KINGDOM OF MOROCCO

NATIONAL AGENCY FOR THE REGULATION OF CANNABIS-RELATED ACTIVITIES

GUIDE TO GOOD AGRICULTURAL AND COLLECTION PRACTICES FOR CANNABIS

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ABBREVIATIONS & DEFINITIONS

ANRAC: National Agency for the Regulation of Cannabis-related Activities.

GACP: WHO Guidelines on Good Agricultural and Collection Practices for Medicinal Plants.

Pesticides: Chemical substances intended to repel, destroy, or control pests and undesirable species of plants or animals causing damage to the cannabis plant.

Cannabis plant: Any plant of the Cannabis genus.

Producer: Any natural person holding a licence to grow and produce cannabis, as determined by Law NO. 13-21.

Crop rotation: The basic agronomic practice of alternating different crops on the same plot.

Sustainable agriculture: All agricultural practices that are economically viable in the long term, environmentally friendly, and socially fair.

OVERVIEW

Since the enactment of Law No. 13-21 on the legal uses of cannabis, Morocco has allowed the cultivation, production, processing, and manufacture of the cannabis plant for medical, pharmaceutical, and industrial purposes. The method of cultivation and harvesting determines the quality and properties of the final industrial and pharmacological product.

The Guide to Good Agricultural and Collection Practices for Cannabis comprises a series of methods that farmers should apply in order to protect their health and well-being, the health and well-being of the people who consume their produce, and the environment.

It is particularly important that Cannabis is produced:

- Under hygienic conditions that minimise the risk of microbial contamination;
- Under conditions that minimise negative risks to plants during cultivation,processing, and storage;
- Under such conditions that the properties of the final produce are constant and reproducible.

The Guide to Good Agricultural and Collection Practices for Cannabis aims to standardise the cultivation and production of cannabis and to guarantee its quality, and therefore covers the activities of the entire cannabis cultivation chain: cultivation, harvesting, packaging, labelling, storage and transport, safety, control, and traceability.

Overall, cannabis cultivators will have to comply with all the legislation and regulationsin force as well as the specifications relating to the cultivation and production of cannabis issued by ANRAC, for production destined to be marketed in Morocco. In addition, they will have to comply with the specific regulations of each country to which their products are intended to be exported.

In order to ensure a standardised quality of the finished product, it is useful to follow the rules of good agricultural practices at all stages of cannabis production.

Similarly, the cannabis industry in Morocco is committed to protecting the environment at every stage of its activities. Cultivators should therefore take into account this aspect, whether through the saving of natural resources, the use of chemicals (fertilisers, pesticides ...) or the reduction of carbon footprint.

DEFINITION OF GOOD AGRICULTURAL PRACTICES

Good agricultural practices are defined as practices that aim to improve the quality, safety,and sustainability of cannabis products while maintaining environmental, economic, and social sustainability.

The **GACP** includes practices used in agricultural production, from planning and harvesting to packaging and transport, which are implemented to ensure the safety and well-being of consumers and workers and to protect the environment.

The WHO Guidelines on Good Agricultural and Collection Practices **(GACP)** for Medicinal Plants[1] are designed for every stage of production, from choosing the right plotfor agricultural practices, testing water quality and choosing the best irrigation system,designing and maintaining the farm, and cannabis cultivation and harvesting, to worker training, health, and safety.

[1] http://apps.who.int/iris/bitstream/handle/10665/42783/9241546271.pdf?sequence=1

CHAPTER 1: BASIC PRINCIPLES FOR SUSTAINABLE CULTIVATION AND HARVESTING OF CANNABIS

Principle 1: Full knowledge of the Guide to Good Agricultural and Collection Practices for Cannabis.

1. It is mandatory that all personnel involved in cannabis cultivation and harvesting operations are trained in the principles of Good Agricultural and Collection Practices.

Principle 2: Have a cultivation permit.

2. Before the start of the cannabis cultivation season, farmers must be organised into a cooperative composed specifically of persons holding a cultivation and production licence issued by ANRAC. This licence is granted on the of publication of this document in geographical areas of provinces specified by regulation and within the limits of the quantities necessary to meet the needs of the activities related to the production of medical, pharmaceutical, and industrial products.

Principle 3: Respect methods that preserve the environment.

Ensure the preservation of the environment, particularly in terms of saving water resources and protecting wooded areas and soil. This involves:

3. Preserving the ecological richness of the cultural environment;

4. Maintaining and promoting biodiversity;

5. Rationalising the use of water and other inputs;

6. Taking into consideration the types of neighbouring farms;

7. Assessing water quality: irrigation system, rainwater, springs, rivers, wells, etc.

Principle 4: Adopt soil conservation techniques.

8. In the case of open field cultivation of cannabis, respect crop rotation which is the reference cultivation technique. The 'Cannabis Cultivation and Production' specifications indicate that a plot that has produced cannabis during a single cycle per year can be used again for the same crop two (2) years after the last harvest. With one of the key objectives of crop rotation being to save water resources other than rainfall and to regenerate the soil, ensurethat crops grown on two-thirds of the area not used for cannabis cultivation rely on rainfall only and avoid the use of fertilisers and pesticides;

9. The cultivator is, however, allowed to present ANRAC with any other alterative cultivation technique (potted crops or other techniques) that allows the perennial cultivation of cannabis and complies with the rules of sustainable agriculture (minimum tillage, rationalisation of water and other inputs…).

CHAPTER 2: WORKERS INVOLVED IN CANNABIS CULTIVATION AND HARVESTING

Principle 5: Comply with the regulatory conditions in effect.

10. The applicant for a cultivation permit must meet the requirements of Art. 7 of Law No. 13-21;

11. All rights of workers involved in cannabis cultivation and harvesting operations must be respected;

12. Workers should be protected from contact with toxic or potentially allergenic elements by wearing body protection equipment (gloves, goggles, dust mask).

Principle 6: Observe good health and safety practices.

13. Workers with a contagious diseases or open wounds should not be involved in anyharvesting, packaging, labelling, storage and transport, security, control, or traceability operations;

14. Workers should always wash their hands after using the toilet or handling pollutants (pesticides, oil, and other chemicals);

15. Workers should make sure that they wear appropriate and clean clothing.

Principle 7: Ensure hygienic facilities.

16. All premises should have suitable changing facilities and toilets located outside the production areas. Washbasins with taps should be in close proximity to the toilets. Where possible, they should be positioned so that workers pass them on their way to the working area.

Principle 8: Awareness raising and training.

17. Raising workers' awareness of the provisions of Law No. 13-21 on the legal useof cannabis, particularly those relating to the control of crops and the ongoing responsibility of the producer before ANRAC;

18. Training of producers and workers in the best cultivation and harvesting techniques to ensure produce of the highest quality possible. Training can be organised within the cooperative in collaboration with the relevant ANRAC departments/units.

CHAPTER 3: PLOT SELECTION AND SOIL TESTING

Principle 9: Choice of the plot to be cultivated.

The conditions for choosing the plot to be cultivated are:

19. Good crop productivity with the utmost respect for the environment;

20. The local climatic conditions must allow the crops to complete their cycle under good water conditions;

21. The soil of the plot must have sufficient depth and physico-chemical characteristics favourable to crops;

22. The terrain should not be too rugged to avoid problems of surface runoff and erosion;

23. Spontaneous vegetation should not consist of perennials that are difficult to remove;

24. Inquiring about local plant diseases and how they spread, and the density and nature of the local insect population.

Principle 10: Soil testing and maintenance.

25. Understand the soil as an ecosystem in its own right and not just as a medium for cultivation, as it promotes germination, emergence and root development, as well as soil conservation;

26. Avoid soils contaminated with sludge, heavy metals, residues, plant protection products, or other chemicals, etc;

27. Carry out soil tests to determine what measures need to be taken to restore soil organic matter or to adjust the pH. Soil testing also helps to determine the types of pesticides and fertilisers that have been applied to the plot and to assess the level of chemical contamination of the soil;

28. Limit the degradation of the soil's structure (compaction, settlement) and

save energy by reducing the use of agricultural machinery;

29. Maintain soil structure by limiting intensive tillage practices;

30. Adopt the practices of crop rotation, to which Law No. 13-21 refers explicitly, use green manure, plant cover, and fallowing, all of which areagricultural techniques that can optimise land use.

CHAPTER 4: CANNABIS CULTIVATION

Principle 11: Producers members of the cooperative.

31. Commitment by cannabis producers to ensure that their practices comply with the GACP Guidelines as a whole;

32. Compliance with the commitments made by the cooperative to which they belong under the contract they have signed with their customers;

33. Acknowledgement of the supervisory role of the cooperative with regard to its members.Communication of all the information for the keeping of the registers which are under the responsibility of the cooperative.

Principle 12: Seeds and seedlings must be certified.

34. Cannabis seedlings or seeds must comply with national regulations. They must be certified by ANRAC;

35. Each variety of cannabis has specific sowing and spacing requirements to grow properly;

36. The varieties selected must be resistant to disease;

37. The seedlings must be free of pests and diseases to ensure healthy plant growth;

38. Cannabis varieties must be selected according to the location and method of harvesting agreed upon at the time of signing the contract between the cooperative, to which the producer belongs, and the customers;

39. Vegetatively propagated cannabis seeds and/or seedlings used in organic production must be certified organic.

Principle 13: Responsible irrigation

Cannabis cultivation can have specific water requirements, depending on the cultivated area, some of which are generally met by rainfall.

40. The preservation of water resources is one of the producer's priorities;

41. Irrigation water should contain as few contaminants as possible such as faeces, heavy metals, pesticides, herbicides and toxicologically hazardous substances. In case of risks or doubts, chemical and microbiological water tests should be carried out;

42. Producers must ascertain the origin of the water they use and verify its quality, by tests if necessary;

43. The water distribution system in the production area should be closed and protected from contaminants. If a well is used, this includes covering the wellhead and ensuring that it is adequately protected;

44. Excessive irrigation can cause various problems to crops (e.g. root rot, fungal diseases, etc.);

45. For each crop season, the producer should have a detailed irrigation plan, based on the weather statistics and forecasts available for the coming months;

46. Producers should choose to irrigate their plants early in the morning or late inthe afternoon, when temperatures drop, to avoid considerable water loss dueto intense evaporation;

47. Modern micro-irrigation methods such as drip irrigation, which use water efficiently, should be considered;

48. Rainwater harvesting is a technique to be favoured.

Principle 14: Proper use of pesticides.

49. Pesticides used in the cultivation and production of cannabis are licenced by the ONSSA;

50. Cannabis is not very susceptible to disease and rarely suffers yield losses between sowing and harvest. The use of pesticides is only justified to prevent or reduce crop damage;

51. Follow the manufacturer's and competent authorities' instructions for the use of pesticides;

52. Do not handle pesticides near water sources;

53. Favour preventive rather than curative actions, physical methods, e.g. immediate hand-picking, or removal of all diseased plants, to avoid the spread of disease;

54. Use products with a low impact on health and the environment and take into account the pictograms on the packaging;

55. The prescribed dose mentioned on the label of a product is calculated to guarantee its effectiveness. Exceeding this dose is unnecessary and harmful to the environment;

56. Use only licenced and authorised pesticides;

57. The use of synthetic pesticides is prohibited;

58. Avoid exposure of any part of the body to pesticides. Producerd must ensure that all appropriate physical protection equipment is available: gloves, masks, coveralls, hats, boots, sprayers, etc;

59. Clean all used equipment thoroughly with soap and water;

60. Store pesticides and spraying equipment in locked rooms intended for that purpose, with adequate temperature and ventilation, in accordance with the

regulations and good practices;

61. Keep all pesticides in their original packaging;

62. Wash empty packages with soap, place them in sealed bags, and place them in the nearest waste bin immediately after use.

CHAPTER 5: EQUIPMENT

Principle 15: Environmentally friendly equipment.

63. Use the least environmentally damaging equipment and machinery;

64. Implement techniques and behaviours to save energy and reduce CO2 emissions;

Principle 16: Cleanliness of equipment and tools.

65. Choose equipment that is easy to clean to minimise the risk of contamination;

66. Make sure that the equipment and machinery used for harvesting are clean andin perfect working order;

67. Regularly clean machines that come into direct contact with cannabis;

68. Clean equipment and tools at least immediately after use and whenever necessary (change of variety, change of plot, etc.).

Principle 17: Expert knowledge of equipment.

69. Opt for equipment and machinery of simple design to allow easy access and cleaning;

70. Calibrate with great precision the machines used for spreading fertilisers or plant protection products;

71. Check equipment for safety before each use.

CHAPTER 6: CANNABIS HARVESTING

Principle 18: Good harvesting conditions

72. Harvest when the plants have reached the optimum quality for their intended use;

73. Remove damaged or dead plants;

74. Harvest in the best possible conditions. Avoid harvesting when the soil is waterlogged or the ambient humidity is high. Take precautions to avoid the disadvantages if harvesting must nevertheless take place in high humidity conditions;

75. Ensure that no other species or varieties of cannabis are mixed with the crop;

76. The passage of animals over the crops is forbidden during the fifteen (15) days preceding each harvest.

Principle 19: Handling harvested cannabis.

77. Avoid direct contact of the harvested material with the ground;

78. Pack cannabis immediately after harvesting for transport in clean, dry containers (canvas bags, baskets, boxes);

79. Ensure that all containers are clean and free of residues from previous crops;

80. When not in use, keep containers dry and free from pests and domestic animals;

81. Prohibit mechanical damage and compaction of cannabis that can lead to undesirable quality changes. Producers must therefore avoid: – overfilling bags or other containers, – over stacking bags or boxes;

82. Process freshly harvested cannabis as quickly as possible after harvesting to avoid possible thermal alteration;

83. Protect the harvested produce from pests and domestic animals.

CHAPTER 7: POST-HARVEST PROCESSING

Principle 20: General considerations

84. Ensure that all processing, washing (if required), sorting, drying, and storage are in compliance with national law and regulations;

85. Apply the post-collection processing to the harvested raw material to ensure the physico-chemical and organoleptic qualitydesired by the client and avoid any deterioration or contamination, including cross-contamination, which are necessary conditions for obtaining raw material with a good commercial value and in order to ensure the safety and harmlessness of its use by consumers;

Ensure that the premises (or spaces) where primary processing operations will be carried out meet the following standards:

86. Separate clean and dirty areas and reserve a space for each unitary processing operation;

87. Respect the moving forward principle in time and space;

88. Ensure that the floor of the processing area is easy to clean, non-slip, and doesnot allow the growth of micro-organisms. A slope in the floor should ensure that cleaning water is drained to the drainage channels;

89. If primary processing operations are carried out in a closed space, ensure that the walls are covered with food-safe tiles that are easy to clean and that theintersections of the walls are rounded. Windows and openings must be closed;

90. Ensure continuous ventilation of the space from the clean processing areas to the dirty areas.

Principle 21: Comply with drying standards.

91. The final produce (dried leaves, seeds, flowers) must have a percentage of humidity of 8 to 10%, which is the optimal humidity that allows storage in good conditions while preserving quality.

Principle 22: Open air drying: the collected material should be dried in the shade.

The collected material must not be exposed to direct sunlight, unless this drying methodis specified, so that its chemical and organoleptic characteristics (mainly its colour) arenot affected. The raw material must be protected from rain and excess humidity.

92. In the case of natural air-drying, the collected raw material should be spread out on racks or grids in protected areas, and raised from the ground by about 25 to 30 cm to facilitate air circulation;

93. Dry the collected material in the open air, in the shade, in a shed, or in a greenhouse which must be kept dry and well ventilated to preserve the quality of the product;

94. Respect the drying time of the collected material. Rapid drying presents a risk of loss of essential oils, whereas drying for too long could lead to microbiological alterations (development of bacteria and moulds) in the material to be dried;

95. Spread the collected material in thin layers of a few centimetres to ensure rapid, uniform, and even drying;

96. Flip the dried material regularly, once or twice a day;

97. Make up homogeneous piles of plants to be dried with the same degree of maturity, humidity, and harvest date, to avoid the appearance of alterations in the dried material.

Principle 23: Follow the instructions for using artificial dryers.

Artificial drying can be done in heat chambers, drying cabinets, solar or electric dryers, or ovens;

98. Follow the manufacturer's recommendations on how to install the dryer and on the safety of the people operating the equipment;

99. Respect the load capacity of the dryer (quantity of material);

100. Respect the drying conditions (ventilation, temperature, flipping, etc.);

101. Ensure that the material collected is of the same level of maturity and the same date of harvest, as this will avoid the occurrence of drying accidents;

102. Respect the drying time recommended by the manufacturer or the authorised technicians, depending on the parts of the plants to be dried;

103. Monitor temperature and humidity carefully. Temperatures above 40°C can cause alteration of the active chemical components of the harvested material;

104. Avoid direct contact between the plant material to be dried and the fuel and smoke from the dryer;

105. Ensure that traces of insecticides or any other toxic products used for cleaning, disinfection, or rodent control have been removed from the premises where the dryers are installed before the drying operation starts.

Principle 24: Observe good hygiene practices.

106. Identify practices that pose risks to the drying operation;

107. Maintain a hygienic environment throughout the drying process;

108. Respect the rules of hygiene relating to the workers, equipment and tools used, and the environment where the drying operation is carried out;

109. Define a control and prevention system for the drying process;

110. Isolate batches suspected of not having followed good hygiene practices.

Principle 25: Carry out an initial sorting and cleaning of the raw material.

111. Process the dried material on a clean surface and never directly on the ground;

112. Eliminate all plant species other than the target species;

113. Remove foreign bodies (stones, soil aggregates, glass, metal, etc.);

114. Eliminate parts of the plant that are not useful for the desired output;

115. Remove diseased or contaminated plants from the harvested plant material;

116. Avoid placing the dried material directly on the ground when sorting;

117. Ensure that any dried material with quality defects is eliminated based on its appearance and organoleptic properties (colour, smell, taste). If sticks are used (e.g., beating for leaf separation), check the leaves and the percentage of leaves not separated from the stems;

118. Ensure that there is no temperature rise during this separation process;

119. Ensure the elimination of the stems that may alter the quality of the dried material in case of long-term storage (material transfer phenomena);

120. Ensure that the waste from the sorting process is not left in nature to avoid causing environmental damage.

CHAPTER 8: PACKAGING AND STORAGE

Principle 26: Observe good packaging practices.

121. Ensure that the packaging of the dried plant material follows standard operating procedures, national regulations, and those of the country where it is intended to be used;

122. Pack the dried material as soon as possible to prevent spoilage and to protect it from possible pest attacks or other sources of contamination, including cross-contamination;

123. Take every precaution to ensure that the containers for the raw material are clean and allow for ventilation, while ensuring that the containers do not interact with the raw material;

124. Pack the dried material in clean burlap or canvas bags or baskets or any other clean or food-grade container, and ensure continuous aeration to avoid anaerobiosis while maintaining the standard weight of each container;

125. Reusable packaging materials such as burlap or canvas bags should be cleaned and disinfected and should be properly dried before reuse;

126. Ensure that all packaging materials are stored in a clean, dry place, away from pests and out of reach of livestock, domestic animals, and other sources of contamination;

127. Install instruments to monitor and show the temperature and humidity of cannabis storage areas.

Principle 27: Properly identify the packaged product with a label.

128. The labels on the packages should clearly show the brand where applicable, the scientific name or code of the cannabis plant, the processing batch code, its origin, the name of the supplier, the date of collection, the date of packaging, and the weight of the bag packaged. Care should be taken to ensure that all processing and packaging operations and activities are recorded on a regular basis.

Principle 28: Adopt good storage practices.

129. To maintain produce quality, storage of plant material should be in clean, well-ventilated, dry, and pest-free facilities with limited temperature fluctuations;

130. The bags containing the plant material should be stored in clean, dry warehouses, preferably in a linear arrangement, 25-30cm off the ground and at least 50cm away from walls. Avoid stacking the material by excessive high storage, which can lead to the deterioration of the stored material;

131. Storage areas for the collected material should not be used for the storage of pesticides and other chemicals;

132. The FIFO (First-in, First-out) standard must be applied and respected by establishing an order of processing of products according to their order of arrival. Any spoiled or non-compliant raw material must be discarded before carrying out the necessary processing;

133. Fumigation of plant material must be coordinated with the customer, and only authorised or specially trained persons may be responsible for it. Only chemicals authorised by the regulatory authority of the country of origin and/or the countries where the product is to intended be used may be employed;

134. All fumigation operations, fumigants used, and dates of processing must be documented;

135. The building where the cannabis is stored must be equipped with a system that both filters the air to prevent odours associated with the cannabis plant material from escaping to the outside and prevents the build-up of heat, steam, condensation, or dust and odours.

Principle 29: Use clean and contamination-free packaging.

136. All packaging material used during the collection period must be kept clean and free of contamination. When not in use, the packaging material should be stored in dry conditions, away from sources of contamination and animals (rats, cats, dogs, donkeys, mules, etc.);

137. The collected material must be protected from insects, rodents, birds, livestock and domestic animals, and other pests that may impair its quality;

138. Once collected, the fresh material must be transported to suitable premises that meet health and safety standards for primary processing. It must be properly unloaded and stored without pressing to avoid a rise in temperature that could alter the raw material.

CHAPTER 9: TRANSPORT

Principle 30: Adopt good transport practices.

139. The collected material must be handled properly during transport (loading and unloading) to avoid loss of the desired parts of the plant and to prevent physical or chemical alterations that depreciate the final quality;

140. The means of transport used for the bulk raw material from the collection site to the processing site must be cleaned and cleared between each load;

141. Organise the transport operations in such a way that the raw material does not stay in the processing sites or collection centres for very long;

142. When unloading, ensure that the raw material is weighed on a clean scale and stored in a clean place;

143. Ensure cleanliness and hygiene of the driver, assistant driver, and raw material handlers;

144. Maintain the transport logbook on a permanent and regular basis.

CHAPTER 10: TRACEABILITY

Principle 31: Tracking record of each batch.

All processes or procedures that could affect the quality of the product must be recorded in the production record, as required by the cannabis cultivation and production specification. This obligation applies in particular to the following points:

145. The place of cultivation and name of the person in charge;

146. Details of previous crops grown on the plot concerned; e.g. nature, origin, and quantity of parent plants;

147. Chemicals and other substances used during cultivation (fertilisers, pesticides, herbicides, etc.);

148. Standard cultivation conditions, where applicable;

149. Special event(s) during the cultivation or harvesting period that may have had an effect on the chemical components (diseases, temporary disruption of the standard cultivation protocol), especially during the harvesting period;

150. The nature and quantity of the product;

151. The date(s) and time(s) of day on which the harvest took place;

152. Drying conditions;

153. Measures used to control undesirable situations;

154. The results of all tests performed.

Principle 31: Documentation.

155. Soil and water test reports should be kept on file;

156. The origin of all batches should be clearly indicated by labelling (e.g. batch number). This should be done as early as possible in the procedure;

157. Batches of different geographical origins may be mixed on the express condition that they are similar and that the mixture is homogeneous. Any mixing of lots must be reported;

158. The documentation for each batch must show that the cultivation, harvesting, and processing procedures were carried out in accordance with the prescribed standards;

159. All parties involved at any level of production must demand from their contact persons all documents establishing the traceability of each batch;

160. Audit results should be reported. Audit reports and results of concurrent tests or any other documents must be kept for a minimum of ten years.

The Producer must keep a data register in accordance with Decision No. 1296-22.

Principle 32: Equipment monitoring and safety.

161. The premises in which cannabis is grown, processed, packaged, and stored must be sufficiently secure. The building must be able to withstand attacks and only certified staff should have access;

162. Workers involved in cannabis production operations must be certified by their employer. When signing the supply contract, the supplier shall designate the accredited persons and indicate the method of control;

163. Waste should be stored in such a way that the risk of theft is controlled. If waste is collected in bags, it must be stored immediately in locked containers (compactors).

Principle 33: Ensure compliance with ANRAC requirements.

164. Producers must respond to the demands that ANRAC may make in terms of safety and monitoring of cultivation plots;

165. Producers must design and maintain operational policies and procedures to support physical security measures and prevent theft or loss of cannabis.

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