

Meeting Materials: November 13, 2025

Discussion Topic: Batch Tagging of Mature Cannabis Plants

Under existing statutory and regulatory requirements, each mature cannabis plant must be individually tagged with a plant tag. Immature plants may be tagged in groups of up to 100 plants. Recent statutory changes (begun by SB 622, Allen, Chapter 496, Statutes of 2025 and completed by AB 8, Aguiar-Curry, Chapter 248, Statutes of 2025) amended the requirement that each plant have a separate and unique tag, opening the possibility for tagging larger quantities of mature plants under a single plant tag.

The Department is considering options to allow for batch tagging of mature plants and is interested in receiving input from the public and the Committee.

Input Requested and Discussion Questions

- Immature plants can currently be tagged in batches of up to 100 plants on a single tag. Should the Department implement a similar structure for mature plants? If you were able to select the number of plants per plant tag or some other structure for your operation (e.g. by strain, by row, etc.) what would that look like?
- What limitations or restrictions are appropriate for the Department to consider?
- For cultivators: is batch tagging of mature plants something you would use on your premises?
- For regulators (e.g. local jurisdiction representatives, law enforcement officials, or other state partner agencies): what are the pros and cons of batch tagging from your perspective?
- Under the Department's existing contract with Metrc, which is in effect until June 2028, the cost per mature plant remains the same regardless of whether a plant tag is affixed. In effect, it is a cost per plant. If batch tagging does not impact the state's Metrc contract costs, is this still worth pursuing?
- What factors should the Department consider related to tagging of cannabis plants as we move toward hemp integration in 2028?
- The Department is also seeking the following data points:
 - Estimated time to tag all plants
 - Estimated time to remove tags from all plants (if tags are removed before plant disposal)
 - Average amount of time it takes to harvest a harvest batch

