



TECHNICAL ADVISORY

2025-009

Date: December 3, 2025

Subject: Licensee Operations: Start-Up Inventory Request; Additional Inventory Request(s)

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 cultivator licensees with guidance on the Office of Medical Cannabis's (OMC) interpretation of 915 KAR 1:020, Section 4(3) (Start-Up Inventory Request) and 915 KAR 1:020, Section 4(4) (Additional Inventory Request(s)) and how they may continue to maintain compliance with KRS Chapter 218B and 915 KAR Chapter 1.

Start-Up Inventory Request

Per 915 KAR 1:020, Section 4(3), “[o]nce a cultivator or producer has received approval from the cabinet to commence operations, the cultivator or producer shall: (a) [b]ring a start-up inventory of medicinal cannabis seed, seedlings, tissue cultures, clones, and plants into its facility.”

Cultivator licensees will have sixty (60) calendar days from receiving approval to begin cannabis business operations from OMC to request to bring in “Start-Up Inventory.” Throughout this sixty (60) calendar day window, a cultivator licensee may make multiple requests to bring in “Start-Up Inventory.”

Additional Inventory Request(s)

Per 915 KAR 1:020, Section 4(4), “[f]ollowing acquisition of its start-up inventory, a cultivator or producer may submit a written request to the cabinet by electronical mail to kymedcanreporting@ky.gov requesting that the cabinet open a window in the state’s designated seed to sale tracking system for the cultivator or producer to enter new medicinal cannabis seeds, seedlings, tissue cultures, clones or plants into the system.”

An inventory request submitted by a cultivator licensee outside of the sixty (60) calendar day window for “Start-Up Inventory” shall be considered an “Additional Inventory Request.” When submitting an “Additional Inventory Request” to the OMC, cultivator licensees must include documentation

identifying the entity providing the licensee with additional inventory and the inventory's location of origin.

ISSUED BY:

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Cannon Armstrong, Executive Director
Office of Medical Cannabis

Date:

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