

Sent on behalf of: Heather Florence, CPHI(c) Regional Environmental Health Consultant for Island Health

December 5, 2016

Dear Market Manager

Re: Market Manager Responsibilities and Island Health Position on Marijuana Edibles

It is everyone's goal to ensure the safety of foods sold at temporary food markets. To that end, it is important that the requirements laid out in the [Guidelines for Sale of Foods at Temporary Food Markets](#) are followed. The Guidelines list market manager responsibilities, vendor responsibilities and provide examples of higher and lower risk foods.

Vendors of fresh whole fruits and vegetables or other lower risk foods are not required to submit an application to the Health Authority and do not require a Letter of Confirmation. Some products, such as jams, jellies, and pickled vegetables can only be considered lower risk if pH and A_w levels are sufficient to prevent the growth of pathogenic microorganisms. It is the responsibility of the Market Manager to ensure that individuals selling these products have completed the necessary testing at an appropriate laboratory and have the results present at the market.

Higher risk foods include any food capable of supporting the growth of disease causing microorganisms or the production of toxins. It is the responsibility of the Market Manager to ensure that vendors of higher risk foods have written approval from the local Health Authority. Potential vendors of higher risk foods *without* either a Letter of Confirmation or a copy of their valid Operating Permit/Approval must be excluded from selling or distributing those products.

Island Health would also like to clarify our position on marijuana edibles. The term 'marijuana edible' includes any food, beverage, or other product intended for oral consumption and having marijuana as an ingredient. As per the Guidelines, some foods with pH and/or A_w levels typical of lower risk foods may be higher risk due to the source of the food, how it is processed, or other risk factors. Marijuana lacks government controls on processing, labelling, and maximum recommended dosage. This makes marijuana edibles higher risk foods. Higher risk foods, including marijuana edibles, are not suitable for home preparation. Further, all food prepared in food premises must be from an approved source. In addition to the risk factors mentioned, marijuana cannot be legally sourced for public distribution, and therefore cannot be prepared in a food premises. ***Marijuana edibles are not approved for sale or distribution.***

Additionally, Market Manager responsibilities include:

- Ensuring all vendors are aware of the guidelines for the sale of foods at temporary food markets.
- Ensuring no home prepared, higher risk foods are sold or offered for sale without health approval.
- Ensuring each vendor completes a list of foods to be sold.
- Maintaining and a written record of all vendors and food items to be sold.
- Being present and on-site at all times the market is in operation (responsibility may be delegated).
- Ensuring each vendor provides for adequate hand washing if samples are provided, with samples prepared in accordance with the Guidelines. Only samples of lower risk foods are to be served at the market unless a Temporary Food Service permit has been issued.