

11.12.25 Outdoor Grower #1; Unincorporated Area

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, et.) what would that look like?

Yes, I believe a similar structure should be adopted for mature plants. I think that any easily identifiable area, field, or section of rows should be able to be identified by a single batch tag.

With our DCC field / demised premises maps, we have clearly identified sections with their associated square footage represented per row. By assigning a batch tag to each of these sections, it would be possible to identify the entire field, or each strain section within the field, with a single batch tag.

If too broad, a good compromise could use one tag per row within each field, identifying the entire row (assuming the material in that row is the same strain etc.).

What limitations or restrictions are appropriate for the Department to consider?

Again, I think these batches / groupings should only identify groupings of the same strain within the same license (same Metrc naming convention). This could group a few rows to an entire field.

I believe the important issue here is that the area be clearly delineated by row separation, field road, fence, or any other means of clear separation that would allow for easy identification of the area upon inspection.

For cultivators: is batch tagging of mature plants something you would use on your premises?

Yes, if possible, we would use any approved protocol available that would allow us to reduce the number of tags required per planting cycle in an effort to reduce labor costs.

The Department is also seeking the following data points:

Estimated time to tag all plants: On average, one person can apply 1,500-2,000 tags per day. On our farm, with a crew of 20 people, it takes approximately 22 to 24 days to apply 880,000 tags, resulting in +/- 4000 total labor hours per cycle.

Estimated time to remove tags from all plants (if tags are removed before plant disposal): On average, one person can remove 350-400 tags per hour, resulting in +/- 2200 labor hours to remove all of our tags per cycle.

Average amount of time it takes to harvest a harvest batch: If we define a harvest batch as a typical harvest day, we use +/- 300 labor hours to harvest +/- 15k plants per day resulting in a total of 6k to 6.5k total labor hours to harvest the total crop per cycle.

Conclusion: As you can see, our total labor required for tagging nearly equals our total labor required for harvesting.

11/12/25 Outdoor Grower #2; Unincorporated Area

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?

Yes, we would like to see a similar system implemented for mature plants. Tagging by strain would be ideal for our internal planning & tracking.

What limitations or restrictions are appropriate for the Department to consider?

The current tagging requirements require immense labor costs and waste as the tags can't be reused. They also pose a threat to plant health during planting season as winds can cause the tag to damage the sprout. This has been an issue with CDFW as well due to tags blowing into streams.

For cultivators: is batch tagging of mature plants something you would use on your premises?

Yes

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?

N/A

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?

Yes, between the reduction in waste and labor needed to tag this would be worth pursuing despite no change in license costs.

The Department is also seeking the following data points:

Estimated time to tag all plants: This year it took us 60 days to tag all of the plants at our facilities. A team of 6 people can tag approximately 1 acre of plants in a day. We spent a total of \$50,000 on labor for plant tagging.

Estimated time to remove tags from all plants (if tags are removed before plant disposal): Tag removal is built into our harvest process (flash freezing) so does not add extra time, but it does require one full time employee strictly gathering tags during harvest days.

Average amount of time it takes to harvest a harvest batch: 8 hrs per acre (~10,000 plants) with a team of 80.

11/12/25 Indoor Grower #3; Carpinteria

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?

Yes, unlimited batch size by strain and planting date

What limitations or restrictions are appropriate for the Department to consider?

Strain (cultivar) and planting/date (similar to harvest batch rules)

For cultivators: is batch tagging of mature plants something you would use on your premises?

Yes, if reasonable

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? NA

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?

Yes, for operator cost and environment savings

What factors should the Department consider related to tagging of cannabis plants as we move toward hemp integration in 2028?

Our team manages a large-scale outdoor cultivation operation, and we appreciate the Department's willingness to reconsider the practicality and efficiency of the current track-

and-trace system. Based on our direct operational experience, we strongly recommend and support the move toward batch tagging mature plants.

Allowing batch tagging, whether by row, by strain, or at the license level, would significantly reduce both labor and administrative burden. Individual plant tagging consumes substantial time for our field staff and places additional workload on our track-and-trace staff. In practice, traceability is maintained digitally, not through the sheer number of physical tags. Plants are already “batched” both as immature lots and at harvest, and extending the same approach to mature plants does not compromise oversight.

The labor savings alone justify reform. Our historical tagging data from a growing season demonstrates how resource-intensive the current system is:

- **2,702.75 labor hours** dedicated to tagging in a single season
- **\$46,519.11** in direct hourly wages
- **Does not include:** salaried labor, supervisory time, or T&T data-entry hours
- Tagging period duration: **1-1.5 months** with a crew of **10-15 people**

Material waste is another area where the current system falls short. Individual plant tagging requires thousands of plastic tags and zip ties per cycle, all of which become landfill waste after use. Allowing operators to batch their plants, we would significantly reduce plastic waste, packaging and shipping, and labor cost.

Batch tagging would also better align with real-world cultivation practices. Assigning tags by row or strain helps operators quickly identify and respond to issues such as pest infestations, irrigation inconsistencies, or nutrient deficiencies. These natural cultivation groupings are already how farms monitor plant health. Being able to tag by these groupings enhances internal tracking without sacrificing regulatory visibility.

In summary, individual mature-plant tagging imposes excessive labor demands, creates avoidable administrative complexity, and generates significant material waste while providing minimal additional compliance value. Batch tagging is operationally logical, environmentally responsible, and fully compatible with track-and-trace traceability. We strongly encourage the Department to adopt batch tagging for mature plants and to consider allowing licensees to generate their own tags consistent with other agricultural sectors.

We appreciate the opportunity to provide this feedback and are happy to supply additional data or clarification upon request.