January 12, 2026

NEW YORK STATE | OFFICE OF CANNABIS MANAGEMENT

CHIP Academy 3

GMP Certification for Cannabis Processing

NEW YORK SOCIAL & ECONOMIC EQUITY NY SEE

Resources & Information

All information presented in this session is available through various resources and documents released by the Office and other government agencies or is mentioned within the adult-use license application.

Links to resources that may be useful for adult-use cultivators or processors:

- Parts 123, 124, 125, 128 https://cannabis.ny.gov/marihuana-regulation-and-taxation-act-mrta
- Cultivation 123.4 Regulations: https://cannabis.ny.gov/revised-adult-use-cannabis-regulations-0
- PLMA Regulations*: https://cannabis.ny.gov/part-128-129-plma-adopted

If there are any unanswered questions after this training session, **please refer to the FAQ resource and official guidance documentation published on the Office's website**. The FAQ document should be your primary point of reference for all inquiries related to license applications.

CHIP Academy training sessions are intended as a resource to assist new licensees. This training does not constitute legal or professional advice. All assistance, and information provided to licensees during this program is publicly available. All licensees are bound by current and future state laws, rules, regulations, and guidance.

* At the time of writing, comments submitted on proposed changes to PLMA Regulations are currently under review. The link and/or regulations may be different than what is included in this slide deck. Please refer to the Office's website for the most updated regulations and resources: https://cannabis.ny.gov/marihuana-regulation-and-taxation-act-mrta#regulations

Agenda

1. Orientation to GMP
2. Walk-Through Areas Investigated During Audit
3. Benefits of GMP

Orientation to GMP

GMP Certification Requirement of NYS

- (1) **All cannabis and cannabis product processing** shall be **in accordance with good manufacturing practice (GMP) standards**, pursuant to either Part 111 or Part 117 of Title 21 of the Code of Federal Regulations, as applicable for the type of cannabis or cannabis product being processed or as otherwise determined by the Office.
- (2) A licensee who is authorized to conduct certain processing activities as determined by the Office shall **establish compliance with GMP standards** by submitting to the Office proof of a **qualified third-party GMP audit**, of the licensee's extraction and/or manufacturing processes as applicable, to the satisfaction of the Office, **within one (1) year of commencing licensed operations**. The Office shall determine which third-party GMP auditors are authorized and qualified.
- **§ 123.6(a) NY State Regulations for Processing License Facility Operations.**

Definitions

- **cGMP:** current Good Manufacturing Practices
- **HACCP:** Hazard Analysis Critical Control Points
- **Certification Body**: A certification body is an independent third party that handles a certification process. (Accredited in US by ANSI for ISO)
- **Audit**: A third-party audit is performed by an audit organization/auditor independent of the customer-supplier relationship and is free of any conflict of interest. Typically, the certification body hires a subcontracted auditor though not always.

Prepared & Ready

Federal Legalization/ Descheduling Cannabis:

- In the event the federal government shifts policy on cannabis, processing regulations already in place in NY based on the federal CFR (Code of Federal Regulations) could be used as the regulatory structure for all types of cannabis processing.
- For this reason, the required **NY regulations will be a competitive advantage in a national or international marketplace** over states that do not require GMP standards for all processing and packaging.

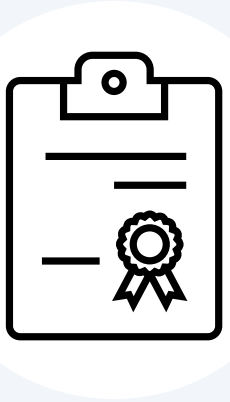
Walk-Through Areas Investigated During Audit

The 5 P's of Good Manufacturing Practices (GMP)

People
Roles, responsibility, and training

Products
Clear specification at every phase of production

Processes
Properly documented, simple, and consistent



Procedures
Guidelines for undertaking critical processes

Premises
Cleanliness and equipment calibration at all times

Areas of Investigation during GMP Audit

1. Management Commitment
2. Risk Management
3. Quality Management Systems
4. Site & Facility Management
5. Product Controls
6. Staff Training

Responses to Auditor questions should be Clear, Concise, Targeted, and Honest

Management Commitment

- Company **Culture & Vision** come from the top down of the organization. Originating at C-Suite and permeated throughout the organization
- Your organization needs a defined **mission statement**
- With a defined **vision** and **goal** from C-Suite, the management team builds strategy and manages the execution of plans that support the achievement of the strategy
- Thorough understanding and thinking-through processes to build the safest, efficient, accurate, compliant processes possible
- Understanding your processes helps you **create process flows** for compliance and training, and helps you **understand** how your items will be tracked in software

Management Review Meetings to Uphold Commitment

- Quarterly management meetings (at a minimum)
- MGMT Review Form documents what transpires during the meetings
- Any non-conformances and/or Corrective Action Plans are recorded accordingly with the respective documentation

Risk Management

- Defining all processes, at multiple levels
- Overview of entire operation (all processes)
- Process flows breaking down each process into its individual steps
- Once your process is defined, you can begin hazard analysis, management, mitigation
- This is encompassed within HACCP certification & implementation

Hazard Analysis Example

Process Step	Chemical Risks or Hazards	Biological Risks or Hazards	Physical Contaminants	Causes	Control Measures	Likelihood	QMS SOP or Record	Reason for Decision
Flower Selection for processing	Flower with pesticide residue	Mold, moisture generated breakdown,	Dirt, hair, insect residue or parts	(c) PPP applied improperly (B&P) cultivation, drying or storage protocols	PPP application/IPM plan GAP Plan for Cannabis cultivation, Storage and handling SOP Lab testing results confirm thresholds Worker training	Low to moderate	Cultivation Records, Sampling and testing records, COA, Drying and storage SOP and records	
Grinding	Residue from cleaning solution on equipment	Mold or other microbiological contamination	Machine residue i.e. metal shavings, grease, lubricating fluids	(C&B) Improper cleaning (P) Improper maintenance and cleaning	Cleaning and maintenance SOP, Worker training related to cleaning and maintenance	Low	Cleaning SOP and validation, Maintenance SOPs Cleaning records	

Quality Management Systems

Documents that record and describe a standard operating procedures, company policies, standard forms for record keeping, etc.

- Document Control (versions & Edits)
- Keeping Documents Organized
- Standardize the File Naming Conventions

<u>Organized Categories of Documents in QMS</u>

- Contracts & Agreements
- Customer Relationship Management
- Distribution + Warehouse
- Human Resources- Safety & Security – Training
- Information & Technology
- Lab & Equipment
- Facility Maintenance
- Management Responsibility
- Manufacturing
- Purchasing
- Quality
- Regulatory

Making documentation approachable for a higher fidelity rate of accurate + complete records

Bristol Extracts uses Microsoft Office. We are able to create a Microsoft Form to capture data which generates a response log which is used for audits. A QR code can be generated that links to the form and allows ease of access for the form to be filled out regularly.

Site & Facility Management

- Cleaning & Sanitization Facility Maintenance
- Cleaning & Sanitization Records (example: sanitizer ppm log)
- Equipment use log, calibration log, maintenance log
- Landscaping (landscaping is at least 1.5’ away from building)
- Exterior-Interior junctions (ex: doors, warehouse) have no gaps at doors, no cracks in floors, sealed separate and high integrity division between outside vs. inside
- Pest Control service, provider documentation, service records
- Water documents (Backflow, municipal water report, your 3rd party test of your facility tap water)

Product Controls

- Track and Trace Software
- Specification documents for every step
- Following SOP’s, being consistent
- Clean practices
- Preventative measures (filters, metal detection, check weigh scales)
- Compliance Testing of Product Batches
- Product Controls support product quality & consumer experience
- Product Controls are preventative actions that reduce the likelihood for product recall incident

Staff Training

- Strong Training Programs are the foundation for your organization & human capital strength
- People directly involved in manufacturing are the front-line defense in the enforcement of quality during production
- **Communication and transparency with staff**

Benefits of GMP

GMP is Great for Business

- **Quality Control**: GMP ensures that products meet quality standards, reducing the risk of product defects. This leads to improved product quality and helps to maintain consistency and potency.
- **Compliance with Regulatory Requirements**: GMP is essential for meeting regulatory requirements and industry standards. Compliance with these requirements is critical to ensure the safety and quality of your cannabis products.
- **Enhanced Safety**: GMP helps to ensure that your products are safe for use. This includes proper handling of raw materials, accurate labelling of products, and proper packaging and storage.
- **Improved Efficiency**: GMP helps to optimize production processes, reducing waste and increasing productivity. This can lead to cost savings and increased profitability.
- **Improved Brand Reputation**: A reputation for **quality** and **consistency** is critical for business success in the cannabis industry. GMP helps to ensure that products meet customer expectations, enhancing the reputation of the company and building customer loyalty.

Takeaways

- Scheduling & Reminders
- Frequent Transparent team communication
- Leaning on Softwares
- Creative Problem Solving

Questions & Answers

If you have any questions, please email **SEE.Academy@ocm.ny.gov** and the SEE Team will get back to you as soon as possible.

Thank you!

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