



Missouri Department of Health and Senior Services

P.O. Box 570, Jefferson City, MO 65102-0570 | Phone: 573-751-6400 | FAX: 573-751-6010
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Paula F. Nickelson
Director

Michael L. Parson
Governor

NOTICE OF ADMINISTRATIVE HOLD

July 31, 2024

Subject: Notice of Administrative Hold

Dear Licensee,

Marijuana product in your inventory has been placed on administrative hold. Pursuant to 19 CSR 100-1.100(4)(P), the Department of Health and Senior Services may immediately place marijuana product on administrative hold where the product presents a potential threat to health and safety. Product must remain on administrative hold until such time as the Department determines the product is safe, may be remediated, or must be destroyed.

Per 19 CSR 100-1.010(2), administrative hold means a status given to marijuana product by the Department that prohibits any activity with the marijuana product including waste, sale, or transfer of the marijuana product until the hold is lifted.

Per 19 CSR 100-1.180(2)(B)2, prior to sale, delivery, or distribution, dispensary licensees shall verify through the statewide track and trace system that marijuana product has not been placed on administrative hold, recalled, or otherwise required to be destroyed. It is important for licensees to understand that seed-to-sale systems may not have the functionality to notify a licensee that marijuana product is on administrative hold and it is the licensee's responsibility to verify this information through the statewide track and trace system (Metrc) prior to sale, delivery, or distribution.

As part of an on-going investigation, DCR has determined there is a credible and imminent threat to public health that warrants placing product within this Licensee's inventory on administrative hold.

Therefore, DCR reminds/requires the Licensee to take the following actions in addition to rule requirements stated in this notice:

- If not already done so, the Licensee shall immediately place all product that is on administrative hold in quarantine in the space previously designated for quarantine items and within a secure space with limited access.
- No marijuana product on administrative hold shall be moved or altered in any way once it has been secured in quarantine, including wasted.

Pursuant to 19 CSR 100-1.030(2)(C), licensees "must cooperate in any investigation conducted by the department." Failure to cooperate with a Department investigation may be grounds for penalties, including fines, suspension, or revocation of the license or certification.

The designated contact must immediately, but prior to 5pm CST today, July 31, 2024, reply to this notice indicating the following:

1. That the notice of administrative hold has been received and that the Licensee intends to comply; and

PROMOTING HEALTH AND SAFETY

The Missouri Department of Health and Senior Services' vision is optimal health and safety for all Missourians, in all communities, for life.

2. Explain how the Licensee will ensure all marijuana product on administrative hold has been moved to quarantine and made secure and that no action, including wasting will occur with packages on administrative hold; and
3. Verification that SOPs outline verification that marijuana product is not on administrative hold prior to sale, delivery or distribution and that staff have been trained and are following this requirement.

DCR will be in further contact as the investigation proceeds. 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 cannabiscompliance@health.mo.gov.

Jennifer Zamkus, Director
Section for Compliance and Enforcement
Division of Cannabis Regulation
Department of Health and Senior Services