

# Glendale Volatile Manufacturing Operations Manual

APN: 516-111-064 APPS: 13319

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- I. PROJECT DESCRIPTION** - The Glendale Cannabis Facility is a seed to sale establishment hosting the following faculties; Distribution, MANUFACTURING, and Processing. This facility will provide many services for licensed local Cannabis Cultivators.
- A. Address: 1691 Glendale Drive  
Blue Lake, CA 95525
- B. The Company will MANUFACTURE both Medicinal Use and Adult Use Cannabis Concentrates.
- C. The Company will engage in Commercial Cannabis Activities involving Manufacturing using Volatile Extractions, Processing, and Packaging.
- D. Onsite Manager Contact Information:  
Name: MICHAEL BROSGART  
Title: OWNER  
Phone #: 202-320-7645
- E. Alternative Contact Information:  
Name: BRITTNEY CROSBY  
Title: AGENT  
Phone #: 904-669-0987
- F. Hours of Operation 7am - 7pm Monday - Saturday
- G. The Number of Employees: 3
- H. Anticipated Gross Annual Revenue from Manufactured Cannabis to be determined once final floor plan is laid out. Company may operate as both a M-Manufacturer and an A-Manufacturer and shall produce individual Anticipated Gross Annual Revenue Reports for each license type.

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**II. County Authorization** - To be inserted here upon Licensure

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## III. SITE

### A. SITE PLAN \* SEE ATTACHED

### B. CONSTRUCTION PLAN NOTES -

- 1. Construction Schedule** - Estimated 8-10 months from breaking ground to construction completion.
- 2. Site Work** - Currently the entire parcel is paved, approximately 76,000 square feet. The proposed projects construction design has an estimated; 28,000 square feet foot print of new building, 22,000 square feet of parking and driveways, and installing an estimated 26,000 square feet of new landscaping. This projects construction will require removal of the existing pavement, Pacific Builders has estimated that amount at 60%.
- 3. Debris Removal** - Pacific Builders will be the General Contractors and they hire Kern Construction of McKinleyville California to remove, deconstruct, and recycle the debris. Cal-Trans acquires this recycled debris and re-uses it locally to build and repair roads.
- 4. Ground Disturbance** - Pacific Builders estimated that the depth of ground disturbance 3' for foundations, 4'-5' for Storm Drains features such as detention basins, 6'-8' for Sewer and Water Connections (one water supply, one sewer line, and one fire suppression line. PG&E trenches are normally 4' deep coming from the transformer into the building.
- 5. HVAC** units will be located in enclosed structures with proper ventilation and located as north west as possible on the site to reduce the noise level for surrounding neighbors and wildlife. System will be designed with Carbon filters to minimize odor released from premises.

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## IV. FACILITY OPERATIONS

### A. Water Source, Storage, Irrigation Plan, & Projected Water Use - Non Diversional

1. *Water Source* is provided via a 6" water main provided by the Glendale Community Services District and a 4" sewer connection to premises.
2. The projected water use is based on three types; (\*See TABLE 1)
  - a) Personnel - usage for restrooms, hand washing sinks, and water fountains
  - b) Sanitation / Janitorial - sanitary stations for cleaning equipment, utensils, and storage/transfer containers
  - c) Manufacturing for VOLATILE Extraction Machines

TABLE 1

<b>ESTIMATED WATER USE APPS# 13319 - VOLATILE MANUFACTURING</b>			
<b>PERSONNEL</b>	3 EMPLOYEES	ESTIMATED 30 GAL/ DAY/EMPLOYEE (X) 6DAYS/WEEK	2,160 GALLONS PER MONTH
<b>SANITATION</b>	JANITORIAL	ESTIMATED 30 GAL / DAY (X) 30 DAYS	1,000 GALLONS PER MONTHS
<b>MANUFACTURING</b>	MACHINES	0 USE FOR OPERATION	0
			<b>3,160 GALLONS PER MONTH ~ AVG LESS THAN 105 GPD</b>

3. Storm Water - The site proposes an estimates 25% of the parcel will be landscaped. The Landscape design reflects designated composting areas, trees, grass to be planted and areas that include storm water capture basins. The Buildings Roofing Design include strategic Gutters and Channels built to disperse rain run off into these planned capture basins that slow down and naturally filter water, Overall improving the condition of the lands as it is currently completely paved.
4. Waste Water - Water collected from floor drains in cleaning areas will be drained to a shared 300 gallon holding tank and tested before going to sewer, being reused or picked up from a 3rd party waste disposal . All other uses, toilets, hand washing sinks, fountains etc. will be drain to waste as directed by the Humboldt Bay Municipal Water District and regulated by the California State Waterboard and the North Coast Regional Water Quality Control Board.

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## **B. Measure Taken to Ensure Protection of Watershed & Habitat**

The Site is not known to be located in any sensitive habitat areas, including the Coastal Zone or stream side management areas. The Sites perimeter will be fully fenced to protect any wildlife from entering. The sites prior use was by a mill for stacking clean lumber.

## **C. Solid Waste Management and Cannabis Disposal Measures**

Solid Waste will be stored in secure containers in a covered area and picked up on a weekly basis by Recology Arcata 555 Vance Ave, Arcata CA 95564.

Cannabis green waste created by the extraction process will already be broken down from the extraction processes and then it will be mixed with brown waste. Before any disposal of cannabis waste, it must be deemed "unusable and unrecognizable" by means of disguise through blending with solid waste, it must also be weighed and labeled with bill of lading with product info, and finally quarantined in a dedicated area on camera for 72 hours. Video Surveillance records will be stored for a minimum of 90 days. Company will provide Department with required information of hauling or collection of Cannabis Waste by local agencies, franchisers, private permitted waste haulers, or self hauling.

## **D. Proper Storage for Pesticide, Fertilizer, Soil Amendments, & Petroleum, Products and Hazardous / Toxic Materials**

All Hazardous / Toxic materials will each in a properly constructed and maintained storage room that will protect personnel and the environment. Any Products or Materials that have been opened will be kept in their original container with labels affixed and then placed in secondary container to prevent spillage or cross contamination. In the event of a spill, area will be isolated, contained, and cleaned up as soon as possible. Applicant will maintain and keep all required warning signs posted, the Material Safety Data Sheets available and kept in storage room, all Emergency Contacts including name, address and telephone number of emergency care facilities, and any personal protective gear required.

See pg. VII Extraction Operation, Section 2: Permissible Extractions, Subsection b.) Volatile Solvent Extractions Policy, part 1.) Volatile Solvents Storage & Procedures

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## V. SECURITY PLAN

### A. Security Plan

The entire property will be monitored with RFID Technology (Radio Frequency Identification) that is integrated with a 24 hour video surveillance system and a security alarm system with automatic law enforcement notification, our inventory tracking system, as well as people tracking via RFID chip in their required identification badge. This technology allows for the owners of Company and other persons privy to monitoring to access all activities occurring on site in real time. Each person, product, and process is tracked and monitored at all times, providing safety, security and accountability to all.

#### 1. Unauthorized Access Prevention Measures

- a) Perimeter - Our site perimeter is completely fenced with 3 Gates. The main Gate Serves as the General Entrance & Exit. The Main Gate will be open during business hours and all first time visitors are required to register at specific premises where business is to be conducted, this includes but isn't limited to our; managers, employees, contractors, sub-contractors, vendors, distributors and the like. There is a secondary Gated Entrance that is accessible only to Authorized Personnel, Transporters and Contractors. Lastly there is an Exit only gate where delivery trucks, personnel etc leave the site.
- b) Construction - The Sites construction of each entry area, material or product storage area and exit areas used by personnel and products are well lit and commercial grade doors and locks are installed both on the interior and exterior. Any entry or exit door in Limited Access Areas are secured with RFID technology and only Authorized Personnel can open by scanning Identification Badge with RFID chip.
- c) Authorized Personnel - All Authorized Personnel, Suppliers and Visitors, upon first time arrival will be required to register with the Facility to receive a Laminated Identification/Access Badge. Access Levels throughout the Premises will vary on persons responsibility to corresponding processes and will be programed into the ID Badge. All Authorized Personnel are required to wear Identification Badge with RFID chip assigned by company at all times while on property and any Contractors or Sub-contractors, vendors or distributors must at minimum wear a visible name tag while in Limited Access Areas. Limited Access Areas are restricted to anyone under the age of 21. All comings and goings of non-employee authorized individuals are logged, maintained, and accessible to licensing authorities. Anyone on site without proper identification and authorization must be escorted out by management



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- d) Security Monitoring Maintenance - Premises must be maintained so that all surveillance has a no obstructed views and that monitoring systems are not interfered with. Regular Inspection and Maintenance shall be performed and recorded.
- e) Suspicious Activity - When there is any reason to suspect suspicious activity, the first step is to document observations and accurate reporting of behaviors. Second, must be submitted in a timely manner to the Supervisors assigned SAR responsibility.

### 2. Theft and Diversion Measures

- a) Inventory & Personnel Tracking - Company's use of Vertically Integrated ERP (Enterprise Resource Planning) Software with RFID technology allows real time monitoring, tracking and reporting of all movements made by cannabis products and personnel on site at all times. The Software contracted will be compatible to integrate with the State Track and Trace Program.
- b) Accessibility to Limited Access Areas - Personnel Access will be limited to the area use required by job duties as well as specifically scheduled time frames for completion of job duties. In order to further prevent cannabis or cannabis product diversion, all personnel are required to store personnel belongings in the Personnel Locker Room. The Locker Room is an area where secured lockers are available to all personnel and accessible during working hours. These areas are denoted on the site plan with an asterisk.
- c) Diversion Risks - The risk of Diversion increases when Cannabis or Cannabis Products are not securely stored, (i.e., Transfers between Facilities) therefore a Supervisor must be present to inspect, document and accompany the product to its next secured holding. Supervisors identification and reports are attached to the Product Inventory Processing.
- d) Securing of Electronic Records - All mechanical components for Electronic Records including the Security Alarm System, Video Surveillance System, Inventory and Personnel Tracking System, etc are Stored in the Electronic Storage Room Secured and designated as a High Level Restricted Access Area.

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## 3. Video Surveillance Measures

- a) System Requirements - The Premises Surveillance System features complete digital video surveillance capable of 24 hour continuous recording at 15 frames per second, providing clear images in all lighting environments at a resolution of 1280x720 . All surveillance recordings are kept for 90 days and display at the current time and date on recorded event.
- b) Remote Access - Licensee will have remote access to Surveillance and can monitor all activities from off-site, strengthening activity tracking.
- c) Interference Prevention - Location installation of Surveillance cameras are out of persons natural reach and reasonable distance for foreign reach, so that if obstruction were attempted, identification of persons or activity will already be recorded. The Surveillance cameras are fully enclosed and protected from tampering or disabling, as all power and control features are Secured either on site in the Electronic Storage Room or Remotely Controlled by Licensee.
- d) Specified Areas Where Cannabis Or Cannabis Product is Weighed, Packed, Stored, Quarantined, Loaded and Unloaded for Transportation Including Preparation and Transfers
  - (1) VOLATILE MANUFACTURING - Building B - Entrance & Exits , In-take / Sign-Out Area, Weighing Station Area, Extraction Booth #1, Extraction Booth #2, Extraction Booth #3, Quarantine Area, and 140 SF of Office Space, Secure Record Storage, Inventory Storage, Supply Storage, Chemical Storage, Unloading Zone, Unloading Dock.

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## VI. PROCESSING PLAN

### A. Processing Facility

#### 1. Location of Volatile Manufacturing Facility

- a) The Volatile Manufacturing Facility is located in Building B on the Site Plan. The Extraction Center is 5,398 sq.ft. and is divided into the following spaces; Entrance & Exits, In-take / Sign-Out Area, Weighing Station Area, Extraction Booth #1 & #2, Extraction Booth #3 & #4, Extraction Booth #5 & #6, Quarantine Area, and 140 SF of Office Space, Secure Record Storage, Inventory Storage, Supply Storage, Chemical Storage, Unloading Zone, Unloading Dock.

#### 2. Estimated Number of Employees

- a) 3 Total in the Volatile Extraction Center

#### 3. Employee Facilities

- a) The Volatile Manufacturing Facility is on city water and has all water processed in the Water Management Center on site.
- b) The facility provides all employees filtered water at water fountains and hand washing sinks, lockers, as well as ADA compliant bathrooms and toilets located in Building C in the Common Areas
- c) These facilities will be constructed and provided as required by local and state laws and regulations.

### B. Hours of Operation - 7am - 7pm Monday - Saturday

\* All deliveries will be made between 8am and 6pm Monday - Friday \*

### C. Expected Daily Trips - AVERAGE 7 DAILY TRIPS

- 1. **\*ALL EMPLOYEES, SUBCONTRACTORS AND DELIVERY DRIVERS AGREE TO USE EXIT 4 GLENDALE DR ON HWY299 . THIS WILL REDUCE TRAFFIC ALONG GLENDALE DR, AS IT IS THE CLOSEST EXIT TO THE SITE**

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## 2. TABLE 2

ESTIMATED DAILY TRIPS - APPS# 13319 - VOLATILE MANUFACTURING			
<b>PERSONNEL</b>	3 EMPLOYEES	ESTIMATED 2.5 TRIPS / DAY/EMPLOYEE (X) 6DAYS/WEEK	180 TRIPS / MONTH
<b>DELIVERIES</b>	AVERAGE DELIVERS PER DAY = 1 (1 DELIVERY = 2 TRIPS)	ESTIMATED 2 TRIPS / DAY/ (X) 5 DAYS/WEEK	40 TRIPS / MONTH
			220 TRIPS / MONTH ~ 7.3 TRIPS PER DAY

### D. Summary of Employee Safety Practices

#### a) Processing Practices

- (1) Clean and Sanitary Work Surfaces and Equipment
- (2) Protocols for Cross Contamination, Mold, and Mildew Growth on Cannabis
- (3) Employees Accessibility to face mask and gloves when handling Cannabis
- (4) Employees Hygiene Clean Hand Practices

#### b) Employee Safety Practices

- (1) Safety Protocols & Employee Safety Training
- (2) An Emergency Action Response Plan and Spill Prevention Protocols
- (3) Employee Accident Reporting and Investigation Policies
- (4) Fire Prevention Policies
- (5) Maintenance of Material Safety Data Sheets (MSDS)
- (6) Materials Handling Policies
- (7) Job Hazard Analyses
- (8) Personal Protective Equipment Policies
- (9) Posted Emergency Contact List
- (10) Operation Manager Contacts
- (11) Emergency Responder Contacts
- (12) Poison Control Contacts
- (13) Employee Accessibility
- (14) Safe Drinking Water
- (15) Toilets
- (16) Hand washing Sinks

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## VII. EXTRACTION OPERATIONS

**1. Extraction Equipment and Machinery Qualifications Policy** - Company has established this policy and procedures for all installation, maintenance, and use of extraction equipment and machinery to ensure safety to all personnel and product. We declare that all Building B will be constructed in accordance with all state and local laws, and that all equipment and machinery will be installed by qualified person. The equipment and machinery used must be validated that it is suitable for its intended use. Any personnel operating the equipment will have had proper training and showed competence in their ability to use, maintenance, validate and reverify. Personnel are responsible for validating all equipment and machinery and documenting all verifications as described below.

### a) Validation Procedures

- (1) Confirm the design specifications, operating procedures, and performance characteristics meet licensees intended use.
- (2) Confirm building and installations are in compliance with design specifications (proper materials, capacity, functions, properly connected and calibrated).
- (3) Confirm performance consistency for all ranges of operation, while maintaining the quality requirements of the licensees standard operating procedures.
- (4) Follow established schedule for routine re-verification

### b) Verification Record Documentation Requirements

- (1) successful verification - dated and signed by person conducting verification
- (2) successful re-verification for any modification made to it, intended use, or standard operating procedure
- (3) log - detailing and documenting the verification and re-verification of all

**2. Permissible Extractions** The Company Volatile Manufacturing Center will conduct NON Flammable Extractions by various methods described in this section. Chemical Extractions using a professional closed loop CO<sub>2</sub> gas extraction system and using volatile solvents and any other method approved by the Department of Public Health. Company will request authorization from the Department for any other method by submitting a detailed description of the extraction including method and safety.

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**a) Closed Loop Extraction System Policy** - Company has established this policy and procedures for the Closed Loop Extraction System to ensure proper use and safety for all personnel and products. All Chemical extractions must be conducted in a closed-loop system that is commercially manufactured and bears a permanently affixed and visible serial number. In addition, any mechanical certifications will be obtained and any structural requirements needed for fire, safety and building codes will be satisfied. All extractions will be conducted in C1D1 Explosion Proof Booths.

**(1)** Closed Loop System, Equipment and Machinery to be used include, but are not limited to the following; \*All Equipment and Machinery that is purchased and installed will have the proper operating procedures to accompany it. \*

**(a)** Active Certified Closed Loop Extractor

**(b)** Recovery Tank / Cylinder

**(c)** Material Column / Cylinder

**(d)** Collection Vessel

**(e)** Dewax Chamber / Cylinder

**(f)** Recovery Pump (vacuum pump)

**(g)** Chillers

**(h)** Heaters

**b) Volatile Solvent Extractions Policy** - Company has established this policy and procedures for our Extraction Operations to ensure compliance under all State Laws and provide a safe facility for both personnel and products. The Facility will be constructed for and approved by the Local Fire Code Official. We declare that all Chemical extractions using volatile solvents will be conducted in a closed loop extraction system and when any hydrocarbon-based solvents are used, they must be at least 99 percent purity. In addition, all extractions or post-extractions conducted using ethanol, must be done using food grade ethanol.

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**(1) Volatile Solvents Storage & Procedures** - All Volatile Solvents must be stored in designated storage room that has been properly constructed and maintained to protect personnel and environment. Volatile Solvents that have been opened will be kept in their original container with labels affixed and then placed in secondary container to prevent spillage or cross contamination. This designated Hazard Chemical Storage room will contain all the required Signs Posted, an on hand and up to date copy of the Material Safety Data Sheets, and a list of Emergency Contacts including name, address and telephone number of emergency care facilities, and any personal protective gear required. The allowable Amounts Stored on site will be dictated by the local Fire Department. Any amount of Hazardous Materials stored on site that exceed the Regulatory Threshold will be reported in a Hazardous Materials Business Plan to the Local CUPA following the guidelines of the "Community Right to Know Act" .

\* Solvents will be delivered and picked up 3 days a week. This will keep the storage levels low to moderate.

- |  |
|--|
| <ul style="list-style-type: none"><li><b>(a)</b> Volatile Solvents Stored<ul style="list-style-type: none"><li><b>i)</b> Butane (150 - 300lbs and 30 - 55 gallons)<ul style="list-style-type: none"><li><b>(1)</b> 1,000 LBS stored outside if allowed</li></ul></li></ul></li><li><b>(b)</b> Non Volatile Solvents Stored<ul style="list-style-type: none"><li><b>i)</b> CO<sub>2</sub> (1,500 LBS gas and 180 gallons liquid)</li><li><b>ii)</b> Ethanol / Isopropyl (55 gal drum)</li></ul></li></ul> |
|--|

**c) Closed Loop Extraction System Policy** - Company has established this policy and procedures for the Closed Loop Extraction System to ensure proper use and safety for all personnel and products. All Chemical extractions must be conducted in a closed-loop system that is commercially manufactured and bears a permanently affixed and visible serial number. In addition, any mechanical certifications will be obtained and any structural requirements needed for fire, safety and building codes will be satisfied.

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## 3. Closed Loop Extraction Process -

- (a) Fresh Cannabis Materials are loaded into the Material Column Capacity. Either Fresh Frozen Live Resin, Buds, or Trim.
- (b) Recovery Tank / Cylinder - This Houses the Solvent either Butane, Propane or a blend of the two and is used to dissolve cannabis oils in the extraction process. The liquid gas is released from the Recovery Tank and travels into the Material Cylinder
- (c) Material Column / Cylinder - This Houses the Cannabis Material. The solvent travels from the Recovery Tank to the Material Column where it dissolves all the useful cannabinoids and terpenes. The Oils, Waxes, Cannabinoids and Terpenes are separated from plant material and are then transferred into the Collection Vessel.
- (d) Collection Vessels - This Houses the Oils, Waxes, Cannabinoids, and Terpenes that have been separated from plant material. Depending on which machine is being used - The materials may run through a secondary Dewax Chamber / Vessel before the solvent evaporation. The Collection Vessel is then either submerged in a warm water bath that aids in the vaporization of the solvent (butane) or the Vessel is jacketed and automatically heated by Co<sub>2</sub>. The solvent flows over a molecular sieve to catch any residual moisture.
- (e) In-Line Dewax Chamber / Cylinder - This Chamber separates the remaining lipids and waxes. The Collection Vessel is then either submerged in a warm water bath that aids in the vaporization of the solvent (butane) or the Vessel is jacketed and automatically heated by Co<sub>2</sub>. The solvent flows over a molecular sieve to catch any residual moisture.
- (f) Recovery Pump - The pneumatic vacuum pump moves the vaporized solvents into the condenser coil which is submerged into an ice bath to re-liquify the solvents or the coil is jacketed and automatically cooled, then the pump returns the liquified solvents to the Recovery Tank / Cylinder.
  - i) This completes the closed loop system. With each run there is less than 5% loss of solvent. If machines are run full capacity for two weeks, the estimated use of butane is 100 lbs. Estimated 45 pounds of material can be processed in 8 hours.



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## VIII. COMPANY TRACK AND TRACE COMPLIANCE

**A. Company Track and Trace System Compliance Policy** - Company maintains strict standards for all operation activities involving cannabis and cannabis products by establishing thorough policies and procedures. Company will use required Track and Trace Software approved and registered by the Bureau and enter all commercial cannabis activity into the database within 24 hours of occurrence. Any misrepresentation or falsifying of database entry into the System is subjects Licensee to Enforcement Action by the Department, regardless of who made the entry. If loss of access to the System occurs at any point in time, Licensee shall maintain detailed records including; the time access was lost and gained, all inventory activities during time of no access and enter them back into System with 3 days of gaining access. Company will not transfer cannabis products to distributor until access is restored and all back information is entered. If operations are in place prior to access of the Track and Trace System Licensee will enter all inventory within 30 days after receipt of UID tags.

### **1. Licensee Responsibilities Include;**

- a) Register for a Track and Trace System Training within 10 days of processed State Application Payment or within 5 days of receiving license approval by the Department.
- b) Order UID tags within 5 days of receiving access to System and recorded within 3 days of receipt into the System.
- c) Assigning at least one owner to be the Track and Trace System Account Manager.
- d) Assuming responsibility of maintaining accurate and complete information entered into Track and Trace System
- e) Assuming responsibility of any actions taken by System Account Manager or User while logged into system and while conducting any commercial cannabis activities.

### **2. Account Manager Responsibilities Include;**

- a) Designating authorized system users who have completed proper training and show competence in ability to use system lawfully and accurately.
- b) Maintaining complete, accurate and up to date list of all system account users and managers.
- c) Ensure that each user of the system has both a username and password and they understand logins are not to be shared or used by another person.

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- d) Cancel any system account manager or users that are no longer representatives of the licensee.
- e) Obtain UID tags from the Department of Food and Agriculture or its designee and always maintain sufficient supply at all times
- f) Ensure that all inventory is tagged and entered into the system as required by law and follow procedures established by Company.
- g) Correct any information entered in error within 3 days of discovery.
- h) Monitor all notifications from the Track and Trace System, identify and resolve all issues before dismissing notification

**B. Company Procedures for Track and Trace Reporting** - Company requires detailed recording of any commercial cannabis activity by a system account manager or authorized personnel. All entries made to Track and Trace Database must be entered by a system account manager or authorized personnel with individual username and password. Any time one of the Commercial Cannabis Activities listed below occur the following procedures must be applied.

**1. Receipt of Cannabis Material Procedures** - When Materials arrive at In-Take from Distribution, System Account Manager or Authorized Personal must accurately enter the following information into the Track and Trace Database before any testing or storing is done.

- a) IN TAKE RECEIPT OF CANNABIS MATERIAL
  - (1) Supplier Name and License Number
  - (2) Distributors Name and License Number
  - (3) Date
  - (4) UID
  - (5) Type of Cannabis Material or Product
  - (6) Weight or Count of Material Product

**2. Transfer Receipt of Cannabis Products Procedures** - When Products are transferred in from other licensed manufactures or out to another licensed manufacture for further processing they must be moved through In-Take, where System Account Manager or Authorized Personnel must accurately enter the following information into the Track and Trace Database before being sent to Distribution.

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- a) IN TAKE TRANSFER RECEIPT OF CANNABIS PRODUCT
  - (1) Supplying Manufacturers Name and License Number
  - (2) Distributors Name and License Number
  - (3) Receiving Manufacturers Name and License Number
  - (4) Date
  - (5) UID
  - (6) Type of Cannabis Material or Product
  - (7) Weight or Count of Material or Product

**3. In-Process Cannabis Product Disposition Recording Procedures** - When Products are In-Process, any changes in the Disposition of the Cannabis Product including but not limited to changes during processing, further processing, and packaging of cannabis or cannabis products, System Account Manager or Authorized Personnel must accurately enter the following information into the Track and Trace Database at the time disposition is deemed complete.

- a) IN PROCESS CANNABIS DISPOSITION CHANGE LOG
  - (1) Product Name
  - (2) Product Description
  - (3) UID
  - (4) Product Disposition Type
  - (5) Date Disposition was made
  - (6) Weight or Count of Material or Product

**4. Finished Cannabis Product Transfers to Distribution Recording Procedures** - Before Finished Cannabis Products are transferred to Distribution, they must be moved through In-Take where System Account Manager or Authorized Personnel must accurately enter the following information into the Track and Trace Database.

- a) IN TAKE TRANSFER TO DISTRIBUTION RECEIPT FOR FINISHED CANNABIS PRODUCTS
  - (1) *Distributors Name and License Number*
  - (2) Date of Transfer
  - (3) UID
  - (4) Type of Cannabis Material or Product transferred
  - (5) Weight or Count of Material Product transferred

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## IX. COMPANY GOOD MANUFACTURING PRACTICES

**A. Company Staff Screening & Hiring Policies** - The Company will comply with all state and federal employment laws including but not limited to; the Californias Fair Employment and Housing Act (CFEH), the Americans with Disability Act (ADA), the California Online Privacy Protection Act (California OPPA), and the California Labor Code, for all in the sourcing, recruiting and hiring of all employees.

- 1. Employment Advertisement Policy** We will only Advertise for employee on platforms that cater to an audience of where at least X% of are over the age of 21. The content of our advertisements will not contain any discriminatory language and not be published in venues that may indicate a preference or limitation based on any protected category. The advertisement will be limited to 600 words describing the position and requirements, explaining specific duties involved, any benefits or intangibles, and a brief appealing description of the company and opportunity presented.
- 2. Employment Hiring Policy** Any persons applying for employment must be at least 21 years of age. After age verification Applicant must complete a company application and pass Criminal Background Check from a third party hired by the Company, as well as participated and complete In-Person Interviews or any other Pre-Employment Testing that may arise from Company.
- 3. Procedures for New Employees** - All Employees of the Company must have a complete file containing each item on the "New Employee Information Checklist" listed below. Authorized Hiring Personnel are responsible for completion of each action listed on the Checklist below.

### a) New Employee Information File Checklist

- (1) Each employee hired by Company must complete all State Employment Forms for tax reporting purposes
- (2) Employee must complete an Emergency Contact Form
- (3) Employee must sign Confidentiality Form
- (4) Employee is assigned and Employment Identification Number
- (5) Employee picture is taken for Employee Identification Badge
- (6) Employee is given a tour of the premises
- (7) Employee is presented with Employee Handbook and signs receipt acknowledgment.

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**B. Company Personnel Standards Policy** - Company has set standards for all Personnel on Site to maintain the health and safety of everyone. These are presented to and accepted by all Employees at time of Hire and they acknowledge that any deviation is subject to immediate termination. The standards are detailed below.

## 1. Illness or Injury Reporting

- a) All Personnel are required to report any illness or open lesion to a supervisor immediately. Supervisor will make a decision to either send employee home, adequately dress the wound if applicable or exclude them from any manufacturing activities that may impose a threat of cross contamination of any cannabis products, contact surfaces or packaging materials.

## 2. Hygienic Practices

- a) All Personnel in direct contact with cannabis products are required to maintain personal hygiene to a level that will protect cannabis products, surface areas or packaging materials.
- b) Employees must wash hands thoroughly before work commences, after work commences, any time they leave work station and anytime hands have become soiled or contaminated. When wearing gloves they must be clean and intact.

## 3. Appropriate Attire

- a) Employees must wear appropriate clothing, remove all unsecured jewelry, remove hand jewelry that cannot be adequately sanitized when manipulating cannabis by hand, and other objects that could fall from body into cannabis products, equipment or containers.
- b) Employees when required must wear appropriate hair nets, headbands, beard covers in an effective manner.

## 4. Personal Belongings

- a) Employees are required to appropriately use designated areas when storing personal belongings, eating food, chewing gum, drinking beverages, and or using tobacco.

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- C. Company Grounds Maintenance Policy** - Company will hire a third party Landscape Contractor to maintain the landscape, exterior of buildings, *parking lots, and driveways on site (including street sweeping)*, as to defer any pests activity or possible contamination in areas where cannabis products are handled or transported.
- 1. Equipment Storage Procedures** - Any equipment used for maintenance of the exterior must be cleaned and stored in designated Storage Room accessible from the exterior of Building. Access to the storage room will be granted by scanning Authorized Personnel Identification Badge.
  - 2. Draining Areas Use Procedures** - Any human activity that requires amounts of water subject to pooling, stagnation, or has a contamination risk if it seeps into ground must be performed in the Designation Draining area. All water naturally occurring on the grounds has proper drainage to sewage.
- D. Company Facility Construction and Design Policy** - Throughout the site Company ensures dedicated areas designed accordingly to store equipment and materials necessary for sanitary operations and production of safe cannabis products. All designs will provide adequate space for movement of people and products. The space between and around all work stations, equipment, or machinery will be substantial for maintaining cleanliness as well as providing enough room for employees to perform duties. Adequate lighting will be installed in all areas where there is cannabis activity as well as hand washing areas, dressing or locker rooms and toilet facilities. Lighting in the areas where components or cannabis products are manufactured, processed, packed and held, plus all areas where equipment or utensils are cleaned will be shatter resistant. Ventilation and control equipment will be installed or used to control dust, odor, and vapors that may prevent or reduce chances of cross contact or contamination of cannabis products, cannabis product packaging materials, and cannabis product contact surfaces.
- E. Company Sanitary Operations Policy** - Company Maintenance Personnel are required to maintain sanitation and cleanliness of the facilities buildings and fixtures. Personnel are required to follow company procedures for cleaning and storing of equipment and utensils. Any toxic chemicals, sanitizing agents, or pesticides that are required for maintaining clean and sanitary conditions, required by equipment for use or maintenance, or used to protect premises from pests, they must be identified, held and stored in means that protect contamination of any cannabis products, cannabis product packaging, and cannabis product contact surfaces. Single Service Utensils such as paper cups, paper towels, or anything else intended for a one time use must be stored,

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handled and disposed of in a way that prevents contamination any cannabis products, cannabis product packaging, and cannabis product contact surfaces.

**F. Company Sanitary Facilities and Control Policy** - Facilities on site will be constructed to support the needs of personnel and production. The water supply will be meet or exceed the needs the operations intended and derived from a proper source. All plumbing installations support a strong flow of water in the quantity needed to the locations requiring water for operations and ensure no cross contamination or back flow between piping systems that carry water in or piping systems that convey sewage and liquid disposable waste from the facility through floor drainages. Toilet and Hand washing Facilities are accessible and kept clean for all usage by Personnel. Rubbish Disposal shall be conveyed, stored and disposed of so as to minimize development of odor, deflect attraction of pests, and protect against cross contamination of any cannabis products, cannabis product packaging, and cannabis product contact surfaces.

**G. Company Equipment and Utensils Policy** - All Equipment and Utensils used in the manufacturing of cannabis products must be designed and installed in such a way that cleaning, maintenance, and use - will not in any way contribute to cross contamination via lubricants, fuel, metal fragments, or contaminated water. Cannabis product contact surfaces must be made from non toxic materials, surface must be smooth, consistent, and non permeable as to prevent any accumulation of particles, thereby reducing the chances for unwanted growth of microorganisms that may contaminate any cannabis products. Any controlled temperature storage compartments are installed with an indicating thermometer, temperature measuring device or a temperature recording device. Any time compressed air or other gases are introduced to a cannabis product or clean its contact surfaces is treated properly as to not contaminate the products.

**H. Company Weights and Measures Policy** - Company only uses Weighing Devices that have been registered with the county sealer and that are approved, tested and sealed in compliance with the requirements in Chapter 5 of Division 5 of the Business and Professions Code. These Devices are required to be used each time cannabis or a cannabis product is; bought or sold by weight or count, packaged for sale by weight or count, weighed or counted for entry into Track and Trace Database. Company will obtain proper weighmaster licensing and certificates to meet requirements in Chapter 7 of Division 5 of the Business and Professions code, for bulk shipments of cannabis or cannabis products.

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## X. COMPANY PRODUCTION AND PROCESS CONTROLS

Company is in compliance with the standards set by the Department of Public Health under Chapter 13 Manufactured Cannabis Safety. The Policies and Procedures set forth are a reflection of the laws enforced and required by all personnel to follow with precision, any deviations are subject to immediate termination.

**A. Quality of Raw Materials and Ingredients Policy** - Company ensures that only top quality raw materials and ingredients are received and used in the manufacturing of cannabis and cannabis products. All Personnel are responsible to follow the procedures established by the Company to maintain safety of employees and produce safe cannabis products for consumers. When necessary Raw Materials that have any traces of soils or contaminants must be washed or cleaned in the designated areas that use filtered water. If Raw Materials have elevated levels of microorganisms that are injurious to public health, they must be pasteurized or treated otherwise to reduce the levels acceptable by the USFDA (United States Food and Drug Administration). In some cases Raw Materials or Ingredients may be susceptible to contamination with aflatoxin or other natural toxins, pests, or extraneous material, before they can be incorporated into finished cannabis products, Personnel must ensure though following company procedures, that these levels are within the acceptable limits set by the USFDA. Any frozen materials or ingredients will be stored in freezers and if thawing required before use, it must be handled in a way prevents spoiling. When allergens are present in any raw materials or ingredients, they must be stored and handled in ways to prevent cross contamination.

**1. Raw Materials and Ingredients In-Take Procedures** - All raw materials and ingredients are received from Distribution at Manufacturing In-Take and must follow the procedures process before being used.

**(1) Complete In-Take Receipt** - Enter in all information from the "IN-TAKE RECEIPT OF CANNABIS MATERIAL" form and enter into Track and Trace Database.

- (a) IN TAKE RECEIPT OF CANNABIS MATERIAL
  - (1) Supplier Name and License Number
  - (2) Distributors Name and License Number
  - (3) Date
  - (4) UID
  - (5) Type of Cannabis Material or Product
  - (6) Weight or Count of Material Product



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(2) Perform Inspection - Personnel are required to visually and physically inspect all materials and ingredients after original receipt In-Take procedures are completed. Detailed Notes are taken on items condition, including, if it needs cleaning, if its quality has be compromised by any damage, or any other information deemed necessary by trained personnel to ensure quality processing. Document all findings of Inspection on "IN-TAKE INSPECTION LOG" supporting acceptance or rejection and enter into Track and Trace Database.

(a) IN-TAKE INSPECTION LOG

- (1) Date of Inspection
- (2) Inspector Name
- (3) Does the shipment manifest match delivered items?
- (4) Is the labeling and packaging correct?
- (5) Are there any obvious signs of compromised quality during transport?
- (6) Accept or Reject Items
- (7) Inspector Notes

(3) Prepare Items for Transfer - Place in containers that protect from deterioration or cross contamination, create and affix label for tracking, then store in secured designated Climate Controlled areas until they are transferred out to appropriate destination.

### B. Standard Requirements of Manufacturing Operation Procedures -

Company ensures that all activities involved in the manufacturing of cannabis products will be preformed under conditions and controls that minimize allergen cross-contact, contamination, deterioration or growth of microorganisms.

**1. Cannabis Product Storage Policy** - All product must be stored in proper containers and held in appropriate temperature controlled areas as to prevent any adulteration of the product during manufacturing, processing, packing and holding. This includes Work-In Process Products as to protect them from cross contact, cross contamination, or growth of undesirable microorganisms.

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- 2. Cannabis Handling Policy** - Personnel are required to follow the Company Procedures with precision when handling unprotected raw materials, ingredients or work-in process products, rejected components and refuse as to not expose Finished Cannabis Products to any cross-contamination, during receiving, storing, transferring, packaging, or shipping activities. Company provides equipment, containers and utensils for these activities at a level constructed to protect products from cross contamination including physical contaminants such as metal or other extraneous material.
  
- 3. Adulterated Products Policy** - Any cannabis products that have been adulterated at any point in the process must either be Disposed of or Reprocessed. Disposal of products are preformed in a way that other Cannabis Products are not exposed to cross contamination. When the product can be Reprocessed it must be done with a proven effective method.
  
- 4. Cannabis Manufacturing Activities Policy**
  - a)** During any washing, peeling, trimming, cutting, sorting, inspecting, mashing, dewatering, cooling, shredding, extruding, whipping, defatting, or forming activities, Personnel must follow the Procedures established by Company to protect cannabis products from cross contamination including contaminants that may drip, drain, or be drawn into cannabis products.
  - b)** For other preparations where heat blanching method is used, product must be brought to required temperature and held there for the appropriate time, and either cooled rapidly or immediately placed into subsequent manufacturing. All Blanchers must be cleaned and sanitized after each use to prevent growth and contamination of thermophilic microorganisms.
  - c)** When processing cannabis products that will be held and used repeatedly, such as batters, breadings, sauces, gravies, dressings, dipping solutions or the like, Personnel is required to follow Procedures established to maintain or treat products in a way that prevents cross contamination and minimizes potential for growth of undesirable microorganisms.
  - d)** Activities including filling, assembling, packaging or related operations will be preformed in accordance with procedures in the designated area to protect any allergen cross contact, cross contamination and growth of undesirable microorganisms.

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- e) Cannabis products that rely on control of water activity for prevention of undesirable growth of microorganisms must be processed at a safe moisture level. Processes including Ice, must use water that is filtered and in accordance with the USFDA.

## C. Company Hazard Analysis Policy

### 1. Standard Requirements to Identify Potential Hazards

- a) Biological, Microbiological
- b) Chemical - Radiological , Pesticides , Additives, Decomposition
- c) Physical - stone, glass, metal fragments, hair or insects

### 2. Standard Requirements for Evaluation of Hazards - Asses level of Severity Hazard imposes, Probability of Occurrence in absence of Preventative Control in the following Activities and Processes

- a) Sanitation Conditions for Manufacturing Premises
- b) Product Formulation
- c) Design, Function, and Conditions of Manufacturing Facility and Equipment
- d) Raw Materials, Ingredients, and other Components used in given Cannabis Product
- e) Product transportation and transfer practices
- f) Manufacturing and Processing Procedures
- g) Packaging and Labeling Activities
- h) Storage of Components and or Finished Product
- i) Intended or foreseeable Use of Finished Product

## D. Company Preventive Controls Policy - Measures implemented by Company to provide assurance to the Department that the Hazards identified are controlled by practices that minimize or prevent any manufactured cannabis product to be adulterated or misbranded. These include

- 1. Critical Control Points
- 2. Critical Limits of Control Points
- 3. Monitoring Procedures
- 4. Corrective Actions to Deviations
  - a) Identify and correct
  - b) Reduce Reoccurrence
  - c) Product Safety Evaluation
  - d) Product Safety Verification Prior to Commerce

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5. Record Keeping Procedures to document H.A and Control Plans, identifying person responsible for each step and the corrective actions taken. These are subject to verification and records review by Department
6. Verification Procedures that demonstrate Control Measures are consistently implemented and effective in minimizing and preventing identified hazards. In addition, showing proper monitoring procedures and represent appropriate decisions are made for corrective action.

**E. Company Equipment and Machinery Qualification Policy** - All equipment and machinery used in the Company Manufacturing Facility must be validated that it is suitable for its intended use. Personnel are responsible for validating all equipment and machinery and documenting all verifications as described below.

## 1. Validation Procedures

- a) Confirm the design specifications, operating procedures, and performance characteristics meet licensees intended use.
- b) Confirm building and installations are in compliance with design specifications (proper materials, capacity, functions, properly connected and calibrated).
- c) Confirm performance consistency for all ranges of operation, while maintaining the quality requirements of the licensees standard operating procedures.
- d) Follow established schedule for routine re-verification

## 2. Verification Record Documentation Requirements

- a) successful verification - dated and signed by person conducting verification
- b) successful re-verification for any modification made to it, intended use, or standard operating procedure
- c) log - detailing and documenting the verification and re-verification of all

**F. Company Master Manufacturing Protocol Policy** - Every Product manufactured must have a Master Manufacturing Protocol to ensure quality control and consistency of each batch size, for uniformity through all batches produced. Company requires that each products Master Manufacturing Protocol identifies points, step, or stages for Products assurance of quality control and proper packaging and labeling and it must include control procedures that ensure batch consistency for each of the Products points, steps or stages identified.

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## 1. Information Requirements for Master Manufacturing Protocol

- (1) Name of Cannabinoid Product.
- (2) Intended Cannabinoid Concentration per serving
- (3) Ingredients Strength per batch
- (4) Ingredients Concentration per batch
- (5) Ingredients Weight or Measure per batch
- (6) List of all components to be used
- (7) Components weight or measures Accurately Stated
- (8) Ingredients Identity and Weight or measure that will be declared on Product Label
- (9) Theoretical Yield expectations for each point, step or stage to reach expected yield of Finished Product, Including minimum and maximum percentages per batch, that would result in requiring a deviation investigation, material review, or disposition decision.
- (10) Description of packaging
- (11) Representative Label or cross reference to actual physical location
- (12) Written Instructions
  - (a) Specifications of each point, step or stage of Product manufacturing to assure quality control and proper packaging and labeling, including specific actions necessary to preform and validate each point, step or stage.
  - (b) Procedures for Product Batch Sampling including a cross - reference for Product Batch Tests or Examinations
  - (c) Special Notations and Precautions
  - (d) Corrective Action Plans for Specifications are not met.
- (13) Each Product Master Manufacturing Protocol may include adjustable amounts or weights of cannabinoid containing ingredients to account for variability of cannabis content in harvest batches.
- (14) Master Manufacturing Protocols can be considered by Licensee a trade secret and is not required by law to disclose information, other than persons manufacturing the product and Department.

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**G. Company Batch Production Records Policy** - Company has established this policy and procedures to ensure the quality at each step of the cannabis products manufactured. Personnel are required to accurately enter all information about the product into our integrated database. For each cannabis product that is manufactured on site, the following information is to be included for each batch manufactured.

1. UID
2. Batch or Lot Number of Finished Product
3. UID of all Products used in Batch
4. Equipment and Processing Lines Used
5. Date and Time Equipment or Processing Lines of the maintenance, cleaning and sanitizing, used in the batch, including cross reference to individual equipment logs, showing that information.
6. Identification Number assigned to each component, packaging and label used in batch.
7. Identity of each Component Used
8. Weight or Measure of each Component Used
9. Statement of Actual Yield
10. Statement of Theoretical Yield Percentages at appropriate phases of processing
11. Actual Results obtained during monitoring
12. Results of any test or exams performed on the batch during production or Cross Reference
13. Documentation, at the time of performance, of the manufacture of the batch
  - a) date each step of the Master Manufacturing Protocol was performed
  - b) initials of Person responsible for performing each of the following steps
    - (1) weighing or measuring of each component
    - (2) verifying weight or measure of each component
    - (3) adding of each component to batch
    - (4) verifying adding each component to batch
14. Documentation, at the time of performance, of the packaging and labeling operations
  - a) actual or representative label or cross reference
  - b) expected number of packaging and labels required
  - c) actual number of packaging and labels used
  - d) Reconciliation of discrepancies between issuance and use
  - e) results of any tests or exams performed on packaging or labeling of cannabis products, including repackaged or relabeled products, or a cross reference to information.

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15. Documentation at time of performance that quality control personnel
  - a) Reviewed batch product
  - b) reviewed required monitoring
  - c) reviewed results of all tests and exams of
    - (1) components
    - (2) in-process materials
    - (3) finished batches
    - (4) packaged and labeled products
    - (5) approved, released, or rejected
16. Documentation at the time of performance, required material review and disposition decision - the batch production record must contain the following;
  - a) actual values and observations obtained during monitoring
  - b) actual values and observations obtained during verification activities
  - c) accurate, indelible, and legible
  - d) created concurrently with performance of activity documented
  - e) detailed history of work performed
    - (1) associated manufacturing facility information
      - (a) name, license number and address
    - (2) Date and Time of activity documented
    - (3) signature or initials of persons performing activities
    - (4) identity of the product
      - (a) UID, lot or batch number

**H. Company Product Complaints Policy** - In the event that a product manufactured by Company receives a complaint, Personnel are required to follow the established procedures in order correct any possible deviations in the processing of said product. Company ensures that a Qualified Person will investigate the product to see if the complaint warrants a failure in the production. If so, then Quality Control Personnel will review and approve the investigational findings and the follow up actions performed, their review process will include all relevant batches and records. For every product complaint Quality Control Personnel must maintain written records for Cannabis Products including;

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## 1. Product Complaint Documentation Requirements

### a) PRODUCT COMPLAINT REPORT

- (1) Name and Batch Description
- (2) Batch Number or UID
- (3) Date Complaint was Received
  - (a) Complainant Name, Address, Telephone Number
- (4) Nature of Complaint - Product Use
- (5) Reply to Complainant
- (6) All Findings of Investigation and Follow Up Actions Performed

**I. Company Product Recall Policy** - For any Products that are deemed misbranded or adulterated, it is company policy for the Department to be notified within 24 hours. Company procedures for Product Recalls include, Determination Factors required to recall a product, Notification Protocols, Quarantine, and Destruction or Waste Disposal Requirements.

### 1. Product Recall Procedures

- a) Determine Factors that necessitate a recall
  - (1) If a product complaint investigation results in findings where the products defect is directly traced to the manufacturing process.
- b) Designate Personnel responsible for implementing recall procedures
- c) Notification Protocols
  - (1) Notification mechanisms (communication and out reach media) to contact customers or licensees that supplied or received the recalled product.
  - (2) Instructions for General Public and Licensees to return or destroy recalled product.

### 2. Product Recall Collection or Destruction Procedures

- a) Collection - Methods implemented by Company to collect recalled products may include but are not limited to; providing a drop off location, providing instructions for a pick up of products, or a mailing address where they could be mailed.
- b) Quarantine - Any products to be destroyed must be placed in quarantine for 72 hours. Any Bills of Landing, Shipping Manifests, or documents including the product information and Weight must be affixed to product. Company will notify the Department and understands all products held in quarantine are subject to audit by the department.



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- c) Destruction - After the 72 hours cannabis product personnel must take measures to make the product "useable and unrecognizable". These actions must be done so on video surveillance. All products intended to be destroyed that contain any chemical, dangerous, or hazardous will be done so in accordance with federal, state, and local laws. Disposal of destructed recalled product must be made in designated secured area with waste receptacle under control of licensee. The following Information regarding the recalled product must be entered into the track and trace database; weight of product, reason for destruction, and date quarantine began. Disposal of cannabis waste must follow the standards outlined in Section (?) of Waste Management in this Manual.

**J. Company Inventory Control Policy** - Company has established an Inventory Control Plan consisting policies and procedures to accurately account for all cannabis and cannabis products including tracking the location and the disposition. Reconciliation of the Systems Database with all on-hand inventory will be preformed by one person and independently verified by a second person at least every 30 days. Company will preform and audit as soon as discrepancies between inventory and database are found and notify Department with in 24 hours of audit reveals more than a 5% discrepancy. Licensee will notify Department immediately if theft or diversion are suspected.

**K. Company Waste Management Policy** - Company has designed and outlined policies and procedures to ensure proper Waste Management practices. Determination of disposal type is made by licensee and disposed of in accordance with requirements of all state and local laws. Any waste that contains cannabis must be disposed of in designated secured area or designated secured waste receptacles under video surveillance and only accessible to authorized personnel. All cannabis products must be rendered unrecognizable and unusable prior to disposal and be entered into the track and trace system. Company will provide Department with required information of hauling or collection of Cannabis Waste by local agencies, franchisers, private permitted waste haulers, or self hauling.

1. Green / Cannabis Waste - Disposal of cannabis that has gone though the extraction process will be mi
2. Hazardous Waste - Disposal of Hazardous Waste will be done in Accordance with Local, State and Federal Law. Facility will obtain a Federal EPA ID Number.

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## a) Cannabis Waste Management Affiliate Information

- (1) Name of Entity Collecting
- (2) Obtain Documentation of Date and Time of waste collections
- (3) Copy of the Certified Weight Ticket or Receipt Confirmation from Waste Facility that is manned and fully permitted
  - i) solid waste landfill or transformation facility
  - ii) composting facility or operation
  - iii) in vessel digestion facility or operation
  - iv) transfer / processing facility or operation

**L. Company Cannabis Products Policy** - Company acknowledges responsibility of manufacturing regulated quality cannabis products that meet the Bureaus requirements. Company will not manufacture any cannabis products outside of parameters (1-3) listed below for production. In the event of Failed Product Batches, Company will comply with the Bureaus Requirements set forth in parameter (4) listed below;

### 1. Prohibited Products are any products

- a) Containing Alcohol
- b) Containing any Non-Cannabinoid Additive that would increase potency, toxicity, or addictive potential. Any Additives that contain nicotine or non naturally occurring caffeine.
- c) Require being held at 41 Degrees Fahrenheit, excluding juices or beverages processed in accordance with regulations set by CDPH and CDFA.
- d) Juices that are not shelf stable
- e) Packed in a hermetically sealed container in a reduced oxygen package that produced a finished equilibrium PH greater than 4.6 and water activity greater than 0.85.
- f) Any Dairy Products prohibited by the Business and Professions Code Section 26001 Subsection (t), Excluding Butter from a licensed milk products plant or retail center infused with Cannabis and sold as a Cannabis Product
- g) Any Meat Products, excluding Dried Meat as prepared in accordance with the CDPH.
- h) Any Seafood Products
- i) Any products deemed by the Department to be attractive to children

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- j) Any products deemed by the Department to be easily confused with commercially available food without cannabis.
- k) Made in the shape of a human being, either realistic or caricature, animal, insect, or fruit.

### **2. Edible Products**

- a) Shall not contain more than ten (10) milligrams of THC per serving
- b) Shall not contain more than one hundred (100) milligrams of THC per package
- c) Shall not contain any ingredient or component that is not approved by the USFDA, with the exception of cannabis, cannabis concentrate, or terpenes.
- d) Any Products that consist of than a single serving size, must be either  
(1) scored, delineated, or otherwise marked to indicate one serving  
(2) packaged so that a single serving is easily identifiable
- e) Containing multiple servings must be homogenized so each serving contains the same concentration of THC, within the variance established by Bureau.

### **3. Topical, Concentrate and Other Products**

- a) Non Edibles shall not contain more than 1,000mg of THC per package for Adult-Use
- b) Non Edibles shall not contain more than 2,000mg of THC per package for Medicinal-Use
- c) Topical products must only contain ingredients permitted for Cosmetic Manufacturing in accordance under Title 21, Code of Federal Regulations.

### **4. Failed Product Batches Procedures**

- a) When a Finished Product fails laboratory testing requirements or quality assurance reviews set forth by the Bureau it is deemed adulterated and may be embargoed.
- b) Failed products must be destroyed unless remediation or reprocessing is approved by Department.
- c) Remediation or Reprocessing of any failed product batches or use of failed harvest batches are required to meet all the requirements and procedures established by the Bureau and the CDPH.
- d) Edible products that have failed laboratory testing shall no be remediated or reprocessed, it must be destroyed.

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- e) When incorrect labeling of THC limits is determined by laboratory testing of a product, a corrective action plan may be submitted to the Department for approval of relabeling.
  
- f) No remediation or reprocessing of a failed product batch or failed harvest batch may begin until after approval by the Department of Corrective Action Plans submitted by Licensee.
- g) Any remediation or reprocessing of failed testing or failed quality assurance reviews for product batches or harvest batches shall be documented in the Manufactures Records..
- h) All remediated product batches and products produced therefrom must pass testing and quality review before retail sale.

**M. Company Labeling and Packaging Policy** - Company acknowledges the requirements needed to Release a finished product to a distributor and has established policies and procedures to comply with State Laws. All labeling must be written in English, unobstructed and conspicuous so consumers can read it, and placed on the outside of container or wrapper of the finished product to be sold at a retailer.

### 1. Primary Panel

- a) PRIMARY PANEL LABELING REQUIREMENTS
  - (1) Identity of Product in text size related to the most prominent printed matter on the panel
  - (2) Universal Symbol
  - (3) Net Weight or Volume
  - (4) THC content and CBD content for entire package expressed in milligrams per package
  - (5) Other Content information can be included as long as it verifiable by certificate of analysis from licensed testing laboratory.
  - (6) Edible Products must be labeled with the words "cannabis-infused" located immediately above identity of product in bold print a text size larger than identity of product.
  - (7) Edible Products must contain THC and CBD content per serving expressed in milligrams.

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## 2. Informational Panel

### a) INFORMATION PANEL LABELING REQUIREMENTS

- (1) Text must be in font point size 6 or larger, any supplemental labeling needed to meet requirements must be in font point size 8 or larger.
- (2) licensed manufacturer, contact number or website address
- (3) manufacturing date of product
- (4) this statement must be included "GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY.
- (5) When product is intended for sale in Medicinal-Use the statement "For Medicinal Use Only" must be on label.
- (6) All ingredients listed in descending order or predominance or weight by volume.
- (7) Any edible products that contains any major food allergens, label must read "contains..." with said allergens stated.
- (8) Edible Products must include the amount in grams, of sodium, sugar, carbohydrates, and total fat per serving.
- (9) Instructions for use, method of application or consumption and any preparation prior to use
- (10) Product expiration Date, "use by" date, or "best buy" date
- (11) UID and batch number if used

## 3. Labeling Restrictions

- a) The labels shall not contain any of the following
  - (1) Misrepresentative claims of products county of origin in the state of California.
  - (2) California County names unless cannabis used in product was grown there.
  - (3) Content or Design that is attractive to children

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- (a) Cartoons
- (b) Similar images, characters, or phrases popular in children advertisements
- (c) Imitation of Candy packaging or labeling
- (d) Terms "candy" or "candies"

- (4) False or misleading information
- (5) Health Related statements that are untrue, misleading, or have unsupported evidence to such claims.

### **4. Statement of Potential Effects**

- a) Statement may be included on the Information Panel if the Manufacturer has substantial information supporting the truth of such potential effects.

### **5. Universal Symbol**

- a) Primary Panel must include the symbol and replicate its form and color
- b) Symbol size must be at minimum, half inch (.5) by half inch (.5)

### **6. Packaging Requirements**

- a) the Package shall
  - (1) protect product from contamination
  - (2) not expose product to toxic or harmful substances
  - (3) have a Tamper-Evident Seal
  - (4) child resistant by satisfying standards of "special packaging" set forth in the Poison Prevention Packaging Act of 1970.
  - (5) not imitate packaging typically marketed to children
  - (6) be opaque for Edible Products
  - (7) For multi serving products, package must be able to be re-sealed and remain child-resistant