

BUREAU OF MEDICAL CANNABIS REGULATION

PRE-REGULATORY MEETING

DISTRIBUTOR REQUIREMENTS—MEETING SUMMARY

LOS ANGELES

October 4, 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:

- Allow for plus or minus 5% for storage limits.
- Should have a shelf date.

QUESTIONS:

- How long may a distributor keep the product?

MAIN THEMES:

- Storage conditions should be in regulation.

Topic 2: Repurposing of Medical Cannabis

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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: <ul style="list-style-type: none">• Allow for animal uses and in construction.
QUESTIONS: <ul style="list-style-type: none">• If you remediate the flower, do you send it back to the same lab?• Can you retest after a failed test? Another lab or same lab?• Who decides which lab to use? Whoever has title?• Should BMCR limit the number of retests?
MAIN THEMES: <ul style="list-style-type: none">• Allow for retesting, repurposing and remediation.

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: <ul style="list-style-type: none">• Distributor should have nothing to do with packaging or labeling.• Don’t allow distributor to create their own brands.• Make packaging a separate type of license. [Multiple commenters]• Require “grown by,” “distributed by” and “packaged by” information on labels.

Topic 4: Sample Collection for Testing Purposes

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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:

- No comments.

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