



Ohio Department of Commerce Medical Marijuana Control Program

MMCP Guidance – Metrc Transfers

Pursuant to its authority in Chapter 3796 of the Ohio Revised Code (O.R.C.) and Chapter 3796 of the Ohio Administrative Code (O.A.C.), the Ohio Department of Commerce (Department) Medical Marijuana Control Program (MMCP) is providing guidance on the use of Metrc Transfers for licensed cultivators and processors. Effective July 1, 2023, all licensees will be required to ensure appropriate and consistent use of Metrc Transfers in accordance with this guidance.

Pursuant to O.A.C. 3796:5-3-01 a medical marijuana entity must maintain a written transportation log (i.e., manifest) prior to transporting any medical marijuana. The licensee transporting the medical marijuana must transmit a copy of the manifest to the licensee receiving the medical marijuana and enter the required information in Metrc before the close of business on the day prior to the transfer.

This document provides further guidance on the appropriate and consistent use of Metrc Transfers.

The MMCP will monitor Metrc to ensure licensees comply with this guidance. Questions may be directed to MMCPCompliance@com.ohio.gov and your assigned MMCP Agent.



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Transferring and Receiving Entities

Licensed medical marijuana facilities are only permitted to transfer product from cultivator to processor, and processor to dispensary.

Any necessary exceptions to these restrictions (ex. processor to cultivator) will require approval from the MMCP by submitting a ticket to Metrc Support.

Transfers from cultivator to cultivator or processor to processor are prohibited.

Transfer Type & Required Information

All transfers from cultivator to processor and processor to dispensary are entered into Metrc as “Wholesale” transfers. Licensees must create a separate manifest for each receiving facility. All manifests must contain the following information:

- (1) The names and addresses of the medical marijuana entities sending and receiving the shipment.
 - a. In Metrc, licensees must enter the Facility License Number, which will populate the name and address of the receiving entity.
- (2) The names, Department-issued Employee ID Badge numbers, Driver’s License numbers, and phone numbers of the employees transporting the medical marijuana.
 - a. Driver information may be stored in Metrc via use of the template feature.
 - i. Both drivers’ information must be entered in each applicable field. For example, if John Smith and Jane Doe are the two individuals transporting the medical marijuana, the “Driver’s Name” field must list John Smith/Jane Doe, the “Employee ID” field must list MMCP12345/MMCPE54321, etc.
- (3) The license plate number and vehicle make and model that will transport the shipment.
 - a. Vehicle information may be stored in Metrc via use of the template feature.
- (4) The time of departure and estimated time of arrival.
- (5) The specific delivery route, which includes street names and distances.
- (6) The total weight of the shipment and a description of each individual package that is part of the shipment, and the total number of individual packages.
 - a. On the Metrc Transfer screen, the licensee must enter the package number for each package in the shipment.
 - b. The necessary information, including the description and weight of each package, will automatically be pulled from the information entered into Metrc for that package and included on the manifest.



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- (7) The wholesale price.
- a. Licensees must enter an accurate wholesale price. If there is no wholesale price (for example, a cultivator sends plant material to an affiliated processor), the amount must be entered as \$.01.

Transfer Errors and Issues

The proper method to correct a transfer error depends on when the error is identified. Below are the most likely scenarios.

Originating Facility – the facility transferring the medical marijuana finds an error or issue after the manifest has been submitted, but before the shipment has left the facility.

- The originating facility should locate the transfer manifest in Metrc under Licensed Transfers – Outgoing.
- Select “Edit” for the manifest to be corrected.
- Make necessary modifications and select “Save.”

Receiving Facility – the facility receiving the shipment finds an error or issue upon receipt, but before accepting the shipment. The receiving facility must **not** accept a transfer if there is an error and can either reject the full transfer manifest or individual packages.

- The receiving facility should locate the transfer manifest in Metrc under Licensed Transfers – Incoming.
- Select “Receive.”
- Select “Reject” on the template to reject the full manifest, or on individual packages.
- Complete the rejection “Reason” using the appropriate option provided in the table below.
- Complete the “Notes” field with all relevant information for the rejection.

Receiving Facility – the facility receiving the shipment finds an error or issue after the shipment has been received and accepted.

- Receiving facility must submit a ticket to Metrc Support. A facility may not attempt to rectify the error without approval from the MMCP.

Transportation Rules

Please refer to O.A.C. 3796:5-3-01 for other important information regarding cultivator and processor transportation of medical marijuana, including vehicle, driver, and route requirements.

Rules for testing laboratories related to the transportation of medical marijuana can be found in O.A.C. 3796:4-2-10.



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Transfer Manifest Rejection Reasons Cultivators and Processors	
Damaged Product	"Damaged Product" must be used when the primary reason for the transfer rejection is because the medical marijuana is damaged.
Incorrect Quantity	"Incorrect Quantity" must be used when the primary reason for the transfer rejection is because the amount of medical marijuana received is incorrect. It may be incorrect because the quantity listed on the manifest does not match the physical quantity received or it may be incorrect because it is not the amount that was expected.
Incorrect Item	"Incorrect Item" must be used when the primary reason for the transfer rejection is because the item(s) received is incorrect. It may be incorrect because the item listed on the manifest does not match the physical item received or it may be incorrect because it is not the item that was expected.
Product Recall	"Product Recall" must be used when the medical marijuana contained in the transferred packages is subject to a product recall.
Loss Due to Theft	"Loss Due to Theft" must be used to record a loss of medical marijuana due to theft, diversion, or loss. Theft requires notification to MMCP and law enforcement pursuant to O.A.C. 3796:5-4-01.
Spoilage/Expiration	"Spoilage/Expiration" must be used when the package is being rejected because the medical marijuana is spoiled or expired.
Other	"Other" may only be used when the reason for the rejection is not covered by one of the other options. The licensee must provide detailed notes to explain the reason for the rejection of the transfer.



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Ohio Statutory and Administrative Authority

- Ohio Revised Code 3796.03(C): permits the Department to establish any rules it deems necessary for the ongoing administration of the medical marijuana control program.
- Ohio Administrative Code 3796:5-6-01 and 5-6-02 permit the Department to enforce the rules and regulations established under Chapter 3796 of the Ohio Administrative Code.
- Ohio Administrative Code 3796:5-3-01 outlines all transportation requirements for cultivators and processors.
- Ohio Administrative Code 3796:4-2-10 establishes all requirements laboratories must adhere to when transporting medical marijuana testing samples.
- Ohio Administrative Code 3796:2-2-01, 3-2-01, and 4-2-01 mandate that licensees establish and maintain certain policies and procedures within their standard operating procedure that ensure compliance with the rules for production, storage, inventory, and transportation of medical marijuana.
- Ohio Administrative Code 3796:2-2-04, 3-2-04, and 4-2-01(D) mandate that licensees track and submit into the Metrc system any information the Department determines necessary for maintaining and tracking medical marijuana.