

Waste Disposal

Massachusetts

Proper disposal of cannabis waste is imperative to **prevent diversion, keep an accurate inventory, and ensure cannabis is safe and secure** at all times.

All destruction of cannabis waste shall **occur in a Limited Access Area**. As of January 2026, licensed businesses are no longer required to have two agents present.

Be sure to weigh and count all cannabis waste items and adjust inventory levels as needed to reflect the change. **Always make a note in Metrc** for each inventory adjustment.

Licensees are required to render all cannabis waste unusable before it is disposed of. Each business' chosen method must be outlined in their written operating procedures. A tried-and-true means of rendering cannabis waste unusable includes grinding and mixing it with another material. Suitable materials for mixing cannabis waste for disposal include **food waste, coffee grounds, mulch, sawdust, growing media, or other non-chemical substances**. This method is required for compliant destruction of cannabis organic material, but can be employed to destroy other forms of cannabis.

Cannabis waste in any form must be secured at all times to prevent diversion. If your business uses exterior receptacles such as dumpsters, they must be locked, secured, and only accessible to the authorized agents of your business.

Please note that the CCC requires licensees, to the greatest extent feasible, to **recycle** any material classified as recyclable. Licensees are also required to safely and compliantly dispose of **liquid and chemical waste**, which might require transport to a hazardous waste facility. In addition, licensees may utilize cannabis organic material, like stalks, stems, root balls, and leaves, that have been rendered unusable within **compost and anaerobic digestion** activities. Such measures help to ensure good environmental stewardship by our industry within our communities.

Be sure to reference the Cannabis Control Commission **guidance document on waste disposal**, keeping in mind current specifics outlined above.

935CMR 500.105: General Operational Requirements for Marijuana Establishments

(12) Waste Disposal.

(a) All recyclables and waste, including organic waste composed of or containing Finished Marijuana and Marijuana Products, shall be stored, secured, and managed in accordance with applicable state and local statutes, ordinances, and regulations. All exterior waste receptacles located on the Marijuana Establishment's Premises shall be locked and secured to prevent unauthorized access, and the potential for Diversion, theft, or loss.

(b) Liquid waste containing Marijuana or by-products of Marijuana Processing shall be disposed of in compliance with all applicable state and federal requirements, including but not limited to, for discharge of pollutants into surface water or groundwater (Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26 through 53; 314 CMR 3.00: Surface Water Discharge Permit Program; 314 CMR 5.00: Groundwater Discharge Permit Program; 314 CMR 12.00: Operation Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Dischargers; Federal Clean Water Act, 33 U.S.C. 1251 etseq., National Pollutant Discharge Elimination System Permit Regulations at 40 CFR Part 122: EPA Administered Permit Programs: The National Pollutant Discharge Elimination System; 314 CMR 7.00: Sewer System Extension and Connection Permit Program), or stored pending disposal in an industrial wastewater holding tank in accordance with 314 CMR 18.00: Industrial Wastewater Holding Tanks and Containers, Construction, Operation, and Record Keeping Requirements.

(c) Organic material, recyclable material and solid waste generated at a Marijuana Establishment shall be redirected or disposed of as follows:

1. Organic and recyclable material shall be redirected from disposal in accordance with the waste disposal bans described at 310 CMR 19.017: Waste Bans.
2. To the greatest extent feasible:
 - a. Licensees shall recycle any material classified as recyclable in 310 CMR 16.02: Definitions; and
 - b. Any Marijuana containing organic material as defined in 310 CMR 16.02: Definitions shall be ground up and mixed with other organic material as defined in 310 CMR 16.02 such that the resulting mixture renders any Marijuana unusable for its original purpose. Once such Marijuana has been rendered unusable, the organic material may be composted or digested at an aerobic or anaerobic digester at an operation that complies with the requirements of 310 CMR 16.00: Site Assignment Regulations for Solid Waste Facilities.
3. Solid waste containing Marijuana generated at a Marijuana Establishment shall be rendered unusable for its original purpose. Once such Marijuana has been rendered unusable, the resulting solid waste may be brought to a solid waste transfer facility or a solid waste disposal facility that holds a valid permit issued by the Department of Environmental Protection or by the appropriate agency in the jurisdiction in which the facility is located.

(d) A Marijuana Establishment Agent shall witness and document how the solid waste or organic material containing Marijuana is rendered unusable on-site including, but not limited to, the grinding up, mixing, storage and removal from the Marijuana Establishment in accordance with 935 CMR 500.105(12). When Marijuana Products or waste is disposed or handled, the Marijuana Establishment shall create and maintain an electronic record of the date, the type and quantity disposed or handled, the manner of disposal or other handling, the location of disposal or other handling, and the name of the Marijuana Establishment Agent present during the disposal or other handling, with their signature. A Marijuana Establishment shall keep these records for at least three years. This period shall automatically be extended for the duration of any disciplinary action and may be extended by an order of the Commission.