



CALIFORNIA DISTRIBUTION

NON-LABORATORY QUALITY CONTROL PLAN

Developed in Alignment with California Regulations (2020)
Title 16 of the California Code of Regulations, Bureau of Cannabis Control, Division 42 Chapters 1 - 8

Contamination Prevention

To prevent contamination, the entire distribution facility will be compartmentalized and points of ingress or egress will be kept securely closed when not in use. These points of access will be monitored for consistent closure and if continually violated, will be reported to the [Role Title]. Compartmentalization within the facility allows for measurable environmental parameters and focused climate control. These features will prevent cross-contamination while promoting the stability and integrity of interior environments. These measures ensure contamination prevention by limiting the movement of pests and limiting the development of pathogens or biological contaminants. Employees will be prohibited from bringing food or liquid into the areas where cannabis is being packaged, stored, or handled, and must maintain proper hygienic practices including washing hands often and covering hair with a hairnet. [Insert sink information including location(s), number of sinks, and any posted signage]. Clean, disposable, non-latex nitrile gloves will be worn when handling infused cannabis products to prevent exposure to skin and contaminants. While employees are handling cannabis products, production batches will be kept distinctly separate, preventing cross-contamination.

The [Secure Inventory Storage Area(s)] will undergo deep cleaning and maintenance at least once per week, or more frequently if needed. The area will be swept, dusted, and maintained in a neat, orderly condition to ensure that cannabis inventory does not attract insects and other pests, or develop pathogens that would compromise the cleanliness of the facility. Employees will be required to: remove product from storage shelves; dust and wipe down the shelves using an approved sanitizing agent; dust and wipe down ceilings, walls, HVAC equipment, and vents; sweep and clean floors; and replace the container's product and product storage bins as applicable, in chronological order based on the product's production batch or harvest batch date.

With finished goods inventory being contained in final packaging, there is a very low potential for contamination and cross-contamination of those products to occur. Inventory audits every 30 calendar days will provide employees with an opportunity to inspect the facility's inventory for contamination or spoilage. This constant vigilance will ensure that if any cannabis products do become unusable or unsellable, they will be quarantined before compromising the rest of the inventory. Proactivity in working against contamination and spoilage will afford [dba name] the opportunity to protect purchasers from receiving inventory that is adulterated.

Employees will inspect equipment on a [daily] basis to ensure that everything is working properly and there are no potential hazards. Employees will also inspect storage [and packaging] areas on a [weekly] basis so that they may quickly identify any potential structural issues that may arise, such as peeling drywall or visible mold, as well as the presence of pests. To aid in protecting the distribution premises from pests, [dba name] may also regularly employ preventative measures to keep pests out of the facility, such as strategically placed sticky traps.

Should an employee discover the presence of pests, pathogens, or harmful particulates in the facility, they will notify the [Role Title]. The [Role Title] will then ensure that the area in which the problem exists is secured with restricted access, and any cannabis material present in that area is moved to the [Quarantine Area] until the problem is resolved and the area is cleaned and sterilized. If the cannabis material has been contaminated, it will be designated as cannabis waste and stored in a [Cannabis Waste Container] until it is destroyed and disposed of in a manner consistent with [dba name] waste management procedures. The movement or disposal of cannabis material affected by this process will be recorded in the California track-and-trace system, METRC™.

Waste will be collected at the end of each day and placed in [locked, labeled] waste disposal bins. If waste is comprised of cannabis, it will be weighed and reported, prior to being rendered unusable and added to the appropriate cannabis waste bin. Waste collection and management will be supervised and conducted under video surveillance. As with cleaning tasks, employees will be required to wash their hands and lower arms after handling waste or waste management equipment. Known factors that entice pests, such as waste or open and exposed food, will be maintained in designated areas with a conscious effort by employees to restrict the introduction of pests. Cabinets, refrigerators, microwaves, and surfaces within the designated office will be cleaned weekly to prevent food spoilage or pest attraction to exposed food and food waste.

Workstation Configuration and Area Maintenance

Cannabis at all stages will come into contact with various areas and equipment used throughout [dba name] cannabis packaging processes. Product-contact surfaces will be made of nontoxic materials and designed to withstand environmental conditions congruent with their intended use; cleaning compounds and sanitizing agents; and the methodology of cleaning performed.

Cannabis product-contact surfaces will be maintained to protect cannabis products from cross-contact, including the allowance for those surfaces to adequately dry in between cleaning and use. When cleaning is necessary to protect against cross-contact or the introduction of microorganisms, all cannabis product-contact surfaces will be cleaned and sanitized before use and after any interruption during which cannabis product-contact surfaces may have become contaminated. Seams on cannabis product-contact surfaces will be smoothly bonded and maintained to mitigate the accumulation of particles, dirt, and organic matter. To that end, [dba name] minimizes the opportunity for growth of microorganisms and allergen cross-contact.

Each area will be equipped with designated equipment and supplies, allowing employees to work under clear, constant video surveillance, and with ample space to accommodate their necessary tools, utensils, and equipment. Employees will be trained and instructed to maintain order and organization within their work areas, preventing batch cross-contamination.

Cannabis Contact Equipment and General Cleaning

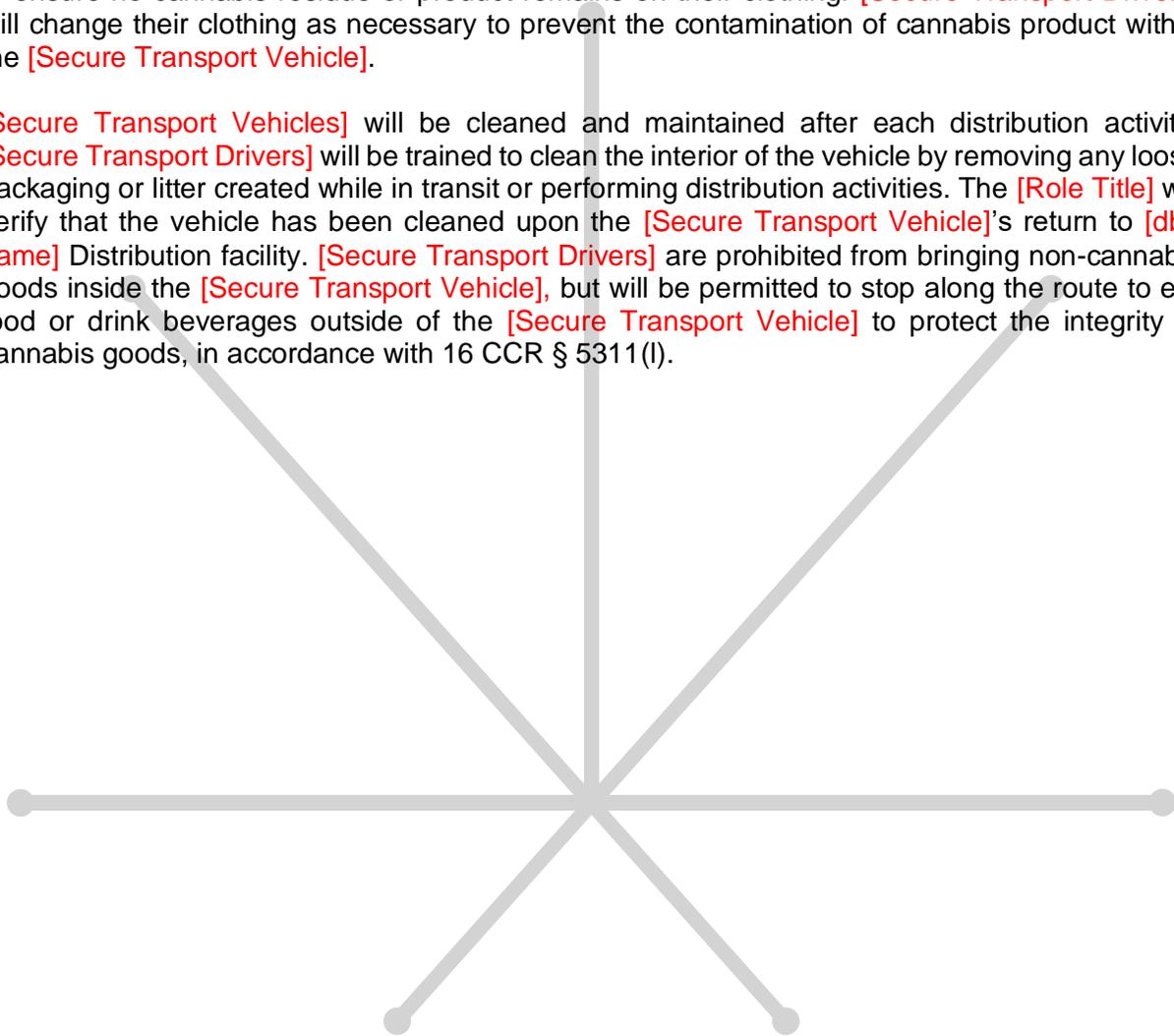
Equipment and utensils used in the labeling, packaging, and storing of cannabis products will be designed of such material and workmanship to be adequately sterilized to prevent contamination. [dba name] will ensure that all utensils and equipment are kept in good working order and will require employees to regularly sanitize all equipment that contacts cannabis in any way. Equipment installation will facilitate the cleaning and maintenance of the equipment and of adjacent spaces to avoid the adulteration of cannabis products. Employees will be tasked with maintaining a sanitary work area by sweeping, dusting, wiping, and sterilizing the production areas as needed, thoroughly sanitizing in between batches of product, and engaging in other cleaning activities as needed. Cleaned and sanitized portable equipment and utensils will be stored in the packaging room.

Vehicle Inspections and Maintenance

Environmental control systems for the [Secure Transport Vehicles] will be inspected and maintained daily and before each distribution activity to ensure a stable environment for cannabis goods while in transit. [Secure Transport Drivers] will maintain and inspect the exterior of the [Secure Transport Vehicle], ensuring there are no points of contamination on the outside of the

vehicle. Employees will check for broken seals on car doors and windows and as well as cracked windows. [Secure Transport Drivers] will check their clothing before leaving the distribution facility to ensure no cannabis residue or product remains on their clothing. [Secure Transport Drivers] will change their clothing as necessary to prevent the contamination of cannabis product within the [Secure Transport Vehicle].

[Secure Transport Vehicles] will be cleaned and maintained after each distribution activity. [Secure Transport Drivers] will be trained to clean the interior of the vehicle by removing any loose packaging or litter created while in transit or performing distribution activities. The [Role Title] will verify that the vehicle has been cleaned upon the [Secure Transport Vehicle]'s return to [dba name] Distribution facility. [Secure Transport Drivers] are prohibited from bringing non-cannabis goods inside the [Secure Transport Vehicle], but will be permitted to stop along the route to eat food or drink beverages outside of the [Secure Transport Vehicle] to protect the integrity of cannabis goods, in accordance with 16 CCR § 5311(l).



POINT 7

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Together we can shape the
cannabis industry for the greater
good. Shoot us an email or give us
a call to start collaborating.

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