

**BUREAU OF MEDICAL CANNABIS REGULATION**

**PRE-REGULATORY MEETING**

**DISTRIBUTOR REQUIREMENTS—MEETING SUMMARY**

**REDDING**

**September 19, 2016**

**Topic 1: Ensuring Quality of Product**

**BMCR Thoughts: Require all distributors to abide by the following storage conditions for all medical cannabis and medical cannabis products:**

- 1. Dried Flower: Humidity 60-65%, dark area out of direct sunlight;**
- 2. Concentrates and infused products: Refrigerated less than or equal to 4 degrees Celsius, dark area out of direct sunlight, well-ventilated area;**
- 3. Edibles: Refrigerated at 4 degrees Celsius; and**
- 4. All products: Sealed bags, dark containers, locked up.**

**COMMENTS:**

- Storage conditions should be put into law. [Multiple commenters]
- Some people like their flower very dry, and 60% is too humid.
- Humidity for flower is strain specific and climate oriented, so some strains need drier conditions than others.
- Humidity level for storage should match the humidity level at which testing sample was taken.
- People can get artificially high levels of THC by drying the flower (“artificial” because the THC level is divided by less weight).
- The drier the flower, the longer the shelf-life.
- Some strains have certain terpenes that make the flower more resistant to fungus; humidity level should be strain-specific.
- Should require sealing product using liquid nitrogen (to get oxygen out).
- Heat, light and humidity cause degradation of product in general.
- There should be no cap on distributor licenses. [Multiple commenters]
- Want a remedy with the Bureau if a distributor takes advantage of a business.
- Wants guidance on whether to give distributors whole, loose harvest batches or pre-packaged amounts.
- Wants guidance on having firearms.
- “Keeping records was suicide.” How will distributors prove they were in operation without paperwork? Affidavit should be enough.

**MAIN THEMES:**

- Put storage requirements for distributors into regulation.

*Disclaimer: This meeting summary is not intended as a verbatim transcript of comments at the meeting, but a summary of the discussion which took place; nor does this document attest to the completeness, reliability, or suitability of this information.*

## Topic 2: Repurposing of Medical Cannabis

**BMCR Thoughts: Allow processing of medical cannabis flower if contamination levels are below limits set by BMCR. Limits will be set using scientific studies and will ensure safety of any medical cannabis product for human use. Any product found with contamination levels higher than those limits set by BMCR will require destruction.**

### COMMENTS:

- Bureau should allow for this. [Multiple commenters]
- Food grade products okay?
- Have to draw at chloroform levels.
- Bureau should allow for partial destruction of a failed batch.
- Many concerns about who owns the flower after a failed test.
- Flower should not be given back to cultivator after failed test.
- Who decides which lab to use?
- There should be timeframes in the law regarding how long a distributor may hold product.  
Requiring distributors to move quickly by contract versus through regulation will raise the price.

### MAIN THEMES:

- Allow for repurposing.

## Topic 3: Labeling

**BMCR Thoughts: Allow for labeling to occur as follows:**

1. **At cultivator's or manufacturer's premises prior to medical cannabis and medical cannabis products being sent to distributor;**
2. **By distributor at the distributor's premises; or**
3. **By a third party at the distributor's premises.**

### COMMENTS:

- No comments.

## Topic 4: Sample Collection for Testing Purposes

**BMCR Thoughts: All sample collection for testing purposes shall be done by an agent of a licensed testing laboratory, under the surveillance of a distributor; sample collection shall be performed under video surveillance. All sample collection shall occur under one of the following conditions:**

1. **A testing lab agent comes to the distributor's licensed premises to select a random sample for laboratory testing; or**
2. **The distributor transports all medical cannabis and medical cannabis products from one testing batch to the laboratory and a testing lab agent selects a random sample.**

### COMMENTS:

- No comments.

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