



State of Rhode Island
DEPARTMENT OF BUSINESS REGULATION
560 Jefferson Blvd- Suite 204
Warwick, RI 02886

Bulletin 2022-5 Supersedes Bulletin 2022-2

Office of Cannabis Regulation – Transport Manifest Guidance

Issued: 9/1/2022

Amended guidance and FAQs are provided below to address new Transport Manifest requirements regarding Hybrid License status. Please see items in red below.

This document intends to explain how to compliantly complete a transport manifest

The FAQ section of this document will be updated as necessary

All inquiries concerning the transport manifest process and documentation, including this guidance and its contents may be directed to DBR.CannabisAudit@dbr.ri.gov

Part 1 – Reminder about Completeness of Documentation

Office of Cannabis Regulation (OCR) will not consider any transport manifest received as compliant if any fields are inadequately completed by the responsible party.

Examples of incompleteness include, but are not limited to, transport manifests that:

- Contain only one (or no) entity information
- Fail to disclose the address, phone number, date and/or time of departure/arrival
- Fail to describe the transport vehicle and/or list the plate number
- List only the printed names of the individuals transporting
- Contain only the signatures of the individuals transporting and no printed names
- List only one of two individuals transporting*

...and Inventory Lists that:

- **Fail to distinguish between MEDICAL and/or ADULT USE product(s)**
- Fail to indicate Unique Batch Numbers for each/all product listed
- Provide incorrect or irrelevant data in the “Batch Number” field (e.g., weights, prices)
- Fail to disclose any product name(s) (e.g., “Bulk” with no descriptor)
- Fail to list (sent and/or received) weights and/or unit counts of product
- Fail to indicate if product listed is to be extracted or remediated

*Per **230-RICR-80-05-1.6.8(C)(4)**: “If using one authorized transport vehicle, the vehicle shall be operated/occupied by a minimum of two authorized transport cardholders...”

Part 2 – Issuance of Updated Transport Manifest Documentation

An updated Transport Manifest form was disseminated to all licensees on September 1, 2022. Copies of this updated form are available upon request.

Upon issuance of this guidance, OCR disseminated to each licensee an updated Transport Manifest to be used for all future transportation of cannabis to and from other licensees. This includes both the Transport Manifest and accompanying Inventory List.

Please note: This documentation succeeds the prior iterations of the Transport Manifest. Licensees will be expected to use the new forms immediately.

Provided below is a brief outline of how to compliantly complete the new Inventory List for Transportation. Each column header of the form itself is described from left to right:

- **“Batch Number”** – This is the full Batch Number as it appears in the originating licensee’s track and trace system. This batch number should also be on the label adhered to the product during transportation.
- **“Product Category”** – Only the categories indicated therein are considered compliant (i.e., Flower, Pre-Rolls, Edible, Ingestible, or Concentrate).
- **“Product Name”** –
 1. Is it wholesale?
If yes, please indicate “bulk,” and if a specific strain is applicable.
 2. Is it a final product packaged for sale?
How would someone order your product at a compassion center?
 - **Flower:** the strain name is sufficient.
 - **Pre-Roll:** the strain name is sufficient.
 - **Concentrate:** indicate type of concentrate and a strain name, if applicable.
 - **Edible:** please indicate the type.
 - **Ingestible:** please indicate the type.
- **“Weight Sent (grams or units)”** –
 1. Is it wholesale?
An exact weight in grams is required that matches what is on the product’s label.
 2. Is it a final product packaged for sale?
Please include two separate data points:
 - The number of packaged products sent.
 - The required weight of each of those products.
 - I. **Example:** 150 packaged Flower Products
 - i. 150 each
 - ii. 3.5 grams
- **“Weight Received (grams or units)”** – All product sent must be weighed prior to accepting the product into the receiving entity’s inventory. Those weights are entered in the “weights received” column.
- **“Price/unit”** – The agreed upon price prior to the transportation of the product. If the product is being sent for extraction/remediation, please indicate as such in this field in place of the price. If no price is agreed upon prior to transfer, please indicate this as well.

Part 3 – Transport Manifest Additional Information and FAQ

1) I recently received approval from OCR for Hybrid License status, how do I distinguish between MEDICAL and ADULT USE designated products on the Transport Manifest?

OCR has disseminated an updated copy of the Transport Manifest. The first column now requires indications of designation type for each and every product listed on the Manifest.

2) Am I required to make MEDICAL vs ADULT USE distinctions on the Transport Manifest?

Yes. All approved Hybrid License applicants were required to demonstrate a plan to distinguish between product types and attest to adhering to said plan. Any manifests received from an approved Hybrid Licensee without these disclosures will be rejected and re-submission will be required.

3) I have not and do not intend to apply for Hybrid License status, am I required to use this new Transport Manifest?

Yes. Any transported product(s) would be designated as MEDICAL.

4) Regardless of Hybrid License status, can I continue to use the old Transport Manifest instead?

No. All future transfers following the issuance of this amended guidance must use the latest version of the Transport Manifest form.

5) Who fills out the manifest?

Regardless of whether the product is going to be picked up or delivered, the licensee with ownership of the product (it is physically at their licensed location) completes the manifest. This is because they are the only party with access to their track and trace system which contains the required information needed for the manifest.

Once the product has been reweighed by the receiving licensee, the product will be imported into their track and trace system and will be assigned a new unique ID. The product should then be relabeled.

If it is a pick-up, the manifest should be completed by the originating licensee (seller) except for the “Name of Person Transporting” section. This should be completed by the registry card holders upon pick-up of the product.

6) Where should I send the transport manifest(s) and purchase order(s)?

Until further notice, please email documentation to peter.squatrito@dbr.ri.gov and carter.wells@dbr.ri.gov.

7) Should I wait until payment is received to provide a copy of the Transport Manifest and/or Purchase Order?

No. Transportations Manifests must be sent **prior to** transportation of product. Purchase Orders must be provided upon issuance of payment.

8) If I am transporting product to be remediated/extracted/processed at another licensee but will be getting the product back afterwards, how do I complete the transfer compliantly?

The originating licensee (the party who has the product physically at their licensed location) fills out the manifest prior to the pick-up/delivery. The product is transported to the receiving entity. The product is inputted into the receiving entity’s track and trace system as they have accepted ownership of the product as it is on their licensed premises. The product

is relabeled. Remediation/extraction/processing is completed. The track and trace system is updated, and product is relabeled if necessary.

When the product is ready to be returned a manifest is filled out by the licensed entity who has the product physically on their licensed location. The product is transported. The product is then received by the receiving entity, entered into their track and trace system, and relabeled.

9) At what point should I submit the manifest to OCR?

Prior to the pickup or delivery. All signatures and requisite information must accompany submitted Manifests.

10) What do I do with the manifest while transporting product?

A copy of the manifest should remain with the product at all time in the locked compartment. An additional copy should remain with the two registry card holders transporting the material if law enforcement is encountered.

11) What if I am rejecting certain products?

You can circle the product not being accepted and the same manifest can be used to transport the product back to the originating entity. If a partial rejection is needed, please cross out the original weight and enter the new weight received.

12) What if my product does not adhere to any of the listed categories on the Inventory List?

Please review the [Medical Marijuana Product Designation List](#) on our website. If your product is not contained in this document, please contact OCR at DBR.MMPcompliance@dbr.ri.gov.

13) I use a third-party vendor for my track and trace system. My system can generate a Transport Manifest, can I use the one it generates in place of the template prescribed by OCR?

If the manifest generated by your track and trace system includes all required fields, it may be used in lieu of the updated OCR template. Please carefully compare your system's Manifest against the OCR Manifest to ensure all fields are included.

Please confer with your third-party vendor to ensure that your inventory is kept completely up to date. This may necessitate an inventory adjustment when generating your manifest and physically transferring your product to another facility. Or your track and trace system may adjust your inventory when you create a Manifest.

It is the licensee's responsibility to know how your system functions and to ensure all inventory currently in your system reflects what is located physically onsite.