

Operational Requirements/Standards

- Cultivar, Indoor specifics, manufacturers, retailers (including age verification), wholesalers, visitors, integrated security, and adulterated cannabis
- Reviewed operational requirements in multiple jurisdictions, primarily Colorado, Massachusetts, California
- Sustainability Committee informed cultivation/farm plan and disposal
- Met/spoke with VAAFm PHARM/Enforcement, ANR-DEC, NACB/The Cannabis Conservancy, VSS, CCB ED/GC, reviewed public comment, Sub Committee members

Cultivator Specific Operational Requirements

- Cultivation and Operation (Farm) Plan
 - Cultivation schedule/description of cultivation activities
 - Grow medium- soil, hydroponics, coco/perlite, rockwool, others
 - Propagation and initial transplant
 - Mixed-light Cultivation plan and schedule (if applicable)
 - Irrigation plan and schedule (if applicable)
 - Harvesting, Drying, Trimming
 - What are your efficiency practices (energy, water, land use?)
 - Employee Plan
 - Agent in Charge, Lead Cultivator, Assistant Cultivator, Seasonal Laborers (include what is applicable based on scale of operation)
 - Use and storage of regulated products
 - Signal what you are planning to use?
 - Nutrients, pesticides, fungicides located in a locked storage room, locked and labeled containers in accordance with manufactures instructions
 - Integrated Pest Management – how are you going to prepare for the unexpected?
 - Follow VAAFM Pesticide rule
 - Waste Management Plan
 - Product Management
 - Testing plan
 - Plan to control inventory before transport
- Record Keeping
 - Maintain records (what applicators did you in fact use? In case of inspection/ something tests hot or positive for something not allowable to use)

Cultivator Specific Operational Requirements

Pesticides

- VAAFM has the authority to regulate pesticide use, training and certification, and licensing and registration for pesticide applicators and dealers, and registers products. It operates a Pesticide Program that fully addresses all aspects of pesticides use including mixing, storage, disposal, worker protection standards, etc.
- Has a list of allowed active ingredients that the CCB should adopt
- Application report/After season report
 - At the time of harvest or at the time transported, indicate what pesticides you have used as part of your operation
 - Part of the manifest?

Standards for Indoor Cultivation

- Propagate, cultivate, harvest, prepare, cure package, store and label Cannabis under their license
 - Can transport to a licensed retailer
 - Cannot transfer to consumer
 - Cannot consume on premises
- Can store inventory on premises- all must be secured in a control area, tracked consistently with inventory tracking rules.
- Only transfer retail cannabis between license holders
 - May provide samples to a testing facility for testing and research purposes- maintain record of sample amounts and testing results
- Subject to inspection of its premises by local fire department, building inspector, or enforcement officer to confirm no health or safety concerns present.
- May provide Vender sample of flower to a manufacturer or retailer
 - Not consumed on any licensed premises
 - Aggregate amount in a calendar month: four grams per strain of flower, no more than seven strains of flower
 - Vender samples designated as such in seed-to-sale and identified as so- labeled VENDOR SAMPLE NOT FOR RESALE
- May provide samples to employees to determine whether to make product available to sell
 - Same rules as above- however, instead labeled QUALITY CONTROL SAMPLE NOT FOR RESALE

Standards for Indoor Cultivation

- Sanitary requirements
 - Reasonable measures to ensure through supervisory operation or medical examination that anyone that has, or appears to have, an illness, open lesion, including boils, sores, or infected wounds, or any other abnormal source of microbial contamination, and a reasonable possibility of contact with retail cannabis shall be excluded from operations until condition is corrected
- Hygienic practices while on duty
 - Maintain adequate personal cleanliness
 - Washing hands thoroughly in an adequate hand washing area(s) before starting work
 - Handwashing facilities and restrooms adequate and convenient
 - Litter/waste properly removed, operating systems for waste maintained so they do not constitute a source of contamination- minimize odor and potential for becoming an attractant, harborage, or breeding place for pests

Visitors to Cultivation Sites

- Visitors allowed, must be escorted at all times by a person facility employee
 - Must have diversion prevention plan in place
 - Unescorted visitors could result in license violation
 - Must be over the age of 21
 - Limit on number of visitors at one time consistent with fire safety plan
- Visitor identification badge issued by license holder
 - Design approved by CCB
 - Visibly displayed at all times
 - Returned on exit
 - Not required for craft outdoor cultivators
- Must be logged in and out and log available to CCB for inspection
- Safety protocol must be established by license holder before allowing visitors
 - On record with the CCB
 - For example: eye protection near horticultural lighting equipment
 - For example: disposable protective shoe covers required and given to increase biosecurity

Adulterated Cannabis

- If adulterated due to willful/intentional use of an application/pesticide
 - Needs to be flagged, recorded and reported by testing facility
 - No redressability, must be destroyed
 - Public health issue
- If adulterated due to no fault of the license holder (drift, etc.)
 - Remediation
 - If simple and official way of remediating it into an oil, allowable
 - Need to work with a licensed manufacturer, needs to be retested
 - If adulteration possess a public health issue, still may need to be destroyed
 - Rendered unrecognizable/unusable as found in waste disposal recommendations

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Standards for Manufacturers

- Shall maintain all records of purchases from any manufacturer or supplier of an ingredient, additive, device, component, part of other materials obtain by the manufacturer. Records made available to CCB on request
- Maintain records of the name and business address of the manufacturer of any cartridge, battery, atomizer coil, hardware or other component in vaporized products. Records made available to CCB on request
- Copy of Certificate of Analysis for each thickening agent, thinning agent or terpene infused or incorporated in production shall be retained by product manufacturer and provided in wholesale transactions/to a retailer
- Policies and procedures for ensuring safety in all processing activities and the related uses of extraction equipment in compliance with Vermont Fire & Building Safety Code
- May provide Vender sample of a cannabis product to a retailer
 - Not consumed on any licensed premises
 - Aggregate amount in a calendar month per vendor: Five grams of concentrate or extract, five hundred milligrams of edibles so long as the sample size of each individual sample size does not exceed five milligrams and satisfies regulatory potency level. Same flower limits apply as cultivators
 - Vender samples designated as such in seed-to-sale and identified as so- labeled VENDOR SAMPLE NOT FOR RESALE
- May provide a sample to employees to determine whether to make product available to sell
 - Same rules as above- however, instead labeled QUALITY CONTROL SAMPLE NOT FOR RESALE

Wholesalers

- Similar feel to indoor cultivation security
 - Security alarms and locks on all perimeter doors and windows
 - Video surveillance with continuous monitoring of storage 'control' area
 - Inventory locked and stored, with seed-to-sale tracking in place
 - System in place to track product and keep separate product from different cultivators
 - How a product can be handled and stored by authorized representatives
 - Define through regulation
 - Certain size safe dependent on quantity, bolted to the ground
 - Storage shall be under conditions that will protect them against physical, chemical, and microbial contamination as well as against deterioration of product or container
 - List of authorized representatives to storage 'control' area on file with CCB
- Oversight/chain of custody the transferring of product and manifest

Retailer Operational Requirements

- Pre-packaged
 - Flower is weighed out and packaged ahead of time
- Deli style sales allowed
 - Flower is weighed out from a clear storage container for each purchase
- If retailer wants to do deli style:
 - Develop SOP addressing all aspects of Deli-Style sales
 - Product reception, product weighing, labeling and repackaging
 - SOP to be approved by CCB
 - Scale and equipment must adhere to VAAFMM's Weights & Measures Program
 - Final product must meet all requirements of pre-packaged material
- May receive vendor samples of flower from a manufacturer or cultivator
 - Not consumed on any licensed premises
 - Aggregate amount in a calendar month: four grams per strain of flower, no more than seven strains of flower
 - Vender samples designated as such in seed-to-sale and identified as so- labeled **VENDOR SAMPLE NOT FOR RESALE**
- May provide samples to employees to determine whether to make product available to sell
 - Same rules as above- however, instead labeled **QUALITY CONTROL SAMPLE NOT FOR RESALE**

Retailer Operational Requirements

- Written Operating Procedures
 - Security measures
 - Employee security policies, including personal safety and crime prevention techniques
 - Description of establishment's hours of operation and after-hours contact info which shall be made available to the CCB or designee, and law enforcement upon request
 - Plan for storage of inventory
 - Description of various strains of cannabis to be cultivated, processed or sold, as applicable and forms in which it will be sold
 - Procedures to ensure accurate recordkeeping, including inventory protocols
 - Quality control plans
 - Emergency procedures, in case of a fire or other emergency
 - How confidential information will be maintained
 - Policy for immediate dismissal of an employee who has diverted or engaged in unsafe practices
 - Retail area needs to be under surveillance and managed by a CLA at all times
- Reasonable effort to limit the number of customers in the retail area at any given time
- Cannabis education materials need to be in retail site where customers are present at all times

Age Verification

- On entry into the Premises
 - Immediately inspect the individual's proof of identification and determine the individual's age.
 - Not admitted unless the retailer has verified that the individual is 21 years of age or older by an individual's proof of identification
 - On point-of-sale by an individual, a Cannabis Licensed Agent (CLA) will inspect the individual's proof of identification and determine the age.
 - Retailer may not acquire or record consumer personal information other than information typically required by a retail transaction, which can include information to determine the consumer's age.
 - May not record or retain any additional personal information from consumer without the consumer's voluntary written permission
 - Retailer shall refuse to sell to any consumer who is unable to produce valid proof of government-issued ID.

Integrated Security

- Will follow all other applicable security requirements already discussed in previous CCB meetings
- An Establishment conducting operations under multiple license types on a single Premise may establish Limited Access Areas for each licensed activity that overlap in shared hallways and access points, provided that operations under each license type are segregated and a Cannabis Licensed Agent has access only to the areas where activities are conducted pursuant to the license under which the Cannabis License Agent is registered