MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:	DATE:
MIOSHA-COM-23-1R2	April 6, 2026

SUBJECT: Cannabis – State Emphasis Program (SEP)

I. Purpose. This instruction establishes a state emphasis program (SEP) to address safety and health hazards associated with the growing, harvesting, and processing of cannabis (marijuana).

II. Scope. This instruction applies to the Consultation Education and Training (CET) Division and the General Industry Safety and Health Division (GISHD).

III. References.

A. Agency Instruction MIOSHA-COM-20-1, Companion and Expanded Inspections, as amended.

B. Agriculture Standard Part 700, Agriculture (Part 700, Agriculture).

C. American National Standards Institute (ANSI)/CAN/Underwriters Laboratories (UL)/Underwriters Laboratories Canada (ULC), Standard for Safety 1389:2023, Plant Oil Extraction Equipment for Installation and Use in Ordinary (Unclassified) Locations and Hazardous (Classified) Locations.

D. Colorado Department of Public Health & Environment, Marijuana Occupational Health and Safety Work Group, January 2017, Guide to Worker Safety and Health in the Marijuana Industry.

E. Couch J.R., et al., Annals of Work Exposures and Health, 2020, Vol. 64, No. 7, pages 693–704, Review of NIOSH Cannabis-Related Health Hazard Evaluations and Research.

F. General Industry and Construction Standard Part 451, Respiratory Protection (Part 451, Respiratory Protection).

G. General Industry Standard Part 2, Walking-Working Surfaces (Part 2, Walking-Working Surfaces).

H. General Industry Standard Part 6, Fire Exits (Part 6, Fire Exits).

I. General Industry Standard Part 33, Personal Protective Equipment (Part 33, PPE).

J. General Industry Standard Part 39, Design Safety Standards for Electrical Systems (Part 39, Design Safety Standards for Electrical).

K. General Industry Standard Part 56, Storage and Handling of Liquefied Petroleum Gases (Part 56, Storage and Handling of Liquefied Petroleum).

L. General Industry Standard Part 69, Compressed Gases: Acetylene, Hydrogen, Oxygen, and Nitrous Oxide (Part 69, Compressed Gases: Acetylene, Hydrogen, Oxygen, and Nitrous Oxide).

M. General Industry Standard Part 75, Flammable Liquids (Part 75, Flammable Liquids).

N. General Industry Standard Part 85, The Control of Hazardous Energy Sources (Part 85, The Control of Hazardous Energy Sources).

O. General Industry Standard Part 92, Hazard Communication (Part 92, Hazard Communication).

P. General Industry Standard Part 301, Air Contaminants for General Industry (Part 301, Air Contaminants for General Industry).

Q. General Industry Standard Part 430, Hazard Communication (Part 430, Hazard Communication).

R. General Industry Standard Part 433, Personal Protective Equipment (Part 433, PPE).

S. General Industry Standard Part 472, Medical Services and First Aid (Part 472, Medical Services and First Aid).

T. General Industry Standard Part 474, Sanitation (Part 474, Sanitation).

U. Michigan Cannabis Regulatory Agency (CRA) (a.k.a. Michigan Marijuana Regulatory Agency).

V. Michigan Department of Licensing and Regulatory Affairs (LARA), Advisory Bulletin, April 10, 2018, Processor Gas Detection System.

W. Michigan Marijuana Regulatory Agency (MRA), Advisory Bulletin, September 30, 2019, Microbusiness or Grower Gas Detection System and Fumigation.

X. Michigan Occupational Safety and Health Act, MCL 408.1001 et. seq., P.A. 154 of 1974, as amended.

Y. MIOSHA Administrative Standard Part 11, Recording and Reporting of Occupational Injuries and Illnesses.

Z. MIOSHA Field Operations Manual, as amended (FOM).

IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.

V. Cancellations. All previous versions of this agency instruction.

VI. Next Review Date. This instruction will be reviewed in one (1) year from date of issuance.

VII. History. History of previous versions include:

MIOSHA-COM-23-1R1, January 9, 2025
MIOSHA-COM-23-1, August 28, 2023

VIII. Contact. Tarah M. Kile, CET Director, and Adrian Z. Rocskay, GISHD Director

IX. Originator. Barton G. Pickelman, Director

X. Background. MIOSHA has established this SEP to address safety and health hazards associated with the growing, harvesting, and processing of cannabis. This industry emerged in Michigan in 2019 due to changes in the legal status of cannabis. In November 2018, voters in Michigan passed a proposal that legalized cannabis for recreational use and required the state to create a licensing system for growers, processors, and retailers. As of November 2025, the number of growers in Michigan has swelled to 972, and the state now has 274 processors and 843 retailers.

This SEP covers the growing, harvesting, and processing of cannabis because the occupational safety and health hazards are mainly found at those operations; the SEP does not include retail establishments. According to a review by National Institute for Occupational Safety and Health (NIOSH), studies have found that workers in cultivation, harvesting, and processing of cannabis face dermal exposure to the psychoactive and medicinal chemicals in cannabis, ergonomic stressors, and potential exposure to allergens and respiratory hazards through inhalation of organic dusts (such as fungi, bacteria, and endotoxins), cleaning chemicals such as peracetic acid, and volatile organic compounds (VOCs) such as diacetyl and 2, 3-pentanedione. The exposure to organic dusts and VOCs was most evident in the decarboxylation and grinding of dried cannabis material, activities that produced elevated concentrations of VOCs and endotoxins. Based on air monitoring data from MIOSHA, use of cleaning and disinfecting chemicals such as chlorine dioxide and peracetic acid between grows or during processing can expose employees to levels of these chemicals above the permissible exposure limit.

In 2022, a cannabis worker in Massachusetts died from an asthma attack due to breathing in marijuana dust at a cultivation factory. Across the US, more than a dozen fires and explosions have been reported at extraction facilities; typically, this was caused by highly flammable chemicals used to extract the hash oil from the marijuana, which are ignited by open flames or sparks. The fires and explosions have resulted in workers receiving serious burn injuries, and these workers include responding firefighters.

As of December 2025, MIOSHA conducted 92 enforcement inspections of cannabis facilities and found 112 serious violations, two repeat violations, 66 other-than-serious violations, and one failure-to-abate violation of MIOSHA regulations. The deficiencies encompassed respiratory protection, personal protective equipment, chemical hazard communication, eyewash facilities, the storage and handling of flammable liquids, electrical safety, equipment guarding, recording and reporting of occupational injuries and illnesses, and an overexposure to peracetic acid.

XI. Significant Changes.

A. Updated number of marijuana facilities in Michigan. See Section X. Background.

B. Updated text on chemical exposure hazards. See Section X. Background.

C. Updated number of violations issued by MIOSHA against marijuana facilities. See Section X. Background.

D. Updated outreach language throughout this instruction.

XII. Enforcement Activities.

A. All programmed inspections under this SEP will be conducted by a team consisting of a safety officer (SO) and an industrial hygienist (IH).

B. Number of Inspections. GISHD will inspect at least ten worksites resulting in at least ten health inspections and ten safety inspections, under this SEP each fiscal year.

C. Inspections will be part of the SEP and will be coded as such in the OSHA Information System (OIS), per section XIV. of this instruction, if their scope involves the growing, harvesting, or processing of cannabis. The inspections would include:

1. Programmed inspection assignments issued under this SEP.

2. Unprogrammed activities (i.e., complaints, referrals, or fatalities) at establishments that grow, harvest, or process cannabis.

3. Follow-up inspections at establishments that grow, harvest, or process cannabis.

D. Targeting. A target list of establishments for programmed inspections will be created using publicly available databases and information at the CRA website. Assignments will be chosen at random from the following categories of licensed facilities: adult-use excess marijuana grower, adult-use marijuana class b and c grower, adult-use marijuana processer, medical marijuana class b and c grower, and medical marijuana processor. The target list will not include retail establishments.

E. Enforcement Delay. The initial three-month enforcement delay on programmed inspections has expired and is no longer in effect.

F. Scope of Inspection. On programmed inspections assigned under this SEP, the SO/IH shall evaluate the employer's compliance with all applicable MIOSHA standards. During an unprogrammed activity at a facility that grows, harvests, or processes cannabis, if an SO/IH discovers potential hazards beyond those in the assignment, the SO/IH shall expand the scope of the investigation to address the other hazards using the procedures in MIOSHA-COM-20-1, Companion and Expanded Inspections, as amended. Per the FOM, if the inspection scope is partial, the SO/IH must expand the scope to address any potentially serious hazards in plain view or discovered during the inspection process.

The SO/IH will be observant for and understand the hazards associated with the growing, harvesting, and processing of cannabis. Some applicable health standards include:

1. Part 700, Agriculture

2. Part 301, Air Contaminants for General Industry

3. Part 430, Hazard Communication

4. Part 433, PPE
5. Part 451, Respiratory Protection
6. Part 472, Medical Services and First Aid
7. Part 474, Sanitation

Some applicable safety standards include:

1. Part 2, Walking-Working Surfaces
2. Part 6, Fire Exits
3. Part 33, PPE
4. Part 39, Design Safety Standards for Electrical Systems
5. Part 56, Storage and Handling of Liquefied Petroleum Gases
6. Part 69, Compressed Gases: Acetylene, Hydrogen, Oxygen, and Nitrous Oxide
7. Part 75, Flammable Liquids
8. Part 85, The Control of Hazardous Energy Sources
9. Part 92, Hazard Communication

Both safety and health inspections are to examine employer compliance with Part 11, Recording and Reporting of Occupational Injuries and Illnesses.

The general duty clause of the Michigan Occupational Safety and Health Act will be used to address ergonomics and other recognized hazards, as applicable.

G. Staff Training and Resources.

1. A training PowerPoint for enforcement and consultation staff is available as a reference for staff at S:\Public\Training\Cannabis\CANNABIS.pptx.
2. The SO/IH will read the Guide to Worker Safety and Health in the Marijuana Industry by the Colorado Department of Public Health & Environment prior to performing a cannabis SEP inspection to become acquainted with the common hazards in this industry.
3. Other reference materials available to the SO/IH are:
   a) LARA Advisory Bulletin, Processor Gas Detection System (found at the CRA website).
   b) MRA Advisory Bulletin, Microbusiness or Grower Gas Detection System and Fumigation (found at the CRA website).
   c) ANSI/UL Standard for Safety 1389-2023, Plant Oil Extraction Equipment for Installation and Use in Ordinary (Unclassified) Locations and Hazardous (Classified) Locations (single copy available at the MIOSHA Standards Section library).

d) NIOSH review of cannabis-related health hazard evaluations and research (article available online).

H. Employer Resources. Employers will be directed to the MIOSHA webpage for cannabis. The webpage contains links to training and educational materials created by MIOSHA and by other government organizations.

XIII. Outreach. MIOSHA's consultation program will use the same strategic approach as the enforcement division for targeting workplaces and activities covered by this SEP. CET will continue to make the public aware of the SEP through social media as well as notifications in newsletters when updated.

XIV. OIS Coding. All enforcement inspections and compliance assistance interventions conducted under this SEP shall be coded in OIS as "CANNABIS." Enforcement will find the emphasis under the State Emphasis Program field in the Inspection Data section, and consultants will find it under the Visit tab.