

Packaging Container Sanitation Guidance

July 2024

JAMES PEPPER, CHAIR
JULIE HULBURD, COMMISSIONER
KYLE HARRIS, COMMISSIONER

OLGA FITCH, EXECUTIVE DIRECTOR

Contents

Introduction	3
Package return requirements	3
Pre-rinse/residue examination.....	3
Sanitation process: three compartment sink.....	3
Sanitation process: dishwashers	4
Industrial dishwasher	4
Residential dishwasher	4
Glassware	5



Introduction

Surfaces, instruments, and reusable devices that have direct contact with cannabis or cannabis products in a licensed cannabis establishment must be adequately washed, rinsed, sanitized, and dried. Empty packaging containers returned to a cannabis establishment for cleaning and refilling with Cannabis can be cleaned at the licensed retail establishment, by a licensed Cannabis Wholesaler, or by a third-party with expertise in cleaning and sanitation. Licensed Cannabis Establishments may engage in “loyalty programs” for returned packaging materials and “exchange programs” where a consumer exchanges an empty, approved package container for a different cleaned container.

As a starting point, package containers must be free of visible soil, residue, marks, and damage to packaging/chipped glass. Never refill a used, unclean container without first sanitizing and cleaning. It could present health and safety issues, as well as tracking issues should a quality control issue arise from bulk or prepackaged sales.

Package return requirements

A package container returned to a Cannabis establishment may be refilled at a Cannabis Establishment with Cannabis if the package container is:

- Designed and constructed for reuse and in accordance with CCB Rule 2.2.9 and CCB Rule 2.2.10.
- One that was initially provided by the Cannabis Establishment to the Consumer, either empty or filled with Cannabis by the Cannabis Establishment for the purpose of being returned for reuse.

Pre-rinse/residue examination

Empty any loose debris from the dirty container to trash or compost bin. **PACKAGING CONTAINERS SHOULD NOT BE EMPTIED INTO THE CLEANING WATER AS IT WILL DILUTE THE CLEANING SOLUTIONS.**

Two systems can deliver effective package container cleaning; manual cleaning in a three-tub sink and dedicated industrial washers. Each approach requires specific techniques and a certain degree of discipline.

Sanitation process: three compartment sink

Two-compartment sink is allowed if sanitizing can happen in a standalone tub.

Each package container is subject to the following steps before being refilled with Cannabis:

- (a) Clean sinks and work area prior to starting to remove any prior debris, residue, or chemicals from other cleaning activities or detergents.
- (b) In the first compartment, clean the container in hot water 110°F (43°C) and suitable detergent for cannabis or food contact surfaces (dawn, etc.).
- (c) Scrub the glass with cleaning brushes to remove film, fingerprints, and other residue. Rotate the glass on the brushes to scrub all interior and exterior surface. Be sure to clean the inside bottom of the glass.



- (d) In the second compartment, rinse the package completely in hot water at 110°F (43°C). If time permits, a double dunk is recommended and preferred.
- (e) Sanitize the rinsed glass in a third compartment filled with water and appropriate sanitizer. (If you do not have a three-compartment sink station, sanitizing may be done in a standalone tub).
 - Chemical manual or mechanical operations, including, without limitation, the application of sanitizing chemicals by an immersion method using a solution as specified on the manufacturer's label use instructions that are approved by the Environmental Protection Agency. Typical sanitizers for glassware include 70% isopropyl alcohol, chlorine, quaternary, ammonium or iodophor-based products. Check the label of your sanitizer to make sure it is approved for food contact surfaces. Check detergent, sanitizer, and rinse agent concentrations once each day using kits, or follow the chemical suppliers' recommendations.
 - Let containers sit in sanitizer for 60-90 seconds.
 - i. Alternative (wipes) In lieu of a submersion sanitizing step certain disposable wipes that are approved for food contact surfaces are acceptable.
- (f) Place containers on a self-draining rack or drainboard to dry. Never use any towel or other cloth to wipe containers dry, doing so may re-contaminate newly sanitized containers.

Sanitation process: dishwashers

Both industrial and residential dishwashers can be used under the guidelines that follow, including that the dishwasher is **dedicated to cleaning cannabis packaging only**. Do not subject it to food or dairy product residue.

Industrial dishwasher

- a. Use the correct detergent, sanitizer, and rinse agents in properly metered amounts.
- b. Check detergent, sanitizer, and rinse agent concentrations once each day using kits, or follow the chemical supplier's recommendations.
- c. High-temperature machines designed to operate higher can be used without additional chemical sanitizers.
- d. Maintain the machine to assure good water flow through the system, including free flow through each nozzle and washer arm. Drain and refill the machine multiple times each day to ensure fresh rinse water is available after peak service times.
- e. Regularly service the machine based on the manufacturers or installer's guidelines.
- f. Place containers on a self-draining rack or drainboard to dry. Never use any towel or other cloth to wipe containers dry, doing so may re-contaminate newly sanitized containers.

Residential dishwasher

If using a residential dishwasher that cannot reach a temperature of 160°F (71°C), sanitizing steps must be taken.

- a. Use correct detergent agent in properly metered amounts.
- b. Sanitize the rinsed glass in a third tub filled with water and appropriate sanitizer. (If you do not have a three tub sinks station, sanitizing may be done in a standalone tub).



- a. Chemical manual or mechanical operations, including, without limitation, the application of sanitizing chemicals by an immersion method using a solution as specified on the manufacturer's label use instructions that are approved by the Environmental Protection Agency. Typical sanitizers for glassware include 70% isopropyl alcohol, chlorine, quaternary, ammonium or iodophor-based products. Check the label of your sanitizer to make sure it is approved for food contact surfaces. Check detergent, sanitizer, and rinse agent concentrations once each day using kits, or follow the chemical suppliers' recommendations.
- b. Let containers sit in sanitizer for 60-90 seconds.
 - i. Alternative (wipes) In lieu of a submersion sanitizing step certain disposable wipes that are approved for food contact surfaces are acceptable.
- c. Place containers on a self-draining rack or drainboard to dry. Never use any towel or other cloth to wipe containers dry, doing so may re-contaminate newly sanitized containers.

A cannabis-clean container is also free of foam-killing residues and lingering aromatics such as sanitizers.

Glassware

To keep glassware clean and odor-free after washing/sanitizing:

1. Air-dry the clean glassware. Drying containers with a towel can leave lint and may transmit germs and odors.
2. Dry and store glasses in a stainless-steel wire basket to provide maximum air circulation. Similar deeply corrugated baskets or surfaces also work.
3. Do not dry or store glassware on a towel, rubber drain pad, or other smooth surface, as they can transfer odors to the glass and slow the drying process.

Store glassware in a manner that will prevent contamination of the container, specifically in an area free of odors, smoke, grease, and dust.

