



BC CRAFT FARMERS CO-OP

# Quality Committee Discussion Paper: Work Plan Priorities and **DRAFT** BC Quality Standard

November 2020

# QUALITY COMMITTEE DISCUSSION PAPER: WORK PLAN PRIORITIES & DRAFT BC QUALITY STANDARD

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## FEEDBACK

Send your feedback to [info@bccraftfarmerscoop.com](mailto:info@bccraftfarmerscoop.com) under subject line QUALITY.

**Contact BC Craft Farmers Co-Op**

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## INTRODUCTION

Among other things, the mission of the BC Craft Farmers Co-Op is to ensure cannabis consumers across the province, country and world have access to the highest quality BC craft cannabis. To support this goal, the Co-Op Board has established a Quality Standards Committee to establish a globally recognized standards for the production and processing of craft cannabis and safe management of plant genetics.

To achieve this goal, the Quality Committee has invited Co-Op members and supporters to participate in the development of 2021 work plan priorities. In addition to releasing a Discussion Paper on quality and BC certification standards, the 2021 work plan will build on recent announcements by the BC government related to direct supply, streamlined administration, economic development, agri-tech and the promotion of “Buy Local” consumer options.

## WORK PLAN PRIORITIES (2020-21)

SHORT TERM (NOV–DEC 2020)	MEDIUM TERM (JAN–FEB 2021)	LONGER TERM (FEB–MAR 2021)
<ul style="list-style-type: none"><li>• Develop a draft Quality Standards and BC Certification Discussion Paper for members, supporters, consumers and other sector leaders to review, focused on:<ul style="list-style-type: none"><li>• Good Production Practices (GPP)</li><li>• BC Certification</li><li>• Facilitating the Transition</li></ul></li><li>• Establish a roster of qualified Quality Assurance (QA) professionals and product testing labs to:<ul style="list-style-type: none"><li>• Review draft Discussion Paper</li><li>• Facilitate more effective procurement</li><li>• Facilitate training, professional development and networking opportunities for members and supporters</li></ul></li><li>• Invite new BC government to support a quality standards and BC certification partnership.</li></ul>	<ul style="list-style-type: none"><li>• Establish sector collaboration with WorkSafe BC to facilitate adaption of best practices, professional development and education opportunities.</li><li>• Update draft Discussion Paper to reflect consultation feedback. Develop Action Plan to guide next steps and strategic investments. Share with members, supporters, BC government and key stakeholders.</li><li>• Develop alternative labelling regulations and mock-up to capture the Quality Standard and more clearly identify craft products.</li><li>• Develop recommendations to improve federal product testing standard that removes barriers for craft farmers without compromising public safety and environmental standards.</li></ul>	<ul style="list-style-type: none"><li>• In consultation with BC government, QA and lab roster, establish an on-line Community of Practice that includes SOP templates, procedure guides, check-lists and other relevant documents to assist Members, reflect regulatory requirements and streamline processes.</li><li>• Fully implement Discussion Paper Action Plan. Invite certifying partners to participate.</li><li>• Prepare a “Green Paper” regarding opportunities that may be associated with the implementation of a “Buy Local” BC craft cannabis program that would promote unique elements of cannabis farming in different BC regions and Indigenous communities.</li></ul>



## **DRAFT: BC CRAFT FARMERS CO-OP QUALITY STANDARD**

The Co-Op Board's Quality Standard Committee has prioritized the development of a BC certification standard for craft cannabis production/processing founded in globally-recognized good production practices.

The adoption of a BC standard should not re-invent wheels or exclude members in various stages of market transition. In this light, the Committee's initial scope is focused on:

- Good Production Practices
- BC Certification
- Facilitating Transition

## **GOOD PRODUCTION PRACTICES (GPP)**

The *Cannabis Act* provides the framework for legal access to cannabis and control regulation of production, distribution and sale. Part 5 of the Act's Regulations addresses GPP requirements to ensure cannabis meets quality standards appropriate to its intended use.

GPP requirements cover all aspects of the production and processing cycle. Rather than prescribe certain activities, the Act's Regulations establish criteria that each licensed facility must follow.

Therefore, interpretation of GPP requirements is very important—particularly in early planning phases.

Since license holders are responsible for understanding and complying with these GPP requirements, they must form the basis of the BC Craft Farmers Co Op (BCCFC) quality standards..

BC GPP standards will be based on five (5) pillars:

- Standard Operating Procedures
- Facility Design
- Pest Control Products and Sanitation
- Testing and Quality Assurance
- Record Keeping and Good Documentation Practices

Certifying partners will be required to demonstrate their application of these good production practices to receive BCCFC's endorsement.



## BC GOOD PRODUCTION PRACTICES

PILLARS	DESCRIPTION
STANDARD OPERATING PROCEDURES	<ul style="list-style-type: none"> <li>• Govern activities from seed to sale</li> <li>• Bulk of a quality management system</li> <li>• Consists of elements most facilities share (security systems, training processes)</li> <li>• Requires some specific site procedures</li> <li>• Describes all activities</li> <li>• Ensures staff are trained to their role</li> <li>• Includes recyclable packaging and product storage options that protect product freshness and meet regulator criteria</li> </ul>
FACILITY DESIGN	<ul style="list-style-type: none"> <li>• Critically important to safe and reliable production</li> <li>• Includes cleanliness, contamination prevention, sanitation, air filtration, odor, water supply, storage and washrooms</li> <li>• Identifies incompatible activities such as co-location (animals, food production) or near-activities with chemicals</li> </ul>
PEST CONTROL PRODUCTS AND SANITATION	<ul style="list-style-type: none"> <li>• Overlooked elements often result in crop failures or unsalable cannabis</li> <li>• Proper facility design can mitigate risks of pest infestation and powdery mildew</li> <li>• Almost all common pesticides banned under <i>Cannabis Act</i></li> <li>• 20-25 pest control products allowed; Few restrictions on biological pest control products</li> <li>• Other prevention measures include mechanical/engineered solutions (HVAC, water treatment, conveyors), PPE and methodical sanitation that manages waste streams</li> </ul>
TESTING AND QUALITY ASSURANCE	<ul style="list-style-type: none"> <li>• Mandatory prior to the sale of recreation cannabis</li> <li>• Specified limits on 96 pesticides, 4 heavy metals and 12 residual solvents</li> <li>• Testing required on each batch/lot to determine potency (THC, THCA, CBD, and CBDA), level of chemical pesticides, heavy metals, residual solvents and microbial contaminants</li> <li>• Applies validated methods and third-party lab results</li> <li>• Some limits extremely low (parts/billion)</li> <li>• Farm spraying pesticides can cause a neighbor to fail testing</li> </ul>
RECORD KEEPING AND GOOD DOCUMENTATION PRACTICES	<ul style="list-style-type: none"> <li>• Required to operate and provide evidence of day-to-day activities</li> <li>• Facilitates proper tracking of cannabis production and audit preparation</li> <li>• Preventative control plans promote efficiency and compliance (SOP's, training and production logs)</li> </ul>



## BC CERTIFICATION

To be unique, a BC quality and certification standard must capture geographic qualifications that will:

- Leverage BC’s well-established international reputation as a global craft cannabis leader
- Complement the provincial government’s “Buy BC” program ([buybc.gov.bc.ca](http://buybc.gov.bc.ca))
- Be relevant and easy for consumers to access and understand

In this light four (4) qualifications are proposed for BCCFC certification:

QUALIFICATION	DESCRIPTION
BC ORIGIN	Strain must be bred or pheno-hunted* in BC <b>Verification:</b> Starting materials chain of custody (CoC); Facility batch records; Uncontested self-identification by breeder <i>*Pheno-hunting is a process of seed selection that results in the establishment of commercially viable and uniform strains of cannabis.</i>
BC GROWN	Plants must have been grown in BC <b>Verification:</b> Address; Batch records
BC OWNED	Majority of company’s owners — and percentage ownership — BC residents <b>Verification:</b> Corporate notice of articles
BC PROCESSED & PACKAGED	Cannabis processed and packaged in BC <b>Verification:</b> Product CoC; Batch records

## FACILITATING THE TRANSITION

Recognizing BC’s craft farmers at various stages of readiness for transition to the post-prohibition market, education and training partnerships can provide a graduated path to certification and good production practices for all farmers over the next 420 days.

To ensure transitioning farmers and processors can effectively adopt and sustain good production practices, BCCFC certification can feature five (5) inclusive categories that can also reflect best practices from other agriculture sectors:



Training and education partnerships can be tailored towards farmers on their terms at each stage of the transition process. Federal and provincial education, training and ag-tech funding programs should be considered.

