

OMMP Gardens and Reporting

How an OMMP Grow Site Works and Who Reports, METRC and OLCC

1999: The OMMP begins,

- 7 plants per patient,
- 3 mature and 4 immature,
- 1 ounce possession limit.

2005: OMMP updated:

- 6 plants,
- Designated caregivers and growers
- Possession amount increased to 24 ounces.
- The Advisory Committee on Medical Marijuana (ACMM) established to advise the OHA on the program.

2013: Dispensaries and labs created under HB 3460

OMMP growers were allowed to transfer cannabis products into dispensaries. All product had to be tested, packaged and labeled.

2014: Measure 91 passes

2015: HB 3400 kicks off adult use regulatory structure

2016: Repeal of residency requirements for licensees and outside money allowed in

2017: Oregon Cannabis Commission created, ACMM dissolved

2019: Oregon has 6.5 year supply of usable marijuana

The OMMP Garden

The OMMP is made up of two distinct parts.

- The card system that registers patients and caregivers and grow sites for those that produce their own cannabis.
- The designated grower system where patients can designate someone to produce cannabis and cannabis medications for them.

The OHA also has the responsibility to manage:

- The OMMOS registration and reporting system,
- The confidential registry of patient names and addresses.
- Grow sites inspections
- ORELAP and testing labs
- Dispensary and processor program

The OMMP Garden

Oregon Medical Marijuana patients may:

- Grow their own cannabis or,
- Designate another person to grow it for them.

In either case:

The patient owns the plants and any product produced from that plant.*

Patient's may:

- Designate non-patients who may grow, process and transfer medical marijuana.
 - Grant permission for growers to transfer any usable marijuana to a dispensary or processor or OLCC processor or wholesaler.
 - Designate a primary caregiver(PCG) and a secondary caregiver (SCG).
-
- The patient and their caregiver may jointly possess up to 24 ounces at any and all times.
 - A patient can only designate a single grower and/or caregiver/secondary caregiver.
 - Secondary caregivers are licensed healthcare facilities.

*This provision was intended to give patients some control over what their grower would provide for them.
However, it is complicated and complicating and has outlived its usefulness.

The OMMP Garden

Growers in the OMMP system

“Person designated to produce marijuana by a patient”

Produces marijuana for a cardholder at:

- Address other than the address where the cardholder resides or,
- Address where more than 12 mature marijuana plants are produced. (ORS 475B.410 (18))

PRMG

“Person Responsible for a Marijuana Grow”

Any OMMP grower that is growing medical cannabis whether they are growing for themselves or others.
(OAR 333-008-0010(47))

GSA

Grow Site Administrator

Grow Site Administrator:

- Registered with the OHA,
- Responsible for grow site with three or more patients
- Responsible for all activity at a grow site, and,
- Reporting into the METRC system.

Caregivers

The smallest subset of growers:

- Allowed to grow for a patient at the patients residence.
- Must also register as a PRMG.

The OMMP Garden

From 2005 until 2015, a grow site was not limited in the number of patients they could register at a grow site.

Every time a patient is added, the grow site can add six more plants. This increased the amount of excess available for the market, increasing the profit for the grow site.

This was known as card stacking.

This practice was largely curtailed in 2015 and again in 2017 with the enactment of grow site plant limits and increasing the number of patients per grower from 4 to 8. These grow site limits are shown below.

Now ...

Gardens may grow for as many patients as they like provided they do not exceed the grow site plant limit. All patients must be registered at the grow site and the grow site registration fee must be paid.

And,

Gardens may be made up of any combination of patients and growers.

12 plants
Grow sites in residential zone within city limits.
Any zone with a patient growing for themselves
Requires one grower

48 plants
Grow sites in all zones except residential zone within city limits.
Requires one grower

24 & 96 plants
Grandfathered grow sites at these limits and zoning respectively
One grower and 2 growers respectively

OHA oversees all:

- Patients & Caregivers
- OMMP growers & GSA's,
- D&P's

OMMP growers may transfer to:

- Patients & their CG,
- OHA D&P's
- OLCC W&P

Patients may transfer to:

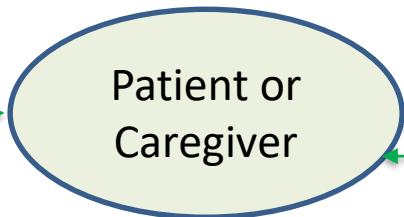
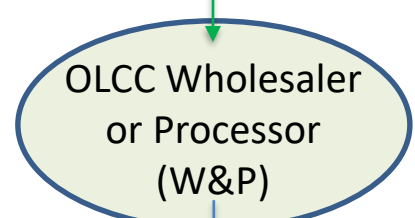
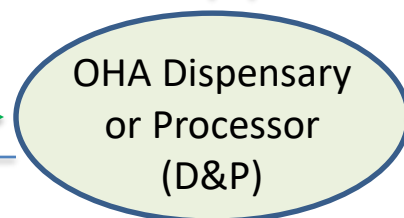
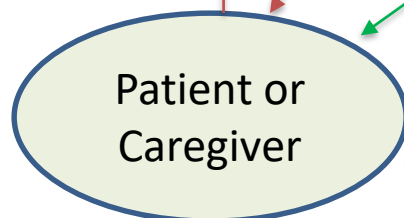
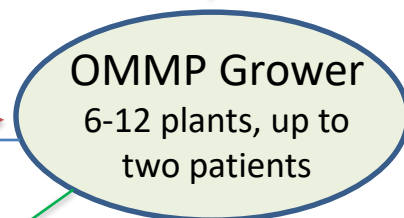
- OHA D&P's
- OLCC Processors
- Other Patients

OHA oversight

Usable & Plant Material

Finished Product

linked

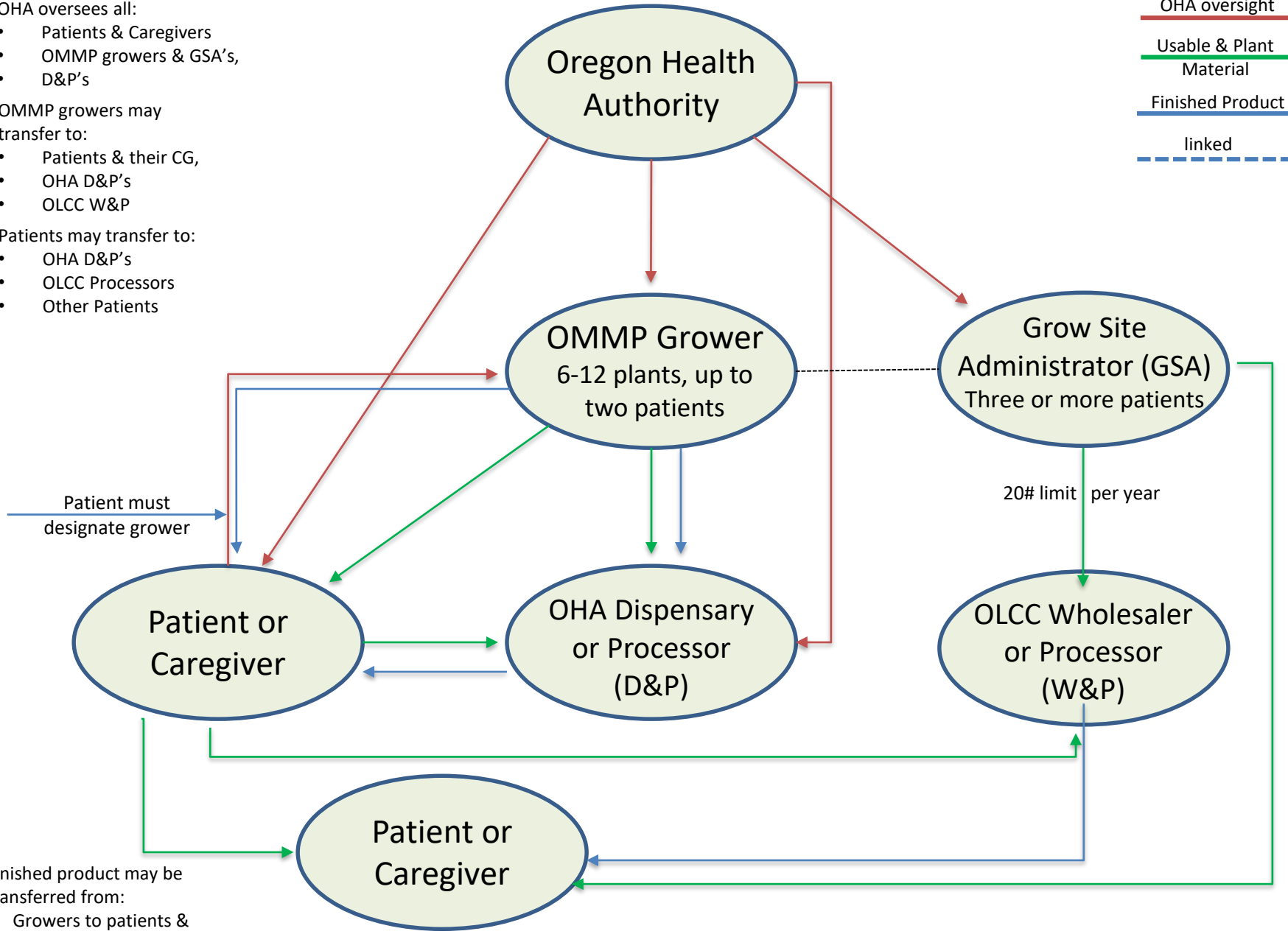


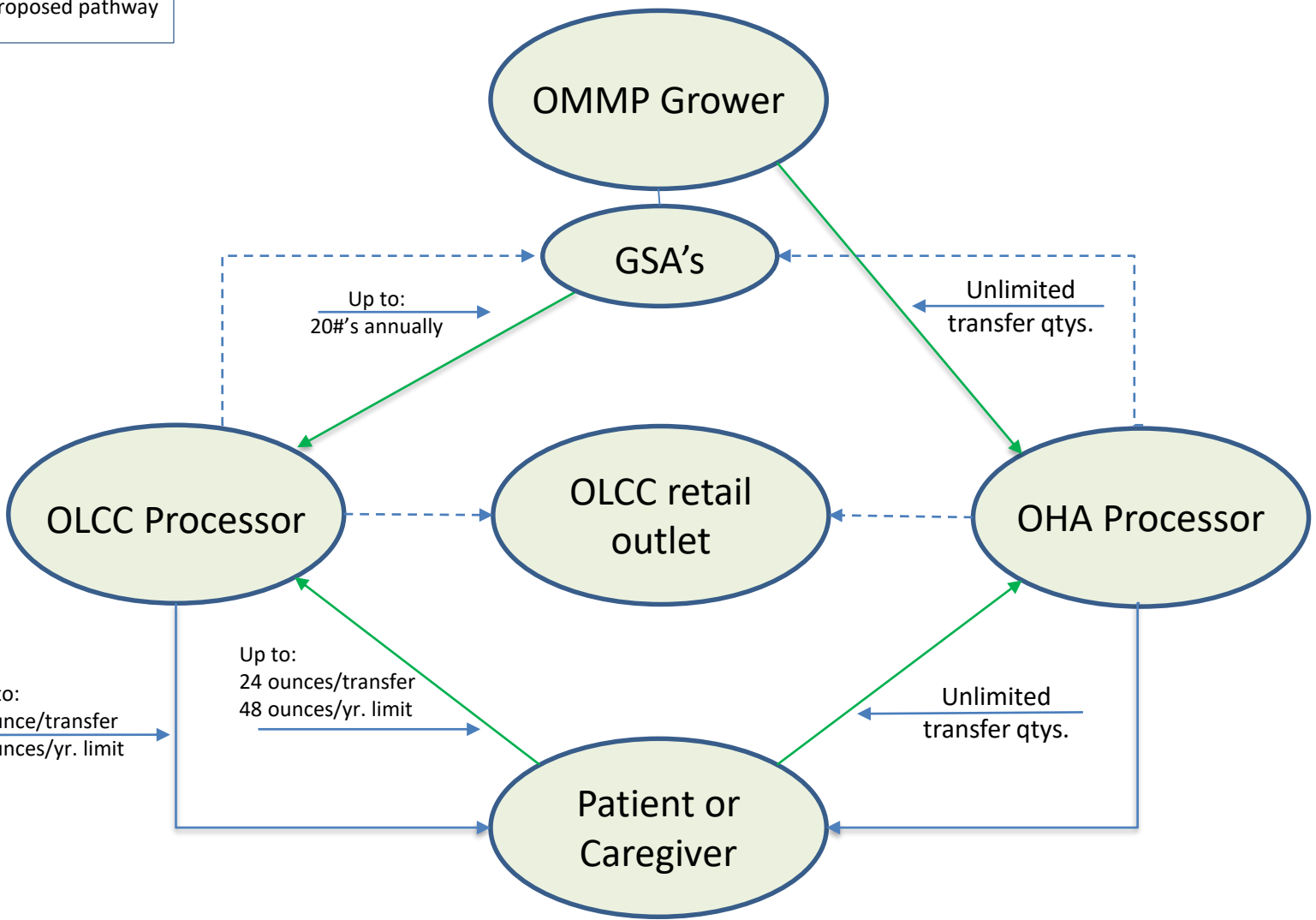
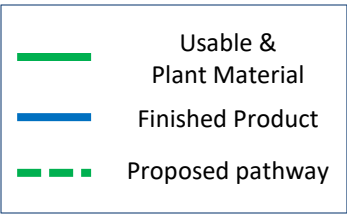
Patient must designate grower

20# limit per year

Finished product may be transferred from:

- Growers to patients & OHA dispensaries
- Processors to patients





The OMMP Garden

Patients growing for themselves at their own home with 12 plants or less pay no grow site registration fees. Designated growers must pay a grow site registration fee for each patient

Grow site registration fee (GSR fee) - \$200 per patient

Who has to pay?

Designated growers must pay a \$200 GSR fee for **every patient** they are growing for.

Patients growing for themselves at an address where they do not live must also pay the GSR fee of \$200.

Grow Site Plant Limits

- Grow sites in residential zones within city limits
- Grow sites at a patient's residence where the resident patient is growing for themselves
- No grow site fee or reporting unless there is a designated grower or transferring.
- These growers would report into the OMMOS system each month

12 Plants

- Grow sites in all zones except residential zone within city limits.
- Grow site fees apply
- Must Report

48 Plants

- Grow sites at these limits and zoning respectively.
- Grow site fees apply
- Must report

24 & 96 Plants

The OMMP Garden

Who must report and where

CTS
Cannabis Tracking
Systems.

CTS
Cannabis Tracking
Systems.

- OMMP growers with 12 plants or less, transferring to patients, dispensaries or processors.
- Any grow site with 12 plants or less with a designated grower.

- OMMP growers with 12 plants or less, no more than 24 immature plants,
- no designated grower and,
- not transferring to dispensaries or processors.

- OMMP dispensaries, processors, and growers with more than 12 plants or three or more patients.
- OMMP grow sites transferring into the adult use market.
- All OLCC licensees

OMMOS
Oregon Medical
Marijuana Online
System

EXEMPT

METRC
Seed-to-Sale
Tracking System

The OMMP Garden

Annual METRC user fee \$480
(There is no fee for OMMOS)

OMMP growers reporting into METRC or OMMOS are required
to use a state-certified scale

- Projected cost \$700 - \$1300
- Annual Calibration \$75

The OMMP Garden

Twenty Pound Rule

A marijuana grow site may transfer up to 20 pounds of usable marijuana per year to a person that holds a license issued under ORS 475B.090 or 475B.100, provided that:
(processors and wholesalers)

- The transfer is tracked using the system developed and maintained under ORS 475B.150;
- More than 12 mature marijuana plants are produced at the marijuana grow site
- Three or more patients at a grow site
- The usable marijuana has been assigned to the person responsible for the marijuana grow site pursuant to ORS 475B.425;
- The usable marijuana has been tested in accordance with the provisions of ORS 475B.550 to 475B.590;
- The marijuana grow site first registered with the Oregon Health Authority under ORS 475B.420 on or before the effective date of this 2017 Act.

The OMMP Garden

The effect of consolidation on the Designated Grower Program

Number of current GSA's grow sites	669*
Number of GSA grow sites with cannabis in OLCC system	18

This is a result of these grow sites being unable to secure water rights. Access to a legal water source is a condition of transferring product into the OLCC system. Since it is also a condition of licensure, the patients being provided for by these grow sites will lose their growers.

Consolidation will result in a 98% drop in grow sites providing no-cost medications to patients.

*these grow sites currently provide no-cost cannabis to over 5,000 patients