

Plant Traceability Reporting for the Cannabis Central Reporting System (CCRS)

For Washington State Cannabis Producers

This guidance covers plant tags and related reporting requirements. It is a supplement to the **CCRS Upload User Guide**, regarding the submission of plant files, plant destruction files, plant transfer files, as well as other files related to these reporting obligations.

Background: Per RCW 69.50 and WAC-314-55-083(4) Cannabis licensees must track cannabis from seed to sale in the Cannabis Central Reporting System (CCRS). Cannabis seedlings, clones, plants, lots of useable cannabis or trim, leaves, and other plant matter, batches of extracts, cannabis infused products, samples, and cannabis waste must be traceable from production, through processing, and finally through the retail environment. This includes being able to identify which lot was used as base material or to create each batch of extracts or infused products.

Providing traceability information prevents diversion and promotes public safety.

Specific to plant tags, and related reporting requirements: sub-sections of <u>WAC-314-55-083(4)</u>

The following information is required and must be completely up-to-date in CCRS:

- Notification of "events," such as when a plant enters the system (moved from the seedling or clone area to the vegetation production area at a young age);
- When plants are to be partially or fully harvested or destroyed;
- When a lot or batch of cannabis, cannabis extract, cannabis concentrates, cannabis-infused product, or cannabis waste is to be destroyed;
- When useable cannabis, cannabis concentrates, or cannabis-infused products are transported;
- Any theft of useable cannabis, cannabis seedlings, clones, plants, trim or other plant material, extract, infused product, seed, plant tissue or other item containing cannabis;
- All cannabis plants eight or more inches in height or width must be physically tagged and tracked individually.

Fundamentals of Plant Tags: Sample Process for Producers

We will use a fictitious producer (Joe Green) that just got a license. With this mock licensee, we will give an overview of the files needed to report at various stages of production, as well as examples of file templates used to transmit data into CCRS.

Example: Joe Green recently got a producer license and passed inspection to allow production (growing of) cannabis at their location. They want to make sure they follow all reporting requirements in WAC-314-55-083(4), so let's take a look at what reports are needed along the way. For all the examples below we will use Joe's pretend license # 456789.

Joe receives 350 seeds, 50 clones and one (1) mother plant from another producer.

- The producer selling the seeds and plants to Joe creates and submits a manifest to CCRS
- Joe will claim these various items as inventory, once he sets up the Group 1 files

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- 1. First, Joe submits the following Group 1 files
 - Strain
 - i. White Widow
 - ii. Blue Dream
 - iii. Gorilla Glue #4

	А	В	С	D	E
1	SubmittedBy	Joe Green			
2	SubmittedDate	9/12/2023			
3	NumberRecords	3			
4	LicenseNumber	Strain	StrainType	CreatedBy	CreatedDate
5	456789	White Widow	Hybrid	Joe Green	9/12/2023
6	456789	Blue Dream	Sativa	Joe Green	9/12/2023
7	456789	Gorilla Glue #4	Indica	Joe Green	9/12/2023
8					

- Area defines the physical locations of cannabis plants, such as
 - i. Nursery
 - ii. Greenhouse A
 - iii. Greenhouse B
 - iv. Outdoor Area 1
 - v. Outdoor Area 2

4	АВ		С	D	Е	F	G	Н	1
1	SubmittedBy	Joe Green							
2	SubmittedDate	9/12/2023							
3	NumberRecords	5							
4	LicenseNumber	Area	IsQuarantine	ExternalIdentifier	CreatedBy	CreatedDate	UpdatedBy	UpdatedDate	Operation
5	456789	Nursery	FALSE	Clone Room	Joe Green	9/12/2023			Insert
6	456789	Greenhouse A	FALSE	Greenhouse A	Joe Green	9/12/2023			Insert
7	456789	Greenhouse B	FALSE	Greenhouse B	Joe Green	9/12/2023			Insert
8	456789	Outdoor Area 1	FALSE	Outdoor Area 1	Joe Green	9/12/2023			Insert
9	456789	Outdoor Area 2	FALSE	Outdoor Area 2	Joe Green	9/12/2023			Insert
10									

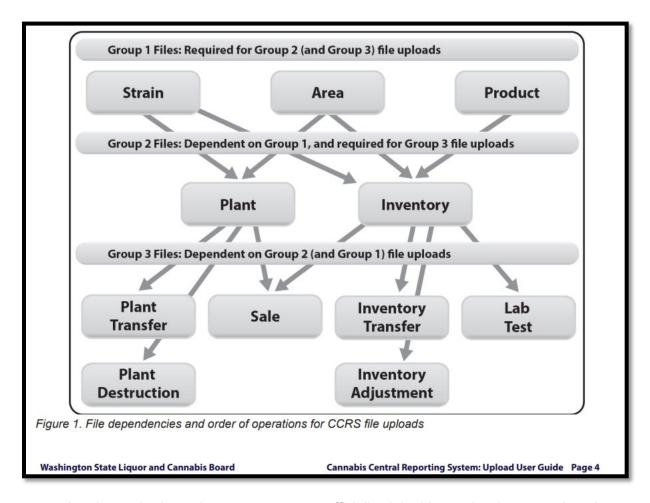
• Product (initial report, will be updated later with harvested materials)

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i. Propagation Materials

4	А	В	С	D	E	F	G	Н	1	J	K	L
1	SubmittedBy	Joe Green										
2	SubmittedDate	9/12/2023										
3	NumberRecords	4										
4	LicenseNumber	InventoryCategory	InventoryType	Name	Description	UnitWeightGrams	ExternalIdentifier	CreatedBy	CreatedDate	UpdatedBy	UpdatedDate	Operation
5	456789	Propagation Material	Seed	Seed	100 White Widow Seeds	0	Seed_WW_JG23	Joe Green	9/12/2023			Insert
6	456789	Propagation Material	Seed	Seed	250 Blue Dream Seeds	0	Seed_BD_JG23	Joe Green	9/12/2023			Insert
7	456789	Propagation Material	Clone	Clone	50 Gorilla Glue #4 Clones	0	Clone_GG_JG23	Joe Green	9/12/2023			Insert
8	456789	Propagation Material	Plant	Plant	1 Gorilla Glue #4 Motherplant	0	MotherPlant1_JG23	Joe Green	9/12/2023			Insert
9												

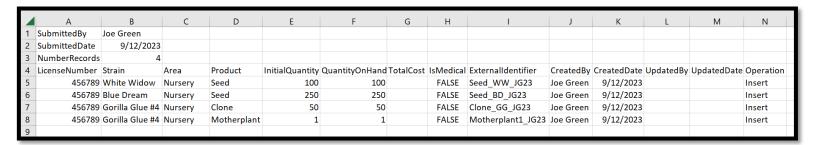
2. As seen in steps 1 through 3, Joe submitted the three fundamental Group 1 files, which are needed *before* any Group 2 or Group 3 files can be submitted (see diagram below, taken from page 4 of the CCRS Upload User Guide).



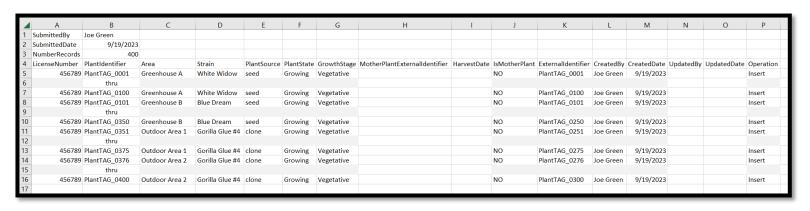
3. Joe then submits an inventory report, to officially claim his seeds, clones, and mother plant as newly received/created inventory (all are considered "Propagation Material").

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There are similarities in the information between "Product" and "Inventory" by design, as licensees report their inventory as the amounts of previously defined products.



- 4. Joe plants 100 seeds in Greenhouse A and another 250 seeds in Greenhouse B until these plants reach 8" in height, there are no plant tags required on the plants themselves, nor as any reported plant tags in CCRS. Joe needs to prepare for when these plants approach 8" in height, because a unique ID tag for each plant will soon be required to be physically attached to each plant and reported to CCRS.
- 5. The 50 clones that Joe received were all 3-4" in height and all 50 came with a single ID derived from their mother plant. As they continue to grow, Joe plants the 50 clones into individual containers and then places 25 others in Outdoor Area 1 and another 25 in Outdoor Area 2. Again, Joe needs to prepare for when any of these plants approach 8" in height, as a unique ID tag for each plant will soon be required to be physically attached to each plant and reported to CCRS.
- 6. Joe provided the growing seedlings and clones with good conditions, and they are rapidly approaching 8" in height, so now Joe needs to create and submit a plant tag report, and physically attach a unique ID tag to the base of each plant.



Please note: the above screenshot shows "thru" on several lines, this means that all 400 plant tags would be entered, (it's not possible to show a screenshot with all 400 tags) A real plant tag report would need to include each Plant Tag ID# that is between 0001 and 0100, between 0101 and 0250, and so on.

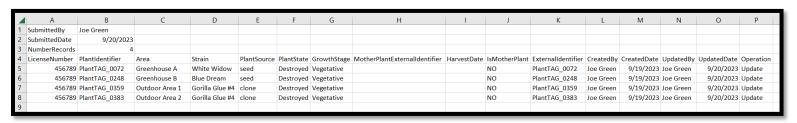
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7. Joe identifies several plants grown from seed are males and wants to get rid of those before they pollinate any female plants. Joe also noticed that a few plants are not healthy, and decides to destroy these as well, thus he will need to report a destruction event (a Group 3 type file) and update their plant report accordingly.

Destruction event example

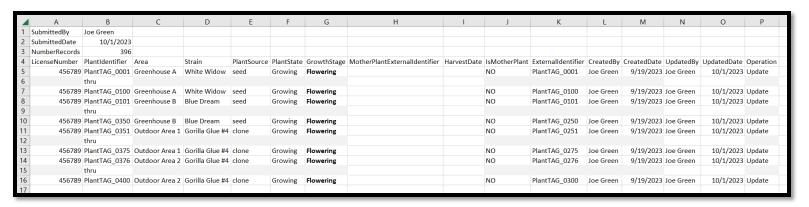
	Α	В	С	D	E	F	G	Н	1	J	K	L
1	SubmittedBy	Joe Green										
2	SubmittedDate	9/19/2023										
3	NumberRecords	4										
4	LicenseNumber	${\bf Plant External Identifier}$	DestructionReason	DestructionDetail	DestructionMethod	DestructionDate	ExternalIdentifier	CreatedBy	CreatedDate	UpdatedBy	UpdatedDate	Operation
5	456789	PlantTAG_0072	MalePlant		Compost	9/19/2023	PlantTAG_0072	Joe Green	9/19/2023			Insert
6	456789	PlantTAG_0248	MalePlant		Compost	9/19/2023	PlantTAG_0248	Joe Green	9/19/2023			Insert
7	456789	PlantTAG_0359	PlantDied		Compost	9/19/2023	PlantTAG_0359	Joe Green	9/19/2023			Insert
8	456789	PlantTAG_0383	Other	Fungal disease	Other	9/19/2023	PlantTAG_0383	Joe Green	9/19/2023			Insert
9												

Plant ID report update example (for destruction of plants)



8. Time passes and growing conditions remain great, so Joe doesn't lose any more plants to destruction. As the day length shortens for plants in Outdoor Area 1 and Outdoor Area 2, Joe also changes the light schedule in Greenhouse A and Greenhouse B, and thus all growing plants begin to flower. Thus, Joe submits an updated Plant report for all remaining plants, to note they are now in the "Flowering" stage of growth.

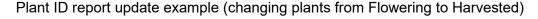
Plant ID report update example (changing plants from Vegetative to Flowering)

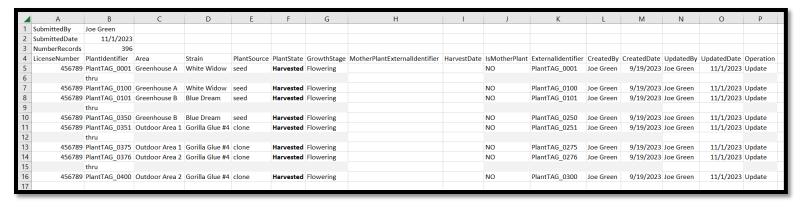


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As previously noted, the above screenshot shows "thru" on several lines. This means that all remaining 396 plant tags would be entered (It isn't possible to show a screenshot with all 396 tags). A real plant tag report would need to include each Plant Tag ID# that is between 0001 and 0100, between 0101 and 0250, and so on. There are only 396 plant tags that need to be updated, as four (4) were previously destroyed.

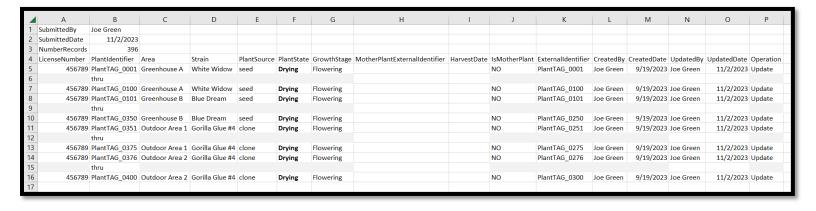
9. Finally, the day comes for harvest, so Joe cuts down the remaining 396 plants and updates the plant report again.





10. The example above shows that all plants were harvested. Some producers may sell freshly harvested plants as is, but many will dry them out, so for those that dry these plants a final report would need to be submitted, noting that the plant state is "Drying."

Plant ID report update example (changing plants from Flowering to Harvested)



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11. Now that Joe has harvested and dried his plants, he needs to officially report the Flower, Wet Flower (if any wasn't dried and is intended for sale as "fresh"), Other Material Lot (i.e. trim), and Waste. In order to do that, he will first need to submit these types of inventory as a Product (a Group 1 type of file), and then claim those harvested materials as Inventory (a Group 2 type of file).

For more information on how to submit the related Group 1 and Group 2 files, please refer to CCRS Upload User Guide

12. Joe wants to sell his harvest to a processor, so it can be made into ready-to-purchase dried flower, sell the fresh "wet" flower and trim to be extracted into concentrates, and even further processed into edibles. To sell his product, he will need to submit a Sales Report, submit an Inventory Transfer report, and update his inventory again (submit updated Inventory) to reflect the amounts of products that are no longer on site.

For more information on how to submit the related Group 3 files mentioned above, please refer to CCRS Upload User Guide

13. One final important report or document is required to transport cannabis from Joe's location to any processor and/or retailer, and that is the need to fill out a Manifest and submit to the LCB.

For more information on how fill out and submit a Manifest, please refer to the <u>CCRS</u>
<u>Transportation Manifest User Guide</u>

Questions? Please contact us - we're here to help!

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