



Commingling and Contamination Prevention in OCal Production

1. Purpose

This instruction provides examples of management practices to prevent contamination and commingling and explains what should be documented in the OCal system plan (OSP). It also clarifies the certifying agent's role in making sure the certified operation is preventing commingling and contamination.

2. OCal Regulations, Title 3 California Code of Regulations (3 CCR):

3 CCR § 10000. Definitions.

3 CCR § 10201. OCal system plans.

3 CCR § 10209. Commingling and contact with prohibited substance prevention practice standard.

3. Policy

3.1. General

Certified operations must clearly describe in their OSPs their management practices to prevent commingling and contamination.

The OSP description should include risk prevention and avoidance measures implemented throughout the operation, identify control points, where risk of contamination is highest, and describe procedures to address control points.

A control point is any point or procedure in an OCal production system where loss of OCal integrity may occur through commingling of OCal with non-OCal cannabis or where OCal cannabis may be contaminated by prohibited substances.

Certifying agents must verify that the OSP identifies all control points and describes the practices and procedures to prevent contamination and commingling, that all practices and procedures are implemented and monitored with appropriate record-keeping and documentation, and that the operation is in compliance with the OCal regulations.

Certifying agents should include a section in the OSP where cultivators and distributors can describe risk prevention and avoidance measures implemented throughout the operation, identify control points, and describe procedures to address control points. This section may

include checklists and narrative questions that assist the operation with describing their unique contamination risks and explaining their prevention practices.

During inspection, certifying agents should:

- a. Assess the risks and verify the adequacy and implementation of the practices and procedures described in the OSP to ensure that preventive commingling and contamination activities are consistently and accurately documented and implemented;
- b. Evaluate any records retained by the operation to verify practices and procedures described in the OSP; and
- c. For a split operation, review non-OCal activities and areas of the certified operation to verify compliance with the commingling and contamination prevention provisions of the OCal Program regulations.

3.2. Preventive Practices

Preventive practices may include physical boundaries, buffer zones, separate receiving, and manufacturing areas for OCal products, clean-out procedures, training of OCal and non-OCal personnel, or completely separate and different storage, packaging or packaging transportation systems.

3.3. Control Points

Certified operations should identify and address their commingling and contamination risks, or control points, in their OSP. This applies to both all OCal and split operations.

- a. Examples of potential sources of contamination and commingling with the operation:
 1. Sanitation and pest management materials and practices;
 2. OCal and adjoining non-OCal areas;
 3. Reuse of boxes and transportation containers;
 4. Adequacy of equipment and storage unit cleaning and purging;
 5. Receiving inputs and ingredients;
 6. Storage and identification of prohibited substances, such as pesticides, and fertilizers;
 7. Use of custom operators and their equipment; and
 8. Transportation unit clean-out, documentation and inspection.
- b. Examples of potential sources of contamination outside of the operation:

1. Environmental conditions, such as the prevailing winds, land slope, upstream uses of creeks and waterways, and their impact on the adequacy of buffer zones between OCal and adjoining non-organic/OCal areas;
 2. Types of crops grown nearby (e.g. genetically modified crops);
 3. Pest management materials used on non-organic/OCal farms nearby and how materials are applied (e.g. backpack, airplane, fumigation, spray);
 4. Pest and weed management of adjoining public roads and areas; and
 5. Any other potential point or non-point sources of contamination.
- b. Examples of procedures to address control point contamination or commingling risks:
1. Accurate and detailed documentation of the production system;
 2. Preventive actions;
 3. Monitoring activities; and
 4. Corrective actions for control points that failed to mitigate risks.