*Funding for this statement, publication, press release, etc. was made possible, in part, by the Food and Drug Administration through grant 5U18FD005964-04; views expressed in written materials or publications and by speakers and moderators do not necessarily reflect the official policies of the Department of Health and Human Services; nor does any mention of trade names, commercial practices, or organization imply endorsement by the United States Government.
IFPTI Fellowship Cohort VIII: Research Presentation

Laura Wildey, CP-FS
Challenges and Various Practices Associated with the Implementation and Enforcement of Cannabis-Infused Food Product Regulations

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Background

10 states allow sale of recreational edibles to the general public

Cannabis is considered a Schedule I controlled substance. No federal guidelines or recommendations exist from which states can build their regulatory framework.

In the absence of a federal framework, states have developed unique regulatory requirements.
Background

Decriminalized Adult Use
Background

• General concerns with edibles
  – Inadvertent marketing to children and adolescents
  – Misleading or inadequate labeling
  – Serving size and dosage
  – Potency inconsistencies

Warning labels found on edibles in various jurisdictions across the United States
Background

- Edibles regulations often include:
  - Serving size and homogeneity
  - Labeling and packaging
  - Transportation and distribution
  - Storage
  - Tracking
  - Collection and testing
  - Waste disposal
  - Education and training
Problem Statement

Multiple states have allowed the sale of cannabis-infused food products for several years, however challenges associated with regulation of those products are relatively unknown.
Research Questions

1. What are the most frequent food safety violations amongst states that have enforced edibles regulations for at least two years?

2. What unique food safety challenges have been identified in the implementation and enforcement of edibles regulations?

3. Are there training requirements for edibles processors and what do they entail?
Methodology

Phase 1

Points of Contact

• Determined Points of Contact
  – AFDO Cannabis Committee
  – Network
  – Internet search
Methodology

**Phase 2**

Interviews and Reports

- Key Informant Interviews
  - Script
    - Pre-tested
  - Qualitative and quantitative
    - Open and closed-ended questions
  - Audio recorded and transcribed
    - Anonymity
Methodology

Phase 3

Compile and Analyze Data

• Analysis of Interview Responses
  – Microsoft Excel for quantitative data
  – Compare and contrast qualitative responses

• Displaying Results
  – Frequent violations
  – Challenges
  – Training requirements
Study Population

- **States**
  - Current regulations for edibles
  - Regulations enforced for at least two years
    - Subject Matter Experts
    - Managers
    - Inspectors
## Results

### Frequent Violations

- Cleaning and sanitizing equipment
- Unlicensed operators
- Lack of appropriate food safety equipment
- Labeling violations
- Hand washing/bare hand contact with ready to eat food
- Record keeping
## Unique Challenges

<table>
<thead>
<tr>
<th>Food or Drug?</th>
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<tbody>
<tr>
<td>Lack of federal oversight (Interstate recalls)</td>
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<tr>
<td>Interagency communication</td>
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<tr>
<td>Inspector training</td>
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<tr>
<td>Operator training in food safety</td>
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<tr>
<td>Equipment sanitization</td>
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<tr>
<td>Laboratory testing consistency</td>
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<td>Edible identification without packaging</td>
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Results

Operator Training

- Certified Food Protection Manager
- Demonstration of Knowledge
- Additional Training
Conclusions

• Food regulations for food products
• Unique equipment
• Plan review and labeling
• Food product limitations
• Accreditation or certification of laboratories
• Food safety education
• Cannabis education
Recommendations

• Food safety training for operators
• Laboratory accreditation/certification
• Cannabis training for Inspectors
• Food safety training for non-food regulatory agencies
• Interagency communication and collaboration
Acknowledgements

• Dr. David Dyjack, NEHA
• Mr. Jesse Bliss, NEHA
• Dr. Sharon Lewis, DC Health
• Jerry Wojtala & Dr. Craig Kaml, IFPTI
• Kathy Fedder, My Mentor, IFPTI
• Joe Corby, Dan Gump and Doug Saunders, IFPTI Mentors
• The Entire IFPTI Team
• My Fellow Fellows
Questions?

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