

# CLEANING AND MAINTAINING EQUIPMENT UNDER THE CANNABIS REGULATIONS

Licensed Producers (LPs) striving to maximize their production capacity must have a strong grasp of Good Production Practices (GPPs), as defined under Canada's [Cannabis Regulations](#). This document specifically addresses those GPPs that relate to the cleaning and maintenance of equipment used in the processing of cannabis products.

## Background

Cannabis is an exceptionally sticky, resinous plant and any equipment that is used to harvest or process cannabis will inevitably be coated in resin. To follow Good Production Practices, that resin must be fully removed from equipment surfaces during the cleaning cycle before the equipment is put back into service. To maintain compliance with the Regulations then, the selection and application of cleaners that effectively remove cannabis resin becomes one of the most critical aspects of an LP's sanitation program.

## Cleaning Solution Selection

Food-safe degreasers have proven to be particularly effective in removing cannabis resin from a variety of equipment surfaces and finishes. Unfortunately, a number of LPs have been reluctant to qualify degreasers on their list of internally approved cleaning products in the mistaken belief that only cleaning products explicitly 'approved' by Health Canada can be used in accordance with the Regulations. In fact, the Cannabis Regulations and Health Canada are completely agnostic on cleaning methods and products that can be used for cannabis production. No cleaning products are specifically recommended nor are any cleaning products specifically prohibited. Rather, the regulations require that whatever cleaners are used, no residual contamination by a cleaning product is transposed onto the end product.

Conversely, the Regulations do require that an LP establish a sanitation program that permits effective cleaning of the premises and equipment and prevents contamination. If residual cannabis resin remains on equipment after cleaning, this residual cannabis resin is a potential source of contamination (i.e. mould, bacteria, etc.) to future production batches.

Isopropyl and other disinfectants are in common use at many licensed production facilities but are just that – disinfectants. Disinfectants are not cleaners and are not effective for removing cannabis resin. When used exclusively to clean production spaces and equipment, disinfectants are very harsh and can accelerate equipment deterioration.

**A Licensed Producer that is using only disinfectant to clean their processing equipment and space will be challenged to completely remove all cannabis resin, which would put them in violation of Sections 80, 84, 86 and 87 of the Cannabis Regulations.**

## Summary of Key Points

- A sanitation program that does not allow for the use of cleaners that effectively remove cannabis resin is very likely in violation of the regulations.
- Isopropyl and other disinfectants are not effective cleaners for removing cannabis resin, thus cannot be the sole cleaning substance(s) included in a sanitation program.
- Food safe degreasers are effective in removing cannabis resin and therefore need to be a part of equipment cleaning protocols.
- Provided that the equipment being used to process the plant material does not have cleaning solution residue on its surfaces, **any** cleaner may be used in accordance with the Regulations.

The following table lists those sections of the Cannabis Regulations that specifically address cleaning and sanitation as per Good Production Practices.

Reference Section Under the Cannabis Regulations	Interpretation
<p><b>Standard operating procedures</b></p> <p><b>80</b> Cannabis must be produced, packaged, labelled, distributed, stored, sampled and tested in accordance with standard operating procedures that are designed to ensure that those activities are conducted in accordance with the requirements of this Part.</p> <p><b>Building or part of building</b></p> <p><b>84 (1)</b> Cannabis must be produced, packaged, labelled, stored, sampled and tested in a building or part of a building that is designed, constructed and maintained in a manner that permits those activities to be conducted appropriately and under sanitary conditions, and in particular that</p> <ul style="list-style-type: none"> <li>(a) permits the building or part of the building to be kept clean and orderly;</li> <li>(b) permits the effective cleaning of all surfaces in the building or part of the building;</li> <li>(c) prevents the contamination of cannabis; and</li> <li>(d) prevents the addition of an extraneous substance to the cannabis.</li> </ul> <p><b>Equipment</b></p> <p><b>86 (1)</b> Cannabis must be produced, packaged, labelled, stored, sampled and tested using equipment that is designed, constructed, maintained, operated and arranged in a manner that</p> <ul style="list-style-type: none"> <li>(a) permits the effective cleaning of its surfaces;</li> <li>(b) permits it to function in accordance with its intended use;</li> <li>(c) prevents the contamination of the cannabis; and</li> <li>(d) prevents the addition of an extraneous substance to the cannabis.</li> </ul>	<ul style="list-style-type: none"> <li>• No specific cleaning methods or cleaning products are required. What is required is that the cleaning methods and products applied are effective at cleaning the surfaces and at preventing contamination. If a cleaner does not fully remove all cannabis resin, this cannabis residue would be considered a potential source of contamination.</li> <li>• With respect to cleaning solutions, there is no risk of the addition of an extraneous substance to the end product if the cleaning solution is entirely rinsed off the equipment prior to putting it into operation. For example, the following three-step process would be an effective approach to apply: <ul style="list-style-type: none"> <li>• <b>Step 1.</b> Clean the equipment with an appropriate cleaning solution (i.e. a food safe degreaser);</li> <li>• <b>Step 2.</b> Rinse the cleaning solution off equipment surfaces;</li> <li>• <b>Step 3.</b> Swab test equipment surfaces. If cleaning solution residue remains, either perform an additional rinse or wipe the surface with a disinfectant such as isopropyl.</li> </ul> </li> <li>• If a particular cleaning product is applied, followed by a rinse and swab tests show that no residual cleaner remains on the equipment, then logically there is no possibility of contamination by an “extraneous substance” and, hence, no risk in using that cleaning product.</li> <li>• Substances that have been registered under programs such as the NSF International/Nonfood Compounds Registration Program, have specifically been evaluated for their risk of contaminating the end product for human consumption and found to be safe when properly used. In this particular application, a substance would be assessed for both its cleaning efficacy <b>and</b> the user’s ability to rinse off the substance from the processing equipment to ensure that the cleaning solution would not itself pose a risk of contamination to the end product.</li> </ul>

**Sanitation program**

**87 (1)** Cannabis must be produced, packaged, labelled, stored, sampled and tested in accordance with a sanitation program that sets out

- (a)** procedures for effectively cleaning the building or part of the building in which those activities are conducted;
- (b)** procedures for effectively cleaning the equipment used in those activities;
- (c)** procedures for handling any substance used in those activities; and
- (d)** all requirements, in respect of the health and hygienic behaviour of the personnel who are involved in those activities, that are necessary to ensure that those activities are conducted in sanitary conditions.