BUREAU OF MEDICAL CANNABIS REGULATION

PRE-REGULATORY MEETING

TRANSPORTER REQUIREMENTS—MEETING SUMMARY

REDDING

September 19, 2016

Topic 1a: Shipping requirements; Transportation manifest:

BMCR's Thoughts: Require the following information on all transport manifests:
1. **Name and license number of source vendor;**
2. **Name of authorized employees of source vendor and recipient;**
3. **Name and license number of receiving licensee;**
4. **Number of units or weight of items being transported;**
5. **Strain and product type of medical cannabis and medical cannabis product in shipment;**
6. **Unique identifiers of all products in shipment;**
7. **Travel routes; and**
8. **All planned stops on travel route.**

COMMENTS:
- The group liked and were fine with numbers 1,2,5,6
- #3 – The group had concerns about pre-listing the receiving licensee on the manifest. What if they reject product? **SUGGESTED** splitting the manifest into two parts (1) a departure manifest and (2) a final manifest for reconciliation. The second manifest could have the sales receipt with purchasing recipient attached to the manifest.
- #4 – the group strongly urged BMCR to consider the industries use of samples and how to exempt/clearly identify samples on a manifest. These are products that may not be "purchased" by the receiving licensee but need to be accounted for. **SUGGESTED** requiring "sample" labeling.
- #7/8 – the group wanted to ensure that any transport manifest allowed enough flexibility to permit field appointments. Often they have a load of product from northern CA and start driving to southern CA. Existing transporters may use "brokers" in southern CA whom they leave the product with and entrust to make the final distribution. They then return home and await final payment. While en route they get contacted for additional stops along the way. Under this practice they are not able to list all stops on a manifest prior to leaving the origination point.
- ADVERTISING – the group was unanimous that signage should not be allowed or heavily regulated. Maybe permit magnetic signs that can be added or removed during transport.

QUESTIONS:

MAIN THEMES:
- The information available in the manifest should not place the driver in danger.

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Topic 1b: Shipping requirements; Documents

BMCR's Thoughts: All transporters shall carry the following documents:
1. **State license and local license, permit, or other authorization for transport;**
2. **Driver's license;**
3. **Physical copy of shipment manifest;**
4. **Proof of insurance; and**
5. **Vehicle registration.**

> **COMMENTS:**
> - The group had no comments/no alteration with the items listed under 1b.

Topic 2a: Transportation thresholds; transporter license

BMCR Proposal: Establishing the transportation threshold, above which a transporter license is necessary, based on product type. If transporting above the following amounts, a transporter license would be required: Dried flower: ≥ 5 lb; Concentrates and extracts: ≥ 50 grams: Medical cannabis-infused products: ≥ 150 units; and Live plants: ≥ 20 ten-count packs of seeds or ≥ 144 immature plants or ≥ 10 mature plants.

> **COMMENTS:**
> - The group had no issues with the listed minimum thresholds suggested by the Bureau.
> - The group felt they were thoughtful and carefully designed, as to coincide with an approximation of one person's potential annual use.
> - SUGGESTION: Maybe delete the difference between mature/immature plants. Just have one category ("plants") and keep the number at 144.

Topic 2b: Transportation thresholds; Maximum thresholds

BMCR's Thoughts: No maximum weight limit on the amount a transporter can transport in one shipment.

> **COMMENTS:**
> - Group was unanimous – **NO max amount**. It should be up to each business to decide the amount of product and amount of financial risk they are willing to take.
> - One transporter currently operating moves 10,000 lb. at a time.

Topic 3a: Vehicle requirements; Storage and security

BMCR Proposal: All vehicles are to be equipped with the following: refrigeration; specialized locking system for storage and for entry and exit; in vehicle security; and, separation between the people in the vehicle (i.e., drivers and passengers) and the shipment.

> **COMMENTS:**
> - Refrigeration – the group felt that this was a topic that the industry will self-regulate. Many growers know proper refrigeration is required and they will not choose transporters that do not

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already provide proper refrigeration.
- The group was in agreement that product should not be seen during transport. Done either via windowless vehicles or the cunning use of "tapestries."
- Specialized lockbox – the group liked the idea of requiring a ridge frame box capable of heavy-duty lock.

MAIN THEMES: As little regulation as feasible. Allow the industry to set common practice and standards.

Topic 3b: Vehicle requirements; Vehicle type

BMCR's Proposal: Transportation by means of aircraft, watercraft, drones, rail and human powered vehicles (including motorized bicycles, etc.) shall be prohibited.

COMMENTS:
- The group did not want to limit the type of vehicle other than to say – no public transportation (e.g. business and trains) and any mode selected should meet all safety and security requirements.

MAIN THEMES: Allow as much flexibility as possible.

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