Records Checklist - For CDFA Licensees					
Author; last update	Mahajan Consulting; January 2020				
Resource Type	Record-keeping requirements checklist				
Licensee Type	California Department of Food and Agriculture (CDFA) Licensees: Cannabis Cultivators, Nurseries, and Processors				
About this Resource	You are required per CDFA regulation to keep certain records.  Use this document as a checklist as you create or audit your record-keeping system.  Your records may be organized by different categories or labels. That's ok, as long as you know where things are.  The regs are linked below; reference them as needed.				
Disclaimer	The information contained in this checklist is for general, informational purposes only. It is not legal advice, individual advice specific to your situation, or any other kind of advice. For personalized guidance, call your favorite cannabis consultant or attorney.				
Source	"CDFA Regs" California Code of Regulations, Title 3, Division 8				
	CDFA may conduct inspections, investigations, and audits of records to determine compliance.				
	All records are subject to CDFA review during standard business hours (8am-5pm Pacific Time) or at any other reasonable time as mutually agreed to by and the licensee. Prior notice to review records is not required.				
General Information	Keep records, electronically or otherwise, on the premises of the licensed location and in a manner that allows records to be examined at the licensed premises or delivered to the CDFA upon request.				
	Store records in a secured area where they are protected from debris, moisture, contamination, hazardous waste, fire, and theft.				
	Keep records for seven years from the date the document was created, unless otherwise specified.				
	Records shall be legible.				
	> Take me to the CDFA Regulations <				
LINKS	> Take me to the Business and Professions Code (BPC) <				

List of Required Records					
#	Short Description	<b>V</b>	Detail	CDFA Regs Section(s) (unless otherwise noted)	
1	Business, Financial, and Legal Records		CDFA issued state license(s). Display the valid license prominently on the licensed premises.	8400, 8304, 8305, 8306, 8307	
2			All permits, licenses, and other authorizations to conduct the licensee's commercial cannabis activity.		
3			Cultivation plan.		
4			All records evidencing compliance with the environmental protection measures pursuant to CDFA Regs Sections 8304, 8305, 8306, and 8307.		
5			Financial records related to the commercial cannabis activity, including bank statements and tax records.		
6			Contracts.		
7			Purchase orders.		
8			Other records or documentation required to be kept pursuant to applicable statutes or regulations.		
9			Things submitted to, and/or received from, state and local authorities. (Recommended)		
10			Other correspondence with state and local authorities, including emails, phone call notes, notes related to inspections, etc. (Recommended)		
11			A log and notes to keep track of inspections conducted by state and local authorities. (Recommended)	8500	
12	Sales & Transfers		Prepare a sales invoice or receipt for every sale or transfer of cannabis or non manufactured cannabis product to another licensee. These may be retained electronically but must be readily accessible for examination by CDFA, other state licensing authorities, any state or local law enforcement authority, and the California Department of Tax and Fee Administration.  See BPC Section 26161 and CDFA Regs Section 8401 for the list of information that must be included on sales invoices and receipts.	8401 BPC 26161	
13	Inventory Control		All UIDs assigned to product in inventory and all unassigned UIDs. UIDs associated with product that has been retired from the track- and-trace system must be retained for six (6) months after the date the tags were retired.	8400	
14			Use the track-and-trace system for all inventory tracking activities at a licensed premises, including, reconciling all on-premises and intransit cannabis or non manufactured cannabis products inventories at least once every thirty (30) calendar days. Retain associated records.	8406	
15	Track and Trace System Records		Use the track-and-trace system for recording all applicable commercial cannabis activities, including the disposition of immature and mature plants, non manufactured cannabis products on the licensed premises, any transfers associated with commercial cannabis activity between licensees, and cannabis waste. Keep all supporting documentation for data or information entered into the track-and-trace system.	8402, 8405	
16			If you lose access to the track-and-trace system for any reason, prepare and maintain comprehensive records detailing all required inventory tracking activities conducted during the loss of access. Once connection is restored, follow steps in Section 8402(e).	0.102, 0.100	
17			Maintain an accurate and complete list of all track-and-trace system users and update the list immediately when changes occur.		
18	Waste Records		Maintain accurate and comprehensive records associated with composting or disposal of cannabis waste.	8308, 8400, 8402	
19			If waste is collected by a third party: (1) Maintain and make available to CDFA upon request the business name, address, contact person, and contact phone number of the entity hauling the waste; and (2) Obtain documentation from the entity hauling the waste that evidences subscription to a waste collection service.	8308	
20			If self-hauling: For each delivery of cannabis waste, keep a copy of a certified weight ticket or receipt from the solid waste facility.	8308	
21	Batch Testing Results		Keep a copy of the Certificate of Analysis (COA) for each harvest batch after regulatory testing is complete (recommended).	8211	
22	Personnel & Training Records		Personnel records, including each employee's full name, social security number or individual taxpayer identification number, date of employment, and, if applicable, date of termination.	8400	
23			Records related to employee training for the track-and-trace system or other regulatory requirements. Records shall include, but are not limited to, the date(s) training occurred, description of the training provided, and the names of the employees that received the training.		

## Will you share your feedback?

I'm curious:

What did you like? What could have been better? Want more stuff like this?

Click here to fill out a quick survey.

Short and sweet. 10 optional questions in total. Spend as little or as much time as you like.