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Medical Marijuana Safety and Education

Task Force Work Group
March 31, 2017

Department of Health and Human
Services
Division of Public and Behavioral
Health
Medical Marijuana Program



Inspections

- NAC 453A.320
 - Will not issue a medical marijuana establishment registration certificate until the Division completes an inspection
 - Will not issue a medical marijuana establishment registration certificate until it has received a satisfactory report of full compliance with all applicable public safety inspections required by state and local jurisdictions, including, without limitation, fire, building, health and air quality inspections
- NAC 453A.322
 - Complete inspections and investigations as needed with or without notice



Hygiene

- NAC 453A.554-560 and 604
 - Agents must practice good hygiene:
 - Washing hands
 - Wearing gloves
 - Wearing clean clothing
 - Not working when sick with a contagious illness
 - limit bare hand contact with the plants and avoid bare hand contact with finished product



Construction

- NAC 453A.606 - 618
- Floors walls and ceilings must be constructed of smooth, hard surfaces that are easily cleanable
 - Concrete floors sealed to prevent water absorption; mold and yeast
 - Ceiling tiles must be washable
 - No wood products unless properly sealed and are not direct contact surfaces
- Ensure doors sweeps/seals are in good repair to prevent pest access
- Chemicals labeled and stored below and away from product and contact surfaces

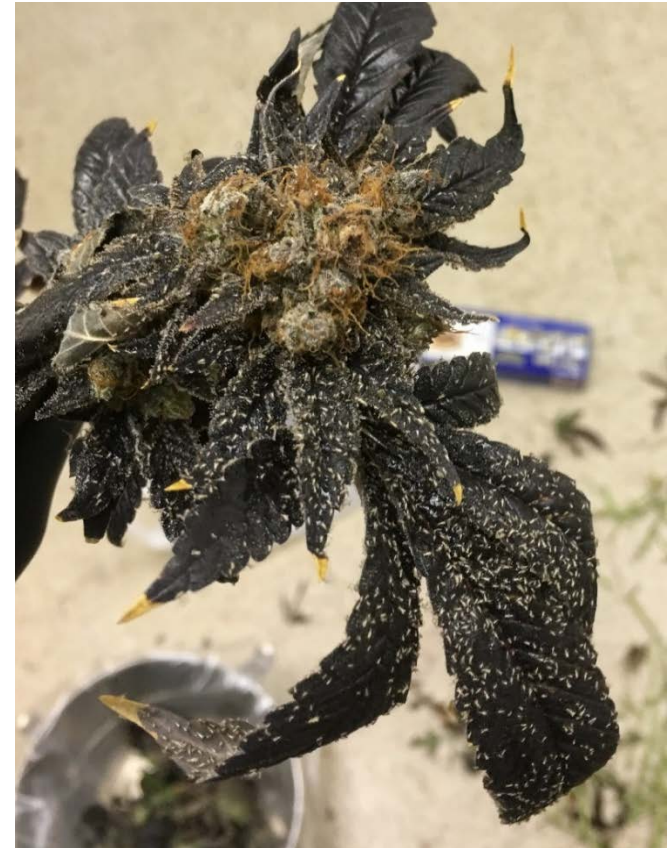
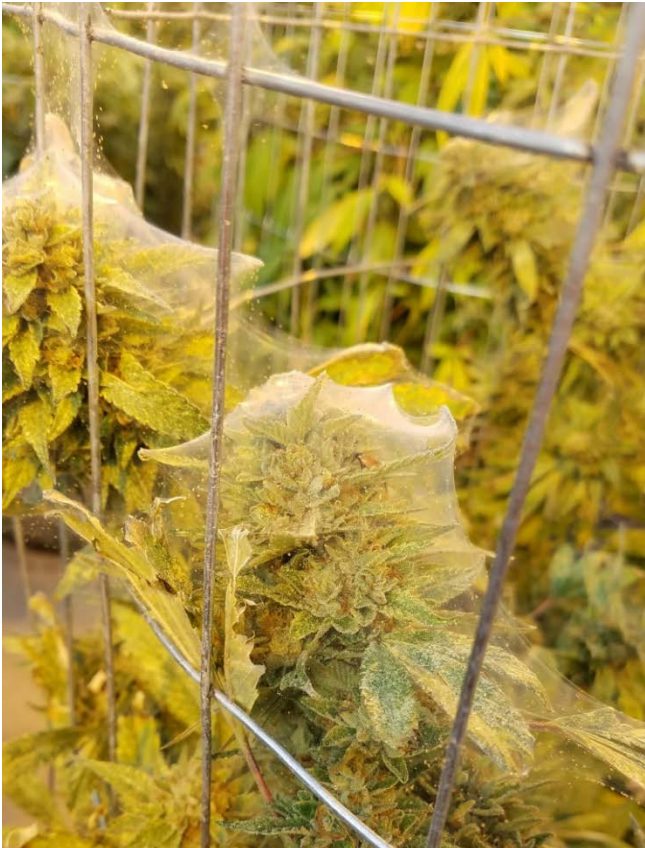


Indoor Cultivation





What are we looking for?





Production

- NAC 453A.592
 - CO₂, Butane, Ethanol, Ice water, Heat



5000-5L Supercritical CO2 Extraction System





Production

- different ingredients and lab equipment





Production

- NAC 453A.566
 - Keep potentially hazardous products 41F or colder
 - Prevent potential contamination or pathogen growth
- NAC 453A.576-584
 - Sanitize contact surfaces/ check concentrations
- NAC 453A.568
 - Label and date all products
- NAC 453A.552
 - At a minimum, the production manager must attend and pass an ANSI accredited food protection manager course



What are we looking for?





Laboratory Testing

- NAC 453A.650-670





When testing occurs

- NAC 453A.404
 - As flower or trim
 - As extract
 - As final product
- Testing must be completed any time the product changes



Laboratory Testing

- Independent testing labs test usable marijuana for
 - Moisture content
 - Potency analysis
 - Terpene analysis
 - Foreign matter inspection
 - **Microbial screening:** Salmonella, E. coli, bile tolerant, total aerobic, **yeast and mold**, coliforms
 - Mycotoxin screening
 - Heavy metal screening
 - Pesticide residue analysis
 - Herbicide screening
 - Growth regulator screening

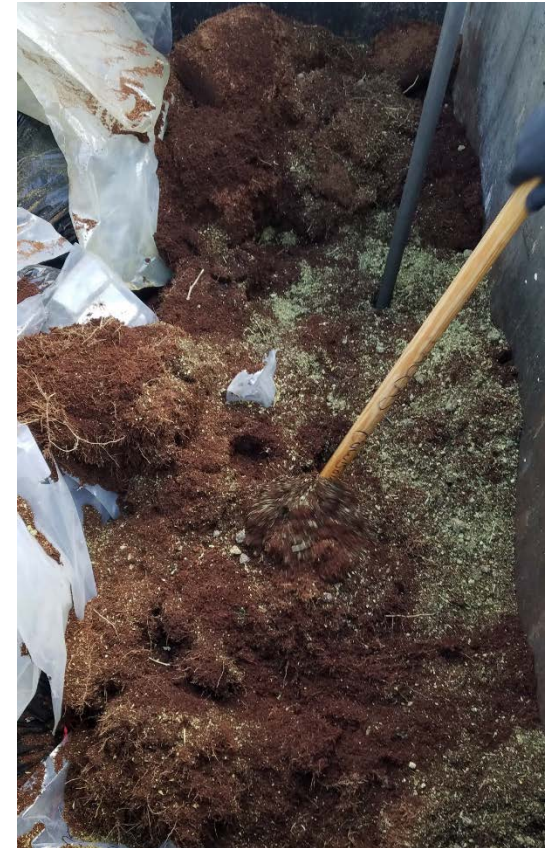


Laboratory Testing

- Independent testing labs test concentrates for
 - Potency analysis
 - Terpene analysis
 - Foreign matter inspection
 - Microbial screening
 - Residual solvent test
- NAC 453A.672
 - Failed lots must be destroyed unless they request re-test or extraction



Destruction





Agent Training

- NAC 453A.336
- **All agents-** facility SOPs, and security measures to prevent diversion, theft or loss
- **Dispensaries** - different strains, methods of use, recognizing signs of abuse or instability by a patient
- **Labs-** GLP, QA, QC
- **Cultivation-** methods of cultivation and fertilization, recognizing insect infestation, pathogens and disease in plants, and the procedures for eradication and the safe disposal of plants, nutritional requirements, procedures for postharvest trimming, drying and curing, and the safe handling of equipment
- **Production-** Understanding the different types of products, and the procedures for safely handling, preparing, producing, packaging and storing products



Packaging/Labeling

- NAC 43A.500
 - Child-resistant packaging
- NRS 453A.360
 - Not appealing to children
- NAC 453A.502
 - Strict control/limited access to materials
- NAC 453A.508-512
 - Label information matches lab results
 - Appropriate warnings on labels



Advertising / Logos

- NAC 453A.708
 - Only promote marijuana through marketing the lab results on the label
 - No pre-printed potency with estimated values
- NAC 453A.402
 - A name, logo, sign or advertisement approved by the Administrator
 - Discreet and professional consistent with pharmacies and medical offices
 - Acceptable: wellness; compassion; health; patient; therapy; garden; nature; cannabis
 - No reference to or perception to being high, fun or recreational in nature
 - Not appeal to minors, contain cartoon-like figures or humor
 - Avoid decorative or gimmicky fonts, max of two fonts and three colors
 - Avoid false claims and slang: cure, bud, pot, weed, joint, doobie, 420



Not Acceptable





Advertising / Logos

- NRS 453A.350
 - Interior/ exterior appearance: professional, orderly, dignified, consistent with pharmacies and medical offices
 - Discreet and professional signage
- Procedure to submit for approval
 - Submit electronic file to medicalmarijuana@health.nv.gov
 - Artwork is reviewed by the Advertising Guidelines Workgroup
 - The Advertising Guidelines Workgroup gives recommendation to approve or deny (with reason)
 - The Administrator makes final decision
 - Appeals are not permitted.



Thank you!



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