

<b>Bulletin Number:</b> MI_IB_0041	<b>Distribution Date:</b> 9/16/21	<b>Effective Date:</b> 9/16/21
<b>Contact Point:</b> Metrc®Support	<b>Subject:</b> Guidance for Cultivators on License Plant Count Consolidation Processes	
<b>Reason:</b> The MRA and Metrc are providing guidance regarding the consolidation of plants counts for cultivators holding stacked co-located licenses.		

Greetings Metrc Users,

The MRA and Metrc are excited to announce updates regarding the plant count inventory of medical and adult-use cultivators that hold stacked class C licenses.

Medical growers are now permitted to hold their plant inventory within any of their co-located stacked licenses as long as the total plant count does not exceed the limits dictated by the total number of stacked class C licenses.

- **Example:** A single medical grower class C license authorizes up to 1,500 marijuana plants. If a licensee holds five stacked medical grower class C licenses at the same address, that licensee can hold up to 7,500 marijuana plants on one of their five licenses if the other four licenses all hold zero plants.

Similarly, adult-use marijuana growers with co-located stacked class C licenses or excess marijuana grower licenses are now permitted to hold their plant inventory within any of their stacked licenses as long as the total plant count does not exceed the limits dictated by the total number of stacked/co-located licenses.

- **Example:** A single adult-use marijuana grower class C license authorizes up to 2,000 marijuana plants. If a licensee holds five stacked adult-use marijuana grower class C licenses at the same address, that licensee can hold up to 10,000 marijuana plants on one of their five licenses if the other four licenses all hold zero plants.

Please note, for licensees holding equivalent medical and adult-use cultivator licenses, the above plant count allowance updates are permissible exclusively within the medical market or exclusively within the adult-use market; plants held in one market will not count for or against plant counts in the other market.

- **Example:** It is not permissible for a licensee holding one medical grower class C license (1500 plants) and one adult-use marijuana grower class C license (2000 plants) to hold 3500 plants on either of their licenses. In this example, the medical grower class C license cannot hold more than 1500 plants and the adult-use marijuana grower class C license cannot hold more than 2000 plants.

There are two different processes detailed below that cultivators can follow to consolidate their existing plant inventory. Please note, cultivators that do not wish to consolidate their plant counts are not required to participate. Further, there is no opt-in requirement or MRA approval necessary for a cultivator to begin executing either of the below processes.

## **Option 1: Phase Out Consolidation Process**

Cultivators opting to utilize the phase out process are expected to continue conducting all day-to-day reporting activities across their active stacked licenses within Metrc.

To execute the phase out consolidation process, existing inventory in a license number that is being phased out should remain within that same license number throughout its growth cycle. The license number that is being phased out should also be utilized to execute the harvest, testing, and transfer of its existing inventory in accordance with the MRA's administrative rules. As plant count inventory depletes within the license number(s) that is being phased out, the cultivator can begin increasing the number of plants within their desired destination license number(s). Please note, the totality of a licensee's plant count inventory across their stacked licenses must not exceed the permissible limits dictated by their total number of stacked licenses.

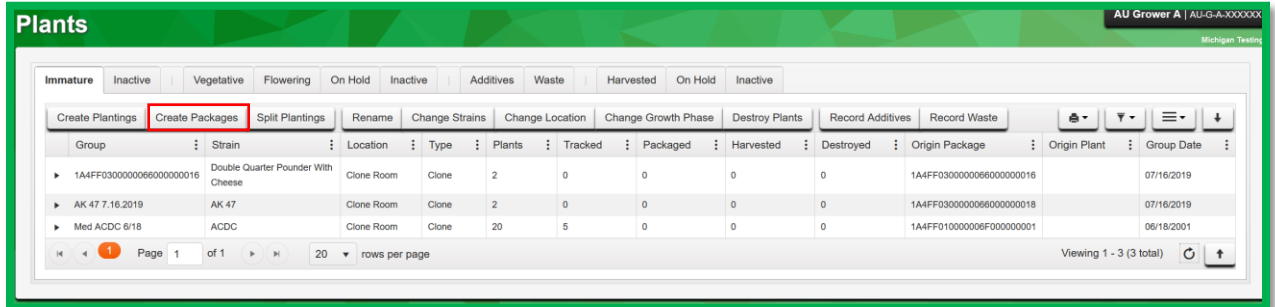
- **Example:** A single adult-use marijuana grower class C license authorizes a licensee to grow up to 2,000 marijuana plants. If an entity has two stacked/co-located adult-use marijuana grower C licenses, one license could hold 4,000 plants if the other license has been phased out so that it holds zero plants. However, during the phase out process, if the license being phased out still holds 1,000 plants, then the desired destination license can only hold up to 3,000 plants.

## **Option 2: Transfer Consolidation Process**

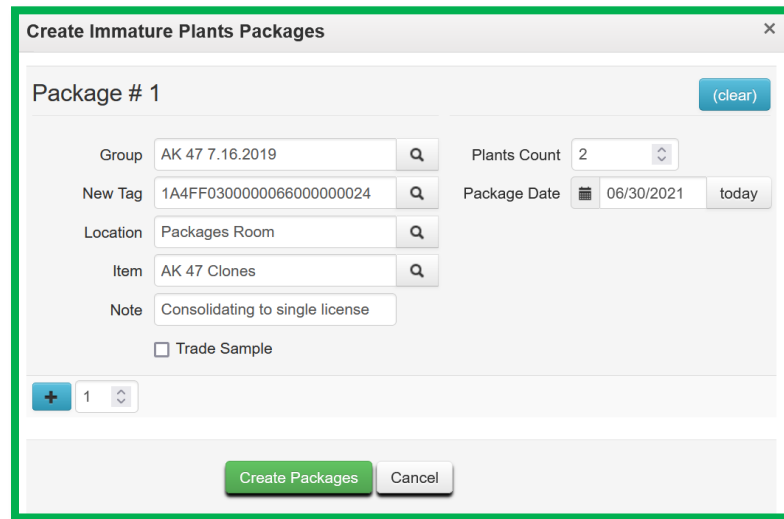
The transfer process would allow for growers to conduct a more immediate consolidation of plant inventory to the desired destination license number. Although this process will expedite the consolidation efforts, there are additional steps and considerations that need to be taken.

1. Create items for all plants (immature, vegetative, and flowering) intended for transfer.
2. Select the plants for transfer and click the "create packages" button.
  - a. For immature plants, you will be creating a package from the batch of plants, whereas for vegetative and flowering plants, you will need to select each individual plant strain specific to create a package.
  - b. If a licensee chooses to transfer vegetative and/or flowering plants, the plant tags that were associated to the plants at the license being phased out will no longer be active once the package is created.

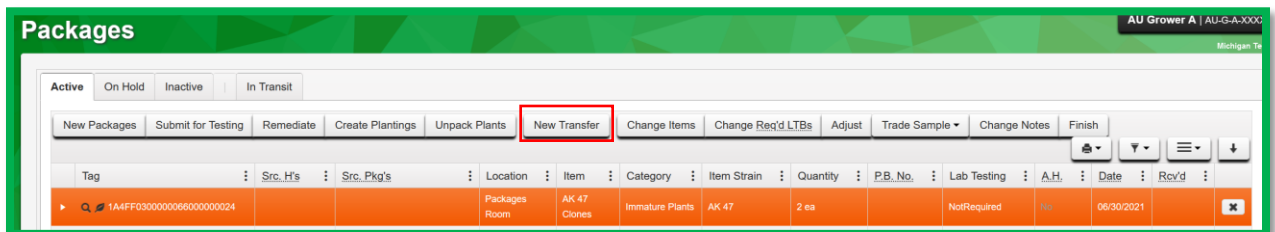
After completing the below steps, new plant tags that correspond with the desired destination license number must be applied.



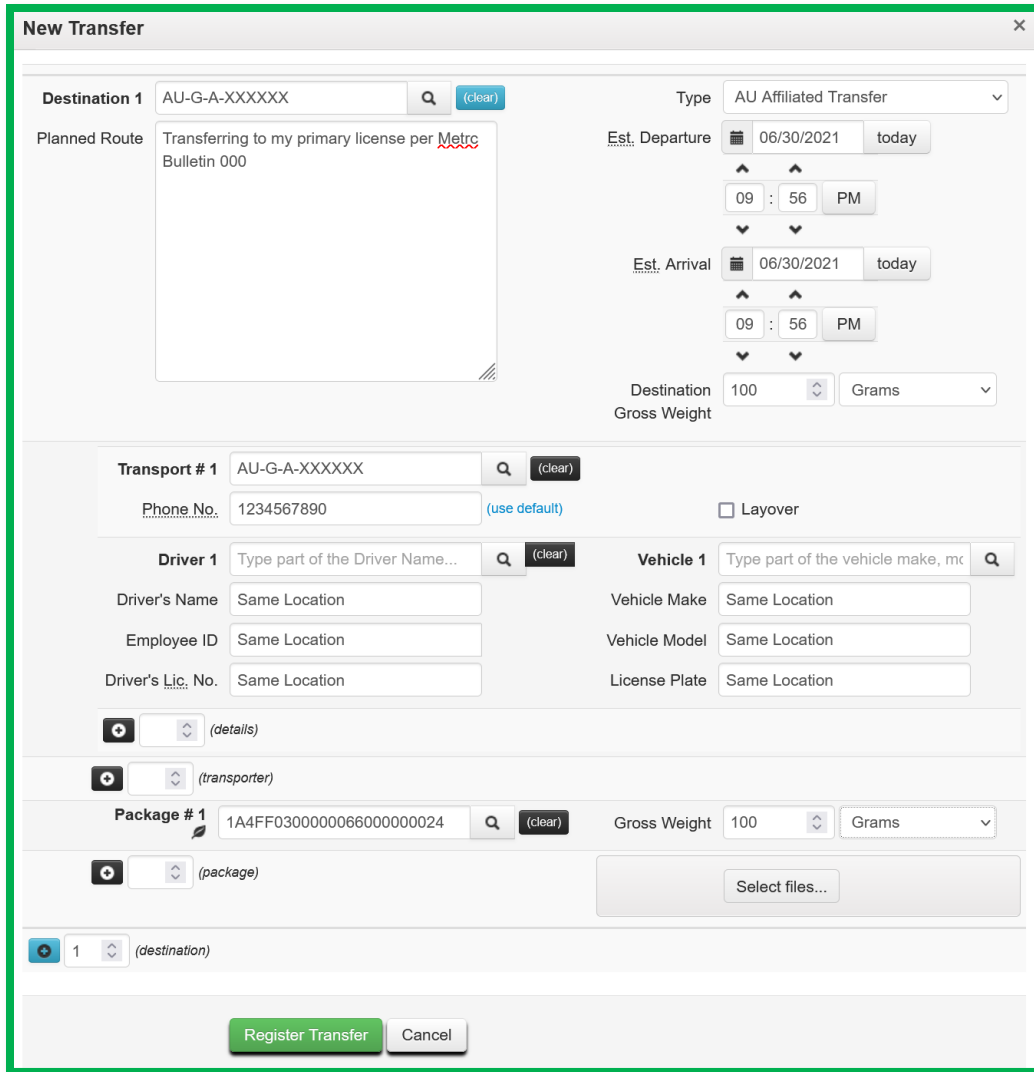
3. Enter the relevant information for package creation.



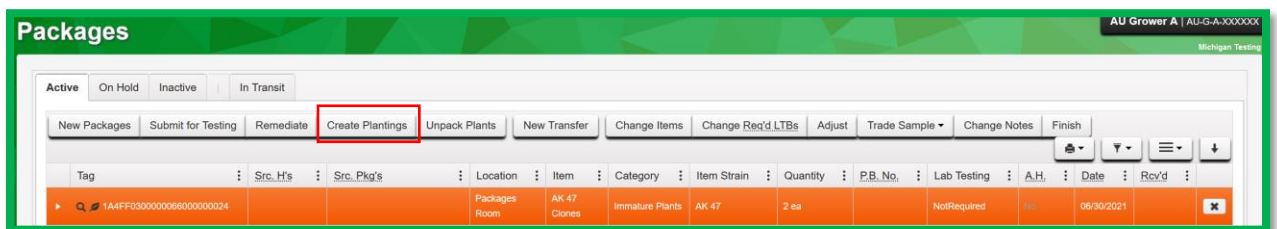
4. Select packages for transfer to the desired destination license and click “new transfer”.



5. Enter the relevant information for transferring to the desired destination license and register the transfer.

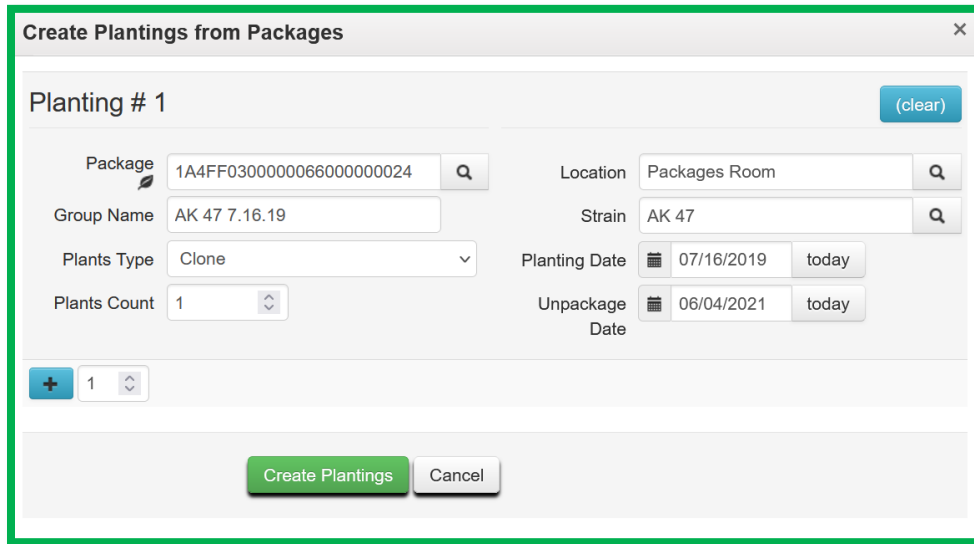


6. Once the transfer is received at the desired destination license number, go to the active packages grid.
7. Within the active packages grid, identify the plant packages that have been transferred.
8. For immature plant batches, select the “create plantings” button
  - a. If the plants being packaged were vegetative or flowering, please go to step 10.



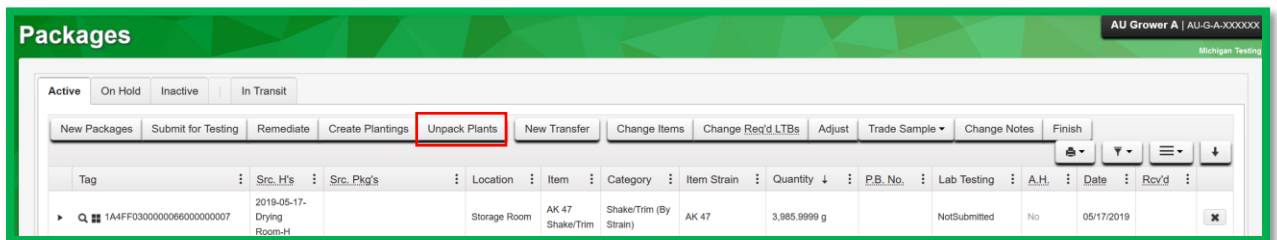
Tag	Src. H's	Src. Pkg's	Location	Item	Category	Item Strain	Quantity	P.B. No.	Lab Testing	A.H.	Date	Rev'd
1A4FF0300000066000000024			Packages Room	AK-47 Clones	Immature Plants	AK-47	2 ea		NotRequired		06/30/2021	

9. Enter the relevant information for recreating the immature plant batch into the desired destination license.



The screenshot shows a dialog box titled "Create Plantings from Packages" with a close button (X) in the top right corner. The dialog is for "Planting # 1" and includes a "(clear)" button. It contains several input fields: "Package" (1A4FF030000066000000024), "Location" (Packages Room), "Group Name" (AK 47 7.16.19), "Strain" (AK 47), "Plants Type" (Clone), "Planting Date" (07/16/2019, today), "Plants Count" (1), and "Unpack Date" (06/04/2021, today). At the bottom, there is a "+ 1" button and "Create Plantings" and "Cancel" buttons.

10. For vegetative or flowering plants, select the "unpack plants" button.



The screenshot shows a "Packages" table with a green header. The "Unpack Plants" button in the top toolbar is highlighted with a red box. The table has columns: Tag, Src. H's, Src. Pkg's, Location, Item, Category, Item Strain, Quantity, P.B. No., Lab Testing, A.H., Date, and Rev'd. A single row is visible with the following data:

Tag	Src. H's	Src. Pkg's	Location	Item	Category	Item Strain	Quantity	P.B. No.	Lab Testing	A.H.	Date	Rev'd
1A4FF0300000660000000007	2019-05-17-Drying Room-H		Storage Room	AK 47 Shake/Trim	Shake/Trim (By Strain)	AK 47	3,985.9999 g		NotSubmitted	No	05/17/2019	

11. Enter the relevant information for recreating the vegetative or flowering plants into the desired destination license.
  - a. New tags from the desired destination license would need to be applied to live plants being added in for consolidation

**Unpack Plants from Packages** ✕

Unpack # 1 (clear)

Package	<input type="text" value="Type part of Package number..."/>	<input type="button" value="Q"/>	Strain	<input type="text" value="AK 47"/>	<input type="button" value="Q"/>
Plants Type	<input type="text" value="Clone"/>		Location	<input type="text" value="Veg Room"/>	<input type="button" value="Q"/>
Plants Count	<input type="text" value="2"/>		Planting Date	<input type="text" value="07/16/2019"/>	<input type="button" value="today"/>
Starting Tag	<input type="text" value="1A4FF0200000066000000025"/>	<input type="button" value="Q"/>	Vegetative Date	<input type="text" value="09/06/2019"/>	<input type="button" value="today"/>
Ending Tag	<input type="text" value="1A4FF02000000660000000026"/>		Unpackage Date	<input type="text" value="06/03/2021"/>	<input type="button" value="today"/>

(tags optional)

Please feel free to contact support at [support@metrc.com](mailto:support@metrc.com) or 877-566-6506 with any questions.