



Cannabis Control Division

August 21, 2026

PREPARE FOR
**NEW MEXICO'S NEW
TRACK-AND-TRACE
SYSTEM**



Dear Licensees,

The Cannabis Control Division (CCD) understands that transitioning to a new seed-to-sale tracking system is an important change for New Mexico's cannabis industry. We want licensees to know that significant preparation has gone into this transition and that we will be here to support you throughout the process.

As we prepare for the transition to NMS2S, the CCD and its partners are working closely together to make the transition as smooth and manageable as possible. We recognize that moving to a new system after many years of using BioTrack may take some adjustment, and we

are committed to providing licensees with clear information, practical resources, and support along the way.

Transition Timelines and Expectation

As noted in a previous bulletin, BioTrack will become unavailable for non-retailer licensees beginning August 25 at 5 p.m. Non-retailers will begin gaining access to NMS2S on August 31. Retail migration will begin on September 1, with retailers expected to have access to their inventory in NMS2S on September 2.

Throughout the transition, our goal is to maintain as much continuity for licensees as possible. Retail sales will continue during the migration period, and we have structured the transition over a short, concentrated period so that staff, technical teams, and support resources can remain focused on the cutover and respond quickly to questions or technical needs as they arise. This approach is intended to minimize disruption to normal business operations while allowing time to carefully validate migrated data and ensure licensees are positioned to begin using NMS2S successfully.

Contract Selection and Deadline

The CCD has been preparing for this transition since 2024, beginning the with the State's competitive Request for Proposals (RFP) process to select a new seed-to-sale tracking system vendor and continuing through development, testing, and implementation planning.

The New Mexico Department of Health (DOH) first implemented the State's cannabis track-and-trace system for medical use in 2015. After adult-use cannabis was legalized in 2021, oversight shifted to the CCD, though DOH maintained the BioTrack contract and CCD accessed its data for regulatory purposes. DOH extended agreements with BioTrack through October 31, 2024. Once that contract ended, the Regulation and Licensing Department (RLD) utilized emergency procurement process to keep the system running, with the CCD partnering with BT Government Inc. on a contract expiring September 15, 2026.

Following the RFP process that opened in October 2025, the CCD awarded the new contract to Albuquerque-based Real Time Solutions (RTS) on January 28, 2026. The full RFP and award documentation are publicly available on the [RLD's website under Archived Procurement](#).

The timing of the NMS2S rollout is designed to ensure continuity in New Mexico's required track-and-trace system. The CCD sought to extend the arrangement for the legacy track-and-trace system beyond September 15, 2026, but could not reach an agreement with BT

Government Inc. beyond that date. Moving forward with the planned transition allows the State to avoid a large gap in service and maintain a system that helps ensure consumers and medical cannabis patients continue to have reliable access to safe, regulated cannabis products.

The CCD understands that some licensees would prefer additional time before the transition. At the same time, our responsibility is to ensure New Mexico has a functioning track-and-trace system in place with the least amount of interruption, and the current transition schedule is intended to accomplish that.

Why NMS2S

NMS2S is first and foremost a regulatory tool that will allow the CCD to more effectively oversee inventory, support compliance, and administer New Mexico's cannabis program. The transition to NMS2S comes as the existing legacy track-and-trace arrangement reaches its conclusion, creating an opportunity for the State to move to a system designed more specifically around New Mexico's regulatory needs and the practical needs of licensees.

A major benefit of NMS2S, and an important consideration throughout the procurement process, was reducing unnecessary costs for licensees. Because use of the State's track-and-trace system is mandatory, we wanted a solution that would support compliance without creating an unreasonable financial burden or barrier to participation in New Mexico's regulated cannabis industry. NMS2S will provide licensees access to a State-supported system without additional per-tag, costly monthly subscription fees, or pay walls for superior services. Some proposals submitted by other vendors would have resulted in significant ongoing costs to licensees, including costs associated with individual plant and product tags. The Real Time Solutions proposal was much more economical for both the State and our licensees.

Cost-savings is just one of many benefits. NMS2S is custom-built for New Mexico regulations and crafted with input from CCD staff who understand both regulatory requirements and the day-to-day realities of operating in the cannabis industry. The goal is to provide licensees with a system that is more practical, intuitive, and responsive to the way New Mexico businesses operate.

Preparation for Transition

The transition to NMS2S has involved extensive technical, regulatory, and operational planning. Here are some of the steps we have taken that we hope you find reassuring:

Meeting with fellow regulators

The CCD has examined the experiences of other jurisdictions without treating any one implementation model as a template for New Mexico. We met with fellow state regulators who have recently gone through track-and-trace transitions, including Illinois and Washington. Those conversations provided helpful insights into what worked well, what challenges arose, and what lessons could be applied as New Mexico prepared for its own transition.

Testing and Validation

New Mexico's procurement incorporated structured testing and validation before statewide deployment. The CCD and RTS have conducted testing as part of that process.

User Acceptance Training has been ongoing since April 2026, including workflows across different license types and activities. Migration validation testing has also been underway since March, and the CCD and its technical partners have successfully migrated data from BioTrack to NMS2S including product test results as part of that validation process.

We have also worked extensively on data backup and migration planning, coordination with the Department of Health regarding the medical patient registry which integrates with NMS2S, and testing and access processes for third-party point-of-sale system providers.

What's Next

NMS2S provides New Mexico with a valuable tool designed to more closely align with our state-specific regulatory framework, but this launch is only the beginning. The CCD and Real Time Solutions will continue to evaluate, refine, and improve the system over time to better support both our regulatory needs and the needs of the industry. And while it is our goal to launch a perfect system, we know that any software change can present issues. We will be responsive and adaptive to ironing out any problems in the days after the launch. That is our commitment in order to have a better system and offer the highest level of support during this time.

The full CCD team, including compliance officers, will be available in real time to answer calls, troubleshoot issues and guide you through each stage. We will have how-to manuals and videos on our website and are preparing to host webinars to answer questions in an interactive environment. We've set up a dedicated webpage with the transition timeline and to provide updates and resources to help you find the

information you need. We encourage you to visit this page to get ready for NMS2S: rld.nm.gov/cannabis/nms2s.

The Cannabis Control Division is ready for this launch and will be by your side to support you and your business throughout the transition and as you continue to use NMS2S.

Sincerely,

Cannabis Control Division

New Mexico Regulation & Licensing Department

The New Mexico Regulation and Licensing Department regulates more than 400,000 individuals and businesses in 35 industries, professions and trades across the state. Its mission is to ensure qualified professionals provide quality care and services to all people of New Mexico.



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