

Does Your “Essential” Cannabis Business Operations Have COVID-19 Policies in Place?

As an “essential” provider during the COVID-19 pandemic, recreational and medicinal cannabis businesses should use all tools and precautions to ensure their workforce, patients and customers are protected from exposure to the coronavirus. By establishing proactive safety, health and sanitation measures your cannabis business will be in a stronger position to weather the storm of the virus and of workmen compensation claims of illness. Eight (8) states continue to allow for recreational sales of cannabis (Alaska, California, Colorado, Illinois, Michigan, Nevada, Oregon, and Washington state), and twenty (20) states and Washington, D.C. continue to allow for medicinal cannabis sales (Arizona, Connecticut, Delaware, Florida, Hawaii, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Montana, New Hampshire, New Jersey, New Mexico, New York, Ohio, Oklahoma, Pennsylvania, Rhode Island, Vermont).



Each state’s guideline for operating amid the pandemic is somewhat unique, but in essence focus on social distancing, limiting the contact between patient/consumers and dispensers/retailers, increase sanitation of commonly used surfaces (grow, laboratories and dispensaries) and maintain a cleaning log. [Contact RHP Risk Management Inc to create a customized Illness Prevention Program \(IIPP\), health and safety policies, and standard operating procedures \(SOPs\) for your cannabis business.](#)

Employee Protection

Ensure employee safety with staffing, sick policies, written documentation and contingency plans. Employers can reduce the number of employees within the workspaces by staggering workforce schedules, physical distancing, provide personal protection equipment (PPE), enforce personal hygiene, and increase facility, workspace, and shared area professional cleaning. Additionally, employers should request employees not share food, drink or snacks.

Employee health can be monitored by implementing and enforcing a criteria for daily health screenings. Ask your employees to take their temperatures at their home before coming to work and then temperature screenings could take place as employees enter the workplace. It is also important to monitor employees throughout work shifts. Employers should be prepared to isolate employees and work areas if someone exhibits symptoms. Any staff showing signs of illness must be sent home immediately and stay at home until symptom free for at least 72 hours or with a doctor release, and employers should allow anyone who can work from home to do so; however, in the cannabis industry that will be difficult as the work is primarily hands on and interactive. After an employee is sent home for suspected illness or with symptoms, the work area or station, the equipment/tools (such as keyboards, telephone, computer, computer mouse, cash register), desktop or laptop and any areas that the employee had spent time (such

as lunch room, bathrooms, or offices) should be sealed off and commercially cleaned thoroughly. If this includes public areas it may require closing for a period to commercially clean before allowing the public back into the space.

Due to interaction with the public, cleaning procedures within a retail store/dispensary should require employees to log when door handles, counter tops, POS and other high-touch surfaces are cleaned (ideally every hour). Employers will need to obtain and fully read Safety Data Sheets (SDSs) for all cleaning and disinfecting chemicals to be used and remember to **NEVER MIX CHEMICALS TOGETHER** (i.e. bleach with ammonia or an acid). Some disinfectants and biocides produce extremely irritating smells and vapors. Use with plenty of ventilation and protect your eyes, airways, and skin.

Employers should implement and enforce PPE use for the entire workforce, including wearing dust masks/respirators, gloves, and eye/face protection when appropriate, including during cleaning and sanitizing surfaces. Employees should be required to regularly wash their hands with soap and water for at least 20 seconds or use hand sanitizer. If your employees regularly wear an N95 mask or tight-fitting respirator in executing their job duties or have requested to do so, you **MUST** have an OSHA compliant Respiratory Protection Program in place, even for voluntary use. Anyone who wears a tight-fitting respirator (N-95 dust masks included) must be medically cleared to wear a respirator and should be fit-tested for a particular model and size of respirator. Remember, the types of disposable dust masks and surgical masks that are commonly used in cannabis cultivation and production are the same types that are used by medical professionals and are currently in critically short demand. **REUSE DISPOSABLE RESPIRATORS WHENEVER POSSIBLE**, or use cleanable, elastomeric respirators.

Delivery Drivers should wear gloves, avoid handshakes, wipe down any bins or containers used to carry product shipments after each delivery, and use hand sanitizer both before and after deliveries. It is also important to sanitize the steering wheel, door handle and other often-used surfaces within the delivery vehicle. A driver should ask customers to use their own pens for signing COAs and manifests. Limit person-to-person interaction by requiring payment in advance or provide amount of prepared check/cash in advance of delivery to avoid wait times and physical interactions.

Customer/Patient Security

As important as it is to protect your workforce, it is also important to protect the health and safety of your customers/patients, as good business practices, good branding and good will. By instituting procedures to protect your retail customers/patients you are demonstrating to your staff you are an industry leader and a responsible community member and employer. Communicate your health and safety protocols to customers/patients as well as your supply chain. Where appropriate, have your workforce wear PPE. Sanitize commonly used surfaces within the retail space, and provide hand sanitizer at every entry and POS station. To encourage physical distancing and reduce contact between customers, patients and employees, businesses should limit the number of people within a store at one time, depending on the size of your retail area and State and local policies. To reduce formation of lines entering a store, mark distancing of 6' using bright tape, markers, or chalk. Retail stores should promote pre-orders, arrange payment prior to pickup/or delivery and offer curbside pickup (some states may require

businesses to request curbside pickup access through their cannabis control bureau). If possible, provide separate entry and exit points to your retail space.

Employers should have a plan in place to isolate employees, work areas, and product should an employee become symptomatic. This could include a temporary closure, loss of product and business.

Retail businesses can create workflows to minimize contact and risk of exposures by offering phone and online orders, home delivery, express curbside pickup. Communication, transparency and education of procedures and plans helps your staff to use best practices.

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At RHP Risk Management, we help our clients characterize the uncertainties associated with environmental and occupational hazards and risks to contextualize the meaning that can be understood by their decision-making audiences be they the public, employees, consumers, regulators, or shareholders. For more information regarding RHP's services to the cannabis industry, visit www.rhprisk.com/cannabis

For more resources concerning COVID-19, visit www.rhprisk.com/coronavirus