



— Welcome!  
Denver Marijuana Industry Meeting

Hosted by:

Denver Environmental Health  
Public Health Inspections Division  
[Denvergov.org/HealthInspections](http://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](mailto:phicomments@denvergov.org)



# Public Health Investigations

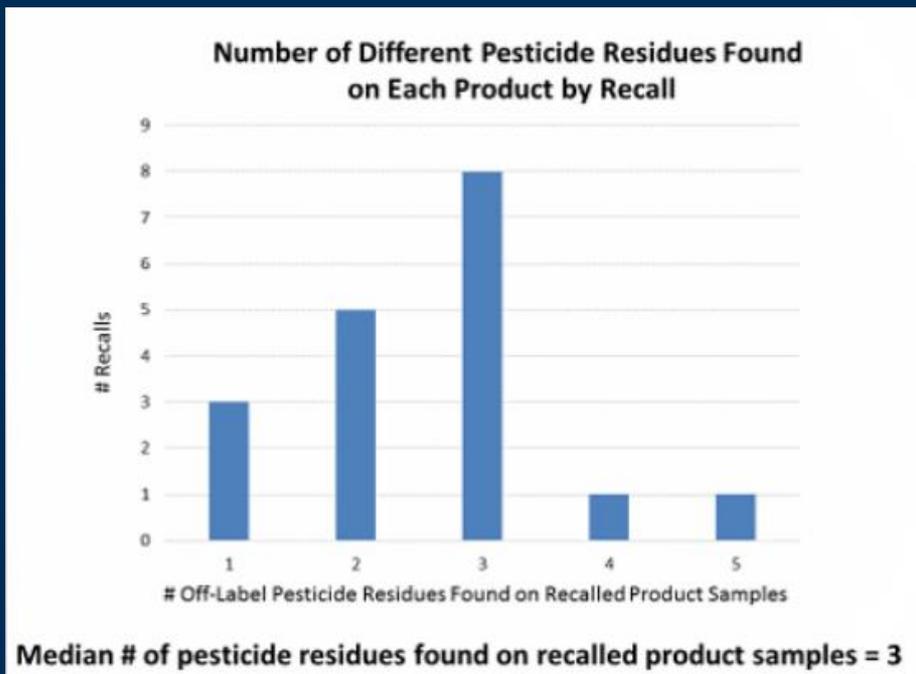
How do investigations begin?

- 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.**"*

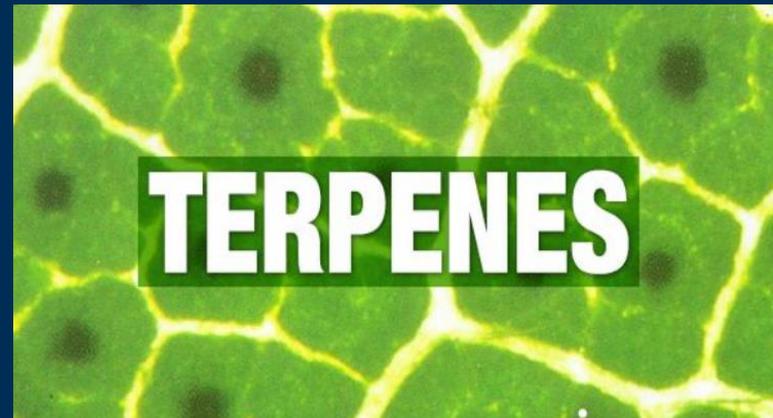
# Product Ingredients

## 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?



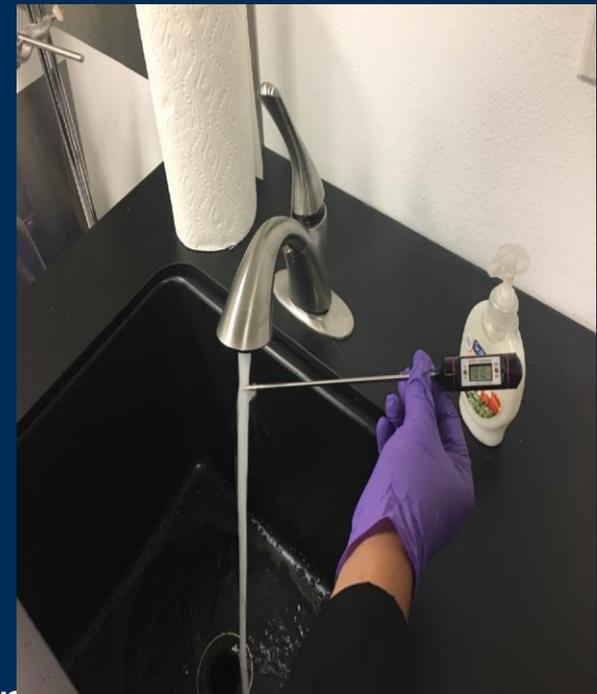
# CBD Products Derived From Hemp

## 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

**PUBLIC NOTICE OF  
ORDER TO CLOSE**

Department of Environmental Health - Division of Public Health Inspections  
200 W. 14<sup>th</sup> Avenue, Suite 200, Denver, CO 80204  
Phone 720-913-1311 phcomments@denvergov.org

The Manager of the Denver Department of Environmental Health, Division of Public Health Inspections, of the City and County of Denver has ordered this establishment \_\_\_\_\_ located at \_\_\_\_\_

**CLOSED DUE TO IMMINENT PUBLIC HEALTH RISK**

This facility was partially/fully closed due to \_\_\_\_\_ which is in violation of section(s) \_\_\_\_\_ of Chapter 23 of the Denver Revised Municipal Code on \_\_\_/\_\_\_/\_\_\_ at \_\_\_:\_\_\_AM/PM.

This facility was permitted to re-open on \_\_\_/\_\_\_/\_\_\_ at \_\_\_:\_\_\_AM/PM after resolving the imminent public health risk.

For further information please call the Division of Public Health Inspections at (720) 913-1311 or phcomments@denvergov.org. Public record of inspections may be found at [www.denvergov.org/ph](http://www.denvergov.org/ph)

FOR THE MANAGER OF ENVIRONMENTAL HEALTH, DIVISION OF PUBLIC HEALTH INSPECTIONS: \_\_\_\_\_  
Environmental Public Health Investigator

This placard shall remain in place for 15 days and will be removed by a Representative of the Manager of the Dept of Environmental Health on \_\_\_/\_\_\_/\_\_\_

It shall be UNLAWFUL for any person to deface, remove or obscure any placard affixed under the provisions of the Denver Retail Food Establishment Regulations, (Chapter 23 Section 23-204E). If the public notice is moved, removed, defaced, damaged, or obscured from conspicuous view prior to the date stated on the notice by someone other than the Representative of the Manager of the Department of Environmental Health, the establishment must contact the Representative of the Manager immediately so another public notice may be posted. Unauthorized removal or failure to notify the Manager of unauthorized removal may result in additional enforcement action.



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# Ask us questions!

Please give us feedback about today's meeting!

[phicomments@denvergov.org](mailto:phicomments@denvergov.org)

