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June 6, 2017

California Department of Public Health
Office of Regulations
1415 L Street Ste. 500
Sacramento CA 95814

Re: Comments on Proposed Medical Cannabis Manufacturing Regulations

Dear Office of Regulations,

The purpose of this letter is to provide comments on the proposed Medical Cannabis Manufacturing Regulations on behalf of the Santa Barbara County Public Health Department. Our comments are in sequential order of page number and code section.

1. Page 5, Section 40100
 - a. Under the definition of "premises", suggest clarifying
 - i. If licensee may manufacture other food items on the same premises as cannabis.
 - ii. If events (social gatherings) may take place on the premises
2. Page 11, Section 40118
 - a. We support the new Type N and Type P licenses
3. Page 29, Section 40162 (6) and (7)
 - a. We support these sections which consider prior offenses involving violation of the Sherman Food, Drug, and Cosmetic Law or violation of the California Food Sanitation Act as a basis for denial of a license
4. Page 43, Section 40232 (a) and (b)
 - a. We support the specific Disease Control measures described in (a)
 - b. We support the specific Cleanliness requirements described in (b) including hand washing, gloves, hairnets, and prevention of cross contamination
 - c. In general, we support requirements that are substantively similar to the Sherman Food and Drug Act and FDA requirements regarding Disease Control in good manufacturing practices
 - d. We suggest that it be clarified that these standards also apply to microbusinesses

5. Page 46, Section 40236
 - a. We strongly suggest that this section include requirements for engineering controls to prevent cannabis odors from leaving the facility
6. Page 60, Section 40256
 - a. We support this language requiring all licensees to conduct a Hazard Analysis and upon completion, must identify and implement preventive controls
7. Page 77, Section 40280 (a)(3)
 - a. We support the requirement that a licensee that produces edible cannabis products shall ensure all personnel who prepare such products complete a food handler course accredited by the American National Standards Institute (ANSI) within 90 days and every three years
8. Page 81, Section 40290 (h)(2) and (3)
 - a. We suggest not using the word "manned" which appears in (2) and (3). This word is antiquated and gender-specific. Suggest using alternate words such as "staffed", "supervised", "crewed", or "managed"
9. Page 83, Section 40300 (a) through (e)
 - a. We support prohibiting licensees from mixing cannabis with alcohol, nicotine, caffeine, or any other product which would increase the potency, toxicity, or addictive potential
 - b. We support prohibiting licenses from mixing cannabis with any psychoactive substance and suggest leaving this language very broad
 - c. We support (c) which prohibits cannabis from being made into potentially hazardous food. This is particularly important because shelf-stable foods are less likely to be implicated in a food-borne illness outbreak.
 - d. We support (e) prohibiting licensees from applying cannabinoids to commercially available candy or snack food
10. Page 85, Section 40305
 - a. We support limiting the per serving dose to 10 mg of THC or less
11. Page 90, Section 40408 (a)(3)(D)
 - a. We, as public health experts, know that clear evidence shows cannabis use has an impact on the developing brain. We suggest changing the warning label statement from "IF PREGNANT OR BREASTFEEDING, CONSULT A PHYSICIAN PRIOR TO USE" to "SHOULD NOT BE USED BY THOSE WHO ARE PREGNANT OR BREASTFEEDING"
12. Page 92, Section 40410 (c)
 - a. We support prohibiting labeling content from being attractive to individuals under the age of 21 and support the examples listed in (1) (2) and (3)
13. Page 94, Section 40415 (d)
 - a. We support the regulation that the package shall not imitate any package used for products typically marketed to children

Thank you for the opportunity to provide input on these proposed regulations. We know that your goal, like ours, is to protect the public's health and promote healthy communities. We look forward to ongoing partnership.

Sincerely,



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