

Division of Cannabis Regulation

Guidance Document – 08.24.23

Topic: Recalled product returns and storage; products on administrative hold

The Division of Cannabis Regulation (DCR) has received questions related to the return and storage of recalled products at dispensary facilities.

Is a dispensary licensee required to store marijuana product returns that are included in a recall?

No. Dispensary licensees are not required to store marijuana product returned by a patient or consumer. Pursuant to 19 CSR 100-1.180(2)(G), the marijuana product return may only be accepted for the purposes of disposal. As a reminder, all marijuana product on administrative hold is required to be stored by the licensee.

How does a dispensary licensee compliantly process the receipt of recalled product if they can only take it in for disposal?

A dispensary licensee should reach out to Metrc Support for assistance with this process. Returned products will not count toward a patient's purchase limit.

Are licensees required to continue to store marijuana product that is on administrative hold?

Yes. Licensees are required to continue to quarantine product in accordance with 19 CSR 100-1 and the Notice of Administrative Hold sent to licensees on August 3, 2023, until receiving written guidance from DCR.

DCR will continue to provide guidance for marijuana product on administrative hold due to the August 2, 2023 recall. We appreciate your patience as we work through this process. For responses to this notice, questions or additional information regarding this notice, please respond to DCR at CannabisComplaints@health.mo.gov.