
Minimum Operational Activity Required for Licensed Cannabis Establishments

September 2, 2026

This document intends to provide guidance as to the minimum operational requirements for licensed cannabis establishments in accordance with 560-RICR-10-10-1.3.3(A)(4)(m) (Regulations pertaining to Cannabis Establishment Applications, Licensing and Renewals) (“the Regulation”), whereby a licensee must submit a variance request for proposed plans to “discontinue operations on a reasonable and temporary basis as determined and approved by the Commission.” The Regulation further states that the license “shall be void and returned to the Commission if the cannabis establishment discontinues its operation without Commission approval.”

For Cultivators

1. What minimum operations do I need to maintain as a licensed cultivator?

For purposes of § 1.3.3(A)(4)(m), the term “operations” shall have the same meaning as “cannabis cultivator activities” as used in § 1.10.4(F)(2), and shall mean **actual** cannabis cultivation, processing, packaging and/or manufacturing.

2. Do I have to make sales to compassion centers/hybrid retailers on a consistent basis to be considered operational?

No. A licensed cultivator is only required to be actively cultivating, processing, packaging and/or manufacturing cannabis to be considered operational.

For Compassion Centers/Hybrid Retailers

1. What minimum operations do I need to maintain as a licensed compassion center/hybrid retailer?

For purposes of § 1.3.3(A)(4)(m), the term “operations” shall have the same meaning as “compassion center activities” as used in § 1.8(I)(2) and shall mean the actual acquisition and dispensing of cannabis. As such, making sales to patients and/or adult-use consumers fulfills the minimum operational requirement for compassion centers/hybrid retailers.

For Adult-Use Retailers

1. What minimum operations do I need to maintain as a licensed adult-use retailer?

For purposes of § 1.3.3(A)(4)(m), the term “operations” shall have the same meaning as “cannabis retail sales activities” as used in § 1.4(I)(2), § 1.5(I)(3) and § 1.6(I)(2), and shall mean the actual acquisition and dispensing of cannabis. As such, making sales to adult-use consumers fulfills the minimum operational requirement for adult-use retailers.

For all licensed cannabis establishments

1. If my licensed cannabis establishment has inventory and/or cannabis packages in Metrc, will that fulfill the operational requirement?

No. A cultivator licensee is required to be actively cultivating, processing, packaging, and/or manufacturing cannabis and/or cannabis products, and a Compassion Center/hybrid retailer and/or an Adult-Use retailer must be selling/dispensing cannabis and cannabis products.

2. How do I apply for a discontinuance?

To apply for a reasonable and temporary discontinuance, a variance request must be submitted to the Cannabis Office through the [Rhode Island Cannabis Licensing Portal](#). An approved variance is required **prior to** discontinuing operations. All other requirements pursuant to 560-RICR-10-10-2, including but not limited to minimum security requirements pursuant to § 2.13 (“Minimum Security Requirements”), must still be complied with even if the Commission approves the variance request to discontinue operations.

3. What happens if I discontinue operations without Commission approval?

If minimum operational requirements as outlined in this guidance document are discontinued post-licensure, without Commission approval, the license shall be **void** and returned to the Commission pursuant to 560-RICR-10-10-1.3.3(A)(4)(m).

4. On what date will the minimum operational activity requirement for licensed cannabis establishments be enforced?

All licensed cannabis establishments are required to maintain minimum operations pursuant to definitions and requirements established in this guidance document and in the rules and regulations by **December 31, 2026**, unless a variance to discontinue operations on a temporary basis has been issued by the Commission.