Welcome!

Denver Marijuana Industry Meeting

Hosted by:

Denver Environmental Health
Public Health Inspections Division

Denvergov.org/HealthInspections

9/12/17
Agenda

• Introduction
• PHI overview
• Public health investigations
• Product ingredients
• CBD products derived from hemp
• Enforcement triggers
• Q&A
Denver Environmental Health

5 Divisions with ~200 employees:
- Office of the Medical Examiner
- Denver Animal Protection
- Environmental Quality
- Community Health
- Public Health Inspections
- 2 Sections:
  - Food Safety & Marijuana
  - Healthy Families/Healthy Homes
When do you see us?

- Plan reviews
- License sign off inspections
- Routine inspections, re-inspections
- Complaints
- Investigations

Timeline:
- 2010: Started inspections of MJ food operations
- 2012 & 2013: Complaint investigations only
- 2014 - present: Routine inspections twice per year & contamination investigations as needed
Inspections

- We’ll always announce ourselves, wearing city ID badge
  - Driver’s licenses not required
- Inspection focus on:
  - Foodborne illness risk factors
  - Hazard analysis of processes
  - Robust active managerial controls are key
    - We can help you develop these
Use us as a resource

- Take our basic food safety classes
- Schedule a non-regulatory mock inspection
  - Helps set your facility up for success
- Call us! Email us!
  - Quickest response is phicomments@denvergov.org
Public Health Investigations

How do investigations begin?

- Visible contamination
- Pesticides
- Ingredients
- Equipment
Public Health Investigations

- Pesticides - Still happening!
- PPE
Public Health Investigations

- Microbial and pests
  - We will order microbial testing if visual inspection suggests contamination
  - Med and rec
Public Health Investigations

Why do we care?

- **Pesticides**: unknown health risks; acute vs. chronic
- **Microbials**: known health risks of inhaling mold/mildew = lung infections
- **Pests**: unknown health risks
Product Ingredients

Do you think about the ingredients in your Oreos?!

From FDA’s website:
“Food and color additives are strictly studied, regulated and monitored. Federal regulations require evidence that each substance is safe at its intended level of use before it may be added to foods. Furthermore, all additives are subject to ongoing safety review as scientific understanding and methods of testing continue to improve. Consumers should feel safe about the foods they eat.”
Product Ingredients

Edibles
- All ingredients shall be sourced from approved sources
  - Used as intended
  - We’re asking additional ingredient questions during MIP inspections

Smoking/vaping products
- Added ingredients – health risks?
  - An area that hasn’t been evaluated
  - We’re seeking info
Product Ingredients

Smoking/vaping products – current status

• Requesting ingredient info for rec/med products
  • Show us due diligence was done
• Potential enforcement when no or adverse info about hazards of burning/smoking/vaping ingredient
• We heard you! If ingredients are allowed by FDA in e-cigs, we’d consider them to be acceptable ingredients in comparable rec MJ products.
CBD Products Derived From Hemp

• Booming industry!

• We will investigate non-MJ sources of CBD wherever we encounter them produced or sold in Denver
  • Medical stores & head shops
  • MIPs

• Who is regulating?
CBD Products Derived From Hemp

Approved source evaluations
• DEH’s balanced approach
• CDPHE’s recent involvement
• Current status

Shelf stability evaluations
• Same process as MJ products
• Verifying control measures for *Clostridium botulinum* (*C. bot*) spores
CBD Products Derived from Hemp

Avoid DEH hold orders by vetting suppliers!

• CO manufacturers:
  • Registered and inspected by CDPHE?
    • Yes = approved source
    • If no, do they have a DEH approved source letter? Yes = approved source
    • Shelf stability concerns?

• Outside CO manufacturers:
  • Ask them to provide verification of license and health inspection from their locality’s regulatory agency
  • Shelf stability concerns?
Enforcement

- Administrative citations
- Operating under imminent health hazards
- Closure triggers
- General violation summons
Ask us questions!

Please give us feedback about today’s meeting!

phicomments@denvergov.org