

BUREAU OF MEDICAL CANNABIS REGULATION

PRE-REGULATORY MEETING

DISPENSARIES—MEETING SUMMARY

FRESNO

SEPTEMBER 27, 2016

Topic 1: Subtypes of Dispensary Licenses

BMCR Thoughts: Establish a subtype of dispensary license that is delivery only. The delivery-only dispensary license would require a brick-and-mortar premises but would allow for delivery, non-storefront retail sales to qualified patients and primary caregivers. BMCR and law enforcement would maintain the right to inspect the premises at any time.

COMMENTS:

- The Bureau should consider creating a subclass of dispensary that does not need to go through a distributor.
- Producing dispensaries should be allowed to obtain delivery-only licenses.
- There should be less strict security requirements for delivery-only dispensaries, but there should still be requirements for surveillance cameras and alarms.
- The delivery-only subtype sounds like a good idea.
- The licensing fees for delivery-only dispensaries should be less than a regular dispensary.
(Repeated once)

MAIN THEMES:

- Fees for a delivery-only subtype should be lower than regular dispensaries.

Topic 2: Employee Requirements

BMCR Thoughts: Require licensees to maintain an accurate, up-to-date roster of all employees (e.g., contractors, full-time and part-time employees, delivery employees, etc.) and accompanying information on each employee as part of their records. The information would include data such as the date the employee started, all applicable training, job description, and any employee information maintained by the licensee.

COMMENTS:

- There should be minimum requirements for the training of dispensary employees.
- There should be no training requirements for employees. Employers should be responsible for deciding on training.
- Business owners should be responsible for their employees. The state should not require any information on employees.
- Employers should be responsible for keeping employee records. State should not be involved.

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: Delivery Requirements: Manifests, Storage

BMCR Thoughts:

1. **Require the following information on all delivery manifests:**
 - a. **Name and license number of dispensary;**
 - b. **Name of primary caregiver or qualified patient who ordered the medical cannabis or medical cannabis products;**
 - c. **Number of units or weight of items being transported;**
 - d. **Strain and product type of medical cannabis and medical cannabis products in shipment;**
 - e. **Unique identifiers of all products in shipment;**
 - f. **Travel route, start and end time; and**
 - g. **All planned stops on travel route.**
2. **All dispensary delivery vehicles shall be equipped with the following:**
 - a. **Refrigeration;**
 - b. **Specialized locking system for storage of medical cannabis and medical cannabis products;**
 - c. **Vehicle alarm system; and**
 - d. **Separation between the people in the vehicle (i.e., drivers and passengers) and the shipment.**

COMMENTS:

- Dislike the idea of all of this information being required on the manifest.
- Business owners do not want to have to create this document for every single delivery made by the dispensary.
- Dispensaries should not have to submit the manifest to the state.
- Businesses want to limit the amount of paperwork that they need to complete.
- It is difficult to determine the start/end time of a trip and the route of a trip prior to the trip. Traffic conditions will likely result in changes to the planned route.
- There should be a method to update the start/end time and the travel route information after the delivery is completed.
- The proposed storage requirements seemed reasonable.
- Should not require the installation of an electric refrigerator. Any mechanism for keeping the product cool should be acceptable.
- An ice chest or cooler should be OK for storage.
- There should be no other passengers in a delivery vehicle besides dispensary employees.
- Separation between the driver and the product makes sense.
- Travel routes should be allowed to be flexible.

MAIN THEMES:

- Times and routes for delivery should be flexible.
- It should not be too costly to have a vehicle approved for being used in deliveries.

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 4: Transaction Limits

BMCR Thoughts: Set the transaction limit for an individual patient within the following range for all dispensaries, based on other states:

1. 2.5 oz per month of usable medical cannabis, regardless of product type;
2. 5 oz per month of usable medical cannabis, regardless of product type; or,
3. Limitations as follows:
 - a. 24 ounces of dried flower;
 - b. 16 ounces solid or 72 fluid ounces of liquid medical cannabis product;
 - c. 16 ounces of cannabinoid concentrate whether sold alone or in an inhalant delivery system;
 - d. Five grams of a cannabinoid extract whether sold alone or in an inhalant delivery system;
 - e. Four immature medical cannabis plants; and, 50 seeds.

COMMENTS:

- The state should not impose any transaction limits. (Repeated three times)
- Any limits that are set should have an explanation as to why the levels are set where they are.
- Limits should only be determined by physician recommendations. (Repeated once)
- There should be some regulation on the amount a person can buy.
- The proposed limits are all too low.
- The limits set should not be set arbitrarily. (Repeated once)
- Transaction limits may be ineffective because a person can easily go to multiple dispensaries and make multiple purchases.
- Limits on different types of products will create more work for the dispensaries because current practices may not be able to accommodate.

MAIN THEMES:

- Transaction limits are not wanted.

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.