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# **INVENTORY TRACKING GUIDANCE**

## **MARCH 2025**

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## Introduction

State law and Board rule [2.2.6](#) require that cannabis establishments track cannabis and cannabis products from seed to sale. [7 V.S.A. § 881\(a\)\(1\)\(J\)](#).

All licensees must use the Inventory Tracking forms available through the CCB Portal:

<http://vermont.force.com/vccb/s/>

If licensees have questions about Inventory Tracking, please reach out to the CCB Compliance Team at [CCB.InventoryTracking@vermont.gov](mailto:CCB.InventoryTracking@vermont.gov).

### CCB Rule 2.2.6: Tracking of Cannabis and Cannabis Products

- a) Cannabis Establishments shall comply with the Inventory Tracking System in a manner determined by the Board and shall cooperate with any third-party vendors the Board utilizes for the purpose of implementing the system. The Inventory Tracking System policy shall be readily available to the public and will not change without at least 90 days of notice.*
- b) Cannabis Establishments shall be responsible for costs associated with compliance with, and adoption of, the Inventory Tracking System.*
- c) All Cannabis and Cannabis Products must be tracked using the Inventory Tracking System from the time the Cannabis is grown by a cultivator until it is sold to a consumer by a retailer. A Cannabis Establishment must reconcile all on-premises and in-transit Cannabis or Cannabis Product inventories each month and must complete the reconciliation within 15 days of the end of each month.*
- d) Cannabis Establishments must have the ability to reconcile transported and on-hand Cannabis and Cannabis Product inventory with the Inventory Tracking System and the associated transaction history and transportation order receipts.*
- e) If Cannabis or Cannabis Product is not ultimately sold to a consumer, it must be disposed of in the manner prescribed by section 2.2.8 of this rule and the disposal must be entered into the Inventory Tracking System.*
- f) Cannabis Establishments and the individuals using the Inventory Tracking System are responsible for the accuracy of all information entered into the Inventory Tracking System. Any misstatements or omissions may be considered a license violation affecting public safety.*

## 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/strains of cannabis.

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

***In the Inventory Tracking System, harvest lot number (the number you provide) will be automatically combined with your license number. When you enter 001, the system will render your harvest lot as shown below.***

Ex. Harvest lot number = CLTV1234-001

### Process Lots

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

Rule 2.1.3(r).

***Process Lot numbers can be alpha-numeric The Inventory Tracking System, as in the case of harvest lots, will automatically combine the harvest lot number with the process lot values you provide. Sequential numbers are recommended but not required.***

Ex. Process lot number = CLTV1234-001-001

## Manufacturer Tracking

*Concentrates/Extracts, Edibles, Tinctures, Infused (Flower and Pre-rolls), Topicals, and Vape Cartridges*

### Manufacturer Lot

Manufacturer Process Lots are whole or partial manufacturer lots that follow different paths to market or are transferred to other licenses for further processing.

Manufacturer lot reporting can follow three paths.

- Plant Material
  - Provide harvest process lot(s)
- Concentrate/Extract
  - Provide manufacturer process lot(s)
- Plant Material and Concentrate/Extract
  - Provide harvest process lot(s) for plant material
  - Provide manufacturer process lot(s) for concentrate/extract

In each case, you will be prompted for source material harvest process lots and/or manufacturer process lots. The manufacturer lot number is traceable back to all the harvest lots that went into the manufacturer lot.

***Manufacturer Process lot numbers can be alpha-numeric. The Inventory Tracking System will automatically combine your license number with the manufacturer process lot you provide. Sequential numbers are recommended but not required.***

***When you enter 001, the manufacturer lot number will be rendered as below:***

Ex. Manufacturer lot number = MANU1234-001

A best practice for naming Manufacturer Process lots is to specify source material and product in the Manufacturer lot number.

- Your licensed concentrate source material: MANU1234-001
  - Gummy Product from your licensed concentrate source material: MANU1234-001-gummy-1
- Other licensee's source material: MANU1234-001
  - GUMMY MADE FROM MANU1234-001, Product is MANU6789-001-001

Once the final cannabis product is ready to be sold, the manufacturer process lot must be printed on the product label.

## Transfers of Cannabis

Transfers must be reported by all license types when any cannabis or cannabis products are moved between licenses. The harvest process lot or manufacturer process lot number(s), registered products, unregistered products, quantities, and date of transfer will be reported by the sender.

Product Type	Registered Product	Non-Registered Product
Concentrate/Extract	Cost per Gram Weight of Concentrate/Extract per package Number of packages	Cost per Gram Total Weight in Grams
Edible/Gummy	Number of Packages Weight of THC per package Cost per Milligram THC	Number of Servings Weight of THC per serving (milligrams) Cost per Milligram THC
Flower (pre-roll and flower)	Cost per Gram Number of packages Weight per package	Cost per Gram Total Weight in Grams
Infused (pre-roll and flower)	Number of packages Cost per package Total Weight of Infused Product (per package)	Cost per Gram Total Weight of Infused Product (Grams)
Tincture	Number of packages Weight of THC per package Cost per Milligram THC	Volume (ml) Weight of THC per ml (mg per ml) Cost per Milligram THC
Topical	Number of packages Weight of THC per package Cost per Milligram THC	Weight of product (grams) Weight of THC (grams)
Vape Cartridge	Cost per Gram Number of cartridges Weight of Concentrate per cartridge	Number of Cartridges Weight of Concentrate per Cartridge (grams)

## Acquisition of Cannabis

Acquisitions must be reported by all license types when any cannabis or cannabis products are transferred. Once the sender submits a transfer form, the Inventory Tracking System will notify the receiving license via email. Acquisition forms cannot be completed without an Inventory Tracking ID. The notification will include an Inventory Tracking ID. The acquisition form will prompt the receiver for the Inventory Tracking ID associated with the transfer. When the receiving license enters the IT ID into the acquisition form, the receiver is prompted to verify transfer details and submit the acquisition form as confirmation of the transaction.

**NOTE: For transferring products between licenses owned by the same entity, you need two portal accounts: one for transfer and another for acquisition.**

1. Use your **default portal account** to enter the inventory tracking **transfer** form.
2. Use a **second portal account** to complete the inventory tracking **acquisition** form. (If you do not have a second portal account, [create a second portal account](#), and ask [CCB.applications@vermont.gov](mailto:CCB.applications@vermont.gov) to share your submission with the new portal account.)

## Retail Reporting

Retailers are required to report all sales. This can be accomplished manually through the retail Inventory Tracking forms in the portal or by using POS systems integrated with the retail API.

## Loss of Cannabis

All licensees will report any loss of material or product on the Inventory Tracking loss form. Loss of plant material is reported by weight. Loss of product is tracked by product quantities.

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

## Video Training

- [Cultivator Training](#)
- [Transfer forms training](#)
- [Acquisition forms training](#)
- [Manufacturer Training](#)