27/2020" and a "today" button.
- Quantity**: Text input with value "1" and a "+" button.
- Submit for Testing** and **Cancel** buttons.

A blue banner at the bottom of the form contains the text: "Creating Sample Packages immediately locks out the source Package(s) by setting the Testing State to SubmittedForTesting." with a "More info" link.

Figure 10: Submit New Package Sample for Testing

Once the test sample has been created, then it can be transferred to the testing facility using the "Lab Transfer" Transfer type. Once the transfer is completed, the user must wait for the testing facility to complete additional testing.

Verify Remediated Product is Test Passed:

Once the remediated test sample is sent to the testing facility and the product passes, the parent packages at the manufacturing facility will reflect a test result of "TestPassed" as shown in **Figure 11**. This indicates the product can be processed into a final product or released for sale to a Pharmacy.

Tag	Location	Item	Category	Quantity	P.B. No.	Lab Testing	Date
▶ Q ABCDEF012345670000016108 ▲	Manufacturing Room	Jaguar CO2 Oil	Concentrate	10 g	23	TestPassed	02/20/2020
▶ Q ABCDEF012345670000016101 ▲	Package Room	M00000001601: Cherry Tincture 50 mg THC	Tinctures	85 ea		TestPassed	10/08/2019

Figure 11: Verify TestPassed Remediated Product

Pharmacies Can Verify Remediated Products:

Once an item has been received, pharmacies can identify a package that contains remediated product the triangle symbol as seen in **Figure 12** indicates a package contains remediated product.

For the package to be transferred to a Pharmacy, the product must have a TestPassed, or RetestPassed testing state. This can be verified in the “Lab Testing” column (**Figure 12**).

New Packages
Submit for Testing
Remediate
New Transfer
Change Items
Adjust
Change Notes
Finish

Tag	Location	Item	Category	Quantity	Lab Testing	Date
▶ Q ABCDEF012345670000016101 ▲	Package Room	M00000001601: Cherry Tincture 50 mg THC	Tinctures	84 ea	TestPassed	10/08/2019

Page 1 of 1
20 rows per page
Viewing 1 - 1 (1 total)

Figure 12: Pharmacy Verification of Test Status

To obtain information on the lab results for the package and obtain additional history, select the arrow to the left of the magnifying glass for the package in question and select the corresponding Lab Results tab. The lab results will display with date, pass/fail, result and the test name. This is illustrated in **Figure 13**.

Tag	Location	Item	Category	Quantity	Lab Testing	Date
ABCDEF012345670000016101	Package Room	M00000001601: Cherry Tincture 50 mg THC	Tinctures	84 ea	TestPassed	10/08/2019

Test Date	Overall	Test Name	Test Passed	Result	Sample Package	Item	Category
03/19/2020	Passed	THC_%(CONCENTRATE)	Passed	0.3	ABCDEF012345670000016113	M00000001601: Cherry Tincture 50 mg THC	Tinctures
03/19/2020	Passed	THCA_%(CONCENTRATE)	Passed	0.1983	ABCDEF012345670000016113	M00000001601: Cherry Tincture 50 mg THC	Tinctures
03/19/2020	Passed	CBD_%(CONCENTRATE)	Passed	0.2	ABCDEF012345670000016113	M00000001601: Cherry Tincture 50 mg THC	Tinctures
03/19/2020	Passed	CBDA_%(CONCENTRATE)	Passed	0.2	ABCDEF012345670000016113	M00000001601: Cherry Tincture 50 mg THC	Tinctures

Figure 13: Lab Test Results Tab

Support:

On the far right of the navigation toolbar, a user will see that there is a Support dropdown. Please utilize this dropdown to reference guides, Metrc Support, or training sign up. These tools can be used at any time for no additional charges as long as you are an owner, manager, administrator, or employee in an active, licensed business.

Manual / User Guide

Louisiana Supplemental Guide

Beginning Inventory

CSV Formatting Guide

Industry Reports Guide

Proper RFID Tags Attachment

Customer Support:

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- support@metrc.com
- 1-877-566-6506

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