

**BUREAU OF MEDICAL CANNABIS REGULATION**

**PRE-REGULATORY MEETING**

**TRANSPORTER REQUIREMENTS—MEETING SUMMARY**

**SANTA ANA**

**October 18, 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 was OK with numbers 1-6.
- The group had safety concerns about listing travel routes.
- The group was of the strong opinion that the manifest should maybe only list zip codes or use global positioning system units to track the route rather than pre-stating the route on the manifest.
- Suggest use of electronic track-and-trace system. Want trace between licensees.
- Number 8 should be given at the end of the trip (safety concerns). The manifest can be good for a short but specified period of time - 24/48/72 hours. This helps reduce the predictability of the cannabis shipment.
- Want surveillance cameras in transport: one on driver and the other on the product.
- Transporters want something to show police.
- The Bureau should look to the transportation regulations of pharmaceuticals.
- Real-time tracking of product should run approximately \$30/month per truck.

**MAIN THEMES:** The information on the manifest needs to be crafted as to not put the driver at risk.

**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;**

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3. **Physical copy of shipment manifest;**
4. **Proof of insurance; and**
5. **Vehicle registration.**

**COMMENTS:**

- Driver License Class C for cars/vans. Class A for trucks
- Manifest – Dispatcher/driver/receiver sign.
- Would like manifest to be similar track-and-trace printout.
- State or federal motor carrier permit for commercial trucks.
- Commercial truck drivers comply with Department of Transportation requirements already. No need to over-regulate the industry.
- Proof of insurance, commercial trucks/commercial insurance - Cargo?
- Surveillance cameras – one on driver and the other on product.

**QUESTIONS:**

- How long will transporters be required to keep manifests?
- Specifically, what kind of insurance is required? Cargo? Drivers?

**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 or: Medical cannabis-infused products: ≥ 150 units; and Live plants: ≥ 20 ten-count packs of seeds or ≥ 144 immature plants or ≥ 10 mature plants.**

**COMMENTS:**

- The proposed thresholds are not equivalent to each other. If a threshold is selected and broken down by product type they should be equivalent in amount. Inequality leads to favoring one type of transport product over another.
- Maybe all product types should be 500 grams?
- Maybe BMCR should consider creating sub-license types for the transport of each kind of product and then setting the amount would be easier.

**Topic 2b: Transportation thresholds; Maximum thresholds**

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

**COMMENTS:**

- Group was unanimous – **NO max amount**. It should be up to each business to decide the amount of product and amount of financial risk they are willing to take.
- The limit should be set by the vehicle and its capacity as determined by the Department of Transportation.

**Topic 3a: Vehicle requirements; Storage and security**

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**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 the industry will self-regulate. Many growers know proper refrigeration is required, and they will not choose transporters that do not already provide proper refrigeration.
- If there are sub-license types for each kind of product then each sub-type of transport vehicle may need specific specifications.
- There should be a video camera in the cab recording the driver and a separate video camera recording the shipment/cargo/product for investigatory and auditing purposes.
- The vehicles should not be mandated to be marked as “MC/MCP” transporters based on concern for safety.

**QUESTIONS:**

- Why require refrigeration if the product you are moving does not require refrigeration?

**MAIN THEMES:** Allow the industry to develop common practices and standards.

**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 overly limit the type of vehicles – however recognized that roadways would be the best way to transport.
- Agree no watercraft – contributes to illegal transport.

**QUESTIONS:**

- Would the regulations applied to armored-cars apply to medical cannabis and medical cannabis product transporters?

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