

July 5, 2018

Health and Safety Guidance for Medical Marihuana Facilities

According to state law, a marihuana facility licensed under the Medical Marihuana Facilities Licensing Act (MMFLA) is to provide access to safe sources of marihuana for medical use. The quality and safety of medical marihuana products is not limited to the required safety tests. All facilities where marihuana and marihuana-infused products are stored should maintain good sanitation and hygiene to limit the potential for contamination.

Examples of practices with the potential for contamination:

- Licking marihuana products (i.e., during the creation of pre-rolled marihuana cigarettes).
- Using bare hands to touch marihuana that will be absorbed, ingested or inhaled.
- Using surfaces that have not been properly sanitized to package marihuana products.
- Storing marihuana products on the floor or in open containers.
- Eating, drinking and/or smoking while packaging marihuana products (the MMFLA does not allow for the sale, consumption, or use of alcohol or tobacco products on the premises).
- Touching eyes, nose or mouth prior to touching marihuana.

Examples of good sanitation and hygiene practices:

- An employee working in direct contact with medical marihuana is subject to the standards in *CURRENT GOOD MANUFACTURING PRACTICE IN MANUFACTURING, PACKING, OR HOLDING HUMAN FOOD* (located [here](#))
- Wash hands before handling marihuana products.
- Always wash with soap and water whenever necessary, including but not limited to: before work, after using the restroom and after touching eyes, nose or mouth.
- Ensure employees cover their mouth when they sneeze or cough and wash their hands afterward.
- Contact surfaces, including areas where marihuana is packaged or made into marihuana cigarettes, should be sanitized – adequately treat contact surfaces by a process that is effective in destroying microorganisms, and in substantially reducing numbers of other undesirable microorganisms, but without adversely affecting the product or its safety for the consumer – as frequently as necessary to protect against contamination.
- Minimize disease transmission by not allowing employees with any illness, infection, open lesion, or other source of microbial contamination to come in contact with marihuana products.

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When should I use?

Soap and Water

- Before, during, and after preparing food
- Before eating food
- Before and after caring for someone who is sick
- Before and after treating a cut or wound
- After using the bathroom, changing diapers, or cleaning up a child who has used the bathroom
- After blowing your nose, coughing, or sneezing
- After touching an animal, animal food or treats, animal cages, or animal waste
- After touching garbage
- If your hands are visibly dirty or greasy

Alcohol-Based Hand Sanitizer

- Before and after visiting a friend or a loved one in a hospital or nursing home, unless the person is sick with *Clostridium difficile* (if so, use soap and water to wash hands).
- If soap and water are not available, use an alcohol-based hand sanitizer that contains at least 60% alcohol, and wash with soap and water as soon as you can.

* Do **NOT** use hand sanitizer if your hands are visibly dirty or greasy: for example, after gardening, playing outdoors, or after fishing or camping (unless a handwashing station is not available). Wash your hands with soap and water instead.



How should I use?

Soap and Water

- **Wet** your hands with clean running water (warm or cold) and apply soap.
- **Lather** your hands by rubbing them together with the soap.
- **Scrub** all surfaces of your hands, including the palms, backs, fingers, between your fingers, and under your nails. Keep scrubbing for 20 seconds. Need a timer? Hum the "Happy Birthday" song twice.
- **Rinse** your hands under clean, running water.
- **Dry** your hands using a clean towel or air dry them.

Alcohol-Based Hand Sanitizer

Use an alcohol-based hand sanitizer that contains at least 60% alcohol. Supervise young children when they use hand sanitizer to prevent swallowing alcohol, especially in schools and childcare facilities.

- **Apply.** Put enough product on hands to cover all surfaces.
- **Rub** hands together, until hands feel dry. This should take around 20 seconds.

Note: Do not rinse or wipe off the hand sanitizer before it's dry; it may not work as well against germs.

Source: CDC. For more info, visit: www.cdc.gov/handwashing. Questions can be sent to the BMMR Enforcement Section via email at LARA-BMMR-Enforcement@michigan.gov

This advisory bulletin does not constitute legal advice and is subject to change. Licensees are encouraged to seek legal counsel to ensure their operations comply with the Medical Marijuana Facilities Licensing Act and associated Emergency Rules.