



Liquor and Cannabis Board Revised Interim Policy BIP-02-2016

Subject: Registered Cooperatives Purchasing Direct from Licensed Producers

Effective Date: July 13, 2016

Ending Date: Upon adoption of rules to implement this policy.

Approved:

Jane Rushford, Chair

Ruthann Kurose, Board Member

Purpose:

This Interim Policy is to address a recent rule change to impose a new requirement that licensees place a longer, 16 digit Unified Business Identifier (UBI) number on labels of marijuana products under WAC 314-55-105. This rule change became effective on June 18, 2016, though the WSLCB issued a notice to licensees that they would have 60 days to comply with the new labeling requirements. Formerly, licensees were required to list the 9 digit UBI number on labels of marijuana products. The change to a 16 digit UBI number requirement was proposed as part of the rulemaking to implement 2015 marijuana legislation.

Though the WSLCB included the new requirement to list a 16 digit UBI on marijuana product labels as part of the formal rulemaking process, very little if any comments were received on the proposed change. However, since the rules became effective, the WSLCB has received a multitude of correspondence from licensees expressing concern and frustrations over the new requirements. Due to this concern, WSLCB staff reassessed the need for the extended UBI number listing on labels, and has discerned that the benefits of the new requirement for traceability and recall purposes do not outweigh the concerns and increased costs associated with complying with the adjusted labeling requirement. The WSLCB will be able to achieve its needs using the shorter, 9 digit UBI number with a minor increase in workload. For these reasons, and as detailed in the below Interim Policy, the WSLCB is reverting to a nine digit UBI labeling requirement on marijuana products, at a minimum. Those who choose to list the 16 digit UBI and have already changed labeling to accomplish the new requirements may continue to do so if they choose. The WSLCB plans to address this change in upcoming permanent rulemaking.

Policy Statement

In addition to the labeling requirements provided in WAC 314-55-105, labels affixed to the container or package containing marijuana or marijuana products sold at retail must include the business or trade name and the nine digit or the sixteen digit Washington state unified business identifier number of the licensees that produced, processed and sold the marijuana or marijuana products. The marijuana retail licensee trade name and Washington state unified business identifier number may be in the form of a sticker placed on the label.