Toolkit · Build out SOP Updated November 22, 2026

Transport Manifest and Delivery SOP

The transport and delivery requirements in the Cannabis Control Act and the CCA draft rules, each cited: who may transport, banned delivery locations, the vehicle and driver filing, vehicle security, daily inspection records, manifests, routes and stops, GPS records, customer ID at delivery, delivery hours, and incident reporting.

Who needs it: Transporters and delivery operators; Retail stores and microbusinesses that deliver to consumers; Establishments that move product to another licensee or to a testing facility.

Rule basis: Code of Virginia §§ 4.1-606 B 2, 4.1-800 A, 4.1-801 A, 4.1-802 A and B 2, 4.1-804, 4.1-805, 4.1-1203; draft rules 3VAC10-40-30 J, 3VAC10-40-235 to -285, 3VAC10-60-20, -40, 3VAC10-80-30 (proposed).

Citations starting **3VAC10** are the Cannabis Control Authority's draft proposed adult-use regulations dated September 9, 2026: **proposed, not final, may change**. Citations starting **§ 4.1** are the Code of Virginia as amended by HB 30, Chapter 1 (2026). The section "What other states required or scored" is reference only and is not Virginia law.

We report what the law says. Not legal advice; see the disclaimer.

The Cannabis Control Act says which licensees may move marijuana, where consumer deliveries may and may not go, and that every transfer is tracked; it leaves secure transport and delivery rules, including age verification, delivery radius and recordkeeping, to the Board. The CCA's draft rules fill in the vehicle filing, vehicle security, manifests, driver conduct, GPS records, customer identification and incident reporting. Citations to 3VAC10 are to the CCA's draft regulations dated Sept. 9, 2026 (proposed, not final; they may change before adoption).

What Virginia requires

Who may transport and deliver (statute)

- The Board must adopt regulations for (i) securely transporting marijuana between marijuana establishments and (ii) securely delivering marijuana from retail stores or microbusinesses "only in person to consumers," including requirements for "age verification, delivery radius, and recordkeeping" (Code of Virginia § 4.1-606 B 2).
- A licensed marijuana establishment may transfer marijuana from one licensed place of business to another only if it is authorized to do so and the transfer is completed by the licensee or its employee, or if a licensed transporter completes it; a violation is a Class 1 misdemeanor (§ 4.1-1203).
- Cultivation facilities may transport marijuana, immature plants and seeds from their licensed premises to another licensed establishment (§ 4.1-800 A); processing facilities may transport marijuana and products to another licensed establishment (§ 4.1-801 A); retail stores may transport to another retail store (§ 4.1-802 A).
- A transporter may take possession from and transfer to cultivation facilities, processing facilities, retail stores, microbusinesses and other transporters, and transport from one licensed establishment to another (§ 4.1-804 A); it tracks product from receipt to transfer, disposal or destruction under § 4.1-611 (§ 4.1-804 C).
- A delivery operator may take possession from a retail store or microbusiness and deliver "only in person to consumers at any residence, including a temporary residence, or business" (§ 4.1-805 A), and tracks product until delivered, transferred, disposed of or destroyed (§ 4.1-805 B).
- A retail store may sell to consumers only face to face, through a licensed delivery operator, or by its own in-person delivery to a residence or business (§ 4.1-802 B 2).

Places deliveries may not go (statute)

- Neither a retail store nor a delivery operator may deliver to (a) any military base, child day center, school or correctional facility; (b) the State Capitol; (c) a hospital; (d) a marine terminal under the supervision of the Virginia Port Authority; or (e) any public gathering place, including sporting events, festivals, fairs, races, concerts and terminals of public transportation companies (§§ 4.1-802 B 2, 4.1-805 A).

Approval before operating (draft)

- Before transporting marijuana to another establishment or offering delivery, an establishment submits to the CCA a list of employees authorized to transport or deliver with a copy of each one's valid driver's license, and for each vehicle: plate number, VIN, make and model; a copy of the registration and proof of insurance; a description of the locked, safe and secure storage compartments; and a description of the security system, secure communication, GPS monitoring device and other equipment required by 3VAC10-40-245 (3VAC10-40-235 A, draft).
- Written notice with the same documentation is required when a vehicle or authorized employee is added or removed (3VAC10-40-235 B, draft).
- No establishment may advertise, offer or begin delivery or transport operations before receiving written approval from the CCA (3VAC10-40-235 C, draft).
- The Board may suspend or revoke transport or delivery privileges for failure to comply with its regulations (3VAC10-40-235 D, draft).
- No marijuana products may be sold, dispensed or distributed outside a marijuana establishment, except that a parent, legal guardian, registered agent or licensed delivery operator may deliver to the patient or consumer under Board regulations (3VAC10-40-30 J, draft).

Vehicle requirements (draft)

- Vehicles are registered and insured in the Commonwealth; registration and insurance documents are kept and provided to the CCA and law enforcement on request (3VAC10-40-245 A, draft).
- Vehicles bear no marking or outward appearance, including brand or company names, that would indicate to a reasonable person that the vehicle transports marijuana (3VAC10-40-245 B, draft).

- At all times during transport, the vehicle has functioning: (1) heating and air conditioning sufficient to keep appropriate temperatures per the originating establishment's recommendations; (2) a locked, safe and secure storage compartment that is a secured part of the vehicle, not easily removed, and keeps marijuana from being visible from outside; (3) a GPS device secured to the vehicle, not easily removed, that stays powered when the vehicle is not running; (4) a secure form of communication with the establishment at all times, such as two-way radio, cellular phone or satellite phone; and (5) an adequate vehicle security system including an audible alarm (3VAC10-40-245 C, draft).
- Access to vehicle security equipment and records is limited to persons essential to security operations, law-enforcement agents, security system service employees, CCA agents and persons the CCA approves; the establishment keeps a current list of everyone with that access (3VAC10-40-245 D, draft).
- The CCA may inspect a vehicle and its equipment at any time without notice; a vehicle that fails may not be used until it passes inspection (3VAC10-40-245 E, draft). The Board's right to access includes inspecting and testing any vehicle used for regulated activity (3VAC10-80-30 A 2, draft).

Daily inspection (draft)

- All security systems, secure communications and GPS devices of each vehicle are inspected and tested at least once per day of use, before the first departure; the person inspecting creates a signed record with their name, the VIN, the date and the status of all inspected systems; the establishment keeps all inspection records (3VAC10-40-265 C, draft).
- A vehicle may not transport marijuana unless every security system, secure communication and GPS device is working (3VAC10-40-265 D, draft).

Manifests (draft)

- Before transport between establishments or to a testing laboratory, the originating facility prepares a transport manifest on the CCA's form itemizing all marijuana; a separate copy travels with the transporting employee at all times (3VAC10-40-255 A 1, draft).

- The originating facility securely transmits a copy of the transport manifest to the receiving facility at least 24 hours before transport (3VAC10-40-255 A 2, draft).
- The transporting employee or delivery operator reviews the manifest and confirms it accurately describes the type and quantity of marijuana in the vehicle, in aggregate and for each delivery (3VAC10-40-255 A 3, draft).
- Before delivery to a consumer, patient or agent, the establishment prepares a delivery manifest on the CCA's form itemizing all marijuana; a copy travels with the delivery employee or operator; the driver confirms it includes sufficient identifying information for each recipient, "including name and day and month of birth" (3VAC10-40-255 B, draft).
- A vehicle may not carry marijuana for which no manifest has been provided, and all marijuana is in "sealed, labeled, and tamper-resistant packaging at all times" (3VAC10-40-255 C, draft).

Driver conduct, schedules and GPS (draft)

- A transporting employee or delivery operator stays with the vehicle whenever it contains marijuana; a lone driver may leave the locked vehicle only to deliver or transfer product, for meals on trips over three hours round trip, for rest periods required by law, to refuel, or for exigent circumstances such as collisions, traffic stops, breakdowns, weather or medical emergencies (3VAC10-40-265 A, draft).
- Drivers carry "transportation credentials" (valid driver's license, a copy of the establishment's license or permit, and all manifests for product in the vehicle), display them at the originating facility before each transport, and show them to law enforcement or CCA representatives on request (3VAC10-40-265 B, draft).
- If any security system, secure communication or GPS device fails during transport, the driver immediately notifies the establishment and all affected originating facilities and returns directly; the vehicle may not resume until all systems work (3VAC10-40-265 E, draft).
- The establishment creates a confidential delivery schedule within 24 hours of the transport and gives it to the driver only immediately before departure (3VAC10-40-265 F, draft).

- The driver communicates with the establishment on arriving at and departing from each scheduled location (3VAC10-40-265 G, draft).
- No unscheduled stops; in an emergency stop the vehicle stays locked and the driver verbally reports the reason, location, duration, the driver's activities, and the identities and activities of anyone interacting with the vehicle or driver; the establishment keeps a record of those communications (3VAC10-40-265 H, draft).
- GPS information for each vehicle for the entire duration of any transport is kept for not less than 90 days and made available to the CCA on request; a third-party GPS monitor may be used if it complies with patient confidentiality laws (3VAC10-40-265 I, draft).
- Undeliverable marijuana returns to the originating facility directly after the last scheduled delivery (3VAC10-40-265 J, draft).
- No marijuana is stored in a vehicle after the facility's hours of operation, and never longer than 24 hours, unless the vehicle is inside an enclosed, secure part of the facility (3VAC10-40-265 K, draft).

Delivery to consumers and patients (draft)

- An establishment offering delivery requires each consumer or patient to provide full legal name, date of birth, address, email address and telephone number, and if applicable the legal name, date of birth and address of the parent, legal guardian or registered agent (3VAC10-40-275 A, draft).
- For each delivery, the driver confirms from a valid driver's license or other valid government-issued photo ID that the person accepting the delivery is the person who ordered it, and if applicable confirms the qualifying patient's registration number (3VAC10-40-275 B, draft).
- If identity, age or registration remains in question after the documents are shown, the driver immediately alerts the originating facility and returns the marijuana directly after the last scheduled delivery (3VAC10-40-275 C, draft).
- Marijuana products may only be delivered between 6 a.m. and midnight (3VAC10-40-275 D, draft).

Incident reporting (draft)

Event	Who must be told	Deadline	Cite
Vehicle accident, vehicle theft, diversion, loss or adulteration, or other event the CCA deems reportable in connection with transport	The CCA and local law enforcement	Within 24 hours of discovery	3VAC10-40-265 L
Traffic stop, breakdown, collision, or unscheduled stop lasting more than two hours	The CCA	Within 24 hours	3VAC10-40-285 A
Incident resulting in vehicle theft, diversion, loss or adulteration of regulated products	Law enforcement and the CCA	As soon as possible	3VAC10-40-285 A
Exigent circumstances requiring removal of product from the vehicle before it reaches the manifest destination	The CCA (good faith effort to contact)	When the circumstance arises	3VAC10-40-285 B

Test samples and testing facilities (draft)

- A testing facility license requires compliance with a transportation protocol for moving marijuana to or from itself or establishments (3VAC10-60-20 5, draft).
- Sampling procedures include transporting test samples in a manner that does not endanger their integrity and follows the CCA's transportation requirements (3VAC10-60-40 E 6, draft).

Records and forms the rules name

Daily vehicle inspection record (fields listed in 3VAC10-40-265 C, draft; signed by the inspector)

Name of inspector	Vehicle identification number	Date of inspection	Status of security systems	Status of secure communications	Status of GPS device	Signature

Vehicle filing to the CCA (items listed in 3VAC10-40-235 A, draft)

Plate number	VIN	Make and model	Registration copy	Proof of insurance	Locked compartment description	Security system, communication, GPS description

Authorized employee	Copy of valid driver's license attached

Vehicle security access list (required by 3VAC10-40-245 D, draft)

Name	Basis for access (security operations, law enforcement, security system service, CCA, CCA-approved)

Unscheduled-stop communication record (contents listed in 3VAC10-40-265 H, draft)

Reason for stop	Location	Duration	Driver's activities	Identities and activities of persons interacting with vehicle or driver

Delivery customer record (fields listed in 3VAC10-40-275 A, draft)

Full legal name	Date of birth	Address	Email	Telephone	Parent, guardian or registered agent name, date of birth and address (if applicable)

What the law does not say

- § 4.1-606 B 2 directs the Board to set a "delivery radius," but the Sept. 9, 2026 draft does not state one.
- The draft rules do not set a cap on the dollar value or quantity of product in a delivery vehicle.
- The draft rules require the transport and delivery manifest "on a form and in a manner prescribed by the authority" (3VAC10-40-255 A 1 and B 1, draft); the draft does not include the form itself.

What other states required or scored

Not required in Virginia. Shown so applicants can see what other regulators asked for.

Massachusetts (935 CMR 500.110(8))

- Massachusetts requires each delivery vehicle to have an exterior vehicle alarm, a non-removable locked compartment for product, and a separate non-removable locked compartment for cash (935 CMR 500.110(8)(a)1.-3.).
- Vehicles carry two-way radio, cellular or satellite communication with dispatch, monitored at all times during a route (935 CMR 500.110(8)(a)4.).
- A GPS device that is "not a mobile device" stays attached to the vehicle and is monitored from a fixed location with location checks at least every 30 minutes (935 CMR 500.110(8)(a)5.).
- Vehicles have cameras in the storage area and the driver area operating during the entire transport, and vehicle security equipment is tested at intervals not exceeding 30 days (935 CMR 500.110(8)(a)6.-7.).
- Each delivery vehicle is staffed with at least one agent, who stays in the vehicle whenever it holds product except while completing a delivery (935 CMR 500.110(8)(c)).

- Cash transport alternatives include a locked bag, an unmarked vehicle, two agents, real-time GPS, two-way communication, and no product carried with the cash (935 CMR 500.110(7)(b)).

New York (9 NYCRR 125.10)

- New York requires transporting employees to be at least 18, or at least 21 when delivering to consumers, and to show employee identification with the license number on request (9 NYCRR 125.10(c)).
- Every transport, including a vehicle, trailer, bicycle or motorcycle, has temperature controls, a fully enclosed locked box, container or cage, and an operational GPS device (9 NYCRR 125.10(e)(1)).
- Transport vehicles bear no cannabis-identifying signs or markings (9 NYCRR 125.10(e)(2)).
- Drones and other unmanned transport are prohibited (9 NYCRR 125.10(e)(4)).
- A transport vehicle is "an extension of the licensed premises" and may be stopped and inspected en route (9 NYCRR 125.10(e)(5)).

New Jersey (N.J.A.C. 17:30-9.15)

- New Jersey requires each delivery vehicle to have a secure lockbox or cargo area, an active GPS device kept with the staff member, and working heating and air conditioning (N.J.A.C. 17:30-9.15(c)).
- Hired and non-owned automobile liability insurance of at least $1,000,000 per occurrence covers all delivery vehicles (N.J.A.C. 17:30-9.15(d)).
- Vehicles bear no cannabis markings, and make, model, color, VIN, plate and registration are provided to the Commission (N.J.A.C. 17:30-9.15(e)-(f)).
- Cannabis is never left in an unattended vehicle unless it is locked with an active alarm, and never overnight (N.J.A.C. 17:30-9.15(g)1).

Ohio (OAC 1301:18-3-13)

- Ohio requires written transport procedures with security and emergency protocols and real-time knowledge of all vehicle locations (OAC 1301:18-3-13(A)(1)-(2)).

- The originating licensee creates a transfer manifest in the state tracking system, and drivers carry a physical copy for the whole trip (OAC 1301:18-3-13(A)(3), (4)(e)).
- Drivers are badged, keep the vehicle attended by at least one badged employee, and vary delivery times and randomize routes (OAC 1301:18-3-13(A)(4)(a)-(d)).
- Vehicle accidents are reported to the designated person within two hours, and emergencies go to 911 immediately (OAC 1301:18-3-13(A)(4)(g)).
- Product is stored in a locked, secure compartment affixed to a vehicle that is registered in Ohio and insured (OAC 1301:18-3-13(B)).

Sources checked 2026-11-22.

- Cannabis Control Commission, 935 CMR 500.000 (effective 09-11-26)
- Office of Cannabis Management, Express Terms adopting Parts 118-125 and 131 (9 NYCRR)
- NJ Cannabis Regulatory Commission, N.J.A.C. 17:30 Personal Use Cannabis Rules
- OAC 1301:18-3-13, Transportation of Cannabis to Another Licensed Entity

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Sources

- Code of Virginia § 4.1-606 (Regulations of the Board)
- Code of Virginia § 4.1-800 (Marijuana cultivation facility license)
- Code of Virginia § 4.1-801 (Marijuana processing facility license)
- Code of Virginia § 4.1-802 (Retail marijuana store license)
- Code of Virginia § 4.1-804 (Marijuana transporter license)
- Code of Virginia § 4.1-805 (Marijuana delivery operator license)
- Code of Virginia § 4.1-1203 (Prohibiting transfer of marijuana by certain licensees)
- Code of Virginia § 4.1-611 (Seed-to-sale tracking system)
- CCA draft adult-use regulations, Sept. 9, 2026 (proposed, not final): 3VAC10-40-30, -235 to -285, 3VAC10-60-20, -40, 3VAC10-80-30

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