



Washington State Liquor and Cannabis Board

Date: June 4, 2025

To: Jim Vollendroff, Board Chair
Ollie Garrett, Board Member
Pete Holmes, Board Member

From: Jeff Kildahl, Policy and Rules Coordinator

Copy: Will Lukela, Agency Director
Toni Hood, Agency Deputy Director
Lawrence Grant, Director of Enforcement and Education
Becky Smith, Licensing Director
Justin Nordhorn, Policy and External Affairs Director
Kevin Walder, Policy and Rules Manager

Subject: **Approval to file a pre-proposal statement of inquiry (CR 101) regarding Batch Tracking of Cannabis Plants.**

The Washington State Liquor and Cannabis Board (Board) is considering amending [WAC 314-55-083](#) to respond to a petition for rulemaking accepted in 2023 regarding Batch Tracking of Cannabis Plants.

Process

The Policy and Rules Coordinator requests approval to file the pre-proposal statement of inquiry (CR 101) for the rule making described above. A CR 101 Memorandum was presented at the Board meeting on June 4, 2025 and is attached to this order.

If approved for filing, the **tentative timeline** for the rule making process is outlined below:

June 4, 2025	Board is asked to approve filing pre-proposal statement of inquiry (CR 101). CR 101 is filed with the Office of the Code Reviser. Webpage is updated and notice circulated by GovDelivery distribution list. Informal comment period begins.
June 18, 2025	Notice is published in the Washington State Register under WSR 25-12-XXX.
July 17, 2025	Informal comment period ends.
TBD	Virtual Public Stakeholder Engagement Session
TBD	Board is asked to approve filing proposed rules (CR 102).

	CR 102 is filed with the Office of the Code Reviser. Webpage is updated and notice circulated by the rules distribution list. Formal comment period begins.
TBD	Notice is published in the Washington State Register
TBD	Public hearing is held and formal comment period ends.
TBD	Board is asked to adopt rules if no substantive changes are made (CR 103). Concise Explanatory Statement is provided to individuals offering written or oral comment at the public hearing or during the formal comment period, consistent with RCW 34.05.325. CR 103 and adopted rules are filed with the Office of the Code Reviser. Webpage is updated and notice circulated by GovDelivery distribution list.
TBD	Notice is published in the Washington State Register
TBD	Rules are effective 31 days after filing unless otherwise specified. See RCW 34.05.380(2).

_____ Approve	_____ Disapprove	_____	_____
		Jim Vollendroff, Chair	Date
_____ Approve	_____ Disapprove	_____	_____
		Ollie Garrett, Board Member	Date
_____ Approve	_____ Disapprove	_____	_____
		Pete Holmes, Board Member	Date

Attachments: CR 101 Memorandum
October 11, 2023 Petition Response



CR 101 Memorandum

Re: Batch Tracking of Cannabis Plants

Date: June 4, 2025
Presented by: Jeff Kildahl, Policy and Rules Coordinator

Background

In October 2023, the Board accepted a petition for rulemaking from a member of the public requesting amendments to [WAC 314-55-083\(4\)\(f\)](#) regarding tracking requirements for individual cannabis plants produced by cannabis licensees.

This current rule requires each cannabis plant that is eight inches or more in height or width to be physically tagged with a unique identifier and tracked individually by the producer licensee. The rulemaking petition accepted in 2023 requested updates WAC 314-55-083(4)(f) to allow cannabis plants larger than eight inches of the same strain and growth stage to be tracked in a batch instead of tracked individually as the current rule requires.

Reasons Why Rulemaking Is Needed

Rulemaking is needed to consider possible updates to WAC 314-55-083 as requested by the petition to allow cannabis plants larger than eight inches to be tracked as part of a batch and not as individual plants.

Process

The rulemaking process begins by announcing the Board's intent to consider changes to existing rules, adding new rule sections, or both, by filing a preproposal statement of inquiry (CR 101) form with the Office of the Code Reviser. This allows staff, stakeholders, industry partners, and all members of the authorizing environment to begin discussing proposed rule changes.

At this stage of the rulemaking process, no proposed language is offered. Any interested party may comment on this possible rulemaking during the designated comment period. Notice will be sent to all who have indicated that they want to receive notice of rule activity related to this preproposal statement of inquiry. The notice will identify the public comment period and where comments can be sent.



PREPROPOSAL STATEMENT OF INQUIRY

CR-101 (October 2017)

(Implements RCW 34.05.310)

Do **NOT** use for expedited rule making

Agency: Washington State Liquor and Cannabis Board

Subject of possible rule making: WAC 314-55-083. The Washington State Liquor and Cannabis Board (Board) is considering possible amendments to WAC 314-55-083 and any other sections of chapter 314-55 WAC as may be necessary regarding tracking of individual cannabis plants by cannabis licensees.

Statutes authorizing the agency to adopt rules on this subject: RCW 69.50.342

Reasons why rules on this subject may be needed and what they might accomplish: In October 2023, the Board accepted a petition for rulemaking from a member of the public requesting amendments to WAC 314-55-083(4)(f). The current rule requires each plant that is eight inches or more in height or width to be physically tagged with a unique identifier and tracked individually. The petition requested updating WAC 314-55-083(4)(f) to allow cannabis plants larger than eight inches of the same strain and growth stage to be tracked in a batch. The current rule requires cannabis plants larger than eight inches to be tracked individually through production.

Identify other federal and state agencies that regulate this subject and the process coordinating the rule with these agencies: None.

Process for developing new rule (check all that apply):

- ☐ Negotiated rule making
- ☐ Pilot rule making
- ☐ Agency study
- ☒ Other (describe) Collaborative rule making.

Interested parties can participate in the decision to adopt the new rule and formulation of the proposed rule before publication by contacting:

Name: Jeff Kildahl, Policy and Rules Coordinator
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Phone: 360-480-7960
Fax: 360-704-5027
TTY:
Email: rules@lcb.wa.gov
Web site: lcb.wa.gov
Other:

(If necessary)

Name:
Address:
Phone:
Fax:
TTY:
Email:
Web site:
Other:

Additional comments: Interested persons can participate in the rule process through open public meetings and by submitting written comments, and are encouraged to sign up for the interested parties list (GovDelivery) at <https://public.govdelivery.com/accounts/WALCB/subscriber/new>. Rulemaking notices and stakeholder engagement opportunities will be emailed via GovDelivery and posted to the LCB website at lcb.wa.gov.

Date: June 4, 2025	Signature: Place signature here
Name: Jim Vollendroff	
Title: Chair	