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To: Current and Prospective Adult Use Cannabis Program Licensees
From: Director John Hudak, Office of Cannabis Policy
Date: March 4, 2025
Subject: Guidance for Producing Variety Packs of Adult Use Cannabis Pre-rolls and Edibles

Background

The Office of Cannabis Policy (OCP) has received several inquiries from adult use cannabis cultivators and manufacturers regarding the production of variety packs of pre-rolls and edibles. As such, OCP is issuing the following guidance regarding the appropriate processes for testing, tracking, and labeling variety packs of adult use cannabis pre-rolls and edible cannabis products for retail sale to consumers.

Guidance

To ensure the appropriate processes for testing, tracking, and labeling variety packs of adult use cannabis pre-rolls and edible cannabis products, the following guidelines apply:

- All items in a variety pack must be of the same product type.
 - For example, a pre-roll may be combined with other pre-rolls of different strains but **not** with infused pre-rolls or other items. A gummy may be combined with other gummies of different flavors but **not** with chews or other products.
- 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.

In order to properly track and test all components for a **variety pack of edible cannabis products**, licensees must first create flavor-specific packages in the inventory tracking system, Metrc. Each flavor-specific package must be tested separately and pass all mandatory testing. Components of different flavor-specific packages may then be combined into variety packs, provided they have each passed mandatory testing. The new product name in Metrc must include the words “variety pack.” Finally, the batch number for each component must be listed on the variety pack label (i.e. 10 gummies of two different flavors will list two test results on the label).

In order to properly track and test all components for a **variety pack of pre-rolls**, licensees must first create strain-specific raw pre-roll packages in Metrc. Each strain-specific raw pre-roll package must be tested separately and pass all mandatory testing. Components of different strain-specific raw pre-roll packages may 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.” Finally, the batch number for each component must be listed on the variety pack label (i.e. three pre-rolls of three different strains will list three test results on the label). Visual instructions are provided below for reference. The same process applies for edible variety packs.

Figure 1: Selecting Raw Pre-Rolls for a Pre-Roll Variety Pack

Tag	Item	Category	Quantity	P.B.	P.B. No.	LT Status	
▶ 🔍 1A4FF030000001000000616	Lemon Haze Pre-Roll 1g	Raw Pre-Rolls	60 g	Yes	LH PR 1.25	TestPassed	✕
▶ 🔍 1A4FF030000001000000617	Trainwreck Pre-Roll 1 g	Raw Pre-Rolls	60 g	Yes	TW PR 1.25	TestPassed	✕
▶ 🔍 1A4FF030000001000000618	OG Kush Pre-Roll 1g	Raw Pre-Rolls	60 g	Yes	OGK PR 1.25	TestPassed	✕

Figure 2: Creating a Raw Pre-Roll Variety Pack

New Packages ✕

New Package # 1 (clear)

New Tag: 🔍

Location: 🔍

Item: 🔍

Quantity:

Note:

Package Date:

Trade Sample

Production Batch

Product Requires Remediation

Mini-template

Quantity: - Select - Max

Package # 1 🔍

Item: **Lemon Haze Pre-Roll 1g**

Current Lab Testing State: **Test Passed**

Quantity:

Packaging - new total will be 40 g

Package # 2 🔍

Item: **Trainwreck Pre-Roll 1 g**

Current Lab Testing State: **Test Passed**

Quantity:

Packaging - new total will be 40 g

Package # 3 🔍

Item: **OG Kush Pre-Roll 1g**

Current Lab Testing State: **Test Passed**

Quantity:

Packaging - new total will be 40 g

Quick Entry

Figure 3: Final Package Tag as Seen in Metrc

Tag	Item	Category	Quantity	P.B.	P.B. No.	LT Status
1A4FF0300000001000000628	Variety Pack - Pre-Roll 1g	Raw Pre-Rolls	60 g	No		TestPassed
1A4FF0300000001000000616	Lemon Haze Pre-Roll 1g	Raw Pre-Rolls	40 g	Yes	LH PR 1.25	TestPassed
1A4FF0300000001000000617	Trainwreck Pre-Roll 1 g	Raw Pre-Rolls	40 g	Yes	TW PR 1.25	TestPassed
1A4FF0300000001000000618	OG Kush Pre-Roll 1g	Raw Pre-Rolls	40 g	Yes	OGK PR 1.25	TestPassed

Figure 4: Pre-Roll Variety Pack History

Tag	Item	Category	Quantity	P.B.	P.B. No.	LT Status
1A4FF0300000001000000627	Variety Pack - Pre-Roll 1g	Raw Pre-Rolls	60 g	No		TestPassed

Description	Employee	Date	Reported	Sources	External App
Packaged 60 Grams of Variety Pack - Pre-Roll 1g from 3 different Packages - Took 20 Grams of Lemon Haze Pre-Roll 1g from Package 1A4FF0300000001000000616 - Took 20 Grams of Trainwreck Pre-Roll 1 g from Package 1A4FF0300000001000000617 - Took 20 Grams of OG Kush Pre-Roll 1g from Package 1A4FF0300000001000000618 - Package Type: Product - Location: Product Vault - Location Type: Default	HILARY REEDER (Hilary.Reeder●●●)	01/28/2025	01/28/2025 04:11 pm	User	

Figure 5: Pre-Roll Variety Pack Lab Test Batches

Tag	Item	Category	Quantity	P.B.	P.B. No.	LT Status
1A4FF0300000001000000627	Variety Pack - Pre-Roll 1g	Raw Pre-Rolls	60 g	No		TestPassed

Batch Name	Test Types Performed	Test Types Required	Status
Filth & Foreign Materials	1	1	Passed (3)

Test Date	Overall	Test Name	Test Passed	Result	Notes	Released Date	Sample Package	Item	Category
01/28/2025	Passed	Filth & Foreign Materials	Passed	0		01/28/2025 03:04 pm	1A4FF0300000001000000625	Lemon Haze Pre-Roll 1g	Raw Pre-Rolls
01/28/2025	Passed	Filth & Foreign Materials	Passed	0		01/28/2025 03:10 pm	1A4FF0300000001000000623	OG Kush Pre-Roll 1g	Raw Pre-Rolls
01/28/2025	Passed	Filth & Foreign Materials	Passed	0		01/28/2025 03:09 pm	1A4FF0300000001000000624	Trainwreck Pre-Roll 1 g	Raw Pre-Rolls

Conclusion

OCP has received several inquiries from adult use cannabis cultivators and manufacturers regarding the production of variety packs of pre-rolls and edibles. All items in a variety pack must be of the same product type and 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. The final variety pack label must include the batch number for each different component. Licensees with questions regarding this guidance can contact OCP's Compliance Team at Compliance.OCP@maine.gov.