

Standard operating procedures in cannabis production



In this issue, **Thomas Walker** discusses why standard operating procedures are so important in growing cannabis for medicinal use, and why they need to be strictly adhered to at all times.

In cannabis production, standard operating procedures (SOPs) form the backbone of operations and compliance, especially when it comes to medical cannabis cultivation. SOPs are essentially a set of best practices and standards that detail the daily operations and compliance procedures of the business. They can only be changed with the approval of authorised persons within the business.

'Early Stages' SOPs are a requirement for any commercial cannabis production facility and need to be included alongside a quality management system and business plan as part of a licence application.

In a cannabis cultivation business, these will include every aspect of production, such as cleaning, hiring, hazardous situation mitigation and control, training and compliance.

Non-compliance is the primary reason for fines, suspension of activities and loss of licence.

PRODUCTION STANDARDS

Once a cultivation methodology has been decided on, a regulatory framework must be selected; this will dictate the design, construction, operation and potential markets for the business.

Good Agricultural and Collection Practices (GACP), produced by the World Health Organization, are used by most medical cannabis producers for the cloning, vegetation and flowering areas.

Once the product is deemed pharmaceutically active, pharmaceutical Good Manufacturing Practices (GMPs) are employed. Trimming, drying, curing and extraction fall under pharmaceutical GMPs, which have the highest standard of production protocols. As stated previously, most producers

look to gain European Union GMPs, as this is the highest level of cannabis certification. It ensures that if a producer aims to export a product, it will be acceptable by the majority of countries.

Integration of compliance protocols into SOPs will require the expertise of a GMP compliance consultant. Choose only the best available and check his or her references. The selection of your GMP consultant will ensure minimal deficiencies when audits take place. Everything from equipment, construction

A SURPRISE AUDIT CAN TAKE PLACE AT ANY TIME, WITH AUDITORS USUALLY FOCUSING INTENTLY ON ONE OPERATING PROCEDURE

practices and business procedures needs to be thoroughly vetted before licence application and construction, or else the entire facility might need to be scrapped!

Before a single seed is sown, a robust set of SOPs should be developed for the training of cultivation staff. The SOPs will serve as a set of instructions for every step of production.

Cannabis-cultivation businesses should, at a minimum, have SOPs for the following:

- Management, organisation and personnel;
- Workflow and space allocation;
- Cleanliness and sanitation;
- Inventory and control management;
- Stock plant production;
- Propagation;
- Vegetative plant growth;

- Flowering plant growth;
- Harvesting, trimming and drying;
- Destruction of plant waste;
- Facility security;
- Quality assurance; and
- Dispatch and Transport.

Once the business is licensed and certified, deviation from the SOPs must not occur. Surprise audits can happen at any time, and auditors tend to focus on a particular SOP and request evidence that it is being employed exactly as indicated.

This is why constant training and review of the SOPs is prudent, especially for new employees.

IMPROVEMENTS

Employees who have previous experience in cannabis production may deviate from the SOPs, as they might be under the assumption that their method will provide better results. This may lead to suspension or withdrawal of the licence.

It's natural for processes and methods to be optimised or tweaked once the business is operational, but how can this be achieved without deviating from the SOPs? The answer is by adhering to strict protocols with regard to the modification of SOPs, and rigorously testing and reviewing each modification before making the changes to ensure its benefit.

People involved in cultivation are rarely fanatical about paperwork, as most of their time is spent attending to the crop. It is therefore important to hire a document control/quality assurance specialist to manage the SOP process and ensure compliance.

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