

**BUREAU OF MEDICAL CANNABIS REGULATION**

**PRE-REGULATORY MEETING**

**TRANSPORTER REQUIREMENTS—MEETING SUMMARY**

**San Diego**

**October 5, 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 1,2,3,4,5,6.
- #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:**

- Can cash and product be together in the same shipment?
- Do the drivers need to be union?

**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>• Carriers permit.</li><li>• There should be a "CA #" issued by the California Highway Patrol.</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>• Minimum thresholds/requirements should be kept low – anything more than a medical license would allow – 6 oz.</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></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.
- If refrigeration is required then the Bureau should look to other pharmaceutical standards.
- The group was in agreement that it should be locked, separation between driver and product and windowless vehicles.
- The Bureau should look to the “secured air freight security framework.”

### **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, watercraft and rail from valid methods of transport.
- The group suggested that the Bureau stay silent on the 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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