



**CANNABIS CONTROL BOARD**

**89 Main Street Montpelier, VT 05602 | [ccb.vermont.gov](http://ccb.vermont.gov)**

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# **INVENTORY TRACKING AND LABORATORY TESTING GUIDANCE**

**OCTOBER 2022**

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## Cultivator Tracking

### Harvest Lots

*Harvest Lot* means cannabis grown in the same manner. To meet the criteria for a single harvest lot, the given lot of cannabis would need to be on the same flowering, fertilizer, and pesticide application schedule. A single harvest lot may contain one or multiple cultivars of cannabis.

Each harvest lot will need to be tested for pesticides and pathogens.

Growers decide individually how many harvest lots they need to have. This will vary depending on what works best for a grower's individual business practice.

***Harvest lot number will be your license number and a sequential number.***

Ex. Harvest lot number = LIC1234-001

### Process Lots

*Process lots* are whole or partial harvest lots that follow different paths toward market or diverted into waste. For example – a single harvest lot would be broken into two process lots if half was sold fresh frozen to a manufacturer, and half was dried, cured, and sold as bulk flower to a retailer.

***Process Lot numbers are the harvest lot number with an additional sequential number.***

Ex. Process lot number = LIC1234-001-001

### Notes on Testing for Process Lots

Process lots of smokable flower will need to be tested for THC potency and pathogens. The moisture analysis will be part of this testing. Flower for retail sales must be at or below 30% THC content.

Cannabis flower that tests positive for *Aspergillus* cannot enter the market as a smokable product. It may, however, be used for extraction purposes.

## Manufacturer Tracking

### Concentrates

All concentrates must be tested for THC potency. Non-decarboxylated concentrates entering the retail market must also be tested for pathogens. THC and THCA cannabinoid testing are required. Other cannabinoid testing is optional and will vary depending on the cannabinoid content guaranteed on the product label.

Solvent extracts or extracts further processed with solvents must be tested for residual solvents.

### Manufacture Lot

*Manufacture Lot* is a single lot of extract produced via solvent extraction or mechanical extraction. It may be a combination of one or multiple process lots from one or multiple cultivators.

***The manufacture Lot number is the manufacturers license number and a sequential number.***

The manufacturer lot number is traceable back to all the harvest lots that went into the manufacturer lot.

Ex. Manufacture lot number = LIC1234-001

*Manufacture Process Lots* are whole or partial manufacture lots that follow different paths to market or are sold to different licensed manufacturers for further processing into cannabis products.

Ex. Manufacture process lot number = LIC1234-001-001

Once the final cannabis product is achieved, and is ready to be sold, the manufacturer process lot number must trace to the product being offered for retail sale.

## Transfers of Cannabis

Transfers must be reported by all license types when any cannabis or cannabis products change owner. The process lot or manufacture process lot number or the registered product and amount and date of transfer will be reported by both the receiver and the sender.

**Manufacturers** will be required to report what is coming into their facility from which license. They will also be required to report what was manufactured – in either number of registered products or in weight of extract. This can be done as the products are produced, or it may be reconciled every two weeks.

## Retail Reporting

Until the final reporting systems are fully developed and released, retailers will report aggregate sales of each product sold in a two-week period. Transfer reports will reconcile inventory still on site. This can be done at any time during the interim reporting period if the same two-week period is identified.

The interim reporting forms will only register 10 products per report – multiple reports may be necessary to accurately track the required data. The interim forms will not support a direct connection with your point-of-sale software.

The CCB, in partnership with the Agency of Digital Services, hope to move toward a system that will have the ability to integrate with point-of-sale tracking software, but at this time those services are not available.

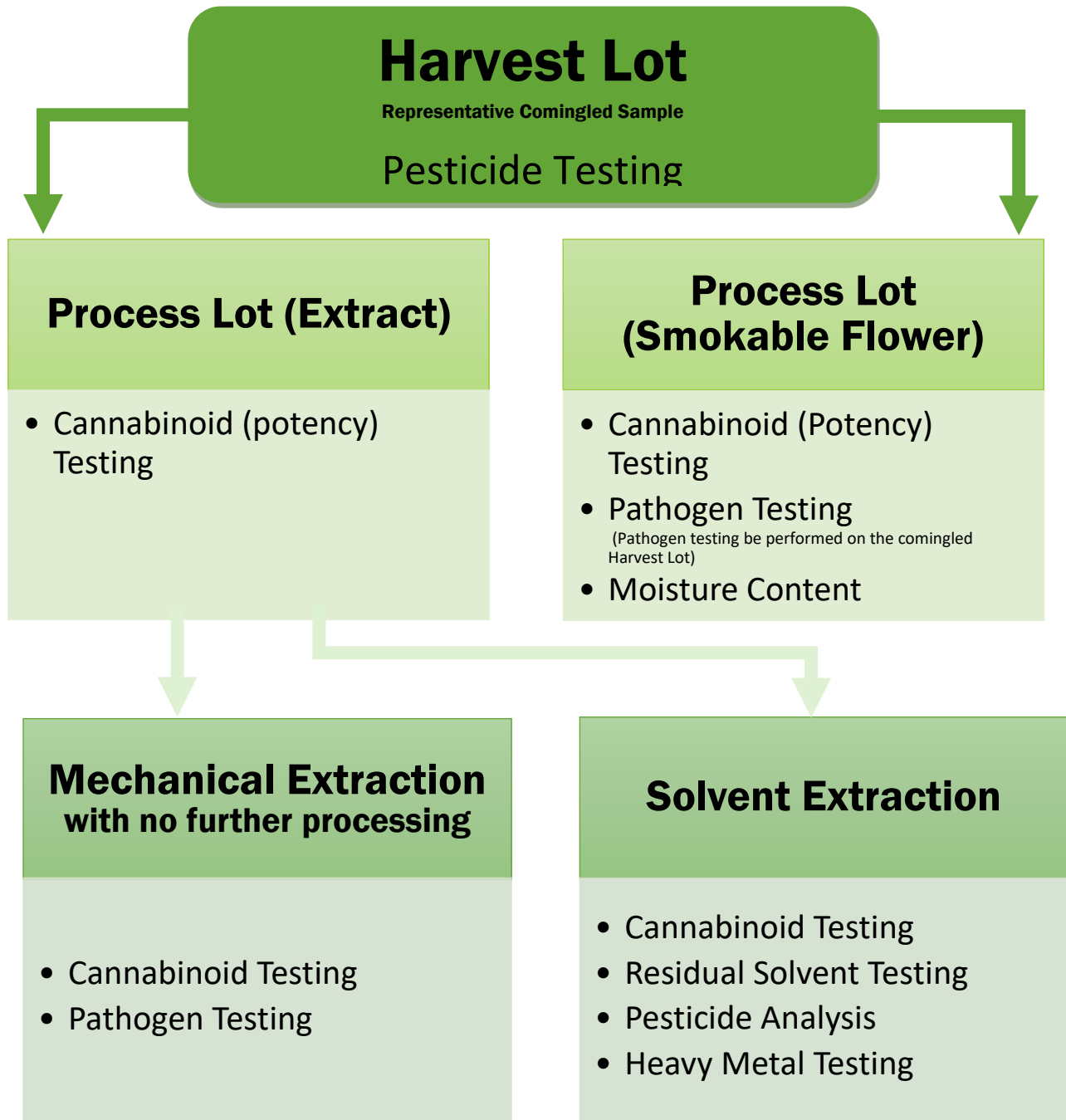
## Loss of Cannabis

All licensees will report any loss of material or product on the loss form. This form captures losses of plant material or product.

Loss of plant material will be tracked by weight. Product loss will be tracked by number of products.

This form will be used to report any loss – including samples sent to other licensees, loss from contamination / adulteration, and waste products.

## Laboratory Testing Flowchart



Cannabinoids	
THC – Tetrahydrocannabinol	THCA – Tetrahydrocannabinol Acid
CBD – Cannabidiol	CBDA – Cannabidiolic Acid
THCV – Tetrahydrocannabivarin	CBC – Cannabichromene
CBG – Cannabigerol	CBDV – Cannabidivarin
CBGA – Cannabigerolic Acid	CBN – Cannabinol

