

Maine State Legislature
Veterans and Legal Affairs Committee
State House – Room 437
Augusta, ME 04330

Good Afternoon Senator, Hickman, Representative Supica, and distinguished members of the joint committee on Veteran and Legal Affairs. My name is Kimber Duncan and I live in Lisbon Falls. I am the general manager of a small cultivator. We were in adult-use from day one in 2020 to October 2024.

I am strongly in **SUPPORT** of **LD 1672 - An Act to Allow Participation in the Adult Use Cannabis Tracking System to Be Voluntary.**

METRC is a predatory program that overcharges the state for its services, nickels and dimes the user, overpromises features and benefits, and underperforms in all areas. I worked extensively in METRC when we were operating in adult-use, and it is a terrible program from a user perspective. It is not an intuitive program (*it reminds me of DOS if anyone remembers that...*), it requires redundant data entry, and it does not provide retroactive reports.

FUNCTION

- Nearly every single button you push is an action you set in stone that cannot be undone. The user manuals and training videos provided by METRC only show someone how to do something and not how to undo anything or fix any mistakes.
- You need to call a call center to fix mistakes which sometimes takes hours or day. The people who help you are not from Maine and need to look up rules before they can begin to assist.
- You need to go through approvals at METRC and sometimes OCP to undo a simple clerical error.
- Small operators rely on sales day to day and week to week to make their bills and not everyone is computer-savvy enough to never make a mistake ever. Administrative delays cause sale delays, and this was specifically an issue for us more than once in adult-use where we could not transact on time due to something silly and small.
- It doesn't matter if a person is sending out a \$50,000 order or a \$600 order, the administrative time to prepare the METRC paperwork is roughly about the same. Folks in Med usually have a lot smaller but more frequent orders to send out than adult use, so this would significantly increase the administrative time needed to complete deliveries.
- We have had problems that user support could not fix. We had a group of plants that when we destroyed the plants in that group we were left with negative numbers in the group instead of plants zeroing out and disappearing. They advised that there is no way to correct these negative numbers and recommended that we simply log the issue with

our ticket number in our facility logbook. They said they would continue to work on it, but I followed up several weeks later and there was still no solution.

- There is no expedited line for urgent matters vs general questions. All support tickets are treated the same whether you have a general question or you have an emergency.
- When we were leaving AU and exiting METRC, the process was not smooth. They shut us off before I deleted our credit card information and then they wanted to charge us for another month even though we weren't in AU. I asked and they said it was my responsibility to delete out all the company's information before they deleted my username or we would be automatically charged for our "industry support fee" of \$40.00. I had to have them re-instate my username so I could log in, delete everything, and then be deactivated again. They could not delete this information for me.

EXPENSE

- In 2023, the business I work for was in adult-use for the full year and we spent \$2,200 on package tags, plant tags and our monthly \$40 user fee. But we spent over \$23,000 on staff labor on METRC touches. METRC "touches" include affixing package tags to boxes, plant tags to plants, working on METRC paperwork for deliveries, and daily data entry. I have attached a spreadsheet with these details for your review.
- We expressed our frustration about the program to OCP, and Vern Malloch stopped by for a sit-down meeting to hear what we had to say. I presented him with an 11-page document of "METRC Pain Points." This has also been provided for your review. Vern addressed many of our concerns with respect but ultimately admitted that it is not a user-friendly program and is not meant to be. It is "for regulators." He encouraged us to seek a program that integrates with METRC to improve our user experience if we are unhappy using METRC directly. We took his advice and shopped around. Programs like Canix integrate with METRC real-time but operate much better in area like ease of data entry (cutting down on redundant entries) and reporting (real-time reports) but programs like this charge at a minimum about \$500-\$1000/month to start. In addition to the \$40/month we were already spending on METRC, the expense was out of control.

The work of track and trace is already being done. Any business owner who has any sense of due diligence is tracking their product. We don't need METRC for this.

Thank you for your time. Please reach out anytime if you have any questions.

Best regards,

Kimber Duncan
651-529-4361
Kimber@gardenofgele.com

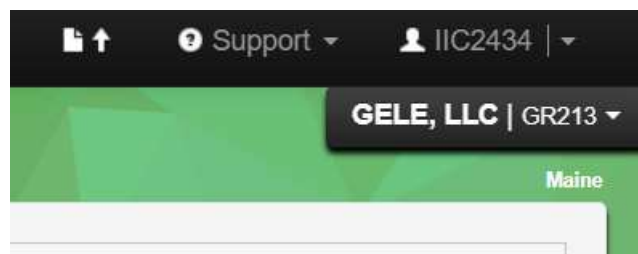
Re: negative plant count / ticket 1850545

Kimber Duncan <kimber@gardenofgele.com>
To: "metrc.com support email" <support@metrc.com>
Cc: Luke Aberle <luke@gardenofgele.com>, Matt Bayliss <matt@gardenofgele.com>
Bcc: Goldie Irvine <goldie@gardenofgele.com>

Fri, Aug 11, 2023 at 7:46 AM

Good Morning,

My Metrc username is **IIC2434** and I work at **Gele, LLC (GR213)**.



I am following-up regarding our current ticket **#1850545**.

Back on July 20, 2023 our Operations and Facility Supervisor (cc'd) emailed Metrc inquiring about an issue he experienced with our immature plants in Metrc. We have a group that when we destroyed the plants in that group we were left with **negative numbers** in the group instead of plants zeroing out and disappearing. Please see below:

LC 2023-06-14 04 **Ticket 1850545**		Litrecola	LV	Clone	No	-6	7	0	10	1A40D02000000CB000007547		
Description		:	Employee		:	Date		:	Reported		:	Sources
Plant Batch (LC 2023-06-14.04) created with 11 Clones of "Litrecola" strain - Clone(s) taken from a Plant (1A40D02000000CB000007547) - Location: Clone Tent - Location Type: Indoor Grow		:	LUKE ABERLE (IIC1***)		:	06/14/2023		:	06/14/2023 03:23 pm		:	User
Moved to location "LV" - Location Type: Indoor Grow		:	LUKE ABERLE (IIC1***)		:	07/13/2023		:	07/13/2023 09:55 am		:	User
7 plants changed Growth Phase		:	LUKE ABERLE (IIC1***)		:	07/20/2023		:	07/20/2023 02:01 pm		:	User
7 plants destroyed - Note: CULL		:	LUKE ABERLE (IIC1***)		:	07/20/2023		:	07/20/2023 02:09 pm		:	User
3 plants destroyed - Note: Cull		:	LUKE ABERLE (IIC1***)		:	07/20/2023		:	07/20/2023 02:10 pm		:	User
Renamed: LC 2023-06-14 04 **Ticket 1850545**		:	LUKE ABERLE (IIC1***)		:			:	07/26/2023 10:21 am		:	User

Metrc's response on July 24, 2023 was that there is **no way to correct these negative numbers at this time** and Metrc recommended that we simply log the issue with our ticket number in our facility logbook. Metrc also let us know that the Metrc Development team has been made aware of this negative numbers issue and that they are working towards a solution.

For your convenience, we went in and tagged these plants with the ticket number in Metrc.

My current question is: now that you have had several weeks, **has the Development team solved the negative numbers issue yet? If not, can we please have an update of the status and a timeline for correcting this negative number issue?** Right now it is confusing to our team to be viewing these negative plants in our immature list and we'd like to solve this problem as soon as possible.

Thank you for your assistance in this matter,



KIMBER DUNCAN
General Manager
207-558-8441 | Email
gardenofgele.com

----- Forwarded message -----

From: **Arhlene Hubbard (Metrc Support)** <support@metrc.com>
Date: Mon, Jul 24, 2023 at 12:18
Subject: [Metrc] Re: Immature plants not destroying instead starting a negative plant count
To: luke aberle <luke@gardenofgele.com>

Arhlene Hubbard (Metrc)

Jul 24, 2023, 11:18 CDT

Hello,

We appreciate you reporting this issue to our team. Once a plant batch is negative there is no way to correct that at this time, so we will recommend that you log the issue with this ticket number in your facility logbook.

Meanwhile, our Development team has been made aware of this scenario and is working towards a solution. Once we have a resolution or an update on this issue, we will contact you via email. We appreciate your patience while we work to resolve the issue for you.

Your ticket number with our team is 1850545.

Warm regards,



To add additional comments, please reply to this email or call the support desk directly and reference ticket (1850545). Once your email is reviewed, we will reply back at luke@gardenofgele.com or call you directly if a contact number has been provided, if necessary.

This email is a service from Metrc. Delivered by Zendesk

From: **Luke Aberle** <luke@gardenofgele.com>

Date: Thu, Jul 20, 2023 at 14:25

Subject: Immature plants not destroying instead starting a negative plant count

To: <support@metrc.com>

Hello

I am experiencing an issue with the destroy function in the immature plant tab for license GR213. I have a group that when I destroy the plants in the group I am left with negative numbers in the group instead of zeroing out and disappearing.



Luke Aberle
Operations & Facility Supervisor
207.712.2656 | Email
gardenofgele.com

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KIMBER DUNCAN
General Manager
651.529.4361
gardenofgele.com

Gele LLC / Metrc
Operating System Pain Points for Users
Original date - March 24, 2023
Updated May 9, 2025

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Gele Staff Background / Overall Complaint

The team working with Metrc at Gele are individuals with proficient experience with similar database programs such as State-run certificate software, Oracle, Sage 100, Sesame and Microsoft excel.

The issue is not that the program is too complicated to understand. Our complaint is that Metrc is a cumbersome program that is not user-friendly.

The system is not functional in a way where the positive function of it outweighs the negative parts. This program as it is today bogs workers down with redundant tasks that could be simplified or it has system limitations that prevent Metrc users from completing their job properly and in a compliant manner.

Post-Production Metrc Pain Points:

Production Batches and Testing Statuses

We are a very small cultivator and find that even most of our small harvests go over the 10,000g amount. This, in turn, doubles our testing costs per harvest and doubles what we need to keep track of for compliance purposes within Metrc. e.g. If our facility harvests and processes a batch of cannabis flower that results in 10,050g of usable flower product, a separate package tag must be created to represent the 50g of overflow weight. The 10,000g tag and the 50g tag must both receive the same full panel AU testing, and must thereafter be treated as entirely separate production batches, even though the 50g are the exact same cannabis product as the 10,000g.

Despite the requirement of splitting production batches over 10,000g, the Metrc program **does not provide any built-in method for tracking the child packages of these separate production batches** that we are required to create. Only the original 50g package can receive a production batch number to designate it as separate from the 10,000g production batch. Any packages created from the 50g package will not contain the new batch number.

E.g. A package of 25g of flower created from the 10,000g production batch and a package of 25g of flower created from the 50g production batch will be completely indistinguishable from each other in Metrc. Furthermore, the two 25g packages of flower have separate test results and cannot be combined without voiding their 'Test Passed' statuses. The user then must take it upon themselves to develop their own method of tracking packages from the two different production batches; production batches which are not actually separate at all, but must be arbitrarily divided due to the 10,000g weight cap.

Overuse of Package Tags

The Metrc system is designed to force users to use excessive amounts of package tags, often in arbitrary, repetitive, and redundant ways. Facilities are required to purchase these tags themselves, despite their use being state-mandated and the methods in which they are used left out of the control of the people using them.

Errors: Packages that are created with an error can be 'unfinished' in the Metrc system, which sends their weight back to their parent package. However, when remaking that package again correctly, the same tag number cannot be used again, so the physical tag must be thrown out despite never having been used.

Adding weight: There is no function to add weight into an existing package that isn't an "adjustment," so every time weight needs to be added, a new tag must be made. For example, if making jars of flower produces 15g of shake on the first day, and 16g of shake on the second day, the 16g cannot be added to the 15g tag, even though the shake from both days will most likely be stored in the same physical container. In order to combine these amounts, a new tag

must be created that incorporates the 15g tag and the 16g tag into one tag. If 20g of shake are produced on the third day, then a new tag must be created that incorporates the 31g from the first two days, and the 20g from the third day, and so on and so forth.

Retail sales and errors in relation to package tags

A person can tag a package incorrectly simply by selecting the wrong item on a drop-down menu. For cultivars that look and sound similar (e.g. Headbanger vs Headstash) this error can occur occasionally. To fix this error, the correct action is to use a new package tag to rename it. When making a new package tag, there will be an option to select the item name, and this is where you can make the change to correct the item. We have 2 concerns regarding this process.

1. This creates a situation where every clerical error made costs the company \$0.25 for a package tag to be used to correct the error.
2. If this package is transacted to a retail location that does not have package tags, this error cannot be fixed and the item will have the wrong name in their system permanently. E.g. A company that does both manufacturing and retail would have package tags in their system to relabel anything that needs it. A small, retail-only location will not have their own package tags and would not be able to make any changes to the product name once they accept it into their system.

Search feature

To search for a phrase or set of characters, one must go to the specific location to search for their item. If one does not know where this item is, they are out of luck and must search every room until they find their item. There is no overall search feature for the program. Using the 3 dots under each room is a long process that adds up if one must do this for multiple items. It would be helpful to have an overall search button where we could type something and pull up all results with that set of characters in it. E.g. If I searched “GO,” the system would pull up all packages and plants with “GO” in the title. I wouldn’t have to go room by room clicking the 3 dots on each one and searching the same parameters in each room.

Harvesting

Individual plant weights: A user must enter each plant weight individually. This is tedious and creates opportunity for error because we have nearly 300 plants in a room sometimes. We are required to enter the harvest name, date, drying location, plant weight, and unit of measure used for each plant. We will enter each of these items except the weight and are able to copy the data to every field. The plant weights must be entered manually. This process is made slower by the program itself. Metrc provides a pop-up window in which to enter harvest data. So sometimes (50%) when I enter the number in, there is a slight delay and we must wait a second before the number appears. This delay for every plant entered makes the data entry process very slow, especially when we have 270 numbers to enter *and* be double-checked.*

No Preview Screen:* There is no preview screen showing totals before hitting the “harvest plants” button. If a person makes one small typo on just one of many plants or selects the wrong unit, then the final total will be off and the user will have to start over harvesting the plants.

Once a harvest name has been used, it cannot be used again. This creates an issue if a user makes a typo on a harvest plant weight and has to start over. The harvest must now have a different set of characters. E.g If we made an error on GO-20230321.01, it can not be this name again.

Time out concerns: The system will time out if I take too long to enter these harvest plant numbers. It will provide a pop-up before timing out where I can select “I need more time” if I see the window pop up. If I have walked away from my screen (e.g. to help a contractor, use the restroom etc) then it will time out within a few seconds, delete my work, and I must start over. *E.g. This exact situation has happened before at Gele when our locksmith needed assistance at a moment when I was 99% done with my work. I had done everything except double-checked my work before hitting the “harvest” button, so I bet I could have hit “harvest” but I really wanted to check my work due to no preview feature. The situation was that I needed to step away immediately to help the locksmith, and when I came back 8 minutes later, my screen was logged out and I had to start the harvest over again. This event cost the company time because the work I did initially was gone and I had to take time to do it again. This cost a total of about 1 hour and 45 minutes in staff labor. Personally, I can confirm that the experience of having to redo such a tedious task affected my attitude.*

Image of plant harvesting screen:

The screenshot shows a web application interface for plant harvesting. On the left is a table with columns for 'Strains' and 'Strain'. The table lists plants with IDs from 3299 to 3320, all of which are 'Litreacola'. The main part of the screen is a form titled 'Template' for entering harvest data. The form has a 'Harvest Name' field (optional) and a 'Unit of Measure' dropdown. Below this are four sections for 'Plant # 1' through 'Plant # 4'. Each section contains a 'Plant' ID field, a 'Weight' dropdown, a 'Harvest Name' field (optional), a 'Drying Location' field, and a 'Harvest Date' field with a calendar icon and a 'today' button. The 'Plant' IDs for the four plants are 1A40D02000000CB000003299, 1A40D02000000CB000003300, 1A40D02000000CB000003301, and 1A40D02000000CB000003302 respectively. The 'Weight' dropdown is set to 'ex. 100.23'. The 'Drying Location' field has a placeholder 'Type part of the Location name...'. The 'Harvest Date' field is set to 'mm/dd/yyyy' and 'today'.

Strains	Strain
3299	Litreacola
3300	Litreacola
3301	Litreacola
3302	Litreacola
3303	Litreacola
3304	Litreacola
3305	Litreacola
3306	Litreacola
3307	Litreacola
3308	Litreacola
3309	Litreacola
3311	Litreacola
3312	Litreacola
3313	Litreacola
3314	Litreacola
3315	Litreacola
3317	Litreacola
3318	Litreacola
3319	Litreacola
3320	Litreacola

Template

Harvest Name ☒

Unit of Measure ☒

Drying Location ☒

Harvest Date ☒ today

Plant # 1

Plant ☒

Weight

Harvest Name ☐

Drying Location ☒

Harvest Date

Plant # 2

Plant ☒

Weight

Harvest Name ☐

Drying Location ☒

Harvest Date

Plant # 3

Plant ☒

Weight

Harvest Name ☐

Drying Location ☒

Harvest Date

Plant # 4

Plant ☒

Weight

Harvest Name ☐

Drying Location ☒

Ops / Cultivation Metric Pain Points

- Creating plantings - mandatory unique group names
- Creating plantings - tracking cuts back to individual 'moms'
- Change growth phase from clones to veg - have to use 'magnifying glass' to look up number of plants in each group
- Change location or phase
 - If more than 180 plants this needs be done in batches or 'error' triggered
- Weaving tag stake onto tags
- Destroy - need weight for each plant we are destroying

General

- No count on what a user has selected
- Can't change group name past 'immature' phase
- No "go back" or "undo changes"
- Cannot create a group name for a batch

Administrative Metrc Pain Points:

Metrc Support

Receipts

Metrc users need to email Metrc every month to receive a receipt for the industry support fee, if they would like a receipt for their records. When I called about this the first time, they acted like it was difficult to create a receipt for me (I wanted a year's worth) and I was told it was impossible to have this automatically sent to me. A receipt is something I must ask for monthly, and will not receive if I do not ask for it.

This receipt is provided to Gele on a Word document, which is a file that is editable. If I wanted to, I could use this template with Metrc's logo to make my own receipt that says anything and could send it to anyone. I instead choose to save this receipt as a PDF for our records. It is not good practice to provide customers with receipts in a format they can change at will.

Unhelpful system for reporting issues

If I email a question to Metrc, it creates a ticket automatically, and someone will get back to me once they research my issue. If I call in with an issue, they also type out an email which creates a ticket. This is an extra step. The impression is that when someone calls an establishment versus emailing, they expect a faster response to the issue as the contact is more direct.

The staff I speak with often sounds lost or like they are reading. The overall impression I have been left with after my many interactions with Metrc customer service is that I am reaching a call center full of people with a script who do not have any real ambition to help me with haste or care. They are all very friendly, there is no complaint about their phone etiquette, but they seem to be working for all states using Metrc without anyone knowledgeable about Maine specifically.

Example of email that was written on our behalf when I called in with an issue.

Claudia Villalba (Metrc)

Jan 27, 2022, 15:32 EST

Kimberly,

Thank you for contacting the Metrc Support Team! Your request has been received and ticket number 1575513 has been generated for you. A Support Specialist will be in touch to assist you as soon as possible.



Claudia Villalba
Metrc Support Team
support@metrc.com
877-566-6506

Kimberly Duncan called in today stating they made a transfer today to Firestorm Cultivation and that a package on manifest 0000190816 needs to be adjusted. By mistake, they miscounted the amount of pre-rolls in package 1A40D03000000CB000001340 which needs to be adjusted by ~30 grams. She also mentioned that she thinks the facility may have already received the package and that no other packages on the manifest need to be adjusted. I let Kimberly know I would forward this information and have someone reach out with further assistance.

To add additional comments, please reply to this email or call the support desk directly and reference ticket (1575513). Once your email is reviewed, we will reply back at kimber@gardenofeale.com or call you directly if a contact number has been provided, if necessary.

Regards,



Metrc Support Team

No Separation of urgent matters

I know every user reaching out to Metrc support probably views their issue as “urgent” but there should be a separation at Metrc of matters that are more casual such as navigation help or cleaning up some old tags, versus an error that is preventing someone from transacting right now. We have experienced a couple events where we needed advice same-day and were told it would be 24 hours. When asked if they could escalate the call for a faster response time, we were told they would “do their best” but these calls are supposed to be first come, first served.

Reports are unhelpful

Format: Reports exported to Microsoft Excel are not functional for practical needs. Most reports of any nature from a database program exist to quantify data over time and present it in either a readable or manipulatable format. These reports, when generated in excel, are aesthetically pleasing to look at, but are not functional. I am not able to sort or filter properly as rows and columns are merged and hidden. A user cannot sort the data properly in Excel when items are hidden or merged. Excel is a data sorting program and reports generated in excel should be free of formatting that restricts the function of the program. The PDF version is the appropriate file version to make a report readable and good-looking.

No retroactive reporting: There is no way to pull a retroactive report. We are expected to pull inventory reports on the 1st day of the month, every month. If we are off by a day, our inventory will be off in our reports.

Copied and pasted from page 3 of the “Industry Reports Guide” found on the Metrc website support section.

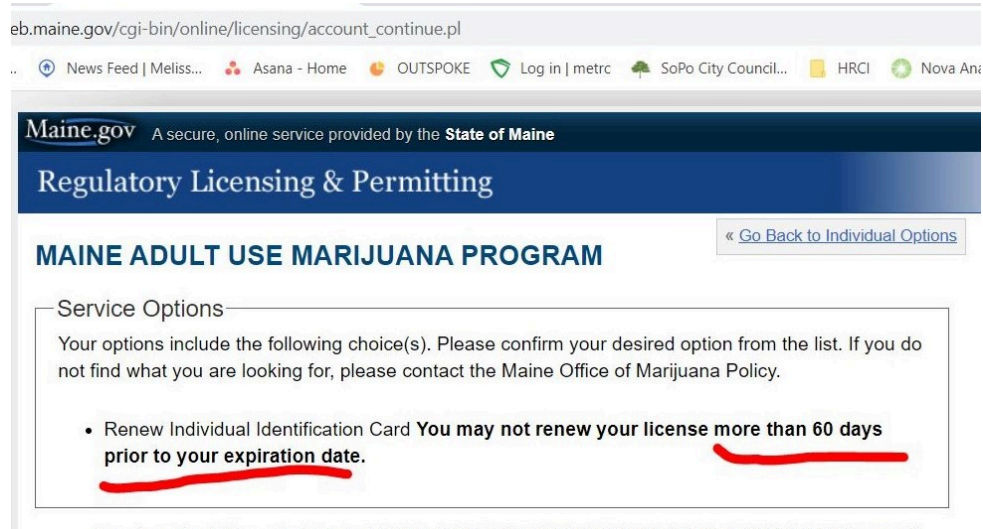
*“We recommend running each “inventory” report available for your establishment on the first of every month for the prior month and the first of every year for the prior year (e.g. run Packages Inventory on November 1 for October 1-31 and on January 1 of a new year for January 1 of the previous year through December 31 of the previous year). Inventory reports only capture active inventory on the day they are generated, therefore running the same report for the same date range even a few days apart may return different results, as inventory may have been discontinued or finished in the system during that time. **You cannot run a retroactive inventory report for any month or year.** Generating the reports in the suggested manner will ensure your establishment is consistently capturing your active inventory and has the information available in the event of an audit.”*

Reports do not show whole picture or are useless data:

- Harvests Report – listed as “Harvest Batch information over a set time.”
 - This report gives the wet weight and stats entered during harvest. It does not show any adjustments made, so the overall report does not show an accurate picture. E.g. We pulled harvest reports and sent them to our accountant. Someone had made an entry error on one of the harvests, but this error had been corrected within Metrc as an adjustment. This adjustment did not show on the report so our accountant thought there were glaring data entry errors within our Metrc profile until we pinpointed the issue was the report itself.
- Inventory Point in Time – listed as “This report displays the location of current inventory on the selected date.”
 - The title “Inventory Point in Time” to the average reader may mean “this is the inventory we had at this point in time.” This is not what this report shows. This report shows our CURRENT inventory and where it was on the selected dates.
- Monthly Plants Inventory – listed as “Monthly Plants Inventory displays a beginning and ending inventory of Plants in the Immature, Vegetative, and Flowering phases, as well as Harvested and Destroyed Plants at the designated facility for each month or portion of a month the report is run for.”
 - This report merely gives the number of plants in each category. No more information than that.
- Plants Inventory – listed as “Displays active Plants Inventory.”
 - I imagine this would be useful for someone who operates their business remotely and wants a real-time check of what is there, but this report has no real use for us.

Conflicting Action Item Dates

When we are 90 days out from an IIC expiring, Metrc will put a banner at the top of the screen that needs to be closed out manually. This banner refreshes itself each time the user goes to a new page and it is disruptive. According to the OCP website, we cannot renew an IIC until at least 60 days from expiration. This banner is displayed for 30 unnecessary days.



Seasonal update issue

In the winter, Metrc updates to a moving background that is “snow falling.” This very silly and unwanted update takes up bandwidth from the program and slows the program down. It is frustrating to see them updating such a meaningless thing that no one asked for, when we would like more meaningful software updates to ease pain points.

Trim vs Shake as it relates to taxes

See Attachment 4

Attachments

1. Email with support@metrc.com showing production batch package limitations
2. Email with support@metrc.com showing production batch separation, delayed response to urgent issue cost company money
3. Email with support@metrc.com showing combined production batches of different passed tests create a Not Submitted status - can only track through notes
4. Trim and Shake as it relates to taxes
5. Metrc costs - distribution of labor at Gele

END OF DOCUMENT



Kimber Duncan <kimber@gardenofgele.com>

Issue Regarding 'Production Batch' Numbers & Child Packages

Ian Hunter <ian@gardenofgele.com>

Mon, Mar 20, 2023 at 12:32 PM

To: support@metrc.com

Cc: Kimber Duncan <kimber@gardenofgele.com>

Hello,

My name is Ian Hunter, IIC#4459, I am a primary Metrc user for Gele, LLC (GR213). We've recently encountered an issue with the 'Production Batch Number' functionality in Metrc, so I wanted to reach out and see if you could help us address it.

Per our understanding, if a package which is to be submitted for testing is over 10,000g in weight, a new package must be created and a separate test sample must be submitted for the weight over 10,000g. When we create this separate package, we designate it as a separate production batch. For example, if the original harvest production batch number is **GO20221201.01**, and the total weight of flower to be tested is 11,000g, we create a second package of 1,000g and, utilizing the Production Batch checkbox feature, designate this second package as **GO20221201.02**.

After each package has received a 'Test Passed' designation, we begin breaking down these packages as we process our product. However, we have found that any child package created from the **GO20221201.02** package does not carry forward this Production Batch No. designation. If we attempt to utilize the Production Batch checkbox feature when creating a child package from **GO20221201.02** (by checking the box and manually entering the batch number **GO20221201.02**), the resulting package receives a 'Not Submitted' test result designation. Thus, any child package created from **GO20221201.02** is visually indistinguishable in the Metrc UI from a child package created from **GO20221201.01**.

However, every child package created from **GO20221201.01** has a different set of test results than every child package created from **GO20221201.02**. This means that a child package from one cannot be combined with a child package from another without receiving a 'Not Submitted' test result designation, even though there is no visual indication in the Metrc UI of a difference between the production batches of the two.

We take compliance very seriously here at Gele, and when dealing with situations like the one described above, we are meticulous about keeping all product from the two separately tested packages as separate production batches. We label all product from **GO20221201.01** with a compliance label that reflects **GO20221201.01**, and we label all product from **GO20221201.02** with a compliance label that reflects **GO20221201.02**. Since there is no way we can see to maintain the same standards of organization within the Metrc UI, we make use of the Notes function in the Create Package window to track which production batch number a given package originated from.

Are we encountering a bug when we create child packages that don't carry over the manually entered Production Batch No. from the parent package? Or are we misunderstanding the intended functionality of the Production Batch No. feature? If so, is there a different way we should be designating our packages in Metrc?

Thanks in advance for your time and attention to this matter. I look forward to hearing back from you soon.

Ian Hunter
IIC#4459
Gele, LLC
GR213



Kimber Duncan <kimber@gardenofgele.com>

Credentialing Ticket has been assigned to Metrc Credentialing Team

Ryan Fretz (Metrc Support) <support@metrc.com>
Reply-To: Metrc Support <support@metrc.com>
To: Ian Hunter <ian@gardenofgele.com>
Cc: Kimber Duncan <kimber@gardenofgele.com>

Mon, Mar 20, 2023 at 1:16 PM

Hello,

Thank you for submitting your request, the Testing Research and Resolution Team has received your ticket 1796358. We appreciate your patience while we research your request while following outlined State processes and protocols we must follow. We will email you with any question we may have and upon resolution to this matter.

Have a good day,

Metrc Testing Research and Resolution Team
support@metrc.com
1-877-566-6506

This email is a service from Metrc. Delivered by Zendesk

[ELZ6KD-MV3GR]



Kimber Duncan <kimber@gardenofgele.com>

Issue Regarding 'Production Batch' Numbers & Child Packages

Rebecca Wiens (Metrc Support) <support@metrc.com>

Tue, Mar 21, 2023 at 1:55 PM

Reply-To: Metrc Support <support@metrc.com>

To: Ian Hunter <ian@gardenofgele.com>

Cc: Kimber Duncan <kimber@gardenofgele.com>

Ian,

Rebecca Wiens (Metrc)

Mar 21, 2023, 12:55 CDT

Hi Ian,

Thank you for your inquiry regarding ticket 1796358. The production batch box when selected will apply to the package it is created with. The child packages pulled from the production batch will not contain the number but you can enter a note stating that it came from that package.

Please see the notes from the user manual + supplemental guide:

Production Batch - This is a group of packages created from a production run of infused product.

To create a Processed Product, like a Production Batch of Concentrate, you will pull from a package or packages of raw product to create the new package for the new Concentrate. You may then pull product out of that Production Batch to create additional Production Batches (e.g. infused edible products). Each new Production Batch will have a new Package Tag and be marked as a Production Batch. If these Production Batches are final products, packages will be created from them for transfer to the Dispensaries and distribution to Consumers.

Thank you,



Rebecca Wiens
Metrc Support Team
support@metrc.com
(877) 566-6506

To add additional comments, please reply to this email or call the support desk directly and reference ticket (1796358). Once your email is reviewed, we will reply back at ian@gardenofgele.com or call you directly if a contact number has been provided, if necessary.

Regards,



Metrc Support Team

support@metrc.com
877-566-6506

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[ELZ6KD-MV3GR]



Kimber Duncan <kimber@gardenofgele.com>

Issue Regarding 'Production Batch' Numbers & Child Packages

Kimber Duncan <kimber@gardenofgele.com>

Thu, Mar 23, 2023 at 9:47 AM

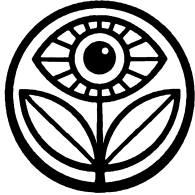
To: Metrc Support <support@metrc.com>

Cc: Ian Hunter <ian@gardenofgele.com>, Matt Bayliss <matt@gardenofgele.com>

Good Morning Rebecca,

Thank you for your response to his ticket. To be clear, we are not referencing concentrates or edible products, we are referring to **dried flower only** for the purpose of our question. I also just want to clarify, are you saying that **there is no built-in way for the Metrc system to track additional production batches created from the initial harvested batch?** Are you also saying that we must provide our own system, like utilizing the notes feature of Metrc as an example, for tracking these batches? Please confirm.

Thank you,

**KIMBER DUNCAN***General Manager*

207-558-8441 | Email

[gardenofgele.com](mailto:kimber@gardenofgele.com)

[Quoted text hidden]



Kimber Duncan <kimber@gardenofgele.com>

Issue Regarding 'Production Batch' Numbers & Child Packages

Rebecca Wiens (Metrc Support) <support@metrc.com>

Thu, Mar 23, 2023 at 3:40 PM

Reply-To: Metrc Support <support@metrc.com>

To: Ian Hunter <ian@gardenofgele.com>

Cc: Kimber Duncan <kimber@gardenofgele.com>, Matt Bayliss <matt@gardenofgele.com>

Ian,

Rebecca Wiens (Metrc)

Mar 23, 2023, 14:39 CDT

Hi Ian,

You can create a production batch package, but it will make the package status Not Submitted. You would then need to test that package. If you are referencing child packages, the production batch number does not stay with those packages and you can add a note regarding the production batch number.

Thank you,



Rebecca Wiens
Metrc Support Team
support@metrc.com
(877) 566-6506

To add additional comments, please reply to this email or call the support desk directly and reference ticket (1796358). Once your email is reviewed, we will reply back at ian@gardenofgele.com or call you directly if a contact number has been provided, if necessary.

Regards,



Metrc Support Team
support@metrc.com
877-566-6506

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Kimber Duncan <kimber@gardenofgele.com>

Issue Regarding 'Production Batch' Numbers & Child Packages

Kimber Duncan <kimber@gardenofgele.com>

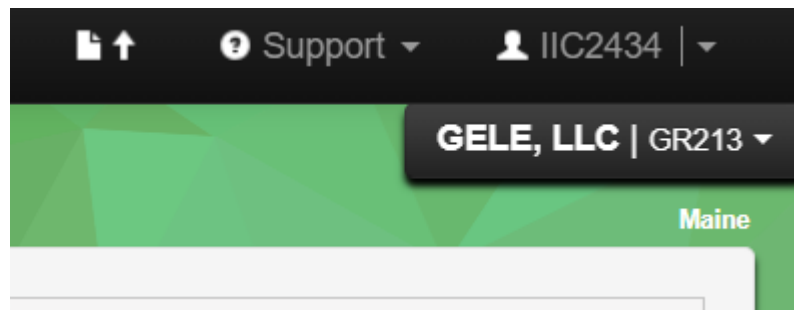
Thu, Mar 23, 2023 at 8:01 PM

To: Metrc Support <support@metrc.com>

Cc: Ian Hunter <ian@gardenofgele.com>, Matt Bayliss <matt@gardenofgele.com>

Good Evening Rebecca,

In case you need this information, my Metrc username is **IIC2434** and I work with Ian at **Gele, LLC (GR213)**.



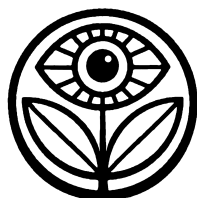
Thank you for elaborating on this answer. To be clear about our question, we are referencing child packages of a new production batch made from an original harvest batch. As an example, if we have a harvest hypothetically named GO-20230323.01 and it was 10,050g, we would make a new production batch of 50g named "GO-20230323.02." For the purpose of this email, we would be referencing this new "GO-20230323.02" package and any child packages made from this new "GO-20230323.02" package.

Also, just want to clarify because I still don't fully understand, can you please answer the below 3 questions?

1. Is the only way for a Metrc user to track the production batch name of the child package of a new production batch (made from the original harvest) through "notes"?
2. Are "notes" listed on a transport manifest?
3. Can you please direct me to the literature in any of the Metrc user guides where Metrc users are advised how to use the "notes" function of Metrc?

Thank you for your help with this matter.

Best,



KIMBER DUNCAN
General Manager
207-558-8441 | Email
[gardenofgele.com](mailto:kimber@gardenofgele.com)

[Quoted text hidden]



Kimber Duncan <kimber@gardenofgele.com>

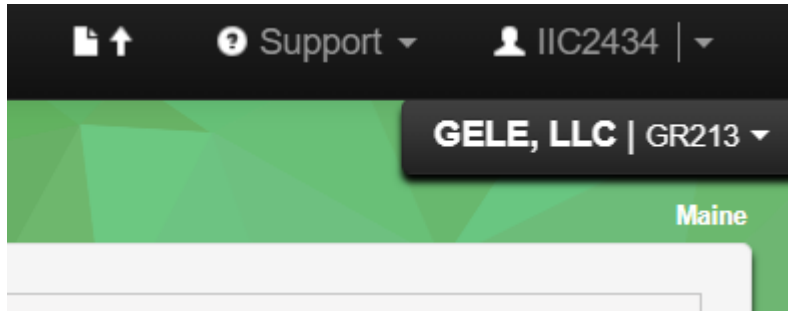
TIME SENSITIVE - Question about separating packages

Kimber Duncan <kimber@gardenofgele.com>
To: "metrc.com support email" <support@metrc.com>
Cc: Matt Bayliss <matt@gardenofgele.com>

Wed, Apr 13, 2022 at 9:57 AM

Good Morning,

My Metrc username is **IIC2434** and I work at **Gele, LLC (GR213)**.

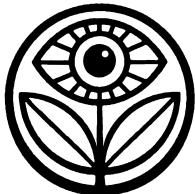


I have a question that I need answered fairly urgently. We would like to send a sample to the lab for our current harvest batch that is ready, but found a part of this harvest we do not want to test or transact at this time. Is it possible to separate out this one section of 1569.4 grams so it is not tested? We plan to evaluate this portion later and test at that time. I tried to separate the packages and send only one package for testing but the test sample was representative of this 1569.4 grams as well.

Is there a way to rename it to avoid this association? Is this possible? I believe I saw an area where I could rename a package a while back, but I can't seem to locate that option now.

Please advise. You can reach me at 651-529-4361. I also left a voicemail regarding this matter.

Thank you,



KIMBER DUNCAN
General Manager
207-558-8441 | Email
[gardenofgele.com](mailto:kimber@gardenofgele.com)



Kimber Duncan <kimber@gardenofgele.com>

TIME SENSITIVE - Question about separating packages

Jessica Foster (Metrc Support) <support@metrc.com>

Thu, Apr 14, 2022 at 12:31 PM

Reply-To: Metrc Support <support@metrc.com>

To: Kimber Duncan <kimber@gardenofgele.com>

Cc: Matt Bayliss <matt@gardenofgele.com>

Kimber,

Jessica Foster (Metrc)

Apr 14, 2022, 12:31 EDT

Hi Kimber,

We would recommend that the you start by repackaging 1A40D03000000CB000001580 into a new production batch package. This will remove the SubmittedForTesting status and restore this product back to NotSubmitted. If you wish to separate 1,500 grams from the new package, you will create another production batch package for the 1,500 grams. This will keep the testing status separate from the new bulk package.

To repackage a package into a production batch package:

Highlight package 1A40D03000000CB000001580 and select New Package

Enter in a new package tag

Enter in the item name or select same item

On the left and right hand side enter in the full amount of the package.

Enter in the date

Select the Production batch Box, you will enter in any combination of letters and or numbers of your choice

Create new package

You will see that this new package has the testing status of NotSubmitted. You can easily trace the source back to 1A40D03000000CB000001580.

To separate 1,500 grams from the new package, you will create another production batch package from the newly created production batch. This will separate 1,500 grams from the new source package that can remain untested if you wish.

Please let us know if we can be of any further assistance regarding this matter.

Have a great day!



Jessica Foster
Metrc Support Team
support@metrc.com
877-566-6506

To add additional comments, please reply to this email or call the support desk directly and reference ticket (1612757). Once your email is reviewed, we will reply back at kimber@gardenofgele.com or call you directly if a contact number has been provided, if necessary.

Regards,



Metrc Support Team
support@metrc.com
877-566-6506

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[3LMQX0-6QWV]



Kimber Duncan <kimber@gardenofgele.com>

TIME SENSITIVE - Question about separating packages

Kimber Duncan <kimber@gardenofgele.com>

Thu, Apr 14, 2022 at 3:26 PM

To: Metrc Support <support@metrc.com>

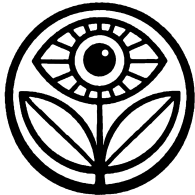
Cc: Matt Bayliss <matt@gardenofgele.com>

Good Afternoon Jessica,

I appreciate your detailed response below and it will be very helpful if we run into this issue again down the road. However, our window for needing this information closed yesterday. This matter was labeled as "urgent" yesterday and I expressed on the phone several times that I needed an answer immediately or same-day at the *absolute latest*.

This response from Metrc came in at 12:31pm EST on 4/14/22, which is **over 26 hours** after my very time-sensitive question was posed. This level of customer service for something so important is **completely unacceptable**. I would like you to please share with me where I can file an official complaint about this response time issue. Can you please also provide me with your manager's contact information? I would like to have a discussion.

Thank you,

**KIMBER DUNCAN***General Manager*

207-558-8441 | Email

[gardenofgele.com](mailto:kimber@gardenofgele.com)

[Quoted text hidden]



Kimber Duncan <kimber@gardenofgele.com>

Packages Question - package changed from "Tested" to "Not Submitted" status?

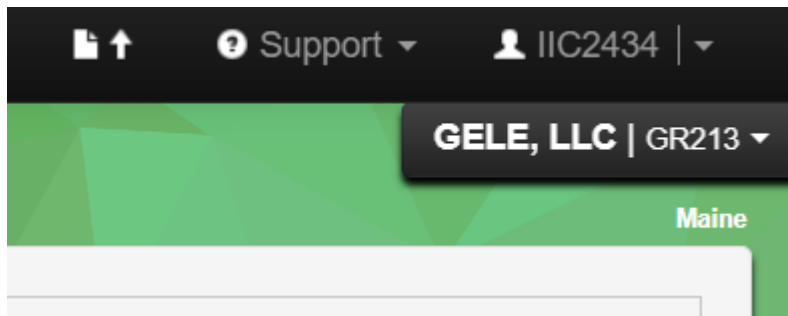
Kimber Duncan <kimber@gardenofgele.com>

Mon, Feb 27, 2023 at 12:29 PM

To: "metrc.com support email" <support@metrc.com>

Cc: Ian Hunter <ian@gardenofgele.com>, Matt Bayliss <matt@gardenofgele.com>, Paige Bullock <paige@gardenofgele.com>

Good Afternoon,

My Metrc username is **IIC2434** and I work at **Gele, LLC (GR213)**.

I am looking for some help with an issue we are having with our packages. We combined two separate packages with a status of "Tested" and that resulted in a package that is labeled "Not Submitted." I know that if we were to combine a "Not Submitted" package with a "Tested" package, that this status change would occur, but both of our packages showed a status of "Tested" so I am looking for some assistance!

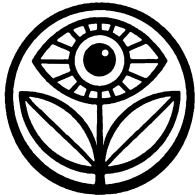
We think this issue occurred when we combined package tags **#4037** and **#4038** into package **#4309**. These two packages were from two separate production batches that were both tested.

Below is a screenshot of the packages I am referencing:

1A40D03000000CB000004309	GO-20221201.01	(multi-package)
Source Harvests Lab Test Batches Lab Results History		
Description		
Packaged 214.6 Grams of Flower - Goji OG from 2 different Packages		
- Took 92.3 Grams of Flower - Goji OG from Package 1A40D03000000CB000004037		
- Took 122.3 Grams of Flower - Goji OG from Package 1A40D03000000CB000004038		
- Package Type: Product		
- Location: Dry/Cure.2		
- Location Type: Default		
- Production Batch No: GO-20221201.02		
- Note: Remaining Flower - 1201.02		
Used 150 Grams for Package 1A40D03000000CB000004332		
Used 16.2 Grams for Package 1A40D03000000CB000004334		
Package adjusted by -48.4 Grams		
- Reason: Scale Variance		
- Note: Adjusted for Total PR Variance		
Package finished		
Package unfinished		
Restored 150 Grams from Package 1A40D03000000CB000004332		
Restored 16.2 Grams from Package 1A40D03000000CB000004334		

We tried to reverse our actions and discontinue these tags to undo our error, but the system won't let us because it says the package was adjusted. Can you help us correct this product back to a "Tested" status? Can you also help us understand what happened so we can avoid this issue going forward?

Thank you,



KIMBER DUNCAN
General Manager
207-558-8441 | Email
gardenofole.com



Kimber Duncan <kimber@gardenofgele.com>

Packages Question - package changed from "Tested" to "Not Submitted" status?

Elizabeth Brunner (Metrc Support) <support@metrc.com>

Mon, Feb 27, 2023 at 5:50 PM

Reply-To: Metrc Support <support@metrc.com>

To: Kimber Duncan <kimber@gardenofgele.com>

Cc: Matt Bayliss <matt@gardenofgele.com>, Paige Bullock <paige@gardenofgele.com>, Ian Hunter <ian@gardenofgele.com>

Kimber,

Elizabeth Brunner (Metrc)

Feb 27, 2023, 17:50 EST

Good afternoon,

Regarding package 1A40D03000000CB000004309, we would recommend that you adjust the child package down to 0 and finish it. You will then need to adjust the source packages up by the amount used to make package 1A40D03000000CB000004309 and then remake it correctly without checking the Production Batch box.

The ticket number for this communication is 1786825.

Thank you,



Elizabeth Brunner
Testing Advisory Team
Metrc Support
support@metrc.com
877-566-6506

To add additional comments, please reply to this email or call the support desk directly and reference ticket (1786825). Once your email is reviewed, we will reply back at kimber@gardenofgele.com or call you directly if a contact number has been provided, if necessary.

Regards,



Metrc Support Team
support@metrc.com
877-566-6506

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3/24/23, 9:16 AM

GELE Mail - Packages Question - package changed from "Tested" to "Not Submitted" status?

[LZ9RY6-56DKK]

METRC - DISTRIBUTION OF LABOR AT GELE - 2023

BY INDIVIDUAL

NAME	DEPT	HOURS / WEEK	PAY RATE	TOTAL \$ / WEEK
Redacted	Admin	6	\$19.00	\$114.00
Redacted	Ops	1.5	\$19.00	\$28.50
Redacted	Ops	5	\$33.65	\$168.27
Redacted	Admin	3	\$28.85	\$86.54
Redacted	Admin	3	\$19.00	\$57.00

BY DEPARTMENT / TASK

DEPT	HOURS / WEEK	WORK COMPLETED
Ops	5.5	time spent entering plant data
Ops	1	time spent working with plant tags
Admin	9	time spent entering harvest #'s, packages, and transfer data
Admin	2	time spent getting paperwork and tags ready for transfer
Admin	1	time spent obtaining signatures and scanning signed copies for records

TOTAL HOURS PER WEEK	18.50
TOTAL HOURS PAYCHECK	37.00
TOTAL HOURS PER MONTH	74.00
TOTAL HOURS PER YEAR	962.00

TOTAL \$ PER WEEK	\$454.31
TOTAL \$ PER PAYCHECK	\$908.62
TOTAL \$ PER MONTH	\$1,817.23
TOTAL \$ PER YEAR	\$23,624.00

Note: This cost is estimating the 2023 costs as labor is split as of 2/3/23. The costs for 2022 would be slightly higher as the GM and Facility Supervisor were handling the work that current staff at a lower pay rate now handle.

These costs are in addition to the monthly \$40.00 Metrc "industry support fee."