CANNABIS LAW ALERT

December 3, 2025 By: Douglas F. Wasser, Esq. Gavin C. Grusd, Esq.





New York OCM Launches Online Portal for Cannabis License Renewals December 3, 2025

Good news for New York cannabis businesses: The Office of Cannabis Management (OCM) has rolled out an online portal to renew your adult-use licenses. If your license was issued in 2023 or 2024, your first renewal may be coming up soon.

The portal is part of the state's New York Business Express (NYBE) system. You can submit your renewal application at <u>Licensing | Office of Cannabis Management</u>. It's designed for the adult-use market.

Key Renewal Timeline

You must submit your renewal no earlier than 120 days and no later than 60 days before your license expires. Apply too early or too late, and it could delay approval or even lead to non-renewal. For example, if your license ends on January 31, 2026, aim for October 3, 2025, to November 30, 2025. Check your expiration date now to avoid surprises.

What You Need to Renew

Gathering documents early keeps things stress-free. Here's a checklist of most items:

- Financial Proof: Updated balance sheets, income statements, and tax returns showing you're in good standing.
- **Compliance Reports**: Records of no violations, including seed-to-sale tracking via Metrc and environmental checks (like PowerScore for growers).
- Operations Details: Proof you are following Good Manufacturing Practices, zoning rules, and lease agreements.
- Equity Info (if applicable): Confirmation of your Social and Economic Equity status, plus reports on community benefits diversity hiring.
- Employee Compensation Info: Disclosure of different positions within your company and their approximate compensation.
- Ownership Updates: Disclosure of any changes since your initial license. This includes certifying that since your original license was granted your True Parties of Interest (TPIs) have not been arrested, charged, or cited with any criminal violations nor are defendants in a civil litigation proceeding.
- Renewal Notification to the Municipality: You must submit a new notification to the municipality regarding license renewal.
- **Community Impact Plan**: You must disclose how you have implemented your Community Impact Plan including specific organizations or institutions you have partnered with and, the written agreements with those partners..
- Labor Peace Agreement: You must disclose the Labor Organization you have partnered with and upload a current Labor Peace Agreement.
- **Fees**: You must pay both the application renewal fee of \$1,000 and the corresponding license fee associated with your license type and scope of activities. The fee schedule is available at: application-and-licensing-fee-schedules.pdf

You need to upload everything through the portal for a clear digital record. OCM reviews most renewal applications within 60-90 days. Watch your email for any follow-up requests.



Areas for Specific Consideration

There are a few areas where your cannabis attorney can help avoid potentially serious pitfalls:

- Criminal and Civil Litigation Disclosures: You are being asked to attest that since the issuance of your license none of your TPIs had criminal charges, arrests, or convictions or have been sued as a defendant in a civil litigation. If that is not the case, OCM wants the updated facts disclosed via the amendment survey mechanism on the OCM website. Disclosures to the OCM could be adversely used against TPIs in Court proceedings, and privilege in those proceedings could be waived by disclosure.
- Amendment Surveys: You are required to report the last submission of an Amendment Survey to OCM. Amendment Surveys serve
 as the current mechanism for disclosing updated information to OCM.
- **Compliance with Laws**: You are also being asked to attest to compliance with State and local laws. This should not be a cursory certification. You should review compliance at length with your attorney.
- **Employment**: Attorneys can assist with good employment practices and policies, such an employee handbook and the required OCM training for your personnel.
- Capital Raises and Growth: Attorneys can amend your corporate documents, as needed, to help your business grow and adapt to raise capital.
- Municipality/Community Board: An attorney can help with both the presentation to the local municipality or community board of your license renewal application and/or review potential zoning changes that have occurred which may impact your renewal.

Why This Matters For Your Business

Renewing on time keeps your doors open in New York's \$4.2 billion market, now with over 500 licensees. Missing the window or skipping docs could mean fines, suspension, or revocation of your license.

Reach out to us today for a sample of the renewal application. For more information or for assistance in your renewal application, contact Ruskin Moscou Faltischek, P.C.'s cannabis practice group at:

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