Office of Cannabis Management's (OCM or Office)

Cannabis Resource Tracking Guidance

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1. What are the Office's resource benchmarking and reporting rules?

Resource benchmarking refers to collecting data and using it to quantify current levels of resource consumption. Once current levels are known, they can be used as a benchmark to measure future performance. Benchmarking metrics are a key aspect of resource management and environmental protection, as understanding past and present resource intensity allows business, industry and government to identify areas for future improvements.

New York State (NYS) cannabis resource benchmarking and resource usage reporting requirements are outlined in 9 NYCRR Section 113.26(a) and 113.7(e)(7)(ix) of the Office's medical cannabis regulations and Sections 123.4(g)(1) and 123.4(g)(2) of the adult-use cannabis regulations.

9 NYCRR Section 113.26(a) states that *Annual benchmarking of energy and water usage is required, in a manner required by the office with the first report to be completed and submitted to the office no later than one year after registration and with subsequent reports to be submitted annually to the office thereafte*r. This requirement applies to registered organizations (RO).

9 NYCRR Section 123.4(g)(2) states that *Cultivators shall use a resource manager to track energy consumption metrics, as approved by the Office, and report utility and energy bills, together with cannabis yield data, to the Office upon request*. This requirement applies to all licensees authorized to cultivate adult-use cannabis including cooperatives and collectives, cultivators of all tiers, microbusinesses, nurseries, registered organizations with dispensing (ROD) and registered organizations non-dispensing (ROND).

These requirements do not currently apply to any licensed, regulated entities not indicated above.

Cannabis resource benchmarking includes but is not limited to the metrics outlined in 9 NYCRR Section 123.4(g)(1): *(i) energy consumption by source (monthly, including consumption and demand); (ii) water consumption (gallons per month); (iii) on-site generation (monthly); (iv) cannabis yield by dry weight*

(annual) for the previous 12-month period and for each month of the 12-month period, excluding stalks, stems, and fan leaves; (v) waste (pounds per month); and (vi) any other information as determined by the Office to assist with energy and resource usage reporting.

123.4(g)(1)(iii) refers to *monthly on-site generation* of renewable energy, including but not limited to solar, wind and geothermal energy.

9 NYCRR Section 113.7(e)(7)(ix) and Section 125.2(c)(3) authorize the Cannabis Control Board (the Board) to require compliance with resource benchmarking and reporting as a condition of license renewal for licensees authorized to cultivate medical and adult-use cannabis, respectively.

2. Why are licensees required to track resource consumption?

Cannabis production benchmarking metrics have been limited because of the product's history as a Schedule 1 drug and the differing environmental standards promulgated across the various state-level legalized markets. Lacking uniform standards and a clear understanding of resource consumption metrics makes it difficult for the cannabis industry to measure and lessen its environmental impact.

Minimizing adverse environmental impacts of cannabis production and increasing the State's resiliency to climate change were two key intentions of the Marihuana Regulation and Taxation Act (MRTA), the bill that legalized adult-use cannabis in NYS. By mandating resource tracking for cultivation licensees, the Office meets the MRTA's intentions, positions NYS as a global leader in resource-efficient cannabis production and ensures the industry stays compliant with the greenhouse gas (GHG) emissions reductions required by the State climate law, the Climate Leadership and Community Protection Act (CLCPA). Once benchmarks have been established, the Office can effectively support industry licensees to reach a goal of net zero carbon generation, waste minimization and water protection. The data collected through resource tracking and reporting will be used by the Office to identify program success and challenges for licensed cannabis cultivation in NYS, ultimately serving as guidance for future policy, education, and funding decisions.

For licensees, knowing the level of resource inputs they are using will help them better understand the relationship between their operating costs and their yield. The first year's data will serve as a benchmark licensees can use as an efficiency target to improve resource consumption in future years. This may help licensees to reduce input costs and operating costs, allowing them to maintain greater profit. Licensees who are extremely resource-efficient may also be able to use this information as a tool to earn greater price premiums from consumers who value environmentally friendly production.

3. Will licensees have to pay to use the Office's internal resource tracking platform?

Licensees will not have to pay to use the Office's internal resource tracking platform.

4. What information will licensees enter into the resource tracking platform?

To meet the Office's resource tracking and reporting mandates, licensees will be required to enter data from their monthly power and water bills, as applicable, into the Office's internal resource tracking platform. This will include information about their use of on-site renewable energy sources and their utility service provider. Licensees will enter data from their power and water bills into the system manually. This information will be transmitted to the Office directly.

5. When do licensees have to begin resource tracking?

9 NYCRR Section 113.26(a) states that *Annual benchmarking of energy and water usage is required, in a manner required by the office with the first report to be completed and submitted to the Office no later than one year after registration and with subsequent reports to be submitted annually to the Office thereafte*r. This requirement applies to ROs.

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These requirements do not currently apply to any licensed, regulated entities not indicated above.
All licensees authorized to cultivate who were licensed by the Office prior to the year 2025 must submit their first resource tracking report no later than August 31, 2025 and annually thereafter. Licensees authorized to cultivate who are licensed by the Office in subsequent years must submit their first resource tracking report no later than August 31 of the year following the year of their initial licensure and annually thereafter.

In situations where a licensee authorized to cultivate has been licensed for less than one full year, the licensee will still be required to submit their first resource tracking report on August 31 of the year following initial licensure and annually thereafter. The Office's internal resource tracking platform provides options for licensees who are non-operational and those who have been operational for less than one full year.

6. How often will licensees be required to submit tracking reports?

All licensees authorize to cultivate cannabis will be required to submit resource tracking reports annually.

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These requirements do not currently apply to any licensed, regulated entities not indicated above.

7. **What are the consequences for missing a report?**

The purpose of resource tracking and reporting is to empower licensees authorized to cultivate, the Office, the State and the greater cannabis industry with verifiable data on resource consumption in cannabis production.

However, 9 NYCRR Section 113.7(e)(7)(ix) and Section 125.2(c)(3) authorize the Board to make submission and compliance with resource benchmarking and reporting a condition of license renewal for ROs and licensees authorized to cultivate adult-use cannabis, respectively.

If a licensee does not maintain compliance with resource tracking and reporting or has missed their most recent reporting due date, they will be issued a Statement of Findings (SOF) and be required to submit a Corrective Action Plan (CAP).

This is consistent with the Office's policies and procedures for non-compliance with other reporting requirements. If the licensee remains out of compliance, the Board may be authorized to decline to renew the license during the next license renewal process.

8. **What is the deadline for submitting a resource tracking report if I previously submitted an attestation?**

Licensees who submitted an attestation about resource tracking affirmed they would complete their mandatory reporting requirements within 30 days of a new platform being made available. These licensees must submit their resource tracking information by October 31, 2026. Licensees who submitted their 2026 resource tracking report using the PowerScore platform prior to September 5, 2026 do not need to take further action at this time. The next resource tracking report will be due August 31, 2027 for all licensees authorized to cultivate who were licensed on or before December 31, 2026, regardless of operational status.

9. **What will happen to the PowerScore account I previously created?**

Licensees have the option to maintain their existing PowerScore account. However, any agreement or data exchange entered into between a licensee and the PowerScore developer, Resource Innovation Institute (RII) will be separate from the Office. Additionally, any data submissions or reporting done through the PowerScore account after 5:01 pm EDT Sept. 4, 2026, will not meet the resource tracking and reporting requirements that apply to licensees authorized to cultivate medical and adult-use cannabis.

10. **Where can I find more information about resource efficiency in cannabis?**

The Office's Energy and Environmental Sustainability webpage hosts information about environmental sustainability and resource efficiency in cannabis. The Office's YouTube page hosts webinars related to resource efficiency as well.

In 2020, the National Cannabis Industry Association (NCIA) developed a best practices guide, Environmental Sustainability in the Cannabis Industry: Impacts, Best Management Practices and Policy Considerations, that provides more information about how to implement resource use efficiency methods to your operation.