



To: All New York State Adult-Use Licensees
From: NYS Office of Cannabis Management
Date: July 30, 2025

Subject: Integration Importance Guidance: Transferring Cannabis Products Between Integrated & Non-Integrated Licensees

Dear Licensee,

As you continue integrating your electronic inventory tracking system with New York State's Seed-to-Sale (STS) system, **BioTrack NY**, the Office has received questions regarding how to transfer product between licensees who have already completed integration and those who have not yet done so.

To ensure a smoother transition, the Office encourages licensees plan to minimize the number of offline transfers from integrated to non-integrated licensees. One way to do this is to transfer products in advance of integration if those transfers are already planned and the products are ready to ship.

Transfers from Integrated to Non-Integrated Licensees

While transfers from integrated to non-integrated licensees are not encouraged, it is possible using the process outlined below:

Integrated Licensee:

1. Creates an offline (paper) invoice.
2. Creates an offline (paper) transfer manifest.
3. "Adjusts" the associated product inventory down in their inventory system.
4. Notes the reason for adjustment, including the license number of the recipient for future reference.

Non-Integrated Licensee:

1. Accepts or rejects the shipment and enters the product into their system.
2. Performs licensed activities using the product.
3. Uploads the product as initial inventory if any remains at the time of integration. A new UID is not required if the UID from the integrated licensee was entered at the time of receipt.

Transfers from Non-Integrated to Integrated Licensees

Transfers from non-integrated to integrated licensees are expected to be uncommon due to the integration timeline moving in order with the supply chain. However, it is possible using the steps outlined below:



Non-Integrated Licensee:

1. Creates an offline (paper) invoice.
2. Creates an offline (paper) transfer manifest.
3. “Adjusts” the associated product inventory down in their inventory system.
4. Notes the reason for adjustment, including the license number of the recipient for future reference.

Integrated Licensee:

1. Accepts or rejects the shipment and “creates” new product to enter into their system. A new UID will be required.
2. Notes the license number of the supplier in their system for future reference.
3. Manually enters the corresponding product lab test results, if applicable.
4. Performs licensed activities using the product.

Contact Information for Support

- Licensees and permitted laboratories with general questions about the BioTrack STS system: NYHelp@biotrackthc.com
- Licensees with compliance questions about BioTrack NY integration: STS@ocm.ny.gov
- Software vendors (integrators) with API or integration process questions: NYIntegrator@biotrackthc.com
- For additional guidance regarding integration with the Seed-to-Sale system, BioTrack NY, visit: <https://cannabis.ny.gov/seed-to-sale>

Thank you,
NYS Office of Cannabis Management