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## Bulletin – Safe and Sanitary Requirements for the Processing of Marijuana

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**To:** Licensees (Marijuana Establishments, Medical Marijuana Treatment Centers)  
**From:** Investigations and Enforcement Department  
**Date:** February 2, 2024  
**Subject:** Bulletin – Safe and Sanitary Requirements for the Processing of Marijuana

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This Bulletin applies to licensed Marijuana Establishments and Medical Marijuana Treatment Centers that process Marijuana (collectively the “Licensees”). The Cannabis Control Commission (“Commission”) has received reports regarding the processing of Marijuana in conditions that are unsafe and unsanitary. The Commission has also received reports of inspections and interviews conducted by the Occupational Safety and Health Administration (“OSHA”) at various Licensees’ Premises. The health and safety of Licensees and their agents, Patients, Caregivers, Consumers and the general public is of the utmost important to the Commission. As a result, this Bulletin serves to remind Licensees of their regulatory obligations.

The Commission has promulgated several regulations to set minimum health and safety standards for the processing of Marijuana and the production of Marijuana Products. Pursuant to 935 CMR 500.101(3)(c)3., 935 CMR 501.101(1)(c)14. c., 935 CMR 500.105(1)(r) and 935 CMR 501.105(1)(r), Licensees are responsible for having a safety plan for the manufacture and production of Marijuana Products and written operating policies in line with OSHA standards. Additionally, 935 CMR 500.130(5)(i) and 935 CMR 501.120(13)(f) require Licensees to have written policies for ensuring compliance with the Massachusetts Fire Safety Code when processing Marijuana.

Commission regulations also include safety and sanitation requirements for handling Marijuana. Specifically, 935 CMR 500.105(3)(a) states, in its entirety:

A Marijuana Establishment authorized to Process Marijuana shall do so in a safe and sanitary manner. A Marijuana Establishments shall Process the leaves and flowers of the female Marijuana plant only, which shall be:

1. Well cured and free from seeds and stems;
2. Free of dirt, sand, debris, and other foreign matter;



3. Free of contamination by mold, rot, other fungus, pests and bacterial diseases and satisfying the sanitation requirements in 105 CMR 500.000, and if applicable, 105 CMR 590.000: *State Sanitary Code Chapter X – Minimum Sanitation Standards for Food Establishments*;
4. Prepared and handled on food-grade stainless steel tables with no contact with Licensees’ or Marijuana Establishment Agents’ bare hands; and
5. Packaged in a secure area.

All Licensees must harvest, dry, cure, trim, and separate parts of the Marijuana plant in a safe and sanitary manner. In other words, Licensees must take into consideration the danger or harm that processing Marijuana may have on the health and safety of employees engaged in those activities, as well as patients and consumers, and take proactive steps to avert that potential harm.

Consistent with that objective, Licensees might also consider taking additional measures and precautions. The Department of Public Health’s (“DPH”) Fatality Assessment and Control Evaluation (“FACE”) report and Occupational Lung Disease Bulletin—along with a Centers for Disease Control and Prevention (“CDC”) Morbidity and Mortality Weekly Report— shared the following recommendations:

- Assess and control hazardous materials in the workplace, including Asthmagens.
- Ensure that all workers are properly trained about hazardous materials in the workplace.
- Develop and implement a comprehensive safety and health program that addresses hazard recognition, avoidance of unsafe conditions, and proper use of equipment.
- Ensure the correct use of personal protective equipment by employees.
- Monitor and manage cases of employees with work related symptoms.
- Making adjustments to an employee’s job tasks and/or role to help reduce exposure to hazards.

[Read DPH’s FACE Report](#)

[Read DPH’s Bulletin](#)

[Read CDC’s MMWR Report](#)

## Questions?

If you have additional questions, please contact the Commission at (774) 415-0200 or [\*\*Inspections@cccmass.com\*\*](mailto:Inspections@cccmass.com)

