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To: Current Adult Use Cannabis Program Licensees
From: Director John Hudak, Office of Cannabis Policy
Date: Monday, February 27, 2023
Subject: Guidance Regarding Changes to Plant Weighing, Waste Recording, and Storage Bin Tagging Requirements

The Office of Cannabis Policy (OCP) is working diligently to implement a comprehensive batch tracking system for adult use cannabis plants at cultivation. As noted in [the corresponding letter](#) sent today to Adult Use Cannabis Program licensees, we have made significant strides recently and are in the final stages of negotiating that agreement. However, we understand there is disappointment in the industry with the pace of negotiations and implementation.

In the pursuit of a solution, OCP has identified several areas where we can streamline or reduce the regulatory burdens that cultivators face and implement some of the advantages batch tracking will provide, even before the software is fully built out. These improvements include:

- (1) Eliminating the requirement to weigh each plant individually
- (2) Eliminating the requirements for the recording of plant waste prior to harvest
- (3) Eliminating the individual tag requirement for multiple storage bins

These changes are effective immediately and this document serves as guidance to licensees about these changes.

1) Changes to Plant Weighing Requirements

In the case of cannabis plants of the same varietal or cultivar, that were planted in the same specific area at the same time and harvested at the same time, it is no longer necessary to weigh each plant individually at the time of harvest. Instead, those plants can be wet-weighed together and at once.

A total harvest weight can then be divided by the number of plants to obtain an average plant wet-weight. This average wet-weight can be entered in the tracking system as the presumed weight of each plant, rather than individual plants required to respond to an individual, specific weight.

2) Changes to Waste Recording Requirements

It is no longer necessary to record cannabis plant waste generated by the trimming of live plants. Any waste generated by the trimming of a live plant during the growing phase must be properly disposed of in accordance with rule, but it is not necessary to record the weight of the waste in

the tracking system. However, if an entire plant is destroyed, it must be noted appropriately in the tracking system. Waste generated by trimming of harvested plant material must also still be entered in the tracking system.

3) *Changes to Storage Bin Tagging Requirements*

If a harvested plant material (maximum size of 10 kilograms) is stored in multiple bins or totes in the same area of the cultivation facility, a licensee may use one tag to identify all the bins containing that harvest batch. The single tag can be photocopied, or the tag number can be recorded on the additional bins. Bins must be stored together in the same area and clearly marked to indicate the total bins that are connected, such as “Bin 1 of 3.”

In the case of harvested material that is further refined into shake or trim, these new product types still require a separate tag and container.

OCP appreciates the patience of Maine’s adult use licensees as we work diligently to finalize a batch tracking agreement.

Frequently Asked Questions

Q: If I have harvested a batch of plants (same variety, planted at the same time, grown in the same area) and obtain the total harvest weight, do I still need to enter an average wet weight in Metrc for each plant?

A: Yes, at this time each plant must still have a weight associated at harvest, but that weight can be an average of the overall harvest.

Q: If I am pruning fan leaves but not harvesting any flower, do I need to weigh the fan leaves and enter it into Metrc as waste?

A: No, in this case you do not need to make any Metrc entry.

Q: If I do not need to enter the waste created by pruning in Metrc, can I discard it with regular trash?

A: No, the rules relating to cannabis waste disposal still apply.

Q: If I have a plant die or decide it is not thriving and want to destroy it, does it still need to be entered in Metrc?

A: Yes, if the entire plant is being destroyed it must be noted in Metrc under the associated plant tag.

Q: If I have three storage bins containing dried flower from the same harvest (same variety), can I use just one Metrc tag?

A: Yes, if the three bins contain the same strain, planted at the same time, grown in the same area, and harvested at the same time. The associated totes must be stored together and contain the Metrc tag number on each tote.

Q: When I begin to trim the flower can I bag the trim, shake, and kief and store it in the same bin as the flower and use the same Metric tag as the flower?

A: No, once the item changes form from flower to shake or trim it needs to be assigned its own tag and stored separately from the flower.