

October 19, 2021

Dear Subcommittee on Public Health,

The Washoe County Health District (Health District) is recommending that the Nevada Cannabis Compliance Board be responsible for the Food Safety regulations and inspections of all of Nevada's Cannabis consumption lounges. This will ensure consistent regulations and enforcement across the State.

The Health District's, Environmental Health Division is responsible for ensuring compliance with local, state, and federal laws, and regulating food, waste, water, vector, and other areas of public health in Washoe County. There are approximately 4,000 permitted retail food establishments in Washoe County that range from full-service restaurants, food trucks, school kitchens, grocery stores, and food manufacturing establishments. In addition, over 900 temporary food permits for special events are issued in an average year. Each facility is inspected a minimum of one time annually. Staff are Registered Environmental Health Specialists (REHS) with the State of Nevada and receive ongoing training in addition to the minimum requirements to maintain their REHS.

At this time THC, CBD, and other Cannabis biproducts are not FDA approved food additives and the Health District's regulations governing food establishments prohibit such products to be used in any food product throughout the county. While updating the Health District's regulations is possible, it will require workshops for public feedback, adoption by the Washoe County District Board of Health, and finally, adoption by the Nevada State Board of Health. In Nevada, each jurisdiction adopts their own food regulations and there is no guarantee that all jurisdictions will be able to adopt the same regulations covering THC, CBD, and other Cannabis biproducts.

There are unique challenges to inspecting food preparation and dosage of THC, CBD, and other Cannabis biproducts as various factors. For example, cooking temperature or fat content of a food product can result in increased or decreased levels of absorption rates in the body. These types of variables will require a significant amount of training and expertise to implement that the Health District is not currently prepared nor equipped to engage in. The level of expertise and training required to provide effective and efficient Food Safety inspections deserves a dedicated Statewide team of experts.

Washoe County Health District values the work this committee has engaged in to evaluate all aspects of public health and safety. Thank you in advance for your consideration of having the Nevada Cannabis Compliance Board be responsible for the Food Safety regulations and inspections of all of Nevada's Cannabis consumption lounges.

Sincerely,

Erin Dixon, IVIS

Division Director, Environmental Health Services





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Dear Cannabis Advisory Committee-Public Health Subcommittee,

Washoe County Health District (WCHD) – Chronic Disease and Injury Prevention Program (CDIPP) is writing this letter to show its support for strategies to keep air quality safe in cannabis lounges.

There is no safe level of exposure level to secondhand smoke whether resulting from cannabis or tobacco smoking. Smoking and vaping cannabis produces fine particulates that pollute indoor air to unhealthy levels. Secondhand cannabis smoke contains many of the same toxic and cancer-causing chemicals found in tobacco smoke, including some in higher amounts, including those linked to lung cancer. Cannabis smoke exposure has a more damaging and longer-lasting effect on blood vessel function with negative effects on the cardiovascular system than exposure to secondhand tobacco smoke.

Everyone has the right to breathe clean air, cannabis lounge employees and patrons alike. WCHD recommends the following:

- Sealing of cross contamination pathways and ensuring physical barriers between the smoking and nonsmoking areas are airtight.¹
- Having separate ventilation systems serving the smoking and non-smoking spaces.¹
- If a smoking room shares a common plenum (air circulation space) with adjacent nonsmoking spaces, either block off plenum or ensure that the smoking room is under slightly negative pressure relative to the ceiling plenum.²
- Limiting contamination from smoking permitted areas to other areas inside the building by exhausting from the smoking rooms to the outside without recirculation to other occupied spaces.²

WCHD appreciates Cannabis Advisory Committee – Public Health Subcommittee for their planning efforts to make cannabis lounges safe and healthy places through outlining recommendations and informing relevant discussions. WCHD - CDIPP is happy to provide any resources to assist in the committee's decisions regarding the public health and safety decisions for cannabis lounges.

Kelli Goatley-Seals, Public Health Supervisor

References

The American Society for Heating and Refrigeration, and Air Conditioning Engineering. (2020). ASHRAE Position Document on Environmental Tobacco Smoke. Retrieved from pd. environmental-tobacco-smoke-2020-07-1.pdf (ashrae.org)

Alevantis, L et al. "Designing Smoking Rooms." ASHRAE journal 45.7 (2003): 26–32. Print.

