

BUREAU OF MEDICAL CANNABIS REGULATION

PRE-REGULATORY MEETING

DISTRIBUTOR REQUIREMENTS—MEETING SUMMARY

SACRAMENTO

September 20, 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:

- For edibles, there should be allergens, sugar content and other ingredients listed.

QUESTIONS:

- How long may product stay at distributors?

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:

- Cultivator should be able to get flower that failed test back to fix it.
- Should be allowed to make products for animals with failed flower.
- Should be able to make paper products or non-food-grade products with failed flower.

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 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:

- Could make labels in black, gray and white only so they aren't appealing to children.

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:

- Distributor could be like a broker and get stuff to move to dispensaries (wholesale).

QUESTIONS:

- Is consignment okay?

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.