



# Perry Johnson Registrars Food Safety, Inc.



## Hemp Violations

Achieving certification can be an exciting time for a business, opening doors to new opportunities and improving systems in ways that ultimately lead to growth. But it can also be daunting, with audit deadlines approaching and any number of anxious thoughts – have we forgotten anything? What are we missing? Will we have a violation found? In hemp manufacturing inspections, specifically, there are a number of pain points on both the state level (referenced from Colorado Department of Public Health & Environment data) and the federal level (FDA Food Facility Inspection Violation data). So what are the biggest areas where infractions are found?

### On the state level

The majority of issues found at the state level have to do with sanitation or contamination reduction practices. These four points are a lack of accessible hand sinks in production areas, bathroom doors leading into production areas that are not self-closing, non-food-grade buckets or surfaces being used to store ingredients or finished products, and a lack of sanitizer test strips in production areas.

The oddball out from the previous four has to do with lighting, specifically the use of fixtures or bulbs that are not protected from breakage above production areas.

While many of the areas of concern at the state level are centered around facility updates, they all have one thing in common – all five may cause product contamination in the worst-case scenario.

### On the federal level

While the FDA put a pause on some federal inspections due to the COVID-19 pandemic, there is still a fair amount of data to draw from. Although the FDA does not regulate cannabis or hemp production establishments, these points may draw parallels to what might be common violations if the FDA should decide to regulate the industry in the future. The conclusions drawn are grouped into broad categories rather than specific one-off problem points:

- Pest Control
- Personnel
- Manufacturing Controls
- Failure to Provide Adequate Hazard Analysis
- Lack of FSVP (Foreign Supplier Verification Program) Development

Primarily involving a lack of required program development and management buy-in, the federal level common violations again have the same theme as the state level – product contamination could result.

While the thought of violations might send a shiver of fear through a company, the citation of them is ultimately intended to protect consumer health and safety. In the same stroke, correcting the cited violations can help protect your business from liability and future reputational damage – thinking of them as an opportunity for growth and improvement rather than a slap on the wrist can make all the difference.

With the huge range of variables at play, though, how can a company better keep in stride with their program development, food safety and quality culture, and management commitment? A Quality Management System (QMS) may be the answer. PJRFSI has the resources and experience you need to best determine what solutions might be best for you and your business when it comes to certification and inspections. Reach out to us today to be put in touch with one of our hemp or cannabis experts – call (248) 519-2523 or visit [www.pjrfsi.com](http://www.pjrfsi.com) now!