

**BUREAU OF MEDICAL CANNABIS REGULATION**

**PRE-REGULATORY MEETING**

**TRANSPORTER REQUIREMENTS—MEETING SUMMARY**

**SANTA ROSA**

**September 22, 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 1,2,3,4,5,6.
- #7/8 – the group wanted to ensure that any transport manifest information did not put the driver at risk of violence.
- Listing the travel route could be dangerous if their computer systems were hacked.
- Maybe have the driver keep a written log with narrative explanations for deviations from planned route versus having the route listed on the manifest.
- The manifest design and information should allow enough flexibility to permit multiple location appointments.

**MAIN THEMES:**

- Too much information on the manifest puts the driver at risk. Do not include any more information than what is absolutely necessary.

**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;

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- 4. Proof of insurance; and
- 5. Vehicle registration.

<p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• The group had no comments/no alteration with the items listed under 1b.</li> <li>• The groups felt that drivers should be required to have some sort of communication device with the vehicle at all times (cell phone, satellite phone, CB radio, etc.).</li> <li>• The group felt strongly that drivers should be subject to background checks. They are and should be treated differently than regular line employees because of their control and access to the product while in transport.</li> </ul>
<p><b>QUESTIONS:</b></p>
<p><b>MAIN THEMES:</b></p> <ul style="list-style-type: none"> <li>• The main proposal looks good.</li> </ul>

**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 or; Medical cannabis-infused products: ≥ 150 units; and Live plants: ≥ 20 ten-count packs of seeds or ≥ 144 immature plants or ≥ 10 mature plants.**

<p><b>COMMENTS:</b></p> <ul style="list-style-type: none"> <li>• The group was adamant that weight should be classification criteria for setting minimums and not market value. Market value fluctuates too rapidly to be the benchmark. Price/value is set by region and would put various transporters in different parts of the state on unequal footing. What location do you pick as the price benchmark? The origination point? The destination point?</li> <li>• The group had no issues with the listed minimum thresholds suggested by the Bureau.</li> <li>• The group thought that as the size of the load increased so too should the security requirements. The group did not have guidance on where the load/security required break points should be.</li> <li>• The group felt that all transport vehicles should be equipped with global positioning system tracking devices.</li> <li>• There should be no non-employees present during transport.</li> </ul>
<p><b>QUESTIONS:</b></p> <ul style="list-style-type: none"> <li>• Is the state going to set the value of medical cannabis and medical cannabis products?</li> </ul>

**Topic 2b: Transportation thresholds; Maximum thresholds**

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

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**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 per load.
- Required security should increase as the load increases.
- Global positioning system and camera devices should be installed in all transport vehicles.
- The group felt that a “cottage transport” license should be created whereby local small transport could occur without any of the restrictions previously listed.

**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.

**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 exclude waterways from valid methods of transport.
- One group member mentioned there are many business that want to use the Port of Oakland as a shipping hub.

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