

**BUREAU OF MEDICAL CANNABIS REGULATION**

**PRE-REGULATORY MEETING**

**TRANSPORTER REQUIREMENTS—MEETING SUMMARY**

**FRESNO**

**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:**

- Agree with items 1-7.
- 8 should be amended to all planned cannabis stops. All cannabis stops should be documented with flexibility for necessary stops (e.g., food, gas).

**MAIN THEMES:**

- Flexibility should be allowed.

**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:**

- Local jurisdictions haven't been issuing "transporter" permits or licenses; BMCR should use the business license for "other authorization."

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- Local license needs to be clarified for transporters.

**MAIN THEMES:**

- “Other authorization” needs to be clarified.

**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:**

- Minimums should be based on “personal use” laws; eight ounces of dried flower, six mature plants and 12 immature plants.
- Mature and immature will need to be defined and should not be based on size of plant but on when plant is at stage of producing flower that can be harvested.
- Shouldn’t need transporter license to move from one dispensary to another if they are owned by same owner.

**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 maximum vehicle carry limit.

**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 should only be required for perishables.
- Locking system should be based on vehicle type.
- Product should be secured somehow, and there should be guidelines on how to secure it but not mandatory requirements.
- State should set minimum standard to prevent diversion.
- Disagreement on whether or not an alarm system on the vehicle should be required.
- Separation between the driver and product should not be required.

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**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:**

- Agreed with the Bureau's proposal.
- Trailers should be allowed but only if they are enclosed.

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