



NOTICE OF ADOPTION OF POLICY STATEMENT

Title of Policy Statement: Security and Traceability Requirements for Marijuana [Cannabis] Licensees – Policy Statement Number PS21-10.

Issuing Entity: Washington State Liquor and Cannabis Board

Subject Matter: This policy statement describes marijuana licensee traceability reporting requirement adjustments that support transition from the current Leaf Data System to the Cannabis Central Reporting System (CCRS).

Effective Date: December 3, 2021

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Policy Statement

Title: Security and Traceability Requirements For Marijuana [Cannabis] Licensees *Number PS-21-10*

References: [RCW 69.50.325](#)
[RCW 69.50.342](#)
[WAC 314-55-083](#)

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[RCW 34.05.230 – Interpretive and policy statements](#)

- (1) An agency is encouraged to advise the public of its current opinions, approaches, and likely courses of action by means of interpretive or policy statements. Current interpretive and policy statements are advisory only. To better inform the public, an agency is encouraged to convert long-standing interpretive and policy statements into rules.

INTRODUCTION

Throughout this document, the term “cannabis” is used in the context of the statutory meaning of “marijuana” as defined in chapter 69.50 RCW. However, current statutory references provided in this document continue to use the word “marijuana.”

This policy statement describes marijuana licensee traceability reporting requirement adjustments that support transition from the current Leaf Data System to the Cannabis Central Reporting System (CCRS).

This policy statement supersedes and replaces previous agency guidance concerning this topic.

STATUTORY AUTHORITY

RCW 69.50.325 describes the scope of marijuana producer, processor and retailer licenses.

RCW 69.50.342 outlines the Board’s ability to adopt rules, including but not limited to, records to be created and maintained by licensees, and security requirements for premises where marijuana is produced or processed.

WAC 314-55-083 describes security and traceability requirements for marijuana licensees.

BACKGROUND

Since 2019, the Washington State Liquor and Cannabis Board (WSLCB) has worked closely and collaboratively with stakeholders to simplify the state's traceability system to reflect the growth and maturation of the cannabis industry. By the end of 2021, the WSLCB and industry will transition from the current Leaf Data System platform to a simplified, data-reporting platform developed and maintained by WSLCB.

Consistent with those efforts and transition to the new system, certain licensee reporting requirements will be adjusted. However, current rule reflects compliance with the Leaf Data System. This policy statement addresses those reporting requirement adjustments.

POLICY STATEMENT

WAC 314-55-083(4) provides that certain information must be kept "completely up-to-date in a system specified by the WSLCB," and outlines a complete list of required information in WAC 314-55-083(4)(a) through (p).

Under the CCRS system, "up-to-date" means a **weekly report** of the required information if there have been updates, changes or actions to any of the information described in WAC 314-55-083(4)(a) through (p).

Further, WAC 314-55-083(4)(h) provides that "[a]ll marijuana, usable marijuana, marijuana infused products, marijuana concentrates, seeds, plant tissue, clone lots, and marijuana waste must be physically tagged with the unique identifier generated by the traceability system."

The CCRS system will not be generating unique identifiers; these will have to be generated by licensees. Under the CCRS system, all marijuana, usable marijuana, marijuana infused products, marijuana concentrates, seeds, plant tissue, clone lots, and marijuana waste must be physically tagged with the unique identifier **reported to** the traceability system.

All other traceability reporting requirements such as manifests, lab results, and co-ops remain the same consistent with existing rule.