NZ NEW ZEALAND COMPLIANCE GUIDE — 2026

Medicinal Cannabis Compliance Checklist New Zealand 2026

The complete guide for cultivators, manufacturers, and suppliers navigating New Zealand's Medicinal Cannabis Scheme — licence requirements, GMP/GACP standards, MQS verification, and traceability obligations.

NZ MEDICINAL CANNABIS SCHEME AT A GLANCE

42	265K+	80+
Licensed Operators	Dispensings in 2025	MQS-Verified Products

NZ$70M	NZ$250M	5,355%
Domestic Market Potential	Export Market Potential	Dispensing Growth 2020–2025

WHAT YOU'LL FIND IN THIS GUIDE:

- ✓ Complete licence application checklist (5 activity types)
- ✓ GMP & GACP compliance requirements
- ✓ Minimum Quality Standard (MQS) verification guide
- ✓ Security, traceability & record-keeping obligations
- ✓ Import/export requirements (July 2024 amendments)
- ✓ Pre- vs. post-scheme comparison & regulatory timeline

ANDREW WILSON
Chief Executive Officer
GrowerIQ / WilCompute Inc.

Dear fellow cannabis professional,

I've been building compliance software for regulated cannabis since before Canada's first legal harvest. In that time, I've watched the same story play out in every new market — Canada, the US, Colombia, South Africa, Switzerland, Portugal — and the lesson is always the same: **operators who invest in compliance infrastructure early don't just survive. They lead.**

New Zealand is writing that same story right now. Your Medicinal Cannabis Scheme has grown from 4,875 dispensings in 2020 to over 265,000 in 2025 — a 54-fold increase. The July 2024 amendments unlocked export pathways that could be worth NZ$250 million. And the December 2025 hemp reform just opened an entirely new supply chain. The opportunity in front of NZ operators is massive.

But opportunity without compliance is just risk. I've seen firsthand what happens when producers try to scale without proper traceability, without auditable batch records, without the systems that regulators expect. It doesn't end well — and in a market with only 42 licensed operators, your reputation is everything.

That's why I put this checklist together. It covers every compliance obligation the MCA and Medsafe enforce: GACP for cultivation, GMP for manufacturing, MQS verification, security requirements, the annual stocktake, 5-year record retention — all of it. No marketing fluff. Just the practical requirements you need to know, laid out clearly so you can act on them.

If you're looking for a platform that can automate the compliance work this checklist describes — from seed-to-sale traceability to digital batch records to one-click MCA reporting — I'd genuinely love to show you what we've built. **Book a demo at groweriq.ca and let's talk.**

Wishing you every success,

Andrew Wilson

MCA-Ready
Stocktake & reporting

GMP Compliant
Digital batch records

MQS Tracking
Quality verified

10+ countries
6 continents

EU GMP
built from day one

Software of the Year
2024 Award Winner

1. Regulatory Framework Overview

New Zealand's Medicinal Cannabis Scheme is governed by the **Misuse of Drugs (Medicinal Cannabis) Regulations 2019**, which came into force on 1 April 2020. The scheme is administered by the **Medicinal Cannabis Agency (MCA)**, a division within the Ministry of Health (Manatū Hauora). Medsafe handles GMP certification and medicine approvals separately.

Key Acts & Regulations: Misuse of Drugs Act 1975 • Misuse of Drugs Amendment Act 2019 • Misuse of Drugs (Medicinal Cannabis) Regulations 2019 • Amendment Regulations 2024 (SL 2024/129) • Medicines Act 1981 • Medicines Amendment Act 2025

Licence Activity Types REG 22

Licence Activity	Scope	Key Requirements
Cultivation	Cultivating cannabis for medicinal products; supplying seeds, plants, or plant material to other licence holders	GACP, Security, Annual Stocktake
Nursery (Seed Supply)	Acting as a seed merchant only; does *not* permit cultivation or supply of plants/plant material	Security, Record-keeping
Possession for Manufacture	Processing dried cannabis; extracting cannabis-based ingredients; manufacturing products; lab testing	GMP, Medsafe Licence
Supply	Distributing/exporting starting material, cannabis-based ingredients, or finished products	MQS Verification, Security
Research	Supplying or administering a non-CBD medicinal cannabis product to research subjects in a clinical trial	Ethics approval, Security

Licence Eligibility Requirements

- [ ] **Applicant must be 18+ and resident in New Zealand**
- [ ] **Expertise and resources** to comply with the Regulations
- [ ] **No prior licence revocations** under the Misuse of Drugs Act 1975
- [ ] **No convictions** under the Misuse of Drugs Act 1975, drug-related offences, or dishonesty offences (Crimes Act 1961)
- [ ] **No equivalent overseas convictions** — same criteria apply to directors/partners of body corporates
- [ ] **Application fee: NZD $2,587.50** (incl. GST) — non-refundable if declined ANNUAL RENEWAL

2. Cultivation Compliance Checklist — GACP Requirements

All cultivation licence holders must comply with Good Agricultural and Collection Practices (GACP). GrowerIQ provides the digital framework to document, track, and audit every GACP requirement below.

Cultivation SOPs & Documentation GACP

- [ ] **Pesticide use documentation:** All pesticides, fungicides, and herbicides recorded with application dates, concentrations, and withholding periods
- [ ] **Fertiliser & growth regulator records:** Type, batch, application rate, and schedule documented for each cultivation area
- [ ] **Irrigation & water quality:** Water source testing, pH monitoring, and irrigation schedules maintained
- [ ] **Growing medium documentation:** Substrate type, batch origin, and sterilisation/quality records
- [ ] **Harvest SOPs:** Documented harvest procedures, drying protocols, and processing methods
- [ ] **Destruction SOPs:** Procedures for destruction of unneeded organic material — documented and witnessed

Traceability & Record-Keeping REG 36–39

- [ ] **Plant counts:** Accurate records of all cannabis plants at each growth stage
- [ ] **Harvest quantities:** Weight of harvested material per lot/batch documented
- [ ] **Lot/batch tracking:** Unique identifiers for each lot from propagation through harvest
- [ ] **Supply records:** Recipient details, quantities, and dates for all material supplied to other licence holders
- [ ] **5-year record retention:** All cultivation records must be kept for a minimum of **5 years** MANDATORY

Annual Stocktake 31 DEC ANNUALLY

- [ ] **Annual stocktake as at 31 December:** Quantify all cannabis material held at licensed premises
- [ ] **Report to Director-General by 31 January:** Submit stocktake results within one month 31 JAN DEADLINE

> *"GrowerIQ tracks every plant, every batch, and every transfer from seed to harvest — giving cultivators the audit-ready traceability that the MCA requires."*

3. Manufacturing & GMP Compliance — Possession for Manufacture

GMP Requirements MEDICINES ACT 1981

- [ ] **GMP compliance:** All manufacturing must comply with the NZ Code of Good Manufacturing Practice for Manufacture and Distribution of Therapeutic Goods
- [ ] **Medsafe licence:** Obtain Licence to Manufacture Medicines and/or Licence to Pack Medicines from Medsafe
- [ ] **Batch records:** Complete manufacturing batch records for every production run — digital records with electronic signatures
- [ ] **Quality management system (QMS):** Documented QMS covering all manufacturing operations, CAPA, change control, and deviations
- [ ] **Validated processes:** Manufacturing processes, cleaning procedures, and analytical methods validated and documented
- [ ] **Environmental monitoring:** Temperature, humidity, and particulate monitoring in manufacturing areas

Minimum Quality Standard (MQS) PART 1 REGS

All medicinal cannabis products supplied in NZ must be verified against the MQS — ensuring safety, quality, consistency, and accurate labelling. Testing must align with European Pharmacopoeia standards.

MQS Test Requirement	Standard	Lab Requirement
Microbiological contamination	European Pharmacopoeia	GMP-certified lab
Heavy metals (As, Cd, Pb, Hg)	European Pharmacopoeia	GMP-certified lab
Pesticide residues	European Pharmacopoeia	GMP-certified lab
Aflatoxins & Ochratoxin A	European Pharmacopoeia	GMP-certified lab
Residual solvents	European Pharmacopoeia	GMP-certified lab
Active ingredient assay	Dried: 80–120% | Pharma: 90–110%	GMP-certified lab
Foreign matter & ash content	European Pharmacopoeia	ISO 17025 accepted
Shelf life & storage conditions	Stability studies	ISO 17025 accepted

Assay Limits: Dried cannabis products must be **80–120%** of stated content. Pharmaceutical dosage forms must be **90–110%** of stated content. Products failing MQS cannot be supplied in New Zealand.

4. Security Requirements

The MCA takes a risk-proportionate approach to security, with higher requirements for high-THC cultivars. All licensed premises are inspected before licence approval.

- ☐ **Physical security:** Adequate arrangements to minimise risk of diversion to the illicit market
- ☐ **Daily security checks:** Security measures verified at the start and end of each working day
- ☐ **Detection systems:** Systems in place to detect unauthorised activity, diversion, theft, or stock discrepancies
- ☐ **Crop protection:** Protection from theft and animal damage documented
- ☐ **Incident reporting — Police:** Notify NZ Police **immediately** if cannabis is removed without authority, lost, or stolen IMMEDIATE
- ☐ **Incident reporting — MCA:** Notify the Medicinal Cannabis Agency **within 3 days** of any security incident 3-DAY DEADLINE

5. THC Limits & Product Categories

Category	THC Limit	Notes
CBD medicinal products	THC ≤ 2% of total cannabinoid content	CBD must be ≥98% of total cannabinoids
Medicinal cannabis (cultivation)	No THC cap	Unlike hemp, no THC restriction for medicinal cultivation
Industrial hemp (post-Dec 2025)	< 1.0% THC dry weight	No licence required; raised from 0.35%
Low-dose CBD (reclassified)	Up to 150mg/day, max 4.5g per pack	Pharmacist-only supply; adults 18+; no products currently approved

Permitted Product Forms

✓ PERMITTED

- Dried cannabis (tea / vaporiser)
- Oral liquids / oils
- Capsules & tablets
- Oromucosal sprays
- Topical formulations

✗ PROHIBITED

- Products intended for smoking
- Food products
- Sterile dosage forms (e.g., eye drops)
- Any non-pharmaceutical form

> *"GrowerIQ's digital batch records and electronic signatures meet NZ GMP requirements out of the box — every lot tracked, every test linked, every deviation documented."*

6. Import & Export Compliance — July 2024 Amendments

Import Requirements

- [ ] **Controlled drug import licence:** Required to import cannabis seed, starting material, cannabis-based ingredients, or finished products
- [ ] **CBD products (prescription medicines):** Do *not* require controlled drug import/export licences
- [ ] **Personal importation prohibited:** Regulation 38A (July 2024) bans importing CBD products via overseas courier or mail for personal use REG 38A

Export Requirements 2024 AMENDMENTS

- [ ] **Controlled drug export licence:** Required for all cannabis material exports
- [ ] **Import licence from destination:** The importing country must provide a licence to import before NZ will issue an export licence
- [ ] **Quality standards:** Exports only need to meet the **importing jurisdiction's quality standards** (no longer required to meet NZ MQS for export)
- [ ] **Seed & material export:** Export of cannabis seed, starting material, and cannabis-based ingredients for testing/analysis/research now permitted

7. Pre-Scheme vs. Current Scheme Comparison

Aspect	Before Scheme (Pre-2020)	Current Scheme (2026)
Prescribing	MoH pre-approval required for each named patient (except CBD)	Doctors prescribe MQS-verified products without pre-approval
Cultivation	Licences only for research/development	Commercial cultivation fully permitted
Manufacturing	No domestic framework	Full pathway with GMP requirements
Product availability	Very limited; primarily imports	80+ MQS-verified products
CBD status	Controlled drug	Not controlled if THC <2% of total cannabinoids
Export	Not commercially viable	Enabled; only importing country's standards required
Industrial hemp	Licence required; THC ≤0.35%	No licence; THC ≤1.0% (Dec 2025)
Market size	~10 research licence holders	42 licence holders; 265K+ dispensings

> *"The July 2024 amendments transformed NZ into an export-ready jurisdiction. GrowerIQ helps operators meet both domestic MQS and international GMP standards simultaneously."*

8. Regulatory Timeline

1 Apr 2020	Medicinal Cannabis Scheme commenced; MCA operational
Sep 2022	Domestic cultivation approved; dried flower available on prescription
5 Jul 2024	**Amendment Regulations 2024:** Expanded exports, broadened starting material definitions, enabled seed export, Regulation 38A (personal import ban)
Apr 2025	Updated MCA Guideline v3.1 for new medicinal cannabis product applications
Jul 2025	Advertising Guidance published jointly by Medsafe and MCA; Medicines Amendment Act 2025 (conference advertising)
11 Dec 2025	Industrial hemp reform: licence requirement removed; THC limit raised to 1.0%; hemp biomass supply to MCS producers enabled
31 Jan (Annual)	**Annual stocktake results due to Director-General** RECURRING DEADLINE

9. Priority Actions Checklist

Immediate Actions

- [ ] **Review licence scope:** Ensure your licence covers all intended activities (cultivation, manufacture, supply, export)
- [ ] **Audit GACP/GMP compliance:** Gap analysis against current MCA and Medsafe requirements
- [ ] **Implement seed-to-sale traceability:** Lot tracking, batch records, and supply chain documentation
- [ ] **Prepare for MQS verification:** Ensure all products meet testing requirements before supply
- [ ] **Review export strategy:** Assess opportunities under the July 2024 relaxed export standards
- [ ] **Review hemp supply opportunities:** The December 2025 hemp reform enables new supply arrangements with hemp growers

Ongoing Compliance

- [ ] **Annual licence renewal:** Submit renewal application and NZD $2,587.50 fee before licence expiry
- [ ] **Annual stocktake:** Complete 31 December stocktake and report by 31 January
- [ ] **5-year record retention:** Maintain all records securely for Director-General access