



Memorandum

To: Devin Gray, Policy Specialist, Policy and Research Division DCC

From: Veterinary Cannabis Society, Advocacy Committee

Date: June 13, 2024

Re: DCC Regulatory Requirements | VCS & Cannabis Pet Products Information

Below are the suggestions of the Veterinary Cannabis Society to the questions propounded in your email of April 10, 2024. These responses reflect the views of the California members of the Advocacy Committee (Dr. Jeff Pollard, Dr. Gary Richter and Charles Lozow, Esq.) and the President (Dr. Trina Hazzah).

1) Should there be specific requirements/limits around different cannabinoids?

a) THC, THCA, CBD, CBDA, CBC, CBG, THCV, etc.

VCS Suggestions:

- Cannabinoids that the DCC deems safe for humans should be readily available for use in pet products.
- Cannabis derivatives (above what is found naturally in the plant) such as THC-D8, THC-D10, and all synthetic cannabinoids should not be available for use in pet products.

b) Cannabis edibles cannot exceed 10 mg THC per serving and 100 mg THC per package – different requirements for pet products?

VCS Suggestions:

- The THC Concentration Limits of §17304 (a) for edibles are suitable for pet treats that are equivalent to an edible cannabis product.
- Section (b) for orally dissolving products like sublingual lozenges or mouth strips should also be safe and effective if these products come to market.
- The limits in (c) regarding topicals and concentrates of 1,000 mg THC per package can be safe and necessary for efficacy in pet products. The associated requirement that these potencies be sold to Medicinal-use patients is a barrier as pet parents may not hold that status when purchasing for their pets.

2) Any ingredients that should be specifically allowed/prohibited in pet products?

VCS Suggestions:

- Prohibited: Xylitol, chocolate, grapes/ raisins, macadamia nuts, anything containing caffeine
- a) Same standards as pet food? FDA, CA CDPH?

VCS Suggestions:

- Same standards as for pet supplements/ treats
- b) Only allow GRAS ingredients, and not food additives that require FDA approval?

VCS Suggestions:

- Agreed for both active and inactive ingredients

3) Recommendations on labeling requirements?

- a) Should we recommend that a person consult a veterinarian prior to administering cannabis to an animal?

VCS Suggestion:

- Yes. This should be a strong recommendation as part of the announcement of implementation of the new regulations, but not a requirement.
- b) Warning labels for contraindications or animal drug-interactions?

VCS Suggestion:

- Consider/discuss whether warnings related to severe hepatic or cardiac dysfunction for pets are appropriate though these may go beyond what is required for humans.
- c) Warnings about signs of animal overdose/intoxication?

VCS Suggestion:

- Consideration may be given to modification of the Primary and Informational Panel warnings as follows:

GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS **ON YOUR PET** MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE **BY PREGNANT OR NURSING PETS** MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS **BY SERVICE**

ANIMALS SHOULD ONLY BE UNDER THE DIRECT SUPERVISION OF VETERINARY PROFESSIONALS. PLEASE USE EXTREME CAUTION

d) Restrictions on untrue or misleading health claims?

- i) Currently prohibited: Any health-related statement that is untrue or misleading. Any health-related statement must be supported by the totality of publicly available scientific evidence (including evidence from well-designed studies conducted in a manner which is consistent with generally recognized scientific procedures and principles), and for which there is significant scientific agreement among experts qualified by scientific training and experience to evaluate such claims.

VCS Suggestion:

- Apply this prohibition to pet products.

4) Recommendations on packaging requirements?

VCS Suggestion:

- Current regulations regarding child-resistant packaging should apply to pet products.
- Packaging for all product types intended for use with pets should be required to be identified as such: FOR USE IN PETS ONLY UNDER THE GUIDANCE OF VETERINARY PROFESSIONALS.

5) Limitations on product types (inhaled, orally consumed, topical, tinctures, etc.)?

VCS Suggestion:

- No authority should be granted for product types other than orally consumed, topicals and tinctures. Inhaled products should be expressly prohibited.

6) Do you foresee any need for different testing requirements for pet products?

VCS Suggestion:

- No. The current regulations are sufficient to protect canines and felines.

- a) Cannabinoid potency, terpenes, residual solvents, pesticides, heavy metals, bacteria, fungi, mycotoxins?

VCS Suggestion:

- See immediately above.

7) Should we consider specific requirements for manufacturers of pet products in addition to what is required for human products?

VCS Suggestion: No.