

The background is a solid dark blue-grey color. Overlaid on this are several abstract, 3D-style green shapes. A large, bright green rectangle is the central focus, containing the text. To its right, a darker green shape extends upwards and to the right. To its left, another green shape extends downwards and to the left. These shapes create a layered, architectural feel.

PJRFSI Cannabis Safety Standard - Cultivation

Perry Johnson Registrars Food Safety, Inc.

Headquarters – Troy, MI

- ▷ Family of 72 companies
- ▷ Global Offices in Europe, Asia, and the Americas
- ▷ Offering services in both Food Safety and Cannabis Safety.
- ▷ Cannabis Safety Standard accreditation in progress





1.

Importance of Food Safety in the Cannabis Industry

Why does it matter?

Why Cannabis Safety?

- ▶ Cannabis industry is like the “Wild West” – little regulation and a lack of clear direction
- ▶ A cannabis grower may have cannabis expertise but haven’t accounted for food safety/product safety



Courtesy Wikimedia Commons

Producer Responsibility

- ▶ grow product safely
- ▶ Implement appropriate controls
- ▶ Whole company commitment



Regulatory Responsibility



- ▶ Includes Federal, State and local agencies
- ▶ Setting food safety standards
- ▶ Conducting inspections
- ▶ Enforcement programs



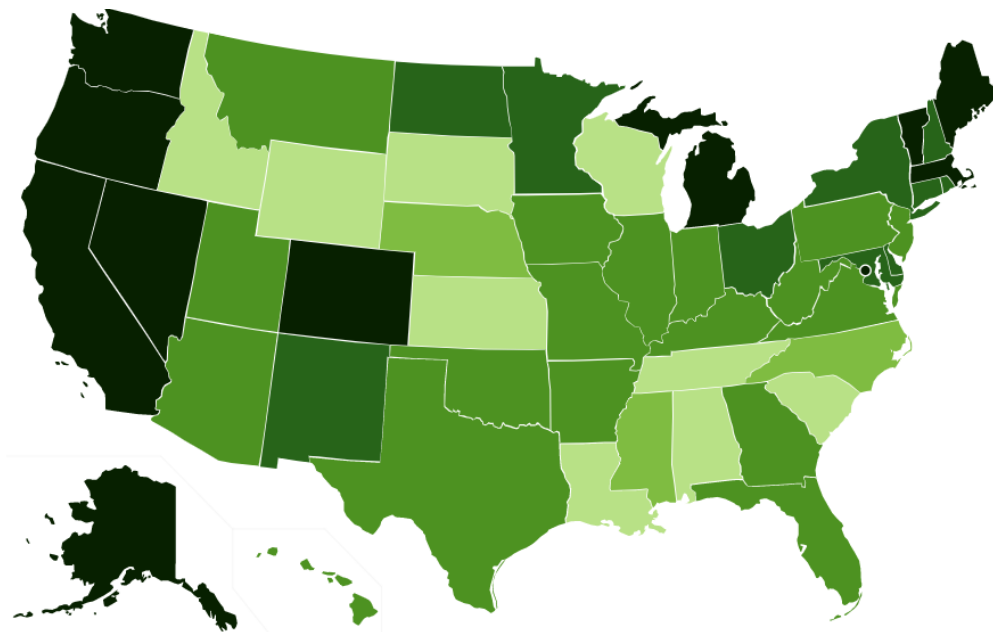
COLORADO
Department of Revenue
Enforcement Division



BUREAU of
CANNABIS
CONTROL
CALIFORNIA

Marijuana Legality by State

Legalized Medical and decriminalized Medical Decriminalized Fully illegal



Hemp Legality by State



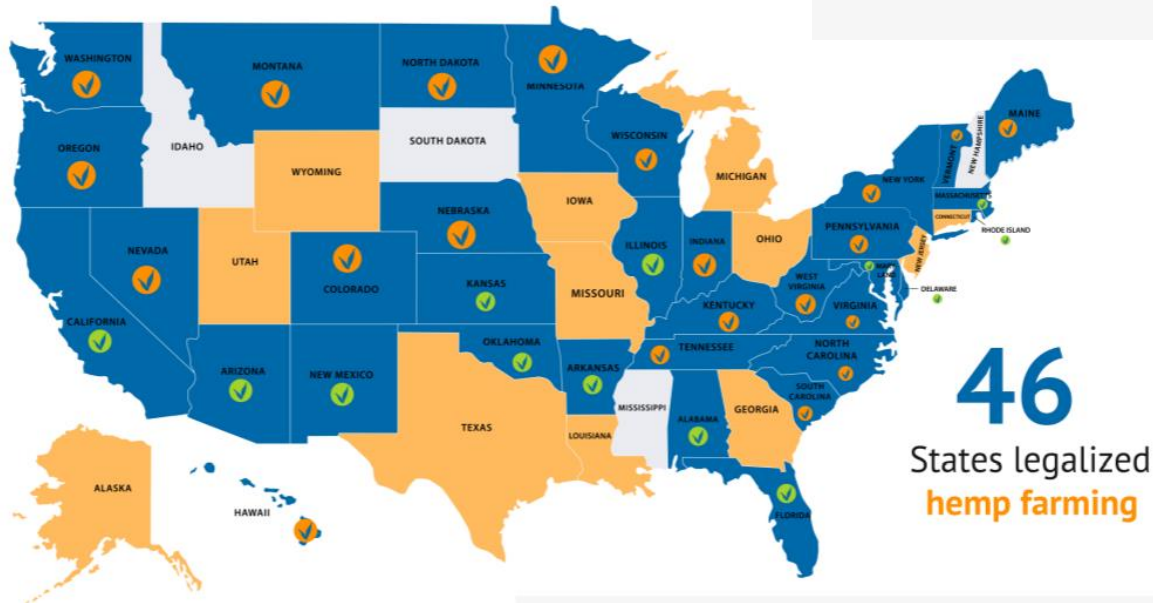
New states which started in 2019 (13 states)



States which grew hemp in 2018 (21 states)



States with enacted hemp legislation (46 states)



Cannabis Food Safety Regulation

- ▷ Not federally regulated by FDA or USDA
- ▷ Food safety standards are developed state by state
- ▷ Enforced through state divisions

Types of Regulation

Varies by State

- ▷ Colorado – Colorado Health Dept
- ▷ California and Oregon – 3 different agencies
- ▷ Florida – Dept of Health (Office of Medical Marijuana Use)
- ▷ Nevada – Dept of Taxation
- ▷ Michigan – LARA/BMR

Cannabis Food Safety

- ▷ High numbers of immunocompromised, young, elderly, or otherwise vulnerable persons are consumers of medical cannabis products.
- ▷ Inappropriate levels of CBD or THC may cause unintentional, unwanted effects.

Cannabis Recalls

- ▶ Cannabis and cannabis products can be recalled
 - ▶ Molds and yeasts
 - ▶ Pathogens
 - ▶ Pesticides
 - ▶ Heavy-metals



Agricultural Product Concerns

- ▷ Mycotoxins
 - Aflatoxins
 - Ochratoxins
- ▷ Pesticides
 - Approved vs. unapproved
 - Regulations
- ▷ Chemical Residues
- ▷ Contamination
 - Water
 - Pests
 - Humans



Product Testing Concerns

Cannabis and Hemp Testing

- ▶ *How is the sampling conducted?*
- ▶ *Frequency of testing*
- ▶ *What credentialing does lab have (State Approved or ISO 17025)?*
- ▶ *What tests are conducted (potency, terpenes, pesticides, heavy metals, micro/pathogens, yeast/molds)?*



Cannabis Packaging

- ▷ Adherence to current Cannabis packaging requirements
- ▷ Types of packaging used
- ▷ Proper packaging storage
- ▷ Proper labeling
 - ▶ THC level of product
 - ▶ Name & address of production facility
 - ▶ Name of the infused product and ingredients by descending weight
 - ▶ Product cannot be a shape, color, package, or labeled to appeal to minors age 17 and under
 - ▶ Child-resistant packaging





2.

Cannabis Certification

Audit Types and Steps to Certification

Third Party Certification

- ▶ Provides audits and certifications outside of regulatory requirements
- ▶ Based on a recognized set of food safety standards such as Good Agricultural Practices or HACCP (Hazard Analysis and Critical Control Points)



Types of Food Safety Audits

- ▷ PJRFSI Cannabis Safety Standard
- ▷ GFSI benchmarked food safety audits
 - ▶ GLOBALG.A.P. allow certification of hemp
 - ▶ PrimusGFS allows the certification of cannabis

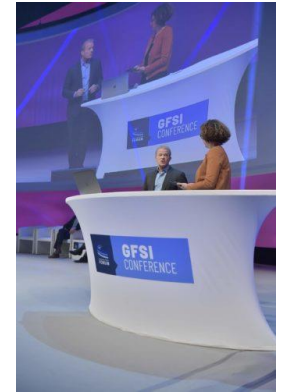


Photo courtesy GFSI

Benefits of Certification

- ▶ Mitigate risks to public health and safety
- ▶ Promote your products with an added layer of confidence
- ▶ Increase consumer confidence
- ▶ Stay ahead of the competition when it comes to government requirements
- ▶ Reduce recalls and save money

Pending Letter

(sample)



Perry Johnson Registrars Food Safety, Inc.

Date
Site Address

Dear Name,

We at Perry Johnson Registrars Food Safety Inc. appreciate the opportunity to serve as your partner as you progress toward becoming a certified SQF Supplier. As detailed in your Certification Agreement, we will audit your Cannabis Safety System and your facility listed at the address above to the PJRFSI Safety Standard.

This letter confirms that you anticipate completing your Cannabis Safety certification with Perry Johnson Registrars Food Safety Inc. by the [target date].

Following the facility audit, you will have up to 30 days to close out any documented nonconformities. Provided you achieve the minimum compliance grade, we will register you as a Certified Cannabis Safety Operation within 45 days of your facility audit date. This timeline may be shortened if you are able to close out all non-conformities earlier than the due dates. After the certification decision has been made, you typically receive your official, signed certificate within two weeks.

Please feel free to contact me by email or at 1-800-800-7910 if you have any questions about the next phase of your certification process. We look forward to being of service to [company name].

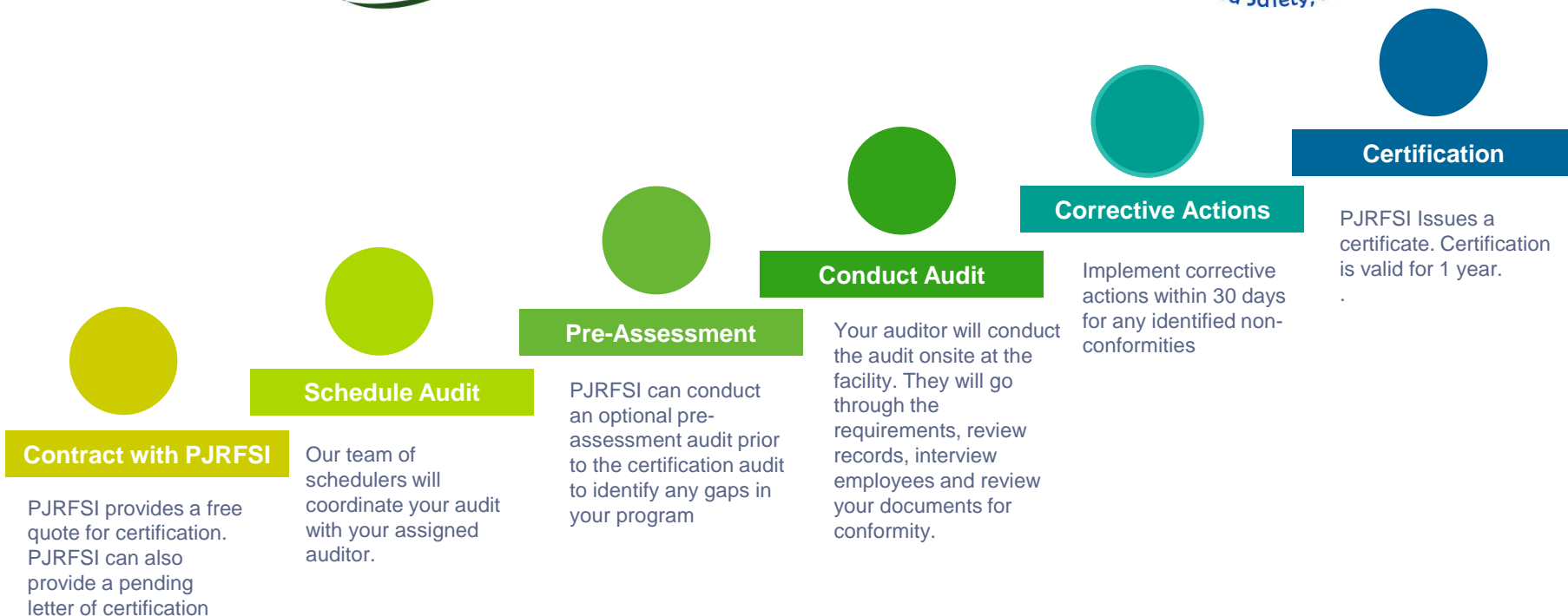
Kind Regards,

Working with
an accredited
Certification
Body

Shows
commitment to
employees,
stakeholders,
and potential
customers



Steps to Certification





3.

PJRFSI Cannabis Safety Standard

PJRFSI Cannabis Safety Standard

- ▷ Applicable for Cannabis and Hemp growers
- ▷ Based off of the USDA GAP requirements
- ▷ State-specific requirements

How to be Audit Ready

- ▷ Pre-assessment
- ▷ Review and implement Requirements
- ▷ Train Employees
- ▷ Internal Audit
- ▷ Implement Corrective Actions

Excerpt from the Standard

▶ Part 1 – GAP Requirements

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▶ Part 2 – State Requirements

Excerpts from the Standard - Part 1

- ▷ 1.0 General Requirements
- ▷ 2.0 Traceability
- ▷ 3.0 Worker Health & Hygiene



Excerpts from the Standard – Part 1

3.0 Worker Health & Hygiene

- 3.1 Drinking water is available to all workers.
- 3.2 All employees and all visitors to the location are required to follow proper sanitation and hygiene practices.
- 3.3 Training on proper sanitation and hygiene practices is provided to all staff.
- 3.4 Employees who handle or package product are washing their hands before beginning or returning to work.
- 3.5 Readily understandable signs are posted to instruct employees to wash their hands before beginning or returning to work.
- 3.6 All toilet/restroom/field sanitation facilities are clean. They are properly supplied with single use towels, toilet paper, hand soap or anti-bacterial soap, and water for hand washing meets the microbial standards for drinking water.
- 3.7 All toilet/restroom/field sanitation facilities are serviced and cleaned on a scheduled basis.
- 3.8 Smoking and eating are confined to designated areas separate from where product is handled.
- 3.9 Workers with diarrheal disease or symptoms of other infectious diseases are prohibited from handling product.
- 3.10 There is a policy describing procedures which specify handling/disposition of product or product contact surfaces that have come into contact with blood or other bodily fluids.
- 3.11 Workers are instructed to seek prompt treatment with clean first aid supplies for cuts, abrasions and other injuries.
- 3.12 Company personnel or contracted personnel that apply regulated pre-harvest and/or post-harvest materials are licensed. Company personnel or contracted personnel applying non-regulated materials have been trained on its proper use.

Excerpts from the Standard – Part 1

- ▷ 4.0 Water Usage
- ▷ 5.0 Soil Amendments
- ▷ 6.0 Agricultural Chemicals



Excerpts from the Standard – Part 1

5.0 Soil Amendments

- 5.1 A soil amendment risk assessment shall address soil amendment risk, preparation, use and storage
- 5.2 If raw or incompletely treated manure is used, it shall be used in a manner so as not to serve as a source of contamination.

6.0 Agricultural Chemicals

- 6.1 Use of agricultural chemicals shall comply with label directions and prevailing regulation
- 6.2 Agricultural chemicals shall be applied by trained, licensed or certified application personnel, as required by prevailing regulation.

Excerpts from the Standard – Part 1

Outdoor Cultivation

- ▷ 7.0 Sewage Treatment
- ▷ 8.0 Animals/Wildlife/Livestock
- ▷ 9.0 Outdoor Soil

Excerpts from the Standard – Part 1

9.0 Outdoor Soil

- 9.1 A previous land use risk assessment has been performed
- 9.2 When previous land use history indicates a possibility of contamination, preventive measures have been taken to mitigate the known risks and soils have been tested for contaminants and the land use is commensurate with test results
Crop production areas that have been subjected to flooding are tested for potential microbial hazards

Excerpts from the Standard – Part 1

▶ 10.0 Indoor Cultivation

10.0 Indoor Cultivation

- 10.1 Chemicals not approved for use on product are stored and segregated away from packing area
- 10.2 The growing area is free of litter and debris
- 10.3 The growing area is reasonably free of standing water
- 10.4 Outside garbage receptacles/dumpsters are closed and are located away growing area entrances and the area around such sites is reasonably clean
- 10.5 The growing area interior is clean and maintained in an orderly manner
- 10.6 Floor drains appear to be free of obstructions
- 10.7 Pipes, ducts, fans and ceilings which are over growing areas operations, are clean
- 10.8 Glass materials above growing areas are contained in case of breakage
- 10.9 Possible wastewater spillage is prevented from contaminating any food handling area by barriers, drains, or a sufficient distance
- 10.10 There is a policy describing procedures which specify handling/disposition of finished product that is opened, spilled, or comes into contact with the floor
- 10.11 Pallets and containers are clean and in good condition
- 10.12 Measures are taken to exclude animals and pests growing area

Excerpts from the Standard – Part 1

- ▶ Operations and Harvesting
 - ▶ 11.0 Sanitation and Hygiene
 - ▶ 12.0 Harvesting and Transportation

Excerpts from the Standard – Part 1

Post Harvest Operations

13.0 Packing

14.0 Packing House Worker Health & Hygiene

15.0 Packing House General Housekeeping

16.0 Traceability

17.0 Maintenance and Sanitation

Excerpts from the Standard – Part 1

Storage and Transportation

- ▷ 18.0 Product, Containers & Pallets
- ▷ 19.0 Pest Control
- ▷ 20.0 Transportation
- ▷ 21.0 Worker Health and Personal Hygiene
- ▷ 20.0 Traceability

Excerpts from the Standard Part 2

▷ State Specific Cannabis Rules



Download the Standard

▶ We are offering a free download of the standard from our website



The screenshot shows the PJRFSI website header with the logo and navigation menu. The main content area is titled "Cannabis" and features a link for a free download of the Cannabis Safety Standard for Manufacturing. The text describes the new Cannabis programs and the certification process.

PJRFSI Perry Johnson Registrars
Food Safety, Inc.

Free Quote Stand

Home About PJRFSI Standards News Training Courses Webinars Contact

Cannabis

[FREE Download - Cannabis Safety Standard for Manufacturing](#)

We now offer specialty certifications that cover all facets of the Cannabis Industry. PJRFSI has created new Cannabis programs based on our successful food, agricultural, and pharmaceutical safety certifications. Whether you are growing/harvesting, producing/extracting, or creating MIP's (Marijuana Infused Products), we have resources for you that are streamlined and effective. PJRFSI Cannabis certification program is based on Good Manufacturing Practice (GMP) guidelines and are State specific.



Webinar Series

- ▶ PJRFSI Cannabis Safety Standard – Retail

March 20, 2020

- ▶ For more info you can email customerservice@pjrfsi.com

Thank you!

Any questions?

Perry Johnson Registrars Food Safety, Inc.

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