



# The Cannabis Industry and Food Safety Audits



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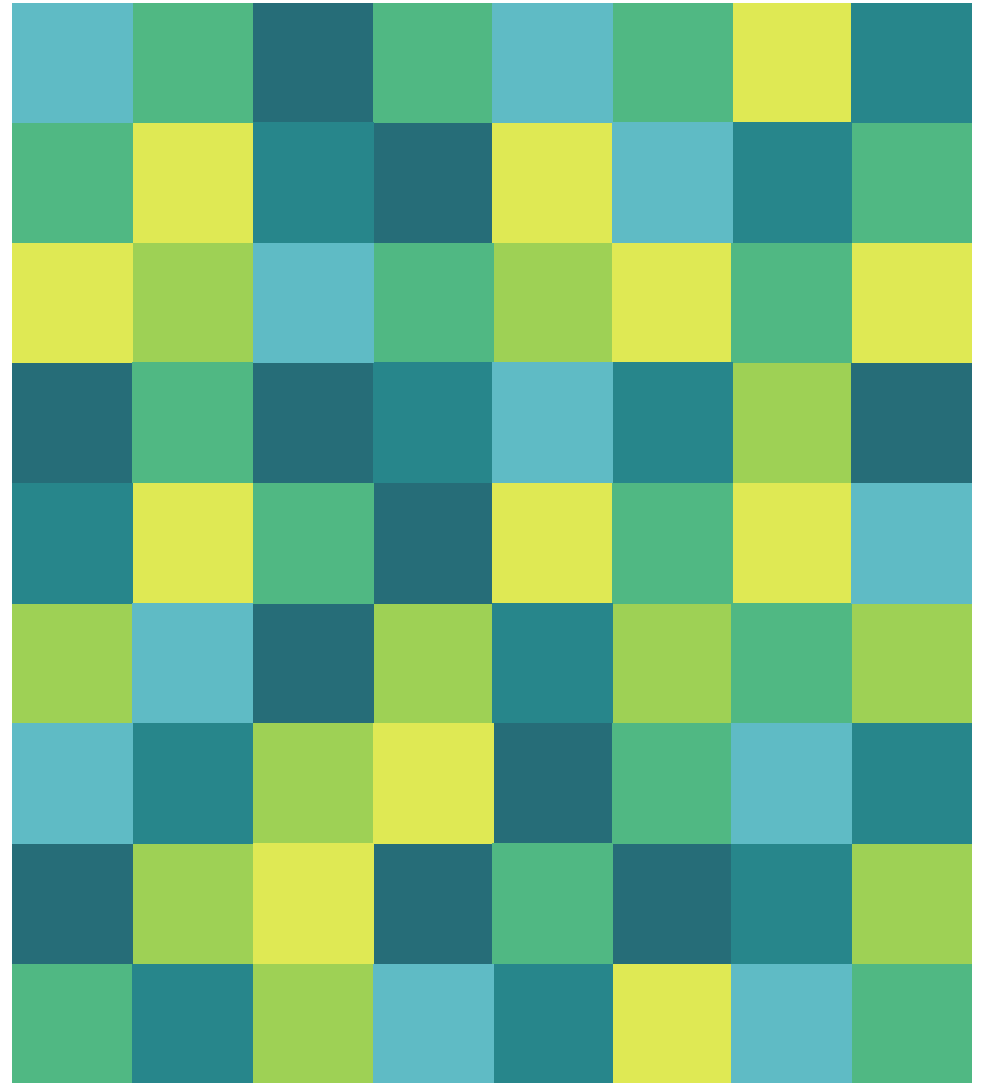
Perry Johnson Registrars  
Food Safety, Inc.  
HQ - Troy, Michigan

Third Party Certification  
Body providing Food  
Safety Audits and  
Certification



1.

Food Safety



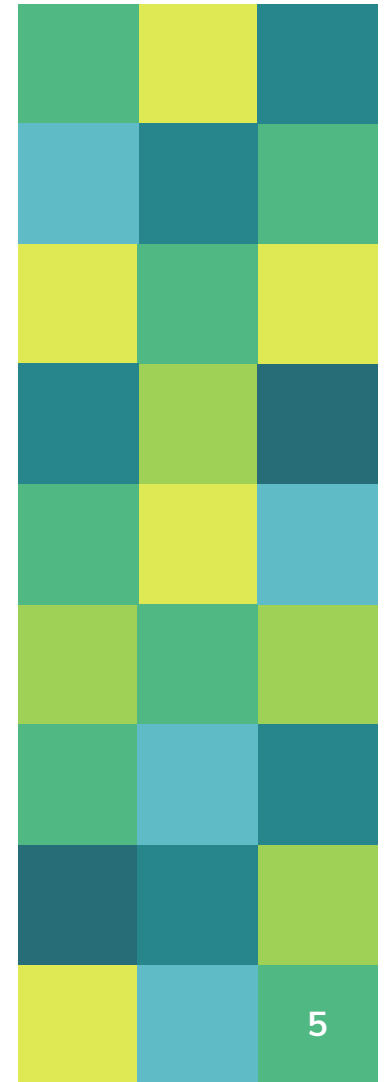
# Food Producer Responsibility

- Grow and/or manufacture food safely
- Implement appropriate controls
- Entire company commitment



# Regulatory Responsibility

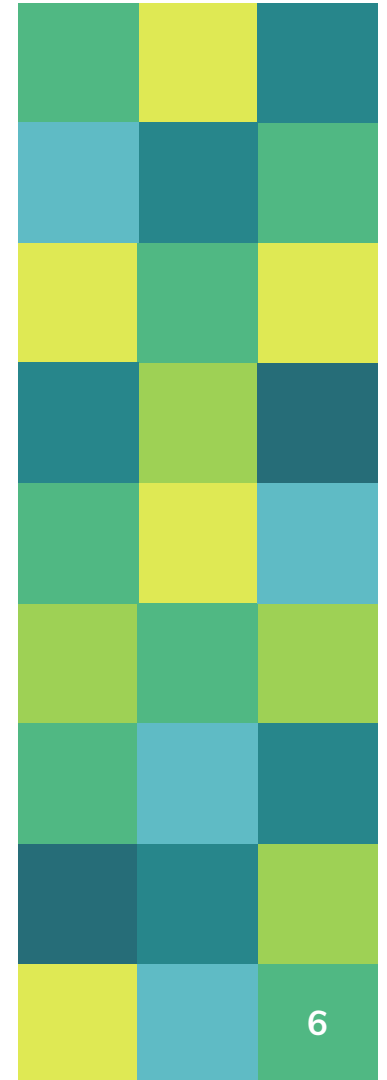
- Includes Federal, State and local agencies
- Setting food safety standards
- Conducting inspections
- Enforcement programs



## Third Party Certification



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



# 2.

## Cannabis Products and Food Safety



# Cannabis Products

Flower

Edibles

Concentrates

Topicals

Tinctures





# Flower

- Pesticide residues
- Untreated manure or compost
- Biological hazards from plant, soil or pests



# Edibles

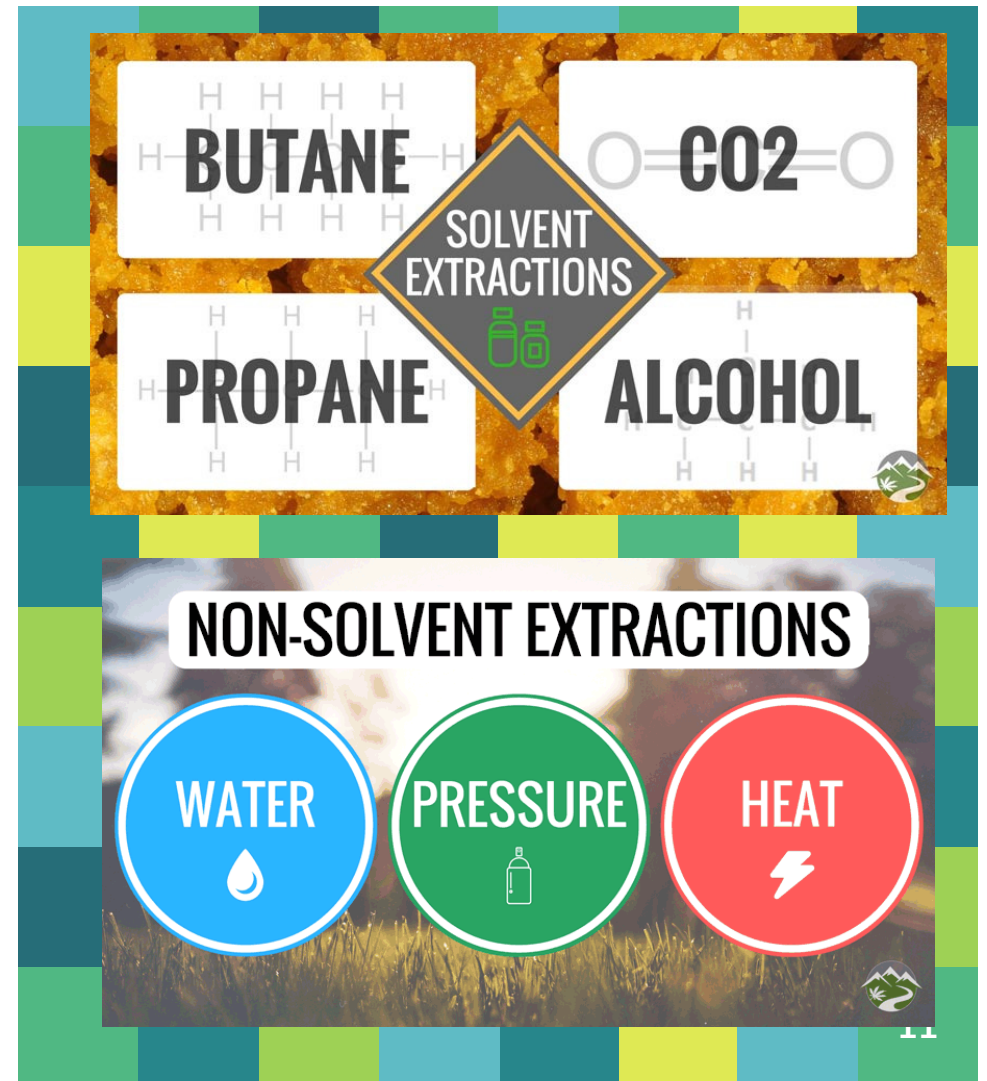
- More and more food products are being produced with Cannabis
- Similar risks as food products



# Concentrates

Solvent based  
extraction

Non solvent based  
extraction



# Cannabis Infused Oils

Made from

- vegetable glycerin
- glycol
- Vegetable oils



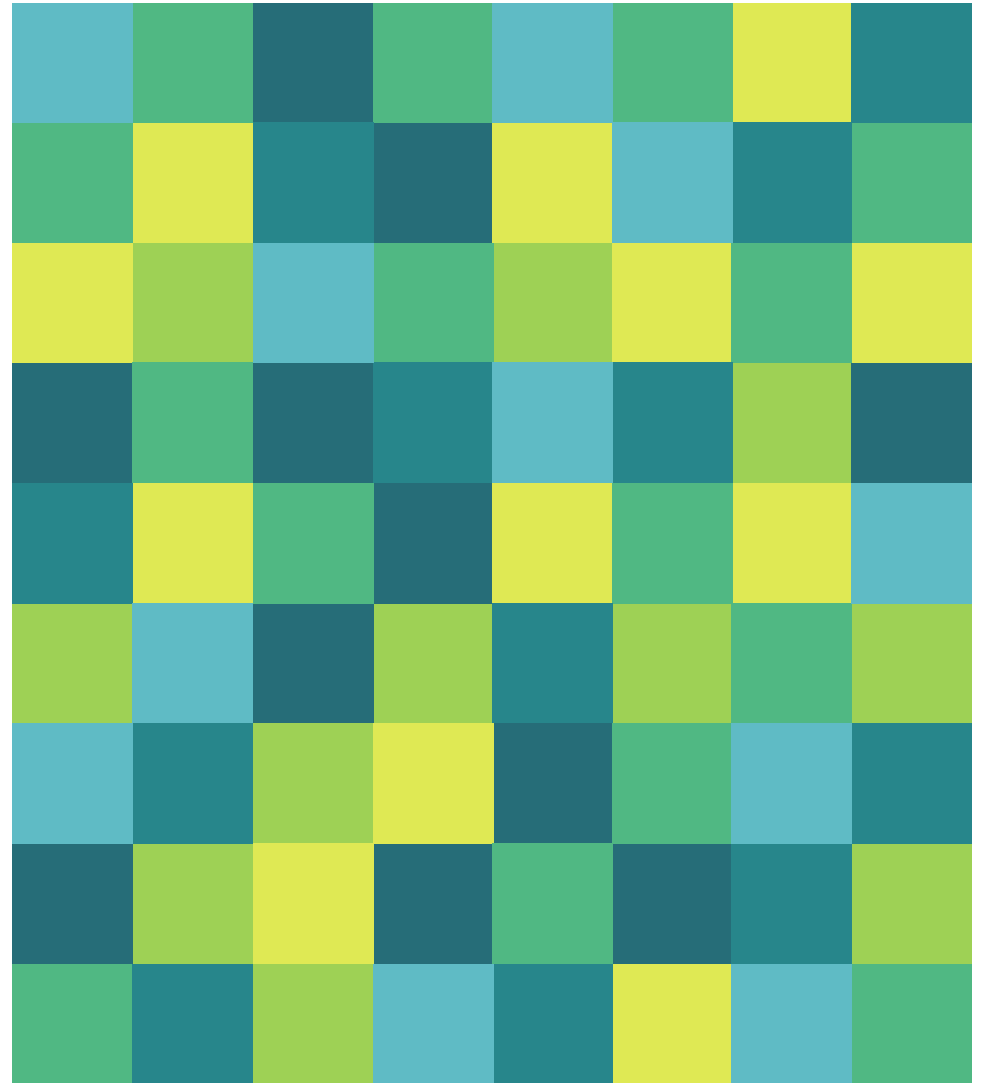
# Tincture

- Alcohol based herbal solution
- Applied to the skin or taken orally

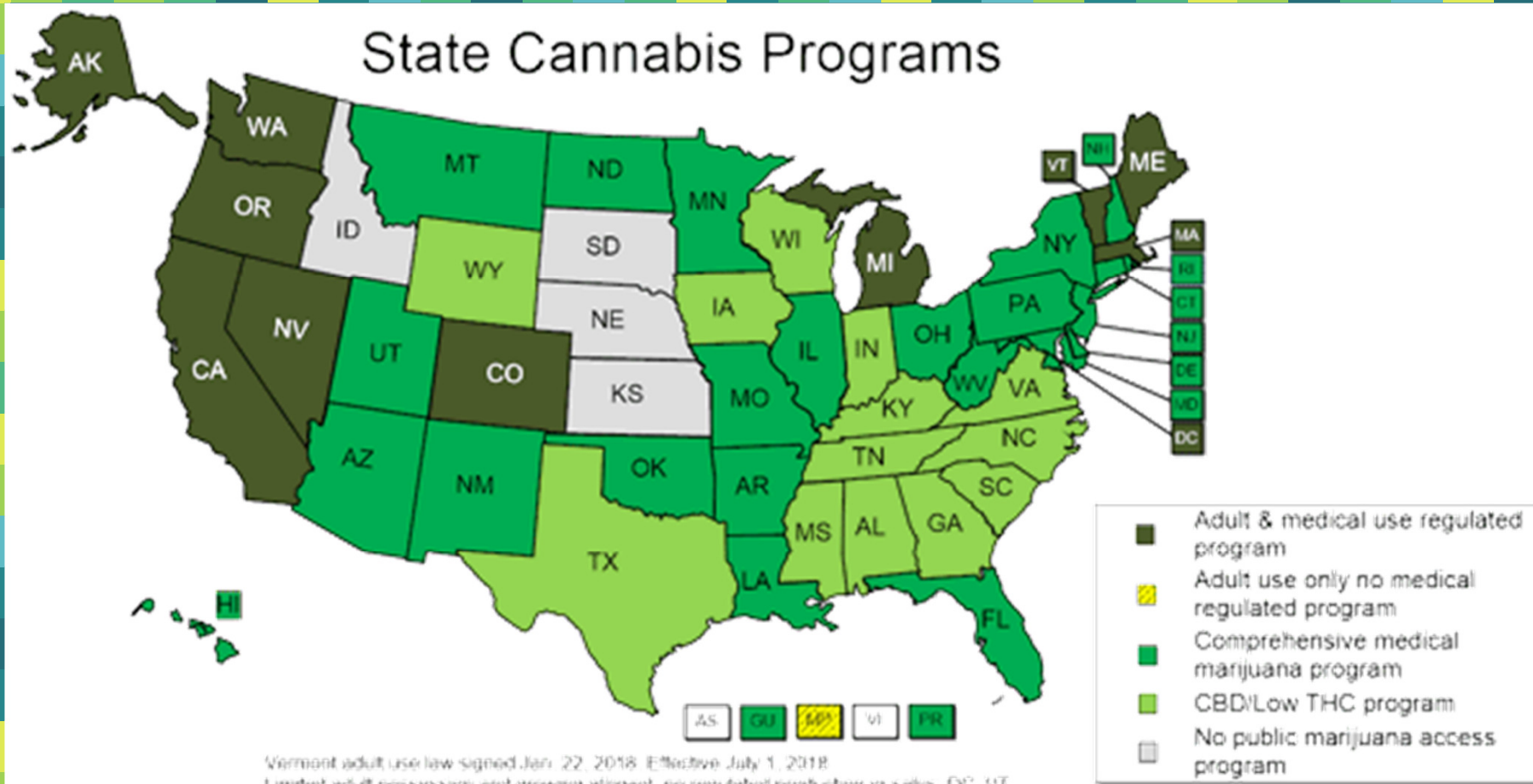


# 3.

## Importance of Food Safety in the Cannabis Industry



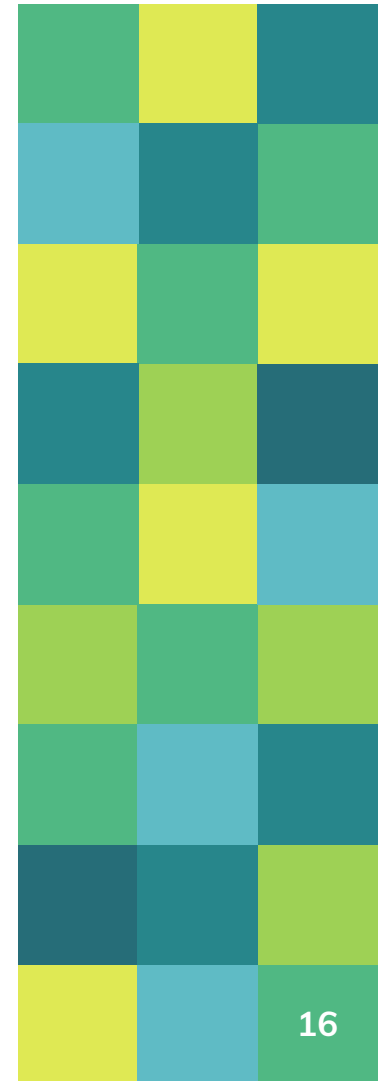
## State Cannabis Programs



Source: NCSL

# Cannabis Food Safety Regulation

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

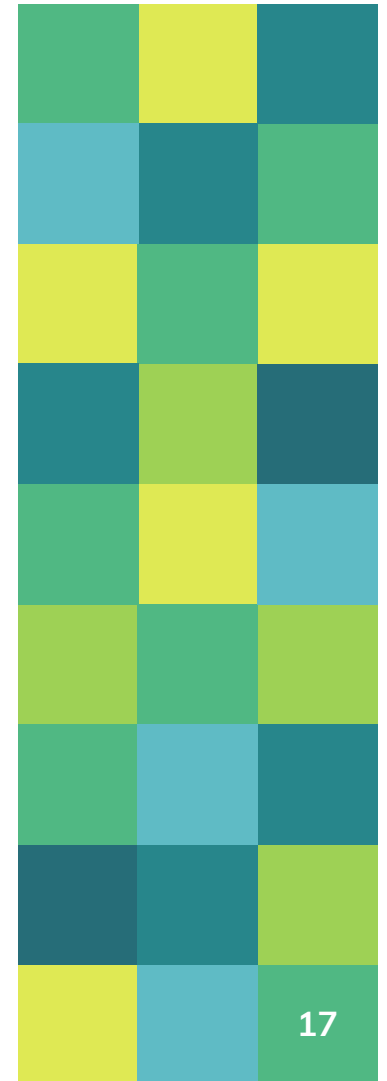




# Cannabis Regulation

## Varies by State

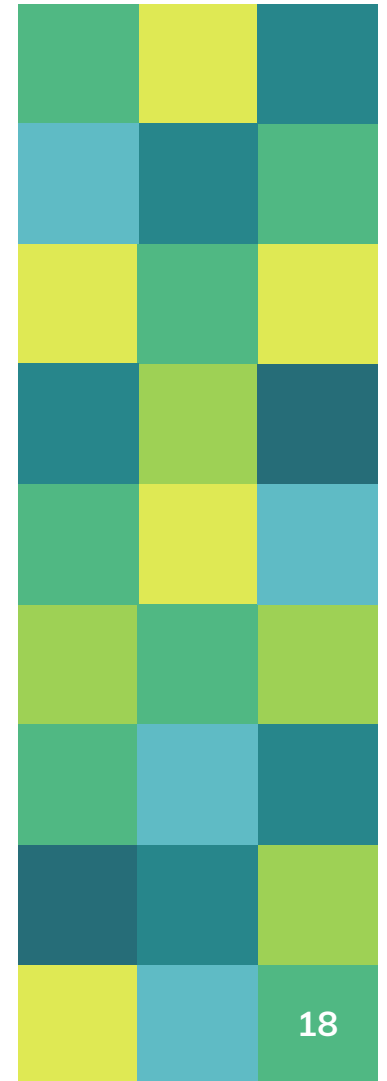
- Colorado – Colorado Health Dept
- California and Oregon – 3 different agencies
- Florida – Dept of Health (Office of Medical Marijuana Use)
- Nevada – Dept of Taxation
- Michigan – LARA/BMR



# Cannabis Food Safety

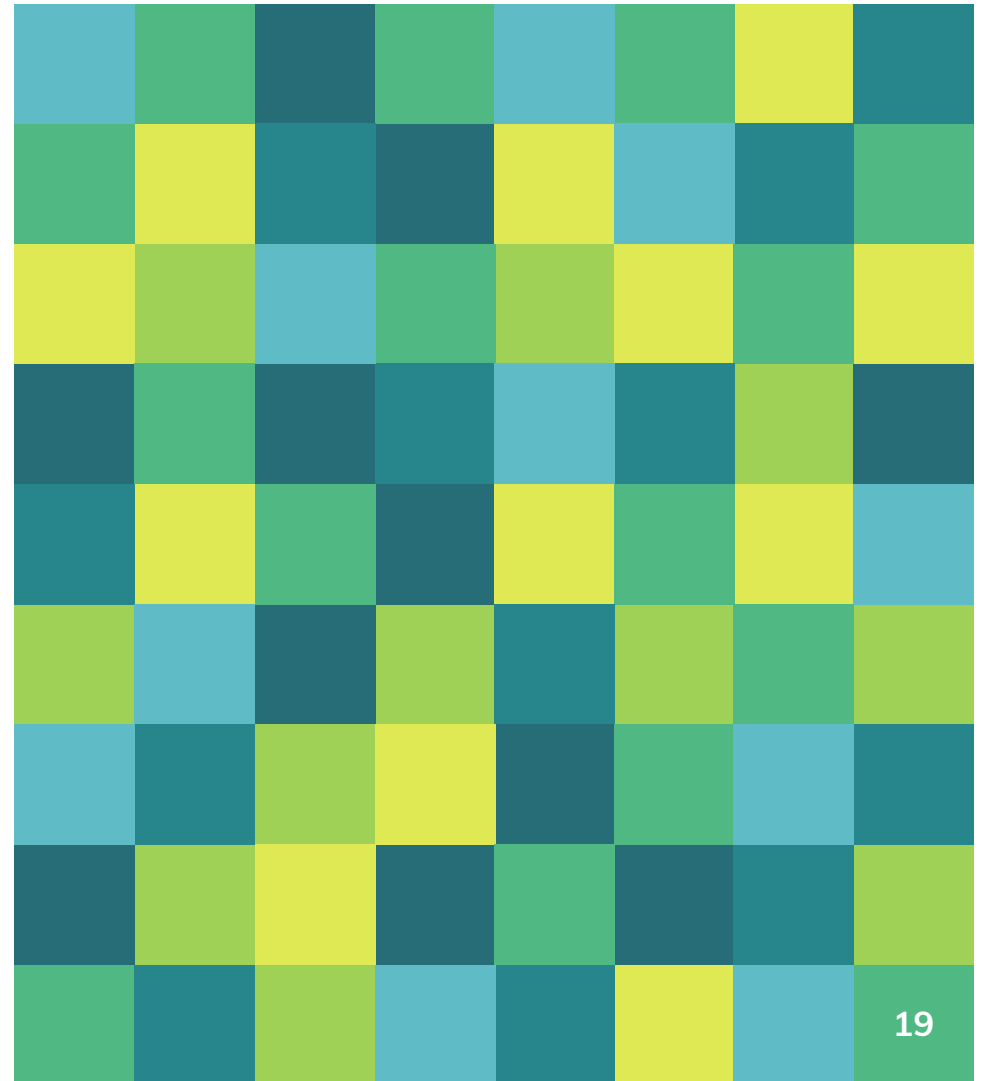
Important because

- immunocompromised individuals, children, and/or elderly are consumers of medical cannabis products
- cannabis edibles may have a delayed effect
- Product may contain inappropriate or unintended levels of CBD or THC



# Cannabis Edible Recalls

- Dixie Elixirs & Edibles
- Growing Kitchen
- Home Baked



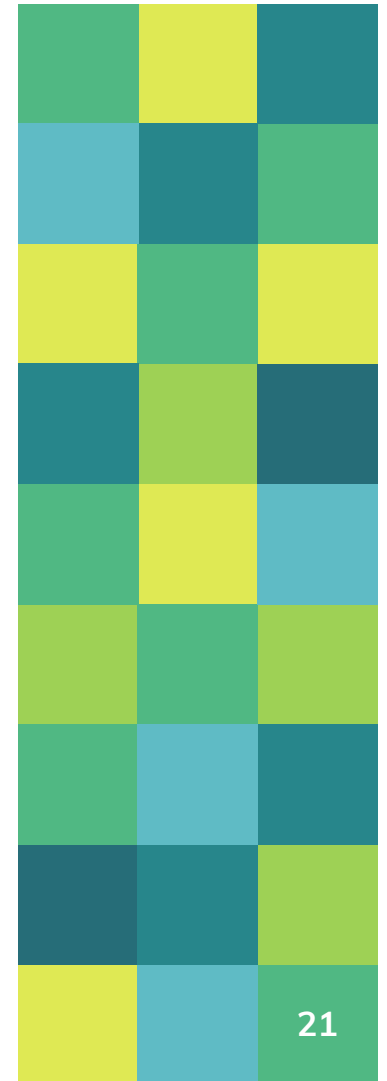
## Cannabis Recall

- 2019 Michigan Recall of 50lbs of medical marijuana
- Due to the detection of chemical residues, e. coli, arsenic, and salmonella.



# Food Safety Concerns

- Mycotoxins
- Pesticide Use
- Chemical Residues
- Contamination from Water or Pests
- Contamination from Employees
- Allergens
- Packaging
- Testing



# Mycotoxins

- Aflatoxins
- Ochratoxins



# Pesticides

- Many of these compounds are the same used by commercial growers of fruits, grains and vegetables. Some are not even labeled for use on food crops.
- The approved list of pesticides vary by state and are constantly changing with the regulation.



# Chemical Residues

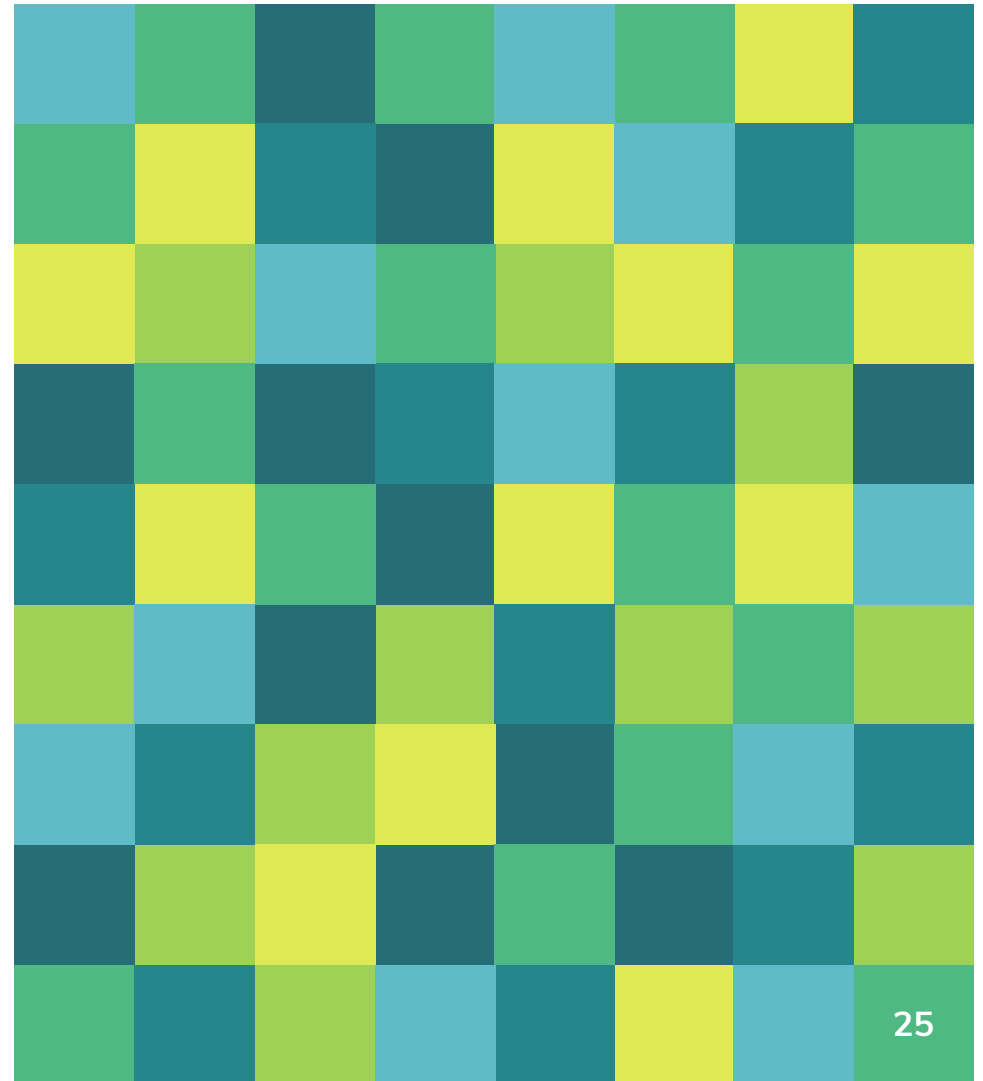
- Overuse or improper use of chemicals
- Exceeds the limit on pesticide or chemical residues





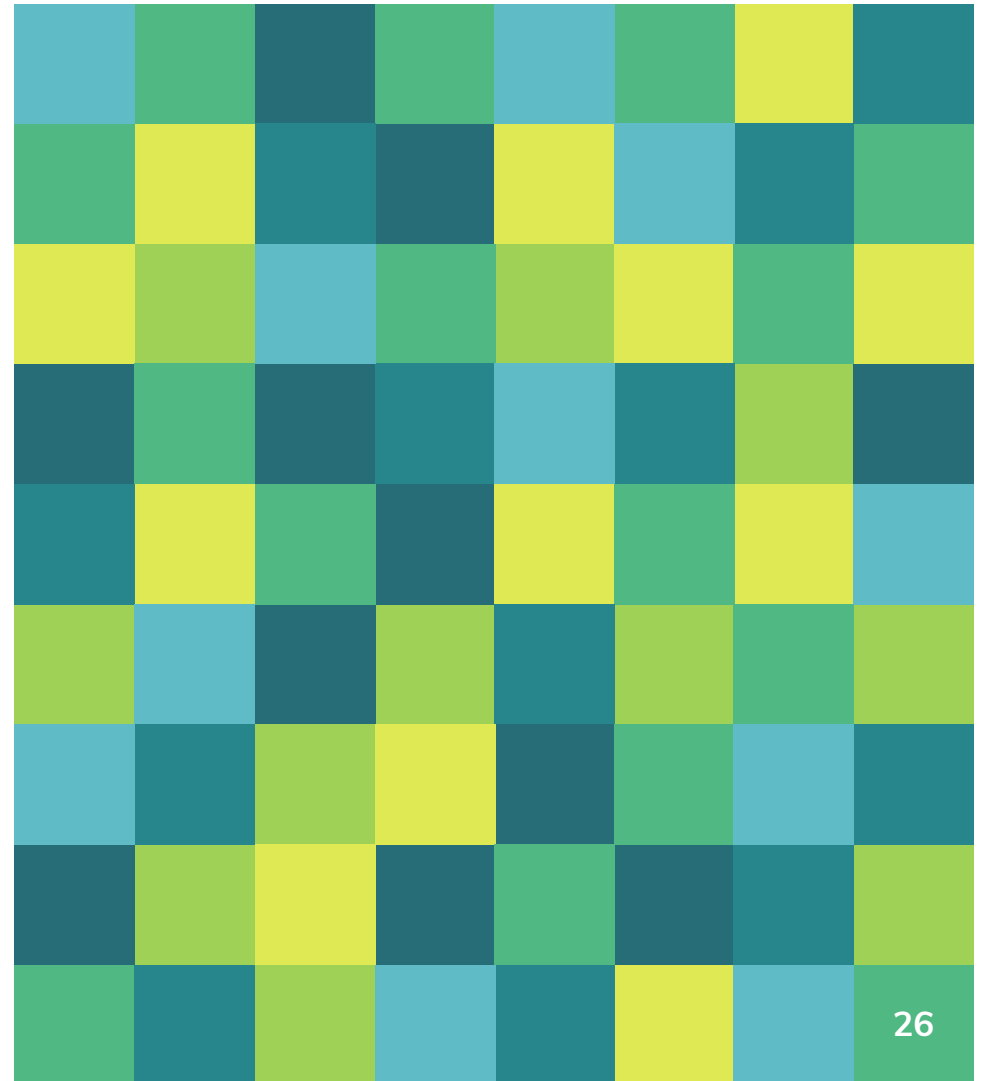
# Contamination from Water or Pests

- Water contamination
- Disease spread by pests



# Contamination from People

- Cross-contamination
- Hygiene procedures
- Training
- Equipment/tools sanitation



# Allergens

## Food Allergens include

- Milk
- Egg
- Fish
- Shellfish
- Tree nuts
- Peanuts
- Wheat
- soybeans



# Cannabis Packaging

- Adherence to current Cannabis packaging requirements
- Type of packaging used
- Proper packaging storage
- Proper labeling



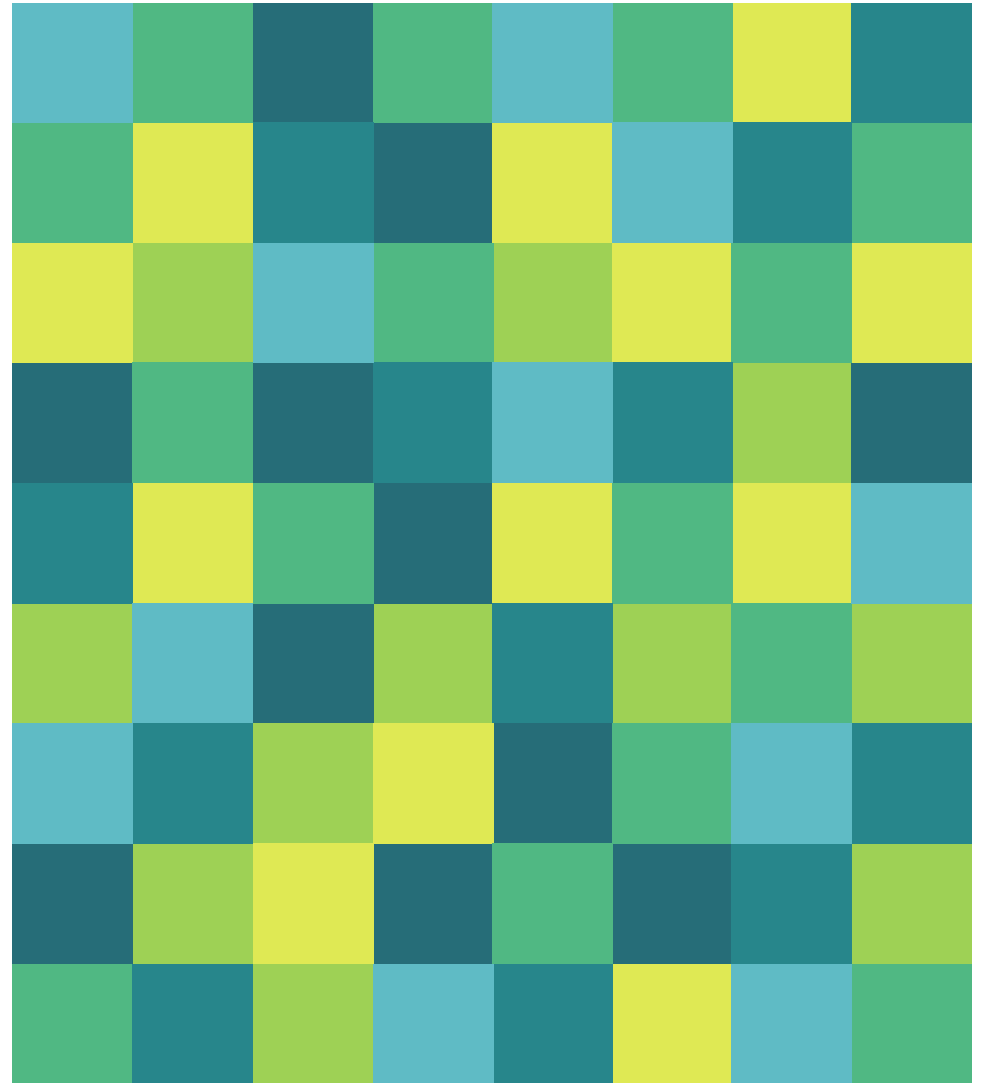
# Importance of Testing

- Testing for potency, chemical residues, pesticides, microbiological pathogens
- Use of 17025 Accredited Labs



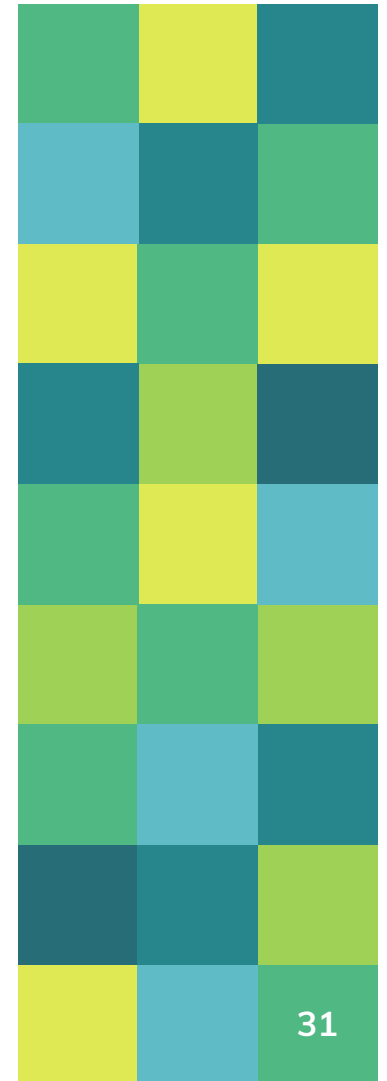
# 2.

## Cannabis Audits



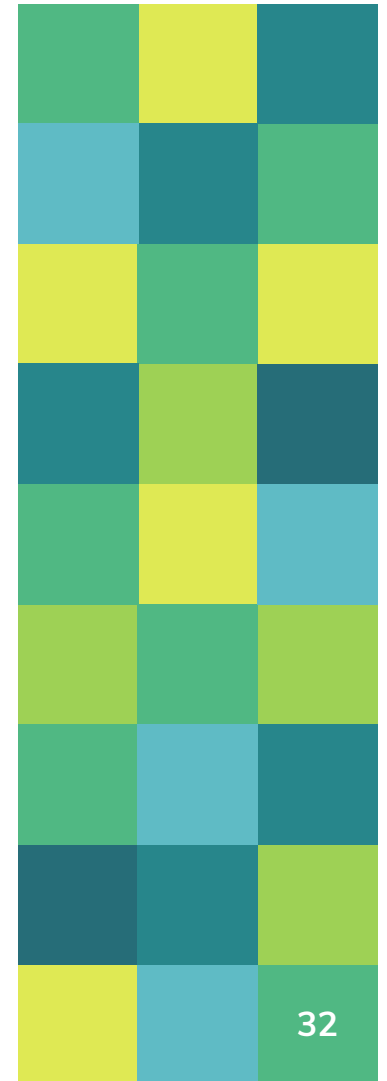
## Types of Food Safety Audits

- Cannabis Good Manufacturing Practices (GMP)
- Good Agricultural Practices (GAP)
- HACCP/GMP
- GFSI Benchmarked Food Safety Audits



## Cannabis GAP

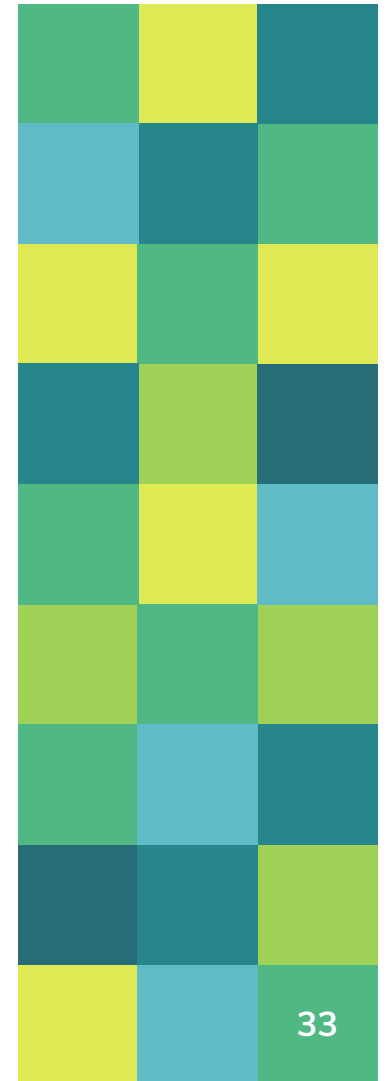
- Applicable to Marijuana or Hemp Grow Operations
- Based on USDA's Good Agriculture Practices
- State specific growing requirements





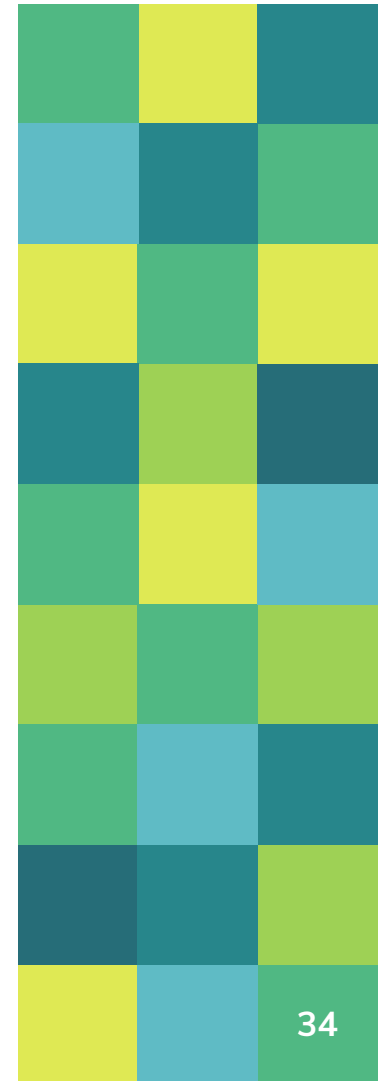
# Cannabis GMP

- Applicable for Cannabis product manufacturers
- Based off of Federal Government 21 CFR 117 Subpart B Good Manufacturing Practice
- State specific requirements



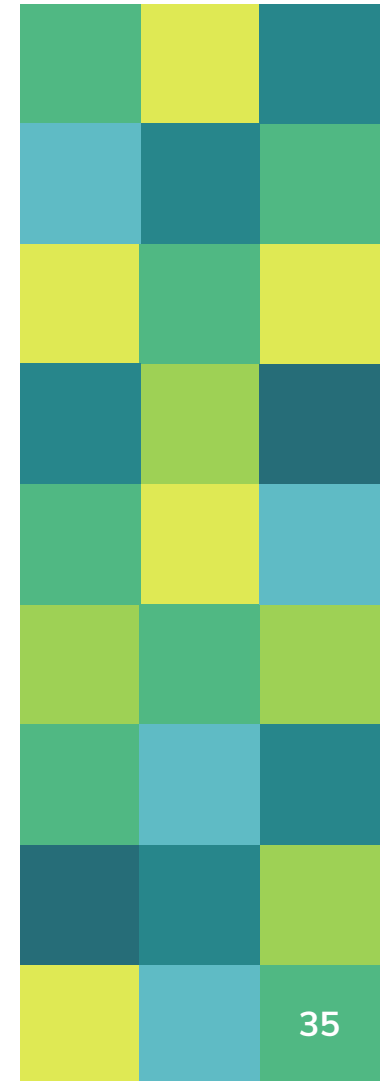
## Cannabis GMP/HACCP

- Includes GMP 21 CFR 117 Subpart B
- Includes Hazard Analysis and Critical Control Point (HACCP)
- State specific requirements



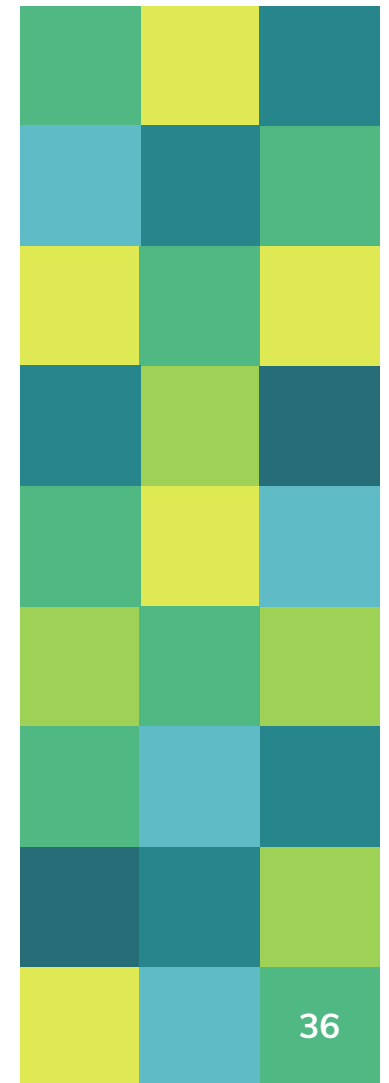
## GFSI and Cannabis

- SQF allows audits for cannabis edibles for Canada only
- BRC allows cannabis products as long as they are food products (no smokable or topical products)
- FSSC and GLOBALG.A.P. does not recognize Cannabis products in scope.



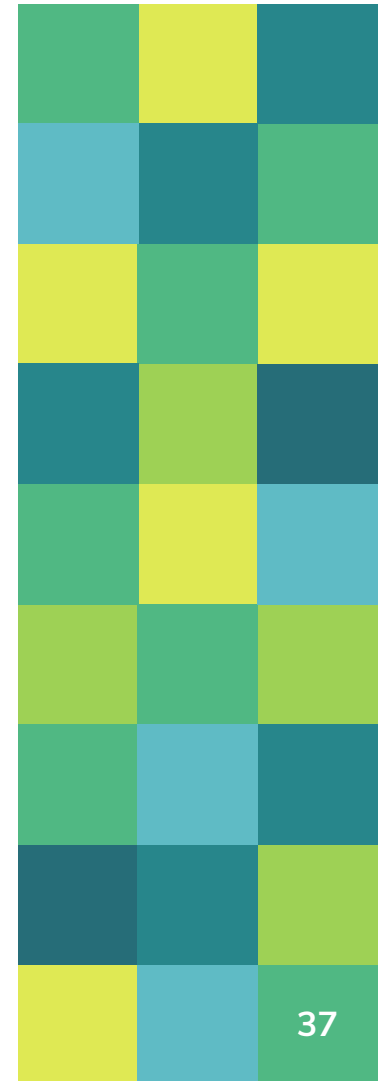
## Steps to Certification

- Fill out client questionnaire
- PJRFSI generates contract
- Schedule the audit
- Audits typically last 1.5-2.0 days onsite
- After the audit submit corrective action for any non-conformities found within 30 days
- Certificate issued for 1 year



## Benefits of Certification

- Promote your products with an added layer of confidence that you are producing safe food
- Gain public and shareholder trust
- Reduce recalls and save money



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# Thank you!

## Any questions?

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