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To: Current and Prospective Adult Use Cannabis Program Licensees

From: Director John Hudak, Office of Cannabis Policy

Date: August 25, 2025

Subject: Guidance for Producing Variety Packs of Adult Use Cannabis Vape Products and Dual Chamber

Vape Devices

Background

The Office of Cannabis Policy (OCP) has received inquiries from adult use cannabis manufacturers regarding the production of variety packs of vape products and dual chamber vape devices. As such, OCP is issuing the following guidance regarding the appropriate processes for testing, tracking, and labeling variety packs of adult use cannabis vape products and dual chamber vape devices for retail sale to consumers.

Guidance

On March 4, 2025, OCP issued <u>guidance</u> regarding the production of variety packs of adult use pre-rolls and edible cannabis products. This guidance expands that authorization to include vape products and to allow the production of dual chamber vape devices. To ensure the appropriate processes for testing, tracking, and labeling variety packs of adult use cannabis vape products and dual chamber vape devices, the following guidelines apply:

- All items in a variety pack must be of the same product type.
 - o For example, a vape cartridge may be combined with other vape cartridges of different strains or flavors but *not* with pre-rolls or other items.
- A variety pack may consist of no more than five different strains or flavors.
- All components of a variety pack must pass mandatory testing *before* being combined into a variety pack to ensure a representative sample and homogeneity of each different strain or flavor. Untested items may *not* be combined into a variety pack.
- Licensees should *not* use production batches to create variety packs in Metrc. Specific Metrc instructions are provided below.
- In the event a specific strain or flavor is recalled, and it is included in a variety pack, OCP will require recall of the entire variety pack.
- Dual chamber vape devices may contain a different vape product in each chamber.
- Dual chamber vape devices must limit the user to consuming only one vape product at a time. The device cannot support inhaling from both sides simultaneously.
- Dual chamber vape devices must clearly indicate which chamber contains which product.

To properly track and test all components of a vape product variety pack or dual chamber vape device, licensees must follow the same processes used for creating variety packs of pre-rolls or edible cannabis products. First, create strain- or flavor-specific packages in Metrc for each concentrate. Each of these must be tested separately and pass all mandatory testing. The different strain and flavor-specific vape products can then be combined into variety packs in Metrc, provided they have each passed mandatory testing. The new product name in Metrc must include the words "Variety Pack" or "Dual Chamber." Finally, the full inventory tracking system identification number of the final batch of each product tested must be included on the label. Visual instructions are provided below for creating variety packs of vape cartridges and dual chamber vape devices.

Figure 1: Creating a New Vape Cartridge Variety Pack Item

Figure 2: Creating a Vape Cartridge Variety Pack Package

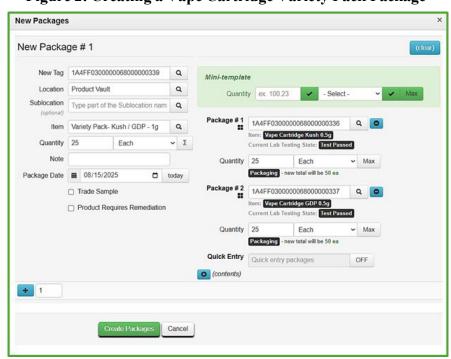


Figure 3: Package History for a Vape Cartridge Variety Pack

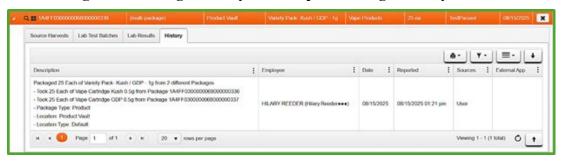
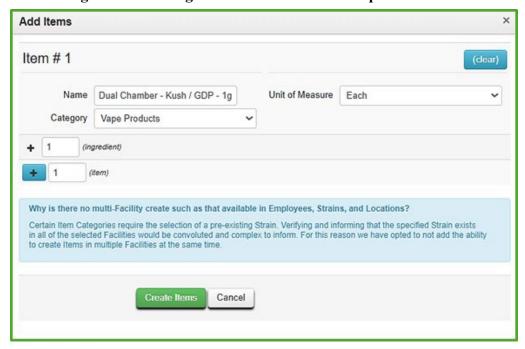


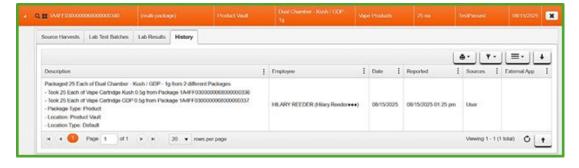
Figure 4: Creating a New Dual Chamber Vape Device Item



New Packages New Package # 1 New Tag 1A4FF0300000068000000340 Mini-template Quantity ex. 100.23 - Select -Sublocation Type part of the Sublocation nam Q Package # 1 1A4FF0300000068000000336 Item Dual Chamber - Kush / GDP - 1g Q Item: Vape Cartridge Kush 0.5g Quantity 25 Each Note Each Packaging - new total will be 50 ea Package Date | 08/15/2025 □ today Package # 2 1A4FF0300000068000000337 ☐ Trade Sample Item: Vape Cartridge GDP 0.5g □ Product Requires Remediation Current Lab Testing State: Test Passed Each ∨ Max Packaging - new total will be 50 ea Quick Entry Quick entry packages OFF (contents) + 1 Create Packages Cancel

Figure 5: Creating a Dual Chamber Vape Device Package

Figure 6: Package History for a Dual Chamber Vape Device



Conclusion

OCP is expanding the types of products permitted to be sold in variety packs to include vape products. Dual chamber vape devices are also authorized so long as they do not allow inhalation from both sides simultaneously. All components of a variety pack must pass mandatory testing before being combined into a variety pack. The final variety pack label must include the full inventory tracking system identification number of the final batch of each product tested for each different component. Licensees with questions regarding this guidance can contact OCP's Compliance Team at Compliance.OCP@maine.gov.