

Nº1

The NJ METRC Reconciliation **Field Guide**

Five codified mistakes that get NJ labs flagged, and the 3-hour clock most operators miss.

WRITTEN BY
An NJ cannabis operator

EDITION
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One licensee's slip can freeze a whole supply chain

When the NJ-CRC places a statewide administrative hold on a licensee's packages, as it did in early 2026 over an alleged unauthorized-cultivation violation, every downstream business holding those packages gets pulled in. Affected operators must pull held product from sale, segregate it in quarantine, and suspend all transfers and processing until the Commission authorizes release in writing.

166

NJ-CRC investigations conducted in 2025

NJ-CRC, 2025 in Review

37

Notices of Violation issued in 2025

NJ-CRC, 2025 in Review

\$50K–500K

Civil penalty range per violation

N.J.A.C. 17:30-20.6

That hold is the loudest signal of the year, but it is not the highest-volume risk. Keeping METRC and point-of-sale records consistent was one of the issues the Commission flagged in its 2025 review, alongside QA and COA tracking and batch-record documentation.

What follows are the five mistakes that produce those citations. Three are explicit rule violations under N.J.A.C. 17:30. Two are best-practice gaps that, when skipped, guarantee you trip a rule downstream. The guide reads in seven minutes. The printable cheat sheet on the last page reads in thirty seconds.

This is informational only. It is not legal or compliance advice. Verify all guidance against current NJ-CRC bulletins and qualified counsel before acting.

01

MISTAKE ONE

Receiving after the driver leaves

• N.J.A.C. 17:30-9.15(j)(5)

WHAT IT LOOKS LIKE

The driver pulls up. You're slammed on the production floor. You sign the manifest so they can leave, planning to count the product after they're gone. Worse: the driver leaves the paperwork on the dock and you sign it whenever you get to it.

WHY IT TRIGGERS AN AUDIT

17:30-9.15(j)(5) requires the receiving staff member's signature attesting to receipt of the goods as one of five mandatory transport-record fields. Custody transfers at signature. Signing before you have verified the manifest against the physical product is how an honest miscount becomes a false required record. The real jump in exposure is moving from a recordkeeping slip to a falsification.

THE FIX

Verify before signing, every time. Count the packages, weigh anything weight-bearing, compare the manifest line items to the physical product, then sign. The driver waiting an extra five minutes is the cheapest insurance there is.

THE PREVENTION

A written intake SOP that says "no signature before reconciliation," a 30-second per-package physical check, and a verifiable timestamp on the signature event. The 17:30-9.15(j) record is what an inspector asks for. The timestamp is what defends you.

► **PENALTY** Civil penalties under **17:30-20.6** run up to **\$50,000 per violation**, and up to **\$500,000** if the Commission deems it major. Statutory ceilings, not first-offense amounts.

02

MISTAKE TWO

License or ID mis-entry on the transfer

• N.J.A.C. 17:30-9.15(j)(2) · 13.3

WHAT IT LOOKS LIKE

Someone fat-fingers a Cannabis Business Identification Card number into the transport record. A facility license number gets transposed. The recipient or transporter ID does not match the person who actually signed. The METRC transfer manifest is correct, but the parallel 17:30-9.15(j) record is wrong.

WHY IT TRIGGERS AN AUDIT

Two rules stack here. 17:30-9.15(j)(2) requires the transporter's name, Cannabis Business Identification Card number, and signature. 17:30-13.3 requires distributor transport-trip records to capture both the sending and receiving businesses. An inaccurate identifier, even by accident, is a recordkeeping defect on the required transport record. It gets materially worse if a wrong identifier looks intentional rather than accidental.

THE FIX

Cross-check every license and Cannabis Business Identification Card number against a known-good roster before the transport record is finalized. Read it back to the transporter. Capture both sending and receiving license numbers as first-class fields, not free text.

THE PREVENTION

Treat the license number as structured data, not narrative. A parser that extracts and validates license numbers against an internal roster catches the typo before the signature does.

► **PENALTY** Up to **\$50,000 per violation** under **17:30-20.6**, up to **\$500,000** if major. Ceilings, not first-offense amounts.

03

MISTAKE THREE

Missing one of the 5 mandatory transport-record fields

• N.J.A.C. 17:30-9.15(j)

THE FIVE MANDATORY FIELDS, VERBATIM

- 1 The date and time that the transport began and ended.

- 2 The name, Cannabis Business Identification Card number, and signature of the staff member performing the transport.

- 3 The weight of the cannabis or cannabis items transported.

- 4 The batch number (or lot number for product), the name of the strain or cultivar, and the form of the product.

- 5 The signature of the receiving business staff member attesting to receipt of the goods.

WHAT IT LOOKS LIKE TO MISS ONE

Most often field 4 is incomplete (strain or cultivar omitted, form left blank), or field 5 is signed by someone who is not the actual receiving staff. Missing field 1 (end-time) happens when the receiver pre-signs a manifest the driver fills in later.

THE FIX

Validate non-empty on all five fields before allowing the signature event, and show the receiver what they are signing. Gate the signature step on a complete record.

04

MISTAKE FOUR

No draft-locally plan for METRC outages

• N.J.A.C. 17:30-9.13(a)(4) · 3.6

WHAT IT LOOKS LIKE

METRC has an outage during a shift change. The receive event happens but you cannot enter it. End of day comes and goes, and the daily-update obligation under 17:30-9.13(a)(4) has been missed. The next outage repeats the pattern. Three failures to update in a quarter and you are looking at a revocation-risk pattern, even though you were never trying to evade the rule.

WHY IT TRIGGERS AN AUDIT

17:30-3.6 authorizes the Commission to designate the mandatory inventory tracking system, and the Commission designated METRC. 17:30-9.13(a)(4) requires inventories updated "on at least a daily basis." When METRC is the only allowed system and it is down, the operator with no local-draft state cannot comply. Investigators look at update cadence over time, not at individual missed days.

THE FIX

Draft locally during outages. The moment METRC is back, sync. Keep a timestamped record of the local-draft window so the audit trail is defensible.

INTAKR IS IN BETA

When you flag a variance, it timestamps the moment of discovery and surfaces a reminder that NJ's 3-hour reporting window has started, so the clock isn't running silently. First 10 NJ labs: beta access free, price-locked for 12 months. **Join the waitlist at intakr.app.**

05

MISTAKE FIVE · THE KILLER

Missing the 3-hour discrepancy-reporting window

• N.J.A.C. 17:30-9.11

WHAT IT LOOKS LIKE

During reconciliation you find a variance. You set it aside to investigate after the receiving rush. By the time someone gets back to it, the clock has been running for four hours.

MANIFEST	→	ON THE SCALE	=	THE SHORT
1,000 g		952 g		-48 g

WHY THIS IS THE KILLER MISTAKE

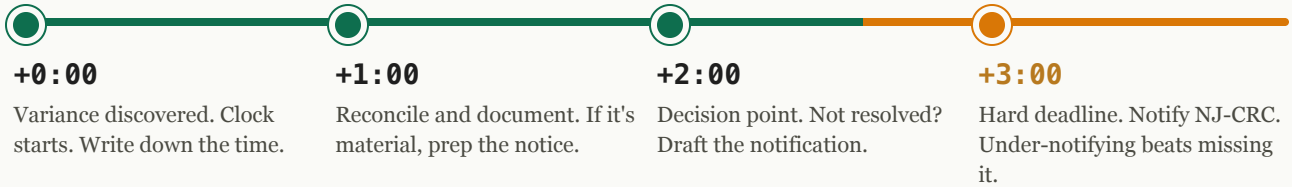
17:30-9.11 requires you to notify the Commission no later than three hours after discovery of any loss, discrepancy, diversion, or theft. The clock starts at discovery, when you first knew or should have known of the variance, not at end of shift. It does not pause for shift changes, for METRC outages, or for "we're still finding the gap." A missed window is serious exposure if the variance later proves material. Even when it turns out immaterial, the missed notification is itself a violation of 17:30-9.11.

THE FIX

The instant a variance is flagged, start the clock and write down the time. Set a visible timer. If reconciliation runs past the window, notify the Commission anyway. Under-notification is far cheaper than missed notification.

The 3-hour clock starts at discovery

Notify the Commission no later than three hours after you discover a loss or discrepancy (17:30-9.11). The clock starts when you flag the variance, not at end of shift.



THE FIVE MISTAKES · ONE LINE EACH

- 1 **Receive after the driver leaves.** Verify before you sign. 9.15(j)(5)

- 2 **License / Cannabis Business ID mis-entry.** Read it back; validate against a roster. 9.15(j)(2) · 13.3

- 3 **Missing one of 5 mandatory transport fields.** Gate the signature on a complete record. 9.15(j)

- 4 **No draft-locally plan for METRC outages.** Watch update cadence, not single days. 9.13(a)(4) · 3.6

- 5 **Missing the 3-hour clock on a flagged variance.** Start the clock at discovery. 9.11

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