

July 8, 2024

Cannabis Advisory Committee
Department of Cannabis Control

Esteemed Council Members of the Cannabis Advisory Committee,

As President of the Pet Cannabis Coalition and a veterinarian with a decade of cannabis industry experience, I offer my recommendations for the DCC's upcoming pet cannabis product regulations. My organization spearheaded the passage of California bills AB 2215 (2018) and AB 1885 (2022).

To provide background on my experience, I've lectured around the world to veterinary professionals, cannabis professionals, and pet owners on the use of cannabis for animals, and I've collaborated with veterinarians around the world to illuminate a better understanding of how cannabis can be used to improve the lives of animals. Additionally, I was one of two veterinary authors on the National Cannabis Industry Association's whitepaper "The Medicine of Cannabis: An Overview for Medical Professionals and Policymakers."

Over the past decade, I've witnessed cannabis benefit a wide range of species, from domestic pets to exotic zoo animals. In many cases the benefits of cannabis are dramatic and life-saving. Animals that would have otherwise been euthanized have been able to recover and live well due to the increased quality of life cannabis can provide.

I provide my background so I can provide qualified insight and recommendations on the rules proposed to implement cannabis products for pets. Many of my suggestions regarding labeling are based on guidelines from the National Animal Supplement Council (NASC), the leader in regulations for animal health and supplement products. NASC works closely with the FDA and AAFCO to provide guidelines for the labeling of animal wellness products. They have already implemented labeling guidelines for hemp-based pet cannabinoid products, which the leaders of the hemp industry have followed for years.

On behalf of the Pet Cannabis Coalition, our recommendations are as follows:

What types of cannabis pet products should be allowed?

- Common methods used in animal healthcare for the delivery of medications include oral ingestion via tinctures, liquids, or chews, topical applications, and nebulization therapy (similar to vaporizers). All of these methods are currently being utilized to deliver cannabinoids to animals by our colleagues around the world.

Are there any types of cannabis pet products that should be prohibited?

- Products intended for inhalation via combustion are not suitable for animal use.

Should there be specific requirements or limits for different cannabinoids (THC, THCA, CBD, CBDA, CBC, CBG, THCV, etc.) in pet products?

1. The only difference between pet cannabis and hemp products would be the amount of THC and/or THCA, as those are the only cannabinoids that need to be sourced from cannabis, as all other cannabinoids can be sourced from hemp and utilized in unrestricted quantities in hemp products.
2. We recommend that the limit of THC and THCA in cannabis products intended for animal consumption follow the limits placed on THC and THCA in cannabis products for humans (which is already existing law).
 - a. According to current scientific research, along with our experience in this field, and working with various species and multiple veterinarians around the world, THC and THCA possess medicinal properties, and imposing stricter limitations on its availability will result in increased costs for pet owners whose pets benefit from the anti-cancer and pain relieving properties of THC and THCA.
 - b. Pets vary dramatically in size, and THC and THCA limits on pet cannabis products could reduce the therapeutic value of cannabis products for large pets, and increase costs for owners.

For adult (human) use, cannabis edibles cannot exceed 10 mg THC per serving and 100 mg THC per package – should a different requirement be considered for animal products (e.g. mg/body weight)?

- As previously stated, we recommend that the limit of THC in cannabis products intended for animal consumption follow the limits placed on THC in cannabis products for humans (which is already existing law).

In addition to FDA requirements, the ingredient requirements for all pet food sold in California pursuant to the Pure Pet Food Act and its implementing regulations, and the list of allowable pet food ingredients maintained by the Association of American Feed Control Officials (AAFCO), are there any other considerations for cannabis pet products?

- These are not food products and should not be labeled as such.

In addition to the existing rules in California for pet food labeling, what labeling requirements should be considered for cannabis animal products?

- These are not food products and should not be labeled as such.

Should labels include a recommendation that a person consult a veterinarian prior to administering cannabis to an animal?

- We recommend using NASC's recommendation: "An examination from a veterinarian is recommended prior to using this product."

Should labels include a warning about contraindications or animal drug-interactions?

- We recommend using NASC's warning: "If animal's condition worsens or does not improve, stop product administration and consult your veterinarian. Safe use in pregnant animals or animals intended for breeding has not been proven."

Should labels include a warning about signs of animal overdose/intoxication?

- We recommend using NASC's warning: "In case of accidental overdose, contact a health professional immediately."

What should DCC consider with respect to packaging requirements?

- Any warning labels for animals should replace the current mandatory warnings for cannabis products which are specific for humans (ie animals don't drive or operate machinery).

Should there be any different laboratory testing requirements for animal products compared to human products?

- No, the current mandated lab testing requirements for California cannabis products are sufficient.

Should you have any questions, please reach out to me at drtimshu@protonmail.com. I am happy to assist however I can so that we can create sensible regulations that provide safety and access without stifling innovation and without further increasing costs to consumers and pet owners, thank you.

Sincerely,



Tim Shu, DVM
President, Pet Cannabis Coalition