

TECHNICAL ADVISORY

2025-008

Date: September 18, 2025

Subject: Licensee Operations: Medical Cannabis Waste Procedures
and Employee Identification Badges

Relevant authority: KRS 218B.130, 915 KAR Chapter 1

Prepared by: Cannon Armstrong, Executive Director
Kentucky Office of Medical Cannabis

The purpose of this technical advisory is to provide licensees with guidance on the Office of Medical Cannabis's interpretation of suitable medical cannabis waste procedures, the correct Office of Medical Cannabis (OMC) email address for placement on cannabis business employee, agent, or volunteer badges, and how a licensee may continue to maintain compliance with KRS Chapter 218B and 915 KAR Chapter 1.

Medical Cannabis Waste

Per 915 KAR 1:030 Section 13(1), “[a] cultivator shall dispose of undesired, excess, unauthorized, obsolete, adulterated, misbranded, or deteriorated medicinal cannabis in a manner as to render the medicinal cannabis unusable. A cultivator shall record medicinal cannabis waste as required in the Commonwealth’s designated electronic monitoring system and seed to sale tracking.”

Per 915 KAR 1:040 Section 13(1), “[a] processor shall dispose of undesired, excess, unauthorized, obsolete, adulterated, misbranded, or deteriorated medicinal cannabis in a manner as to render the medicinal cannabis unusable. A cultivator shall record medicinal cannabis waste as required in the Commonwealth’s designated electronic monitoring system and seed to sale tracking.”

Per 915 KAR 1:060 Section 16(1), “[a] safety compliance facility shall dispose of samples in a manner as to render the medicinal cannabis unusable. A safety compliance facility shall record medicinal cannabis waste as required in the Commonwealth’s designated electronic monitoring system and seed to sale tracking system.”

Per 915 KAR 1:070 Section 14(1), “[a] dispensary shall dispose of expired, undesired, excess, unauthorized, obsolete, adulterated, misbranded, or deteriorated medicinal cannabis in a manner as to render the medicinal cannabis unusable. A dispensary shall record medicinal cannabis waste as required in the Commonwealth’s designated electronic monitoring system and seed to sale tracking system.”

To comply with medical cannabis waste requirements, licensees must weigh medical cannabis waste and record those weights in the OMC's designated seed to sale tracking system (Metrc) as well as in a separate waste log. On the day the medical cannabis waste is weighed and logged, licensees must also physically dispose of that waste in compliance with the applicable regulation. The disposal process shall be performed under video surveillance from the time the destruction begins to when it is placed in a locked dumpster or other approved, locked container and removed from the licensee's site and facility. Destruction begins when the licensee has accumulated medical cannabis waste.

Licensees that are currently operational shall have fourteen (14) calendar days from the date of this notice to come into compliance.

Employee, Agent, and Volunteer Badges

Per 915 KAR 1:030 Section 5(3)(c), "[a] cultivator shall create an identification badge for each employee, agent, or volunteer. The badge shall be conspicuously worn by employees, agents, or volunteers at all times that they are on the licensed premises or during transport of medicinal cannabis. The badge shall contain: (c) A phone number and email address for the Kentucky Medical Cannabis Program."

Per 915 KAR 1:040 Section 5(3)(c), "[a] processor shall create an identification badge for each employee, agent, or volunteer. The badge shall be conspicuously worn by employees, agents, or volunteers at all times that they are on the licensed premises or during transport of medicinal cannabis. The badge shall contain: (c) A phone number and email address for the Kentucky Medical Cannabis Program."

Per 915 KAR 1:060 Section 9(3)(c), "[a] safety compliance facility shall create an identification badge for each employee, agent, or volunteer. The badge shall be conspicuously worn by employees, agents, or volunteers at all times that they are on the licensed premises or during transport of medicinal cannabis. The badge shall contain: (c) A phone number and email address for the Kentucky Medical Cannabis Program."

Per 915 KAR 1:070 Section 9(3)(c), "[a] dispensary shall create an identification badge for each employee, agent, or volunteer. The badge shall be conspicuously worn by employees, agents, or volunteers at all times that they are on the licensed premises or during transport of medicinal cannabis. The badge shall contain: (c) A phone number and email address for the Kentucky Medical Cannabis Program."

To comply with employee, agent, and volunteer badge requirements, licensees must use kymedcanreporting@ky.gov as the required OMC email address for placement on all employee, agent, and volunteer badges. Additionally, licensee must use (833) 727-2828 as the required OMC phone number on all employee badges.

Licensees that are currently operational shall have thirty (30) calendar days from the date of this notice to come into compliance.

ISSUED BY:

A handwritten signature in blue ink, consisting of a large circle followed by a horizontal line and a diagonal stroke.

Cannon Armstrong, Executive Director
Office of Medical Cannabis

Date: 9/18/2025