Toolkit · Build out SOP Updated November 22, 2026

Video Surveillance SOP

The video surveillance requirements in the CCA draft rules, each cited: camera placement, the five-minute failure alert, still images, time stamps, power-outage operation, export formats, 30-day retention and legal holds, the surveillance room, six-month testing, outdoor grows, and filmed destruction and sampling.

Who needs it: Every marijuana establishment: cultivation, processing, retail, microbusiness, transporter, delivery, testing; Outdoor cultivation licensees (video of the cultivation area).

Rule basis: Code of Virginia §§ 4.1-606 B 1, 4.1-800 E; draft rules 3VAC10-30-180 C, 3VAC10-40-30 K, 3VAC10-40-140 F to I, 3VAC10-50-110 B, 3VAC10-60-40 D 2 (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 leaves security standards, including surveillance, to the Board's regulations, and the CCA's draft rules set out where cameras go, what the video system must do, how long recordings are kept and who may enter the surveillance room. Destruction of product and test sampling are also required to happen on camera. Citations to 3VAC10 are to the CCA's draft regulations dated Sept. 9, 2026 (proposed, not final; they may change before adoption).

Other security requirements are listed in the Security plan template.

What Virginia requires

Statutory baseline

- Areas of a cultivation facility where marijuana is cultivated, labeled, packaged or stored must meet the security standards in the Board's regulations (Code of Virginia § 4.1-800 E); the same standard appears in the license sections for processing, retail, microbusiness, transporter and testing premises (§§ 4.1-801 B, 4.1-802 F, 4.1-803 C, 4.1-804 B, 4.1-806 G).
- The Board's outdoor cultivation regulations must include security requirements for lighting, physical security and alarms (§ 4.1-606 B 1).

Where cameras must be

- Fixed video cameras in all areas that may contain marijuana or marijuana products and at all points of entry and exit, appropriate for the normal lighting conditions of the area under surveillance (3VAC10-40-140 F, draft).
- Cameras directed at all approved safes, approved vaults, dispensing areas or sales areas, and any other area where marijuana plants or products are produced, harvested, manufactured, stored or handled (3VAC10-40-140 F 1, draft).
- At entry and exit points, cameras angled "so as to allow for the capture of clear and certain identification of any person entering or exiting the facility" (3VAC10-40-140 F 1, draft).
- Outdoor cultivation: video surveillance "with an unobscured view of the cultivation area" (3VAC10-40-140 G 3, draft).
- A drive-through dispensing window at a pharmaceutical processor or cannabis dispensing facility must meet sales-area requirements, including security lighting, alarm systems and video surveillance (3VAC10-40-30 K 3 b, draft).

What the video system must do

- A failure notification system that gives an audible, text or visual notification of any failure in the surveillance system or its storage device, alerting the establishment within five minutes of the failure by telephone, email or text message (3VAC10-40-140 F 2 a, draft).
- The ability to immediately produce a clear color still photo “that is a minimum of 9600 dpi” from any camera image, live or recorded (3VAC10-40-140 F 2 b, draft).
- A date and time stamp embedded on all recordings, synchronized and set correctly, that does not significantly obscure the picture (3VAC10-40-140 F 2 c, draft).
- The ability to remain operational during a power outage (3VAC10-40-140 F 2 d, draft).
- All recordings allow export of still images in an industry standard image format (3VAC10-40-140 F 3, draft).
- Exported video can be archived in a proprietary format that ensures authentication and guarantees no alteration of the recorded image, and can also be saved in an industry standard file format playable on a standard computer operating system (3VAC10-40-140 F 3, draft).

Recordings: access and retention

- 24-hour recordings from all cameras are available for immediate viewing by the Board or its agent on request (3VAC10-40-140 F 4, draft).
- Recordings are retained for at least 30 days (3VAC10-40-140 F 4, draft).
- If the establishment is aware of a pending criminal, civil or administrative investigation or legal proceeding for which a recording may contain relevant information, it retains an unaltered copy until the matter is closed or the investigating entity notifies the PIC or responsible party that retention is not necessary (3VAC10-40-140 F 4, draft).
- All security system equipment and recordings are kept in a secure location to prevent theft, loss, destruction or alteration (3VAC10-40-140 H, draft).

Equipment and the surveillance room

- All security equipment is maintained in good working order and tested at least every six months (3VAC10-40-140 H, draft).
- Onsite surveillance rooms are kept locked and may not be used for any other function (3VAC10-40-140 H, draft).
- Access to surveillance areas is limited to persons essential to surveillance operations, law-enforcement agencies, security system service employees, the Board or its agent, and others approved by the Board (3VAC10-40-140 I, draft).
- The establishment makes available a current list of authorized employees and security system service employees who have access to the surveillance room (3VAC10-40-140 I, draft).
- A change to an existing establishment's "approved security system" requires an application to the Board and the required fee (3VAC10-30-180 C, draft).

Activities that must be filmed

- Destruction and disposal of green waste, extracts and marijuana products are conducted under video surveillance (3VAC10-50-110 B, draft).
- Test sample collection is conducted under video surveillance; the designated sample collector keeps the recording for 30 days from the date of sampling unless the Board or its designees instruct otherwise (3VAC10-60-40 D 2, draft).

Records and forms the rules name

Surveillance room access list (required by 3VAC10-40-140 I, draft: authorized employees and security system service employees with access)

Name	Employee or security system service employee

Sampling record kept with the sampling video (fields listed in 3VAC10-60-40 D 2, draft)

Date and time of sample collection	Business name and license number of origin	Unique batch number of each batch sampled	Name of designated sample collector

Destruction record (fields listed in 3VAC10-50-110 B, draft; see the Waste disposal SOP)

Date and time	Manner of destruction and disposal	Name and quantity of product and green waste	Signatures of persons destroying and disposing

What the law does not say

- The draft rules do not set a minimum camera resolution or frame rate. The only image-quality figure is the "minimum of 9600 dpi" still-photo standard (3VAC10-40-140 F 2 b, draft).
- The draft rules do not require off-site or cloud backup of recordings.
- The draft rules do not say who must receive the five-minute failure alert, only that it reaches the establishment by telephone, email or text message (3VAC10-40-140 F 2 a, draft).
- The draft video requirements in 3VAC10-40-140 F apply to marijuana establishments; the draft does not apply them by name to regulated hemp product retail facilities.

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)

- Massachusetts requires cameras in all areas that may contain marijuana, at cash vaults or safes, at all entry and exit points and in any parking lot, angled for "clear and certain identification" of anyone entering or exiting (935 CMR 500.110(5)(a)4.).
- Recording runs 24 hours a day and footage is available for immediate viewing by the Commission for at least the preceding 90 calendar days, or longer if the Commission asks for preservation (935 CMR 500.110(5)(a)5.).
- Motion-activated recording is allowed only if the sensor alerts designated employees as set out in Commission-approved written procedures (935 CMR 500.110(5)(a)5.).
- The system must produce a clear color still image, embed a synchronized date and time stamp, and export stills as .jpg, .bmp or .gif and video in a tamper-evident proprietary format plus a standard playable format (935 CMR 500.110(5)(a)6., 7., 9.).
- An on-site surveillance room stays locked, is used for no other function, and a current list of employees with access is available on request (935 CMR 500.110(5)(d)-(e)).
- Delivery agents wear an operational, conspicuously displayed body camera that records all deliveries; footage is kept at least 30 days and then destroyed unless held for an investigation (935 CMR 500.110(8)(b)).

New York (9 NYCRR 125.3)

- New York requires cameras at every point-of-sale area and entry and exit point, positioned for "clear and certain identification" (9 NYCRR 125.3(c)(2)(ii)).
- Recording is continuous during operating hours and whenever cannabis is handled, motion-activated at other times, available to the Office by remote access, and retained at least 60 days (9 NYCRR 125.3(c)(2)(vi)).
- Time stamps are synchronized to National Institute of Standards and Technology time (9 NYCRR 125.3(c)(2)(v)).
- Footage relevant to a pending investigation or legal proceeding is kept unaltered until it closes, and in no event less than 60 days (9 NYCRR 125.3(c)(2)(viii)).

- Outdoor canopy video runs for at least the three weeks before harvest and at all times during drying, curing, storage or disposal (9 NYCRR 125.3(c)(7)).

Ohio (OAC 1301:18-8-05)

- Ohio dispensary video records at least fifteen frames per second, is retained at least forty-five calendar days, and allows real-time access by the Division (OAC 1301:18-8-05(B)(3)(a)-(c)).
- The system includes a display monitor of at least nineteen inches and produces color stills of at least 600 x 600 dpi (OAC 1301:18-8-05(B)(3)(d), (f)).
- Cameras cover all entrances and exits, limited access areas, inventory storage, the destruction and disposal area, areas where sales proceeds are stored or moved, and each point of sale (OAC 1301:18-8-05(B)(5)).
- Equipment is tested at least monthly and any failure is repaired or replaced within twenty-four hours (OAC 1301:18-8-05(C)).

Maryland (COMAR 14.17.10.02)

- Maryland growers keep a motion-activated system recording "images of high quality and high resolution capable of clearly revealing facial detail," running 24 hours a day, 365 days a year, with a time stamp on every frame (COMAR 14.17.10.02H(1)).
- Notices advising visitors of video surveillance are posted (COMAR 14.17.10.02H(2)).
- Recording storage is access-limited, protected by an alarm independent of the main premises alarm, and retained at least 90 calendar days (COMAR 14.17.10.02H(5)).
- Recordings are provided to the Administration or law enforcement within 48 hours of a request for just cause (COMAR 14.17.10.02H(6)).

New Jersey (N.J.A.C. 17:30-9.10)

- New Jersey requires a video system that monitors "all critical control activities," provides remote viewing access to the Commission, and is approved by the Commission before license issuance (N.J.A.C. 17:30-9.10(b)9i).

- Recordings are stored in a safe place with a 30-day archive (N.J.A.C. 17:30-9.10(b)9ii).
- Security lighting illuminates all entrances and exits and may use motion sensors to protect cultivation light cycles (N.J.A.C. 17:30-9.10(b)10).

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)
- OAC 1301:18-8-05, Minimum Security and Surveillance Requirements
- COMAR 14.17.10.02, Cannabis Grower Premises
- NJ Cannabis Regulatory Commission, N.J.A.C. 17:30 Personal Use Cannabis Rules

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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 § 4.1-803 (Microbusiness license)
- Code of Virginia § 4.1-804 (Marijuana transporter license)
- Code of Virginia § 4.1-806 (Marijuana testing facility license)
- CCA draft adult-use regulations, Sept. 9, 2026 (proposed, not final): 3VAC10-30-180, 3VAC10-40-30, -140, 3VAC10-50-110, 3VAC10-60-40

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