Metrc Support Bulletin

Bulletin Number: MI_IB_0066_Recording THC Concentration and Item Brands for Infused Items	**Distribution Date**: June 27th, 2023 (Repost with Updates)	**Effective Date:** In Effect
Contact Point: Metrc® Support	**Subject**: Proper recording of THC content and item brands for infused items.	
Reason: The CRA and Metrc are providing industry guidance on recording item brands and THC Content for infused products.		

Greetings Metrc® Users,

Bulletin 66 was originally posted on June 1st. Following an educational session held by the CRA and Metrc on June 21st, it was determined we would repost this bulletin with additional information from questions that were raised.

The purpose of these updates was based on improving transparency for infused products, which came as a request via the Michigan Metrc workgroup to allow visibility across licenses on the Unit THC concentration for infused Items. Anyone who would like to join the Michigan Metrc User Workgroup can email CRA-Compliance@Michigan.gov.

As of June 5, 2023, the following item categories now require an item brand and the intended THC concentration to be recorded.

- Infused Liquid
- Infused Liquid (each)
- Infused Non-Edible Liquid
- Infused Non-Edible Solid
- Infused-Edible

Please note that all items that have previously been created can still be used and will not require an update. If a licensee would like to update their existing items, they will have the ability to edit, but only new items created after June 5th will be required to have the additional information entered. Any Retailers or Provisioning Centers can continue to receive transfers with items that do not have the newly updated required fields.

Creating Item Brands

To create an item brand the user should navigate to that option under the Admin area as shown in **Figure 1**.
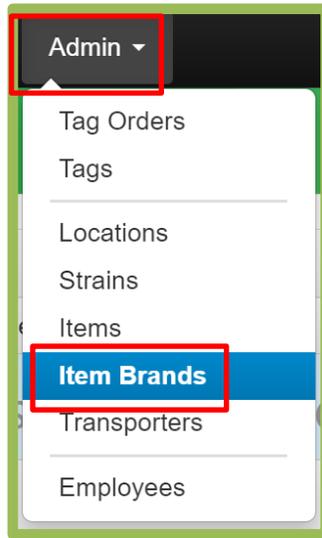

Figure 1: Navigate to Item Brand Screen

This will take the user to the Item Brand grid. Then use the "Add Item Brands" button to create the item brand as shown in **Figure 2**.
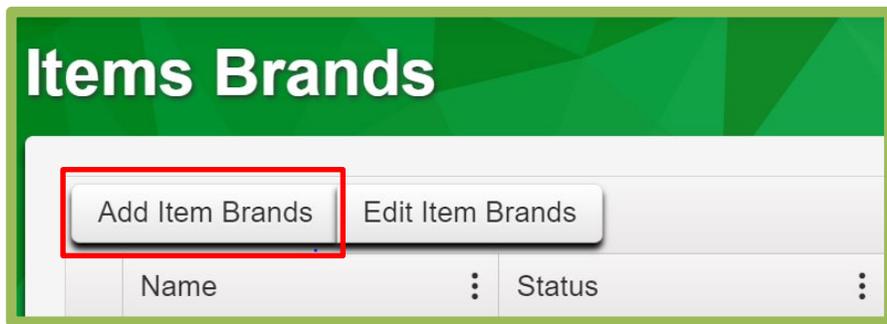

Figure 2: Use the Add Item Brand Button

This will trigger an action window, to enter the name of the item brand in the "Name" field as shown in **Figure 3** below. This will be the name for any intellectual property which in the product will be labeled and sold.

For more information about intellectual property, please refer to this CRA bulletin.

Once the item brand name has been entered, select "Create Item Brands" and the Brand will now be selectable when creating new items which require a brand name associated to it.
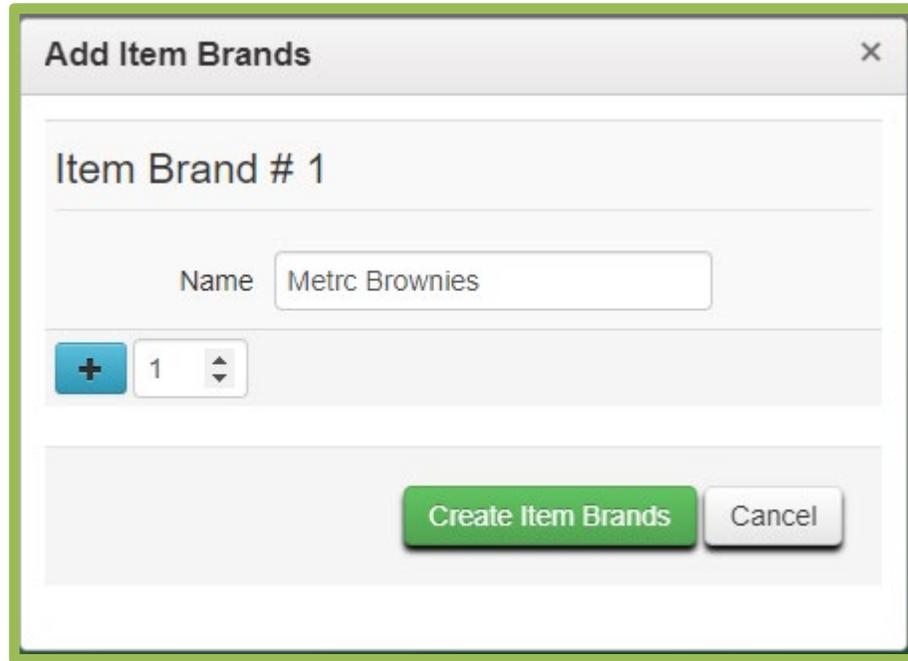
Add Item Brands   ✕

Item Brand # 1

Name   Metrc Brownies

➕ 1 ⏷

Create Item Brands   Cancel

Figure 3: Create the Item Brand

Please Note: If there is not a brand for a given item within one of the categories where is it required, a licensee may create an Item Brand named "N/A" that can be used for all non-branded items.

Adding Items

Users should be creating items using the same process as before the item category changes, by navigating to the items grid under the Admin area on the top navigational bar shown in **Figure 4**.
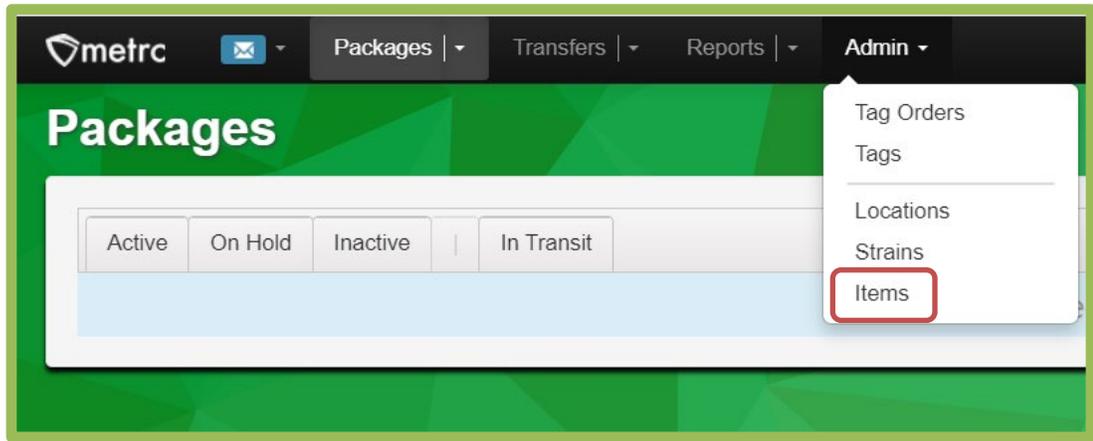

Figure 4: Navigate to Item Screen

Once on the items grid, select the "Add Items" button to begin the process of creating a new item as shown in **Figure 5**.
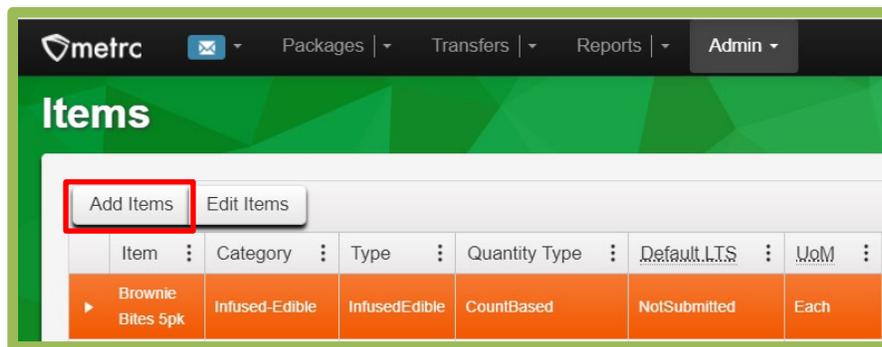

Figure 5: Use the Add Item Button

This will trigger an action window to enter in all the information for the new item including the additional fields for item brand and potency. These fields with their intended purpose are:

Item Brand: The Item Brand created based on the previous steps and guidance that is being affiliated with the item can be utilized to create a New Item.
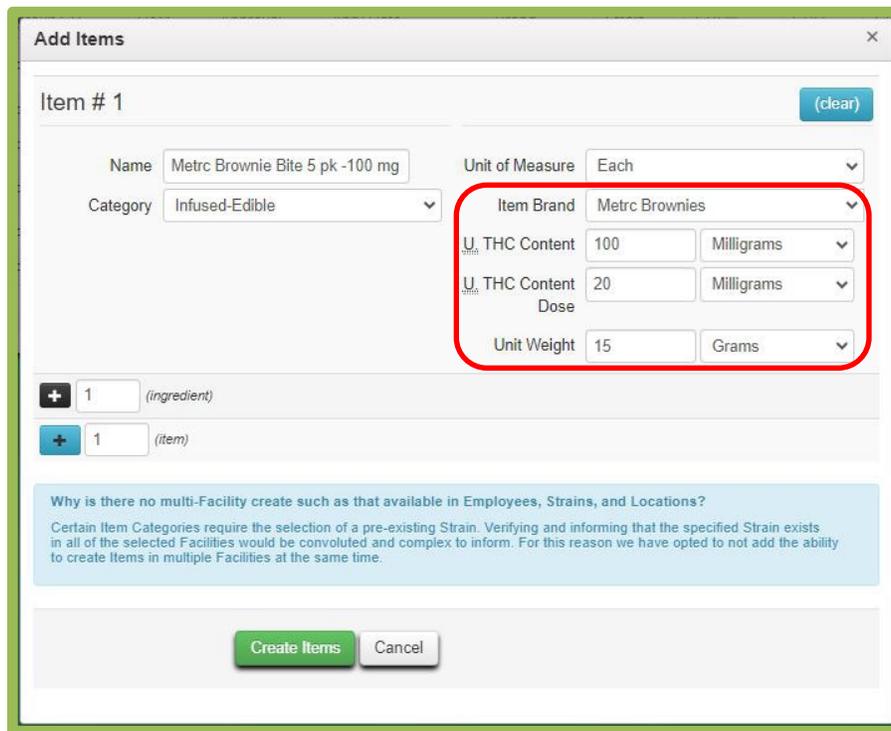
Unit THC Content: The total target THC content for one unit of the item
Unit THC Content Dose: The target THC amount in each dose of the item, this should be the Unit THC Content divided by the number of doses in each unit.

Unit Weight: The total weight of each unit of product – this is unrelated to the potency and is already a required field.

Example: A processor is creating a new item of brownie bites 5 pack from their "Metrc Brownies" brand, the total amount of THC is 100 milligrams with each brownie bite being one dose of 20 milligrams and the total weight of each unit is 15 grams.

As seen in **Figure 6** below, the information was entered to assign the "Metrc Brownies" item brand to the item, and the intended THC content for each unit is 100 mg, with each bite being a dose, so the Unit THC Content Dose would be 20 mg. The unit weight is the physical weight of each unit of the brownie bites.

Figure 6: Example of Creating an Infused-Edible Item

Editing Items

If a licensee would like to edit an item that has already been created, the user will return to the item grid as shown in **Figure 7.** Then select the item that needs to be updated and use the "Edit Item" button.
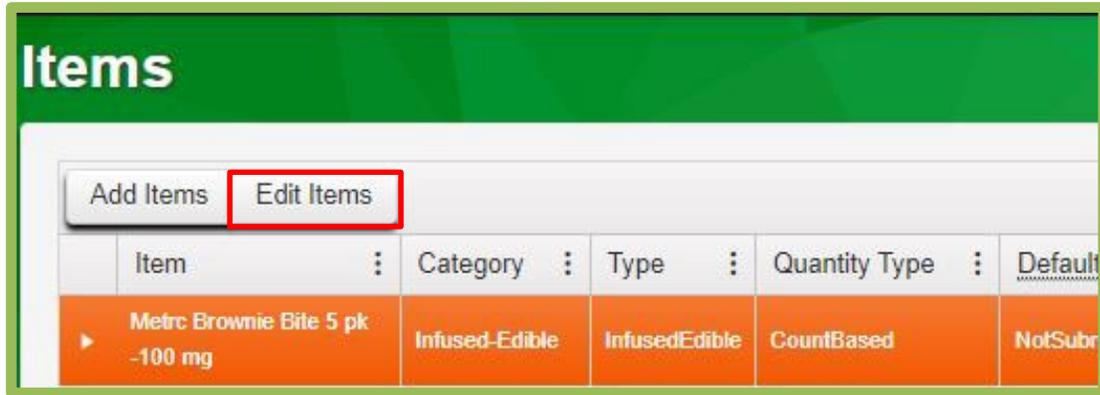

Figure 7: Edit Item Button

Please Note: Items created can be edited at any time, but if it has been assigned to a package, then the **item name and category will no longer be able to be edited**. Licensees can check to see if an item has been assigned to a package using the "Used" column indicator in the item grid. Editing details within the item will be associated with all packages to which the item is assigned to. So, licensees should be sure the edit being made is intended to reflect all packages associated with the item, otherwise, a new item should be created.

Reminder: Users are able to update already created items to add the additional information that will be required for all newly created items, **but for any items created before June 5th, the CRA does not require them to be updated**.

Allowable Potency Variance Guidelines

When entering potency information for a new item, the intended potency will be used for the initial item creation. Following the required testing for potency on a package the item is associated with, if the tested package associated with an item falls outside of the allowable variance of 10%, then the package in its current state is not eligible for sale or transfer.

At that time, there are two options for a licensee to take corrective action on the package.

1. Edit the item within the allowable potency variance guidelines to align with the tested potency.
   a. This option should only be used if the item edit is expected to be applied to all packages for which the item is associated.

2. Repackage the existing package to a new item that reflects the accurate potency within the acceptable variance.

Example:

The intended potency for a chocolate bar is 200mg per package containing 10 scored servings each stated to have 20mg of THC. The 200mg chocolate bar would be considered the item which will be associated with all packages in which the 200mg label is to be used for the chocolate bar.

There are two potential outcomes.

1. A test sample of the chocolate bar batch is tested to be homogenous at 19mg of THC per serving making the serving potency 19mg and the package 190mg, **since this is within the 10% variance allowed nothing further needs to be done to the package.** Future packages associated with this item will not need to be updated as long as the serving and package do not fall outside the acceptable range this item can be used as much as needed. *Please note the tested potency will appear on the compliance label for the package.*

2. A test sample of the chocolate bar batch returns results at 27mg of THC per serving making the package 270mg of THC. Since this is outside the allowable variance and exceeds the allowable THC per serving and package. The licensee

should follow one of the two options (Edit Item or Repackage) outlined above based on their specific use case.

For additional information on potency variance, you can reference the [CRA Technical Bulletin](#).

 Please feel free to contact support at support@metrc.com or 877-566-6506 with any questions.