



Compliance Tip

August 13, 2018

Topic: Clarification for “Caviar” Items

Applicable Statutory Sections/Rules: Medical Marijuana Rules, M 400 Series, 1 CCR 212-1; Medical Marijuana Rules, M 500 Series, 1 CCR 212-1; Medical Marijuana Rules, M 600 Series, 1 CCR 212-1; Medical Marijuana Rules, M 1000-1 Series, 1 CCR 212-1, Medical Marijuana Rules, M 1500 Series, 1 CCR 212-1, Retail Marijuana Rules, R 400 Series, 1 CCR 212-2; Retail Marijuana Rules, R 500 Series, 1 CCR 212-2; Retail Marijuana Rules, R 600 Series, 1 CCR 212-2; Retail Marijuana Rules, R 1000-1 Series, 1 CCR 212-2, Retail Marijuana Rules, R 1500 Series, 1 CCR 212-2,

Tips:

- For the purpose of this compliance tip, “caviar” is defined as marijuana flower or trim that is combined with marijuana concentrate and sold to patients or consumers as a single item.
- This product should be classified as a marijuana concentrate in Metrc®.
- Manufacture of “caviar” using Solvent-Based and/or Heat/Pressure-Based Concentrates is only permitted at a Medical Marijuana Infused-Products Manufacturing Facility or Retail Marijuana Products Manufacturing Facility.
- Manufacture of “caviar” using Water-Based Concentrates is permitted at a Medical Marijuana Infused-Products Manufacturing Facility, Retail Marijuana Products Manufacturing Facility, Optional Premises Cultivation Operation, or Retail Marijuana Cultivation Facility.
- For testing, packaging and labeling purposes, all the requirements for marijuana flower/trim **and** marijuana concentrate must be satisfied.
- For sales limitation purposes, the aggregate weight of the marijuana flower/trim and marijuana concentrate should be considered.
 - For example, considering the one ounce limit at a Retail Store and equivalency amounts provided in rule, the maximum combination would be 14 grams of marijuana flower and 4 grams of marijuana concentrate. Any increase in one of those categories would require a reduction of the other category.