




**Liquor and Cannabis Board Interim Policy
BIP-13-2019**

Subject: Issues with Release 1.37.5 of Leaf Traceability System Software

Effective Date: July 23, 2019

Ending Date: Upon the effective date of rules to implement this policy (or rules modifying WAC 314-55-102 and WAC 314-55-085) or Board action rescinding this policy

Approved:



Jane Rushford, Chair



Ollie Garrett, Board Member

NOT PRESENT

Russ Hauge, Board Member

Purpose:

This policy addresses challenges faced by cannabis licensees following the most recent software changes to the Leaf Traceability System. The problems are associated with the System's ability to associate and retrieve lab test results to the needed inventory record as required under WAC 314-55-102. It is the Board's intent to facilitate licensees' ability to comply with state laws and regulations in light of the challenges created by the changes to the system.

The Board recognizes the importance of both tracking and maintaining product flow through the producers, transporters, processors, labs, retailers, and ultimately to the customers. Currently, elements of the System are interfering with the flow of the product. The Board is committed to working with licensees, labs, and integrators to ensure their business operations can be maintained without compromising public health and safety.

Due to first-hand user experiences, licensees, labs, and integrators impacted by System issues have a unique perspective on the needs of their business and workarounds that may fit that need. However, these workarounds may not follow standard procedures as outlined in the applicable WACs.

As such, effective immediately, the LCB will allow licensees, labs, and integrators flexibility to develop workarounds to problems directly associated with the lab test data and manifest information that remain unresolved by recent fixes to the System. These workarounds may vary from the lab test and manifest standards delineated in WAC 314-55-102 and WAC 314-55-085 to the extent necessary and so long as the workarounds continue to meet the following conditions:

1. Report Workarounds

- Any workaround adopted by a licensee or integrator must be reported to the LCB prior to use at workarounds@lcb.wa.gov.
 - Approval of workarounds is not required
 - Workaround documentation is for reference purposes
- Any workaround adopted by a licensee or integrator must identify all links to the data points in the System that are affected, so that workarounds clearly show linkage between the input and output for product tracking.
- Ensure workarounds developed are only for the applicable issues related to lab results and manifests.

2. Maintain Traceability

- Affected licensees, labs, and integrators must maintain records ensuring all product is traced from the producers all the way through the retail sale.

3. Maintain Test Accuracy

- Any traceability workaround must not compromise or misrepresent true test results of products involved in Quality Assurance (QA) testing.
- For all products sold at retail, the required test results and required accompanying information must be available for customers.

4. Maintain Product Safety

- All products sold at retail must have accurate packaging and labeling information for the product being sold.
- All products must continue to comply with all pesticide laws and rules.
- Any workaround must prevent product diversion or illegal integration.