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**Fellowship in
Food Protection**

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IFPTI Fellowship Cohort VIII: Research Presentation

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Challenges and Various Practices Associated with the Implementation and Enforcement of Cannabis- Infused Food Product Regulations

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IFPTI 2019-2020 Fellow

National Environmental Health Association

Background



10 states allow sale of recreational edibles to the general public



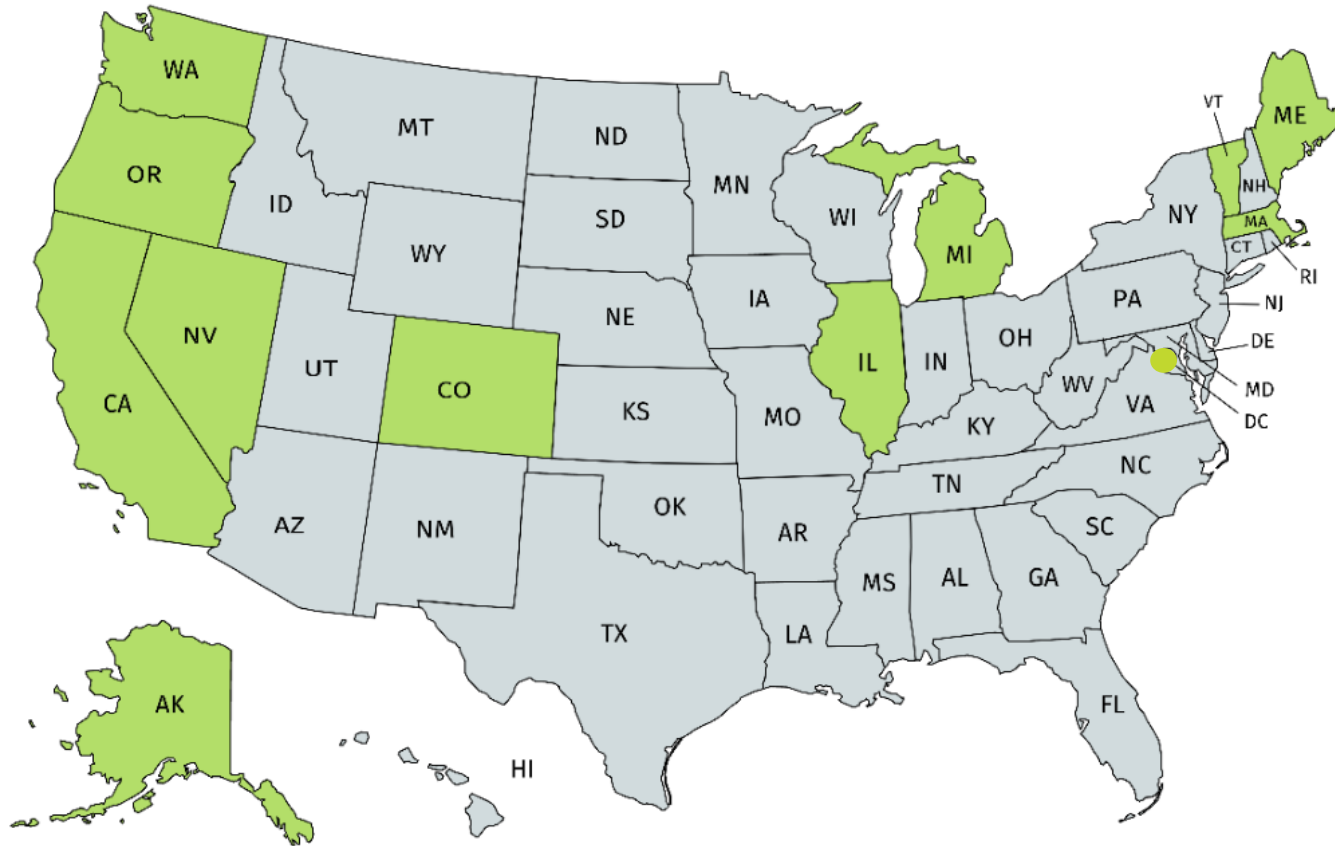
Cannabis is considered a Schedule I controlled substance. No federal guidelines or recommendations exist from which states can build their regulatory framework.



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

Background

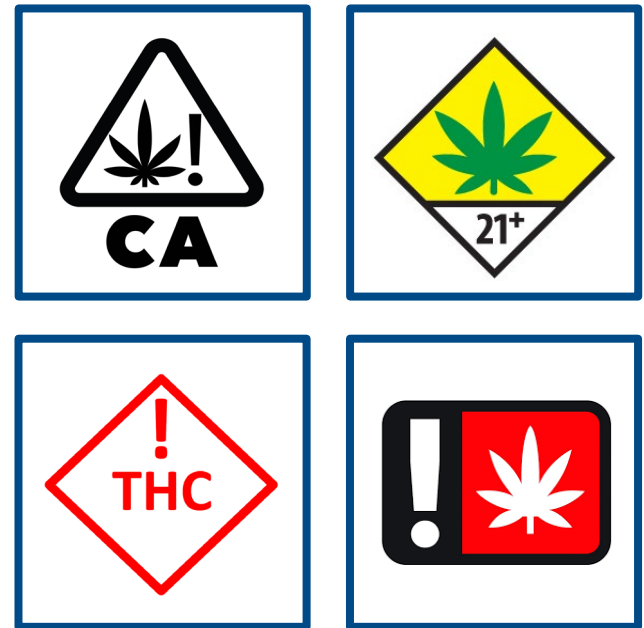
Decriminalized Adult Use



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

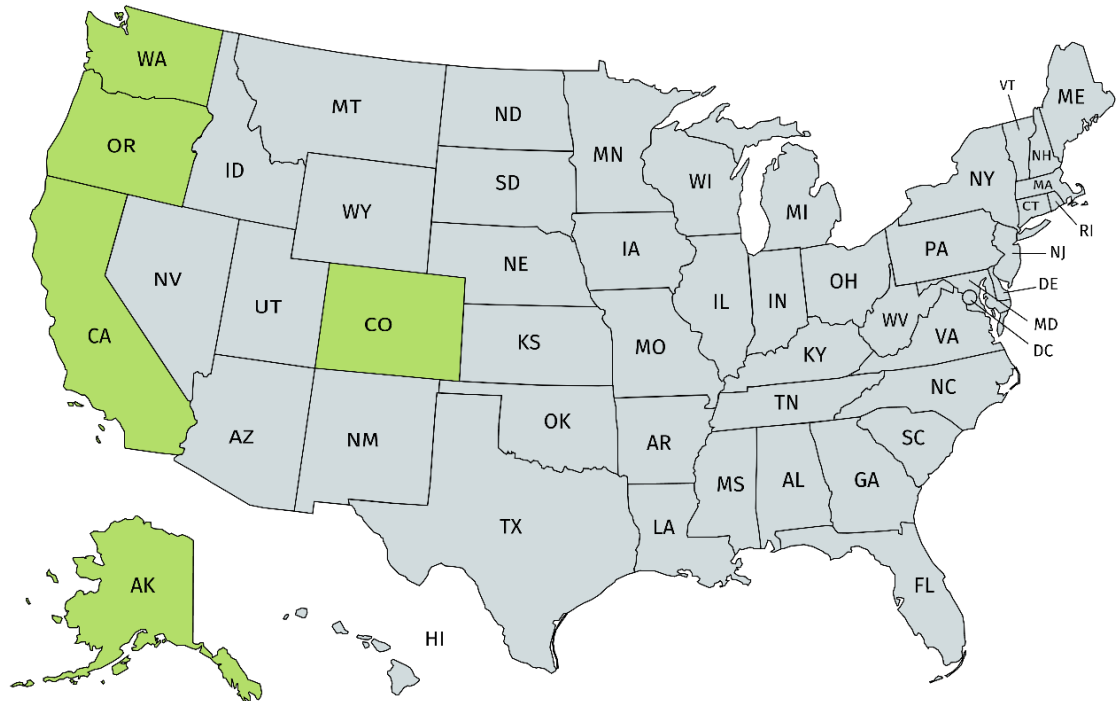
Phase 3

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

Results

Unique Challenges

Food or Drug?

Lack of federal oversight (Interstate recalls)

Interagency communication

Inspector training

Operator training in food safety

Equipment sanitization

Laboratory testing consistency

Edible identification without packaging

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

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Questions?

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