Washington State
Liquor and Cannabis Board

# CCRS Cannabis Central Reporting System

## October 29th, 2021
## 9 am - 11 am

- Regulatory and reporting: Examiners at mjexaminer@lcb.wa.gov 360-664-1614
- Compliance: Enforcement and Education division at mjenforcenr@lcb.wa.gov
- Technical support: testcannabisreport@lcb.wa.gov

# Welcome

- This is a recorded session webinar.
- Attendees will be on mute.
- Please submit any follow up questions or requests for information to: CCRS@lcb.wa.gov

# Agenda:

- Welcome and introductions
- What is CCRS?
- Overview of user guides and other helpful material
- System Demonstration
- Additional Launch information and questions

# CCRS Overview: What is CCRS?

The Cannabis Central Reporting System is a simplified reporting solution that incorporates ideas and concepts from the Cannabis 2.0 stakeholder workgroup. Key benefits of this system include:

- Simpler. Reduces complexity of reporting which reduces margin for error
- More flexible. Licensees perceive the framework to be more flexible for operational efficiencies since it is a reporting-only system (not traceability system)
- Potential of lower costs for compliance. Licensees may see a reduction in business and compliance costs.

# CCRS Overview: What is the technical solution?

- A modified version of the contingency solution previously built.
- This solution is a combination of a file upload platform and the web form manifest.
  - The file upload platform provides a simple file method for loading eleven key reports.
  - The web form manifest is a familiar process used in contingency periods.

# Available Documentation

- Training material will be available online at https://lcb.wa.gov/ccrs/ccrs
  - Testing Guide
  - FAQs - will continue to be updated for the duration of the CCRS project
  - Getting Started with CCRS
  - CCRS User Guide - provides step-by-step instructions of how to use the system
  - Data Model File Specification
  - CCRS Error Guide
  - Secure Access Washington (SAW) User Guide

# CCRS Lab CSV reports

- Product CSV

| | A | B | C | D | E | F | G | H | I | J | K | L |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | SubmittedBy | Jane Doe | | | | | | | | | | |
| 2 | SubmittedDate | 08/10/2021 | | | | | | | | | | |
| 3 | NumberRecords | 4 | | | | | | | | | | |
| 4 | LicenseNumber | InventoryCategory | InventoryType | Name | Description | UnitWeightGrams | ExternalIdentifier | CreatedBy | CreatedDate | UpdatedBy | UpdatedDate | Operation |
| 5 | 654321 | HarvestedMaterial | WetFlower | HarvestedFl | 1 Ounce Recently harvested flower still wet | 28 | WetFlowerINV | John Doe | 08/10/2021 | | | Insert |
| 6 | 654321 | IntermediateProduct | Infused Cooking Medium | THCButter | 1 Ounce of THC Butter | 28 | THCButterINV | John Doe | 08/10/2021 | | | Insert |
| 7 | 654321 | EndProduct | Solid Edible | Brownies | 1 Package of 10 Brownie Edibles | 10 | BrownieINV | John Doe | 08/10/2021 | | | Insert |
| 8 | 654321 | EndProduct | Sample Jar | Sample | Sample to be sent to lab | 2 | SampleINV | John Doe | 08/10/2021 | | | Insert |

- Lab Test CSV

| | A | B | C | D | E | F | G | H |
|---|---|---|---|---|---|---|---|---|
| 1 | SubmittedBy | SmithJ | | | | | | |
| 2 | SubmittedDate | 08/12/2021 | | | | | | |
| 3 | NumberRecords | 1 | | | | | | |
| 4 | LicenseNumber | InventoryExternalIdentifier | LabLicenseNumber | LabTestStatus | TestName | TestDate | TestValue | ExternalIdentifier |
| 5 | 654321 | INV0002 | 6655443322 | InProcess | Cannabinoid D9 THCA Percent | 08/12/2021 | 17% | Tst0000001 |

# System Demonstration

- Welcome email
- SAW Login to Portal
- Licensee Admin Management
- CCRS Templates & Specification Resources
- File naming convention
- Upload Tool
- Error Email

# What support is available prior to launch?

- For technical questions about CCRS contact:
  - testcannabisreport@lcb.wa.gov
- For support on regulatory reporting, contact the Examiners unit
  - mjexaminer@lcb.wa.gov
  - 360-664-1614
- For support on compliance contact the Enforcement and Education division
  - Contact your assigned EO or Cannabis Consultant

    or
  - mjenforcenr@lcb.wa.gov
- Questions not related to technical, regulatory or compliance: Contact CCRS@lcb.wa.gov

# System Launch Updates

- Scheduled Launch of production CCRS application is December 2021.
- There may be a short period of overlap between CCRS and Leaf, however submitting detail in Leaf will not suffice for the required CCRS reporting expected.
- Lab will be getting a new CCRS ID before launch.

# Lab Questions

**Q:** Will labs be required to report their information to this system within 24 hours?

- **A:** Reporting requirements have not changed. It is recommended that labs use the CSV Lab Test report as a per Certificate of Analysis submittal for reporting.

**Q:** Will the laboratory need to provide COA Documents to the LCB? Physical? Digital? Links?

- **A:** Lab are required to provide the test results to LCB via the reports established for that purposes. Record maintenance and access remain the same for both the labs and licensees. No changes have been made on the requirement to produce the records if requested by WSLCB.

**Q:** Will there be a GUI for labs using the portal?

- **A:** Labs will be assigned a lab ID and will report information that is specific to their function. The reports the labs are responsible for will all use Secure Access Washington for CSV uploads.

# Lab Questions

**Q:** Can a lab sub-contract out their testing? If they do, who is responsible for reporting the test results.

- **A:** Labs may subcontract samples for a limited suite of tests and circumstances. The primary lab is responsible for reporting the test results directly to CCRS for the applicable product tested. WAC 314-55-102 (5) and WAC 314-55-103 (18) address referencing and subcontracting.

**Q:** How often do we need to submit the CSV files for Lab test results – is daily okay?

- **A**: WAC 314-55-102 (2)(a)(ii) states: (ii) Certified labs must report quality assurance test results directly to the WSLCB traceability system when quality assurance tests for the field of testing are required within twenty-four hours of completion of the test(s).

**Q:** How often do we need to submit product CSV- daily, weekly

- **A:** Reporting requirements have not changed. Weekly is the minimum for this particular report, however there is no penalty for reporting more frequently to ensure that the product CSV stays accurate and in alignment with the Lab Test CSV reporting.

# Lab Questions

**Q:** Can we include a separate column for testname and one for analyte name instead of combining both under one column named “testname”?

- **A:** No, the CSV is preset and changing the CSV order would require a change order to the system architecture.

**Q:** Do you only want total THC and total CBD or do you want D9THC, THCa, Total THC,CBD,CBDa,Total CBD, each entered as a separate Test Name

- **A:** D9THC, THCA, Total THC, CBD, CBDA, and Total CBD per WAC 314-55-102(1)(a)

**Q:** Test Value- actual numbers or pass/fail for solvents, micro, myco, foreign matter, moisture, WA activity. (Valid Values for Lab results in user guide show pass/fail

- **A:** All values are required – actual numbers. User Guide information aligns with WAC 314-55-102 and is presented with additional detail, there are no changes in the thresholds and testing expectations.

# Lab Questions

**Q:** Lab results for edibles or topicals- user guide states results can be in mg/g or mg/serving. Previously we were directed to not enter in mg/serving only mg/g. Has this changed

- **A:** That is correct, previously LEAF only accepted mg/g as a unit. Since we now have more flexibility in our unit choice mg/serving is an acceptable value to report. Lab SOPS must indicate how these are recorded and be consistent over time in the COA and CSV reporting.

  As a side note, in the current rules draft for WAC 314-55-102, end product testing is not required.

**Q:** Non mandatory results- Do these now need to be uploaded? We never entered results for these before.

- **A:** No, non-mandatory results do not need to be entered. However, non-mandatory samples still require a manifest and inventory controls just like any other samples.

**Q:** How does a lab know what tests are needed on concentrate products? We have always relied on LEAF to tell us if micro/myco has been passed or is needed. We do not have a way to tell if the flower lot the concentrate was made from passed for micro or myco.

- **A:** WAC 314-55-102 has the list of tests required per product type and remains available for reference. The licensee who is requesting the testing suite is responsible for ensuring they have requested the needed tests. Business practices that ensure that the lab knows what the licensee is requesting are encouraged.

# Lab Questions

**Q:** Do we have to report results in 2 significant figures only? Or can we go out farther? And if it is only 2 sig. figs how is the rounding done? Is 17.5 going to be rounded up or down? Excel doesn't do significant figures. It rounds to decimal points, so if you have 1.5, 17, 0.21 each one of these cells would have to formatted differently. If rounding- how does this work for failures- does 10.01mg/serving fail or does it round to 10mg/serving

- **A:** The agency is expecting and asking that all reporting is in two significant figures so that there is consistency in reporting. For instance, in the example above of 10.01 mg/serv., if one lab reports 2 sig figs (10 mg) and another reports 4 (10.01 mg) one test would fail, while the other would pass for the same analytical result.
- **A:** Regular significant figure rules will apply as well as the typical rounding half up (0.5>1).

# Lab Questions

**Q:** Can we see a full example of completed test results for each product category using required nomenclature?

- **A:** The resources that have been reviewed today are available. Providing examples of every possible testing scenario is beyond the scope of the documentation and this webinar.

**Q:** Are the labs supposed to indicate if retests are allowed on failed tests as the Lab Results valid values chart indicates

- **A:** As reviewed in the User Guide there are a number of Lab Result values that will be redacted in the future. Do not use those selections. There one value that is intended to remain “FailRetestAllowed”. It can be used but is not required. Licensees must received LCB approval for any retest and will need to have the LCB documentation to validate they have received approval prior to requesting a lab perform a retest.

# Lab Questions

**Q:** If we get an error report will it specify which entries caused the error? And are the error reports sent immediately? Or is there a delay?

- **A:** CCRS Data Submission Guide Error Messages found on the CCRS Resources page outlines error messages. The error message email is generic language however, there will be an attachment that provides specific detail. Error delivery may vary depending on volume. There may be a delay.

**Q:** Test Value- If the unit is already listed in the test name- it seems redundant to list it in the test value. In your example in user guide you include test units in test value. If this is the format required than each entry will have to be formatted individually according to units needed making it cumbersome.

- **A:** Recognizing that TestValue and TestName do have an inherent relationship the LCB will publish for the labs a more detailed explanation of the valid TestName data field and UOM entry**.**

# Lab Questions

- **Q:** For salmonella positive results- what do you enter if you don't plate. We use a pass/fail method.
  - **A:** 1 for positives / 0 for negatives
- **Q:** Salmonella and e.coli entries – is it supposed to be in scientific notation like BTGN?
  - **A:** Scientific notation does not need to be used for $10^{-1}$, $10^{0}$, or $10^{1}$ values. If the result for Salmonella or STEC were to be greater than 99 CFU/g then scientific notation would be expected. Reporting to two significant figures is more important than scientific notation.

# Lab Questions

**Q:** Similarly some solvents are listed in scientific notation and others aren't, and some state to report in 2 sig figs but the example is only 1 sig fig. Which are we supposed to follow?

- **A:** Report to two significant figures. As stated on the previous slide scientific notation does not need to be used for $10^{-1}$, $10^{0}$, or $10^{1}$ values (scientific notation is always accepted.)

**Q:** Solvents- cyclohexane and xylenes- failure limit is 3 sig figs , but the reporting limit is 2 significant figures. How does this work?

- **A:** Both solvents will have a slight bump in tolerance by rounding to their respective two significant figure values. (i.e. Cyclohexane will go from 3880 to $3.9 * 10^{3}$)

# Lab Questions

**Q:** Please explain the various inventory identifiers.

- **A:** The content presented earlier in this webinar was designed to cover the identifier detail. This information can also be found at the CCRS page in both the User Guide and File Specification documentation.

**Q:** How do we guarantee unique external identifiers between licensees?

- **A:** Labs will not be able to guarantee unique external identifiers sent from a licensee. The labs quality controls will be on the Lab ID and correct entry and association of the test result to the external identifier provided by the licensee.

**Q:** Can we include results from multiple samples on one lab test .csv?

- **A:** Yes. Results from multiple samples can be on one lab test csv. They will need to be clearly distinct and accurate in the external identifier and lab Id.

**Q:** Do the test names have to be specific? Or can the test names be whatever the lab would like to call it?

- **A:** Test names do need to be specific. Test names may not be created by the labs. The User Guide has the content for test information and WSLCB will be sending additional detail specific to the TestName data field.

# Lab Questions

**Q:** Will there be a confirmation when the .csv is successfully processed and accepted?

**A:** No. CSV emails are only sent when there is an error. Individuals who are uploading the report will receive a "submit" confirmation on the screen after upload. It will not indicate processed and accepted.

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# Thank you for attending!

Further information available at
https://lcb.wa.gov/ccrs/ccrs

Additional questions should be sent to
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