

## **Expectations for Maintenance of Standard Operating Procedures**

The intent of this bulletin is to provide guidance to licensees regarding the standard operating procedures (SOPs) they are required to maintain under the Cannabis Regulatory Agency's administrative rules.

### **Rule 6 of the Marijuana Operations Rule Set – (420.206a)**

- (1) A marijuana business must have up-to-date written standard operating procedures on site at all times.
- (2) Standard operating procedures must be made available to the agency upon request.
- (3) Standard operating procedures must detail the marijuana business operations and activities necessary for the marijuana business to comply with the acts and these rules.
- (4) If the agency determines that any standard operating procedure contains inaccurate information or does not comply with these rules and safe food management guidelines, as applicable, the licensee may be required to correct the practice immediately and update the standard operating procedures within one business day.

### **Standard Operating Procedures for all Businesses**

To create consistency when an operational process or task is performed, every licensed marijuana business must maintain SOPs. SOPs document the steps licensees or employees are required to complete for specific work processes. Most importantly, SOPs address health and safety concerns by documenting the safe and appropriate way to produce and handle marijuana and marijuana product.

### **What types of SOPs should each licensee maintain and what should they include?**

Licensees should create and maintain up to date SOPs for the tasks or processes their businesses complete as part of their day-to-day operations. The following are examples of what SOPs should include at a minimum:

- A clear title that accurately describes the procedure.
- Person or person(s) responsible for performing specific tasks within the procedure by position or role.
- Each step required to complete the task or process.

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- If applicable, any controls in place to ensure activities are completed as specified in the SOPs – this may include auditing previously completed work or observance of the staff performing the task or activity.

Below are examples of SOPs the CRA would expect, at a minimum.

SOPs required pursuant to the following rules:

- 420.207 Marihuana delivery; limited circumstances.
- 420.305b Quality assurance and quality control.
- 420.403 Requirements and restrictions on marihuana-infused products; edible marihuana product.
- 420.602 Employees; requirements.

Producers should include SOPs for the following activities:

1. Employee health and hygiene, including handwashing.
2. Extraction/distillation processes.
3. Production of inhalable products.
4. Recording production batch information into the statewide monitoring system (Metrc).
5. Preparing production batches for proper sampling by laboratories – this would include heating distillate.
6. Accepting/rejecting deliveries from transporters.
7. Obtaining and verifying ingredients are from approved sources.
8. Food contact surface cleaning and sanitizing (if applicable).
9. Protecting food from contamination, including allergen cross contact (if applicable).
10. Operation of security systems in accordance with the rules.

Cultivators should include SOPs for the following activities:

1. Application of all chemical or plant treatment including the concentration and frequency.
2. All trimming and harvesting processes (recording these processes in Metrc).
3. Obtaining plants and recording in Metrc.
4. Separating harvest batches by product type and category.
5. Preparing harvest batches for proper sampling by laboratories.
6. Sale of immature plants (if approved by the agency).
7. Operation of security systems in accordance with the rules.

Sales locations should include SOPs for the following activities:

1. Recording and completing proper sales.
2. Adverse reactions.
3. Age verification for purchases.



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4. Verification that all products have passing test results and are not on administrative hold or prohibited from sale.
5. Operation of security systems in accordance with the rules .
6. Accepting/rejecting deliveries from transporters.
7. Verification that products meet all labeling and packaging requirements prior to sale or transfer.

As indicated throughout this bulletin, this is not an exhaustive list of the procedures that licensees are required to create and maintain. This bulletin is intended to provide licensees with examples of the most basic procedures they should have in place based on their license type. Any questions related to the topics in this bulletin should be directed to [CRA-Compliance@michigan.gov](mailto:CRA-Compliance@michigan.gov).