



Mille Lacs Band of Ojibwe
Department of Cannabis Regulation
Cannabis Regulations

October 14, 2025

NOTICE OF ADOPTION

Pursuant to 15 MLBSA § 1203(f)(iii)(B), this serves as the official Notice of Adoption the following:

Cannabis Regulation – 5: PRODUCT INVENTORY AND TRACKING

Summary of changes, to CR – 5: PRODUCT INVENTORY AND TRACKING include:

This Regulation implements 15 MLBS §§ 1203(6); 1206 and Compact Attachment A, parts 9810.1300-1302. This Regulation establishes the procedures and requirements for cannabis businesses to monitor inventory and participate in the Band’s mandatory seed-to-sale track-and-trace system. For cannabis businesses that engage in Compacted Cannabis activity, this Regulation includes provisions regarding integration with the State’s track-and-trace system.

Pursuant to 15 MLBSA § 1203(f)(ii): The Department of Cannabis Regulation reviewed the comments received during the comment period, beginning August 28, 2025, and closing September 29, 2025. The Department of Cannabis Regulation hereby responds to comments below and makes changes as applicable.

Comment 1: CR 5. Changes to clarify and ensure consistent use of calendar days vs. business days, capitalization, internal reference, spacing and tab size were made.

Comment 2: Section 3.6.1.a.i- Additional Tracking Requirements. Can [POS system] records be used to demonstrate the actual discount amount? METRC only reflects the discounted price and does not show the original discount applied. Would [POS system] documentation be sufficient for compliance? No Change Needed.

- Clarification; The language in the regulation referred to here is directly from the Mille Lacs Band of Ojibwe Tribal-State Cannabis Compact, Attachment A, 9810.1302 Track and Trace; Inventory and Tracking Requirements, “subp. 5. Additional tracking requirements...a cannabis business must report...the sale, distribution, transfer, or receipt of products. When reporting a sale in the [Department’s designated monitoring system], a business must include the actual price of the product and any discount amount.”
- Intent; It is the intent of the Department to not authorize compliance waivers of Tribal-State Compact minimum standards.

Comment 3: Section 3.6.1.d- Additional Tracking Requirements. For theft reporting, can we report to the Mille Lacs Band Tribal Police Department? No Change Needed.

- Clarification; In some cases, yes. For on-Reservation facilities, Mille Lacs Band of Ojibwe Tribal Police Department would be local law enforcement. For off-Reservation locations,



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local law enforcement would be the police or sheriff's department of the city or county where the facility is located.

Comment 3: Section 3.6.1.d- Additional Tracking Requirements. Regarding product loss (e.g., the difference between wet weight of a harvest batch and the weight of the parent source package), is it necessary to report standard weight-to-dry weight conversion losses? Or is this section intended only for suspected loss of actual product? No Change Needed.

- Clarification; This section addresses loss of actual product. If the product weight is adjusted for any reason, then that should be recorded under 3.6.1.e., "The justification for any adjustment to the weight or quantity of any products in the cannabis business's system inventory. A business must report the justification for an adjustment to weight or quantity in the Department's designated monitoring system at the time that the business makes the adjustment."

Effective Date: October 14, 2025.

The Department of Cannabis Regulation attached the final version illustrating the updates made as a result of reviewing the comments submitted. Copies of this regulation can be obtained at the Department of Cannabis Regulation and at [Department of Cannabis Regulation \(DCR\) | Mille Lacs Band of Ojibwe](#).

A handwritten signature in black ink, appearing to read "Linda H.", is written over a horizontal line.

Department of Cannabis Regulation Board

October 14, 2025

Date