

BUREAU OF MEDICAL CANNABIS REGULATION
PRE-REGULATORY MEETING
TRANSPORTER REQUIREMENTS—MEETING SUMMARY

OAKLAND

September 27, 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:

- Number 7 should be eliminated because it is not practical.
- Number 8 should be eliminated because it is not practical. It is hard to know when or where a driver will need to stop for things such as food, gas, etc.
- The end time should be flexible to account for traffic, stops for food, gas, etc.
- A 48 hour manifest would be good. The transport must be completed 48 hours from the time it starts.
- Having end and start times on a manifest makes the transporter vulnerable if they always take the same route.
- Allow for daisy chain; multiple manifests during single "trip."

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.**

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COMMENTS:

- Support the Bureau’s proposal as written.

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.

COMMENTS:

- The minimum for dried flower is good; the minimum for concentrates and extracts should be raised to 200-400 grams.
- Others supported the proposal.
- Should set an amount that would allow for sampling. Businesses will go from dispensary to dispensary with samples of product. The average sample size is about ½ pound.
- Should look at how the pharmaceutical industry deals with samples.

Topic 2b: Transportation thresholds; Maximum thresholds

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

COMMENTS:

- The maximum level should be the vehicle capacity.
- Maximum level should be based on insurance limits.

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:

- Should require two security cameras; one on driver and one on product.
- Should require a locked container that is tamper proof.
- Type of lock should be determined by the business; remove “specialized.”
- State should create a list of products that require refrigeration and only mandate it for those products.
- It should be the owner/transporter that determines refrigeration. (Multiple comments supported this).
- Fewer requirements from the state are best; these requirements should be left to the industry.

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- Live feed/global positioning system tracking should be required on the vehicles.

MAIN THEMES:

- Refrigeration should be a business decision.

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:

- Limit transportation means to companies that are licensed motor carriers.
- Vehicle types shouldn't be too limited; want to allow for new invention.
- Mandating vehicle requirements could keep small businesses out of the industry.
- Want small businesses to be able to easily move product.
- Allow transporters to have flexible transport methods.
- Prioritize safety in the permissive means of transport.
- Instead of prohibiting certain types of transport, just set requirements that the transportation means must have.

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