BUREAU OF MEDICAL CANNABIS REGULATION

PRE-REGULATORY MEETING

DISTRIBUTOR REQUIREMENTS—MEETING SUMMARY

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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: • Leave it to contracts. • Broad floor by product type and then contract within those parameters. • Make regulations based on industry standard. • How do you enforce storage requirements? How can you prove it's always 39 degrees?
QUESTIONS: • Can you combine two harvest batches prior to distribution and testing?
MAIN THEMES: • Bureau should/shouldn't regulate storage conditions.

Topic 2: Repurposing of Medical Cannabis

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: • Allow for unlimited number of tests until it passes. • Allow repurposing. [Everyone] • There should be destruction limits unless there's a banned contaminant in it.
MAIN THEMES: • Allow for retesting, repurposing and remediation.

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: 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: • The Bureau should pre-approve brand-specific labels and leave blank the area for test results, expiration, etc. • Distributor should be able to label and re-label. • Opaque bags are a bad idea. Seeing the product is important to consumers. • Should be able to label anywhere. [Multiple commenters] • Should allow dispensaries to buy in bulk and break it down. It's been done that way for 20+ years. [Multiple commenters] • If you don't allow dispensaries to sell by the gram, a lot of waste will be produced from all the packaging.
QUESTIONS: • How will flower be labeled? Can you label it at retail? • Can dispensary break down product? • Who can roll pre-rolls?
MAIN THEMES: • All dispensaries to sell by the gram and label. Allow labeling to happen after testing.

Topic 4: Sample Collection for Testing Purposes

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: • Put sample in tamper-evident box and everyone signs off.