FREQUENTLY ASKED QUESTIONS
About the California Cannabis Track-and-Trace System

1. What is the California Cannabis Track-and-Trace system?

The California Cannabis Track-and-Trace (CCTT) system is the program used statewide to record the inventory and movement of cannabis and cannabis products through the commercial cannabis supply chain—from seed to sale—and it is now being used by cannabis businesses with an annual or a provisional license. The state's contracted service provider for the track-and-trace system is METRC, Inc., a technology company that uses the METRC (Marijuana Enforcement, Tracking, Reporting, and Compliance) software program. CCTT–METRC is a web-hosted system, which means all access to the system is via the Internet. Only an Internet connection (via an Internet service provider) and a web browser (such as Mozilla Firefox, Google Chrome, Apple Safari, or Opera) are required.

2. Do I have to use the CCTT–METRC system?

Yes. All state-issued annual and provisional licensees are required to use the CCTT–METRC system to record, track, and maintain information about their cannabis and cannabis-product inventories and activities, in accordance with the regulations of their respective licensing authority (the Bureau of Cannabis Control, the California Department of Food and Agriculture, or the California Department of Public Health).

An annual and a provisional licensee may continue working with temporary licensees, but temporary licensees are not required to use the system.

NOTE: All credentialed CCTT–METRC system users have access to the "California Transition Period Guide," which outlines how annual and provisional licensees will process and report transfers to and from temporary licensees.

3. My city or county has a local cannabis track-and-trace system I am required to use. Do I also have to use the CCTT–METRC system? Or will the two systems interface, so I can use just one track-and-trace system?

All annual- and provisional-licensed commercial cannabis businesses are required to use the state's CCTT–METRC system, regardless of the system being used by a local jurisdiction. A local jurisdiction's mandated track-and-trace system may have the ability to interface with the CCTT–METRC system for select functionality; for more information on how to get a third-party application programming interface (API) key (a unique computer code that will allow two systems to interact), and to view a list of the currently validated third-party software providers, visit the METRC California website: metrc.com/california.

4. What happens after I have submitted my application for an annual or a provisional cannabis license?

After applying for an annual or a provisional license, follow these five steps:

Step 1: Register for the required CCTT–METRC Account Manager System Training

After submitting an annual cannabis license application to either the Bureau of Cannabis Control, the California Department of Food and Agriculture, or the California Department of Public Health, the owner-applicant will receive a notice either in his or her licensing-system account, via mail, or via email that will include an application number and instructions to register online for the CCTT–METRC Account Manager System Training at metrc.com/california. If you have applied for multiple cannabis licenses, the designated account manager only needs to take the CCTT–METRC Account Manager System Training once; the training may be repeated, if desired.

Step 2: Take the required CCTT–METRC Account Manager System Training

Once an annual or a provisional license has been issued and the required CCTT–METRC training has been completed, the designated account manager must contact the CCTT–METRC support team via email at support@metrc.com and request assistance with getting credentialed into the CCTT system. Once an account manager is credentialed, it could take up to 48 hours to receive login information; **please note the login key will be valid for only 24 hours.**

NOTE: All annual and provisional licensees are required to use the CCTT–METRC system; however, applicants who have been approved to receive an annual or a provisional license will not be provided access to the CCTT–METRC system until their designated account manager has completed the training. As more annual and provisional licensees are credentialed into the CCTT–METRC system, advanced CCTT–METRC training opportunities will be developed and offered to designated system users.

Step 3: Request unique identifier (UID) tags

After being credentialed to access the CCTT–METRC system, the designated account manager will use the system to request unique identifier (UID) plant and package tags, and the CCTT–METRC team will provide and distribute the tags. A UID is a unique 24-character alphanumeric code or designation used to identify cannabis and/or a cannabis product on a licensed premises. UIDs are specifically provisioned as plant or package tags and are ordered by and assigned to the annual or provisional licensee within the CCTT–METRC system. The licensee is responsible for assigning a unique CCTT–METRC identifier to each immature lot, flowering plant, harvest batch, production batch, and distinct cannabis product. This is

accomplished via the issuance of encrypted radio-frequency identification (RFID) tags to annual and provisional licensees; the licensees must apply the tags, and then the assigned UIDs track the cannabis and cannabis products when they are transferred from one licensee to another. The cost of UID tags is included in the license fee that was paid to the respective licensing authority; there is no additional charge.

NOTE: The delivery of UID plant and package tags typically takes seven to 10 business days.

Step 4: Confirm receipt of the UID tags in the CCTT–METRC system

Once you receive the UID tags, you must confirm receipt in the CCTT–METRC system so the tag numbers can be uploaded into your account. UID tags must be documented as "received" in the CCTT–METRC system before they can be assigned to cannabis or cannabis products.

Step 5: Apply the UID tags and report the tag assignment into the CCTT–METRC system

If you are a temporary licensee and are already in physical possession of commercial cannabis or cannabis products at the time your annual or provisional license is issued, you may need to assign and apply the UID tags to all your commercial cannabis and/or cannabis products physically located on your licensed premises. Contact your licensing authority for information related to beginning inventory.

If you are <u>not</u> a temporary licensee at the time your annual or provisional license is issued, all cannabis or cannabis products received and/or produced after the effective date of your annual or provisional license must be assigned and applied with UID tags, and then reported into the CCTT–METRC system.

5. How does the unique identifier (UID) tag work? How do I apply it to cannabis and cannabis products?

There are two types of tagged inventory in CCTT–METRC: plants and packages. Each unique identifier (UID) tag uses radio-frequency identification (RFID) transponders that allow for automatic remote reading and, as a result, identification of the cannabis and cannabis products that have been tagged. The UID numbers assigned to cannabis and cannabis products allow the CCTT–METRC system to track and trace all cannabis and cannabis products through the commercial cannabis supply chain. Information embedded in the tags includes the facility name, business license number, the date the tag was ordered, a unique 24-digit identification number, and a bar code that matches the identification number programmed on the RFID.

Plants: Cannabis plants are considered either immature or flowering. All cannabis plants must enter the system through immature plant lots (up to 100 plants are allowed in one lot).

Immature plant lots (up to 100 plants per lot) are assigned one UID plant tag.

Each immature plant must be labelled individually with the 24-digit UID from the immature plant lot tag. Each individual flowering plant and all plants in the licensee's designated canopy areas must be assigned an individual plant tag, and it must be affixed at the base of each flowering plant.

Packages: Packages are created from immature plants, harvest batches, testing lab samples, nonmanufactured cannabis, and production batches. A package tag has an adhesive backing, so it can be applied easily. Package tags are used for transferring packages and tracking finished products for each licensee in the commercial chain of custody—from seed to sale. The package tag is perforated with the package identification number printed on the upper and lower sections.

6. What size are the radio-frequency identification (RFID) package labels?

A CCTT–METRC UID package tag measures 3 inches by 4 inches; it is perforated with an upper 2-inch by 4-inch portion that stays with a package, and a lower 1-inch by 4-inch portion that can be attached to another device, such as a container, or it can be used on a distributor's, testing lab's, or retail store's intake paperwork.

7. Is there a limit to the number of designated CCTT–METRC system users for each licensed individual or entity?

No. Each licensee is required to designate an owner with legal authority to act as the licensee's CCTT–METRC account manager. The licensee's designated account manager will be required to complete the CCTT–METRC Account Manager System Training and subsequently train each licensee-designated system user in the proper and lawful use of the system.

NOTE: Licensees will be responsible for all data entered into the CCTT–METRC system by their employees or contractors.

8. Is the CCTT–METRC system's account manager required to be an owner?

Yes. The account manager may train and grant access to the system to other users, but ensuring valid data is entered into the CCTT–METRC system is the designated account manager's responsibility.

9. May I change who I want to designate as my account manager?

To change your designated account manager, contact the licensing authority that processed your annual license application.

10. Will a licensee with multiple licenses have a separate CCTT–METRC system account for each license?

Yes. Each license is assigned to an individual account within the CCTT–METRC system. Data will need to be entered separately into each account. Users with multiple accounts will have one log-on name and will be able to navigate easily between the accounts assigned to each license.

11. Once I have my annual or provisional license, may I do business with a temporary license holder?

Yes. The temporary license holder will not have access to the CCTT–METRC system and will instead be using manual manifests, but the annual or provisional license holder will need to enter activities into the CCTT–METRC system. Please see the Support Menu in the system and read the "Transitional Period Guide" for step-by-step reporting instructions for annual and provisional commercial cannabis licensees who are receiving cannabis or cannabis products from—or shipping cannabis and cannabis products to—temporary licensees.

12. Who will have access to my CCTT–METRC system information?

Pursuant to Section 26067(b) of California's Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA), information received and contained in the CCTT–METRC system is confidential and may only be viewed by the licensee and authorized employees of the state of California, or any city, county, or city and county employees who need access to perform official duties pursuant to MAUCRSA or a local ordinance. In addition, upon the request of a state or local law enforcement agency, state licensing authorities will provide access to, or provide information contained in, the CCTT–METRC system database to assist law enforcement with its duties and responsibilities pursuant to MAUCRSA.

13. What CCTT–METRC system information will be available to cities and counties that have a permissive cannabis ordinance?

The state's cannabis licensing authorities currently are developing procedures for vetting and processing CCTT–METRC data requests from local jurisdictions. Data contained in the CCTT–METRC system is confidential and not subject to the California Public Records Act, except as necessary for authorized employees of the state, or any city or county representative who is implementing or enforcing a local cannabis ordinance.

14. What CCTT–METRC system information will be available to local law enforcement agencies?

Upon the request of a state or local law enforcement agency, the state's cannabis licensing authorities will allow access to, or provide information contained within, the CCTT–METRC

system. The California Department of Food and Agriculture, in collaboration with the California Department of Justice, will provide state and local law enforcement agencies with the ability to access shipping manifests in real time, as needed to validate the legal transportation of commercial cannabis products.

15. Does the CCTT–METRC system allow connections to third-party cannabis track-and-trace systems?

Yes. The CCTT–METRC system offers access to third-party business applications via a standard application programming interface (API) or file upload. For more information, please see the "Integration and API" section of the METRC California web page, which also features a list of third-party vendors who have been validated to use the API to interface with the CCTT–METRC system: metrc.com/california.

16. How can I get help with my application programming interface (API) key?

Information on how to get and use a third-party API key is available on the METRC California web page: metrc.com/california.

17. Once I am credentialed into the CCTT–METRC system, what type of data reports can I download?

Licensees have access to a menu of reports with data compiled from their individual CCTT–METRC accounts; the types of reports available varies depending on the type of license you have and what you have reported to the state. For example, the Reports Control Panel provides reports on the licensee's harvests, plant and package inventory, lab results, sales, package adjustments, plants destroyed, and transfer reports. For additional information, licensees credentialed into the CCTT–METRC system should see the Support Menu in the system and read the "California Supplemental Guide."

18. How do I track transfers in the CCTT–METRC system?

Any time cannabis or a cannabis product moves from one licensee to another, the transfer from licensee to licensee must be logged into the CCTT–METRC system, even if the transfer occurred on the same property. Only licensed distributors, licensed distributor-transport only, and licensed testing laboratories may transport packages.

19. Does the CCTT–METRC system record retail sales transactions?

Yes. Licensed retailers record sales, per transaction, in the CCTT–METRC system, as that is the last event in the chain of custody. Transactions must be entered within 24 hours, and inventory must be reconciled in the system at least once every 30 days.

20. I am researching scales for weighing cannabis. How many decimal points are required for entering weight into the CCTT–METRC system?

You are not required to include values to the right of the decimal point when you enter weights into the CCTT–METRC system; however, the system can round to the fourth position to the right of the decimal point, if desired. Please see the California Department of Food and Agriculture's Division of Measurement Standards' website for more information on weighmaster requirements and sealing scales: cdfa.ca.gov/dms.

21. How do I handle preharvest cannabis waste (for example, dry fan leaves)? Will there be a requirement to weigh this waste and enter it into the CCTT–METRC system daily?

Leaves removed from an individual cannabis plant must be weighed and entered as waste into the system under the individual plant tag's, or plant batch tag's, unique identifier number. If you are removing leaves, along with stems, etc., as a part of a harvest, the total combined weight of the harvest waste—the leaves, stalks, and stems—associated with a unique harvest-batch name must be entered into the CCTT–METRC system under that same harvest-batch name.

NOTE: Per the California Department of Food and Agriculture's cannabis cultivation regulations, cannabis waste associated with a harvest batch must be recorded within three calendar days after it has been created. 3 California Code of Regulations, section 8405(c)

22. Are CCTT–METRC system-user guides available?

Yes. Several guides are available to credentialed CCTT–METRC users to review and download; licensees can access these through the Support Menu in the system's database. Access is available only after receiving credentials to the CCTT–METRC system.

23. Once I'm a credentialed CCTT–METRC system user, how can I get help using the system if I need it?

You can get help in many ways:

A. Review the Support Menu in the CCTT–METRC system for the following reference material

- METRC Manual/User Guide
- State Supplemental Guide
- Transitional Period Guide
- California Laboratory Guide

The Support Menu, which is updated periodically with new material, also provides information on how to contact CCTT–METRC staff if you have questions.

B. Get real-time, interactive support from CCTT–METRC system staff

- **Email:** support@metrc.com
- **Phone:** 1-877-566-6506
- **Hours:** Monday through Friday, 7am to 7pm

C. Contact your state cannabis licensing authority

Cultivation Licensees

California Department of Food and Agriculture's CalCannabis Cultivation Licensing Division (CalCannabis)

- **Website:** calcannabis.cdfa.ca.gov
- **Email:** calcannabis@cdfa.ca.gov
- **Phone:** 1-833-CALGROW (1-833-225-4769)

Distributor, Retailer, Testing Laboratory, Microbusiness, and Temporary Event Licensees

California Department of Consumer Affairs' Bureau of Cannabis Control (BCC)

- **Website:** bcc.ca.gov
- **Email:** bcc@dca.ca.gov
- **Phone:** 1-833-768-5880

Manufacturing Licensees

California Department of Public Health's Manufactured Cannabis Safety Branch (MCSB)

- **Website:** cdph.ca.gov/mcsb
- **Email:** mcsb@cdph.ca.gov
- **Phone:** 1-855-421-7887