



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.