MM+G

ARE YOU READY FOR A VISIT FROM THE BCC?

BE PREPARED. KNOW WHAT THEY'RE LOOKING FOR.

Agency representatives have been appearing at retailers all over California to conduct surprise operational inspections. While these visits seem to be primarily "educational" with few fines being levied for compliance infractions, the BCC has indicated that enforcement will become more stringent in the second half of 2018. As a compliant retailer, you will want to be sure to do all you can to comply with the numerous requirements set forth by the various regulatory agencies. A good preparation is to schedule a compliance audit of your facility. At a minimum, conduct a self-audit of your shop using the state and local regulations as a guide.

TOP 10 COMMON INFRACTIONS FROM BCC RETAIL INSPECTIONS

01 Over-Limit Edibles

This is being looked at rigorously and is a common fail. All edibles over 10mg per package must have 10mg serving sizes clearly scored. As many retailers are still selling through 2017 back stock, there are still lots of over-limit edibles on retail shelves. Also, edible products cannot have more than 100mg per package.

02 No Free Samples

Those olden days of dab bars, free samples, and on-site product testing are over. Current regulations forbid free samples for patrons and employees.

03 No Alcohol or Tobacco Sales

Sorry, you can't have a blunt wrap with that anymore. Regulations prevent the sale of any tobacco products and/or alcohol, therefore, blunt sales have been blunted.

04 Security Personnel

All retailers are required to have a licensed security guard. Note to LA retailers that the security guards cannot be employees. Be sure your guards have all required documentation on them and that all of their certifications are current.

05 Cannabis Goods Labeling

All products that are only for medical patients should be labeled "For Medical Use Only." All cannabis goods should have the Government Warning Statement. And remember, as of July 1, all products need to be tested.

★ **STAY TUNED —** There may be some updates to the A and M designation coming through at the state level.

06 Exit Bags

Make sure you are stocked up on your opaque exit bags. All cannabis products must leave the shop in an exit bag.

07 Surveillance System

Inspectors will check to see if the cameras are covering the entire premises, and especially that the POS images are clear and allow for facial recognition. Regulations require that security videos be stored for 90 days.

08 Employee Badges

While on duty, all Employees should wear their employee badges. Be sure the badges display all required information, as specified in the regulations. Train employees to don their badges at all times while conducting commercial cannabis business. Forgetting to put badges on after a break or at the beginning of a shift could be grounds for a failed answer on the BCC inspection.

09 No Minors

21+

There should be no persons under 21 years old on the premises, unless they are in possession of a medical recommendation and have valid, verified identification showing they are over 18. All patrons entering the premises should undergo an age verification process before gaining access to the retail area.

★ **BONUS COMPLIANCE TIP —** Regulations also specify that all employees must be trained in the use of electronic age verification devices, and that all employees must be over 21 years of age.

10 Limited Access Areas

Inspectors will be checking to see that all Limited Access Areas are secure, and that an access log is kept to document all non-employee entrants into the Limited Access Areas.

★ **BONUS COMPLIANCE TIP —** All non-employee visitors to the Limited Access Areas must be accompanied by either an employee or the licensee at all times.

There are **eleven more** audit topics, all of which (and more) are covered in one of MMLG's transitional retail audits.

Contact MMLG today to schedule an audit of your licensed facility and be prepared for your next visit from the BCC. It's not a surprise if you're ready for them!

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