

**BUREAU OF MEDICAL CANNABIS REGULATION**

**PRE-REGULATORY MEETING**

**TRANSPORTER REQUIREMENTS—MEETING SUMMARY**

**LOS ANGELES**

**October 4, 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 1,2,3,4,6.
- #7/8 – the group wanted to ensure that any transport manifest information did not put the driver at risk of violence.
- The identification of the driver should not be on the manifest – maybe a contact number to dispatch where ID can be quickly verified.
- 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.
- Cash should be permitted in transport with the product.
- Cash should be secured similar to Brink's trucks in zippered bags or sealed bags, locked in a separate box.

**QUESTIONS:**

- Will mobile testing labs be permitted?

**MAIN THEMES:**

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

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## 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.

<b>COMMENTS:</b>
<ul style="list-style-type: none"><li>• Motor carriers permit should be added.</li></ul>
<b>MAIN THEMES:</b>
<ul style="list-style-type: none"><li>• The main proposal looks good with small additions.</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:  $\geq 5$  lb.; Concentrates and extracts:  $\geq 50$  grams; Medical cannabis-infused products:  $\geq 150$  units; and Live plants:  $\geq 20$  ten-count packs of seeds or  $\geq 144$  immature plants or  $\geq 10$  mature plants.**

<b>COMMENTS:</b>
<ul style="list-style-type: none"><li>• All of the thresholds look generally acceptable.</li><li>• Maybe set limits on the amount of concentrates.</li><li>• Maybe set limits on flower around 44,000 lb – 50,000 lb.</li></ul>
<b>QUESTIONS:</b>
<ul style="list-style-type: none"><li>• What is the definition of a "unit"?</li></ul>






## Topic 2b: Transportation thresholds; Maximum thresholds

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

<b>COMMENTS:</b>
<ul style="list-style-type: none"><li>• Group was unanimous – <b>NO max amount</b>. 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.</li><li>• Transporters already are required to follow all Department of Transportation weight restrictions – no need to over-regulate.</li><li>• When dropping off at a "licensee" – how does the transporter check or verify that the receiving party is a duly licensed medical cannabis entity?</li></ul>



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### **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.
- The group was in agreement that it should be locked, separation between driver and product and windowless vehicles.
- GPS should be left to the owner as 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:**

- The group did not want to exclude aircraft from valid methods of transport.
- The group suggested that the Bureau stay silent on this method of transportation. This would allow for an easier transition if the federal government is to relax their regulations of the transport of medical cannabis and medical cannabis products.

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