

Technical Advisory Subcommittee: Edibles, Topicals, and Infused Products

June 24, 2015 Meeting Summary and Recommendations

Committee Attendees: Sally Allsworth, Laura Brannan, William Cyr, Ellyn Ford, David McNicoll, Woody Monte, Aligra Rainy, Daniel Stoops, Laurie Wolf, and Andrew Taylor

Absences: Chris Worsley

Other Attendees: Chris Lyons (RAC Chairperson)

OLCC Staff Representatives: Jamie Dickinson, Carolyn Moreno, Amanda Borup

The edibles, topicals, and infused products technical subcommittee met on June 24, 2015 to discuss security, facility, testing, THC amounts, and serving sizes. The following is a summary of that meeting and the subcommittee's rule recommendations on those topics. For purposes of this and future summaries and recommendations, these phrases are defined as follows:

- ***“Believes”*** or ***“agrees”***: no member of the committee voiced a conflicting opinion or approach.
- ***“Generally agrees”***: some members of the committee voiced a differing sentiment than this prevailing opinion or approach.

1. Security

The subcommittee agrees that all cannabis product on the premises should be kept in a locked area, however, because some cannabis products require refrigeration, the locked area would need to accommodate a refrigeration unit. The subcommittee generally agrees that no security cameras should be required indoors in an edibles kitchen facility due to concerns regarding trade secrets and other intellectual property. However, the subcommittee agrees that outdoor security cameras may be acceptable but should not be cost prohibitive. One committee member suggested that the security camera equipment be locked and stored onsite and that each facility should designate one or two individuals to have access to the audio/video equipment. Another committee member believed that there should be no security requirements because the seed-to-sale system would adequately track all of the inventory.

2. Facility

a. Edibles

The subcommittee believes that kitchens producing edible products should be certified by the Oregon Department of Agriculture. The subcommittee generally agrees that processors should have to provide the OLCC with a description of Standard Operating Procedures (SOPs) but believes that each business should be free to create their own. One committee member suggested that each producer provide specific SOPs that articulate the production process in a way that can be understood and replicated by other processor employees.

The subcommittee agrees that employees working in a kitchen should be required to have a food handler's card.

The subcommittee was split on the issue of whether the OLCC should allow kitchens who do not produce cannabis products to share a facility with a processor of cannabis edibles. A few committee members believed that as long as the shared kitchen met the requisite security and sanitation standards, it would be appropriate to allow shared kitchens.

The subcommittee generally agreed that persons aged 18 years and older should be allowed to work in a kitchen or other facility making cannabis products.

b. Topicals

The subcommittee believes that the standard for a topical facility should be that it be clean, sanitary, and secure. The subcommittee generally agrees that employees making topical products do not need a food handler's card.

3. Testing

The subcommittee believes that testing for edible products should be completed at two stages. First the cannabis ingredients, whether extract, infusion, or plant material, used in the edible product should be tested for solvents, mold, mildew, and THC potency. Second, the final product should be tested for mold, mildew, and THC potency. The subcommittee believes that topical products should only be tested at the final product stage for THC potency. If a product tests positive for pesticides or other unwanted products, the subcommittee members agree that the processors should be allowed to test the product again to confirm that the result was not a false positive before having to destroy the product. The committee members agree that the tests should be performed on a small sample that could be used to create a large scale product.

4. THC Amounts

a. Edibles

The subcommittee generally agrees that that a serving size should contain 10 mg of THC and that the serving sizes be sold in packs of 10, which would equal 100 mg of THC per package. Some committee members suggested that the amount of allowable THC exist in a range, due to a margin of error that could occur.

b. Topicals

The subcommittee generally agrees that topical products should not be treated in the same fashion as edible products because topicals contain less than one percent THC and do not alter the mental status of the user. The subcommittee generally agrees that topical cannabis products that contain less than 1% THC should be allowed to be sold in non-cannabis retail locations. One member strongly believes that topical cannabis products need to be regulated because topical products contain THC that may be absorbed through the skin.

5. Serving Sizes

The committee members strongly recommended that the edibles not be individually wrapped due to the cost as well as the amount of waste that would result. All committee members agreed that the public needs to be educated on the how edible products work and how they can affect the body.