



April 11, 2021

RE: VCS Position on AB 384

Dear Assembly Business and Professions Committee and Assemblyman Kalra,

As the Assembly Business and Professions Committee considers AB 384 (Kalra), the Veterinary Cannabis Society (VCS) thanks the committee and Assemblyman Kalra for the opportunity to discuss what has the potential to be legislation that benefits both pets and the veterinary profession. As cannabis becomes more broadly legalized throughout the country, this bill may act as a template for other state and federal legislators as they consider how to handle cannabis for animals.

The VCS supports the spirit of AB 384 in that it protects veterinarians from disciplinary action from the Veterinary Medical Board with regard to a veterinarian recommending cannabis for their patients. This approach is a continuation of AB 2215, which became law Jan 1, 2019, allowing veterinarians to “discuss” the use of medical cannabis with their clients. The VCS maintains veterinarians, not market forces, should be leading the knowledge base and guidance concerning medical cannabis use for animals.

In VCS’s view, the current form of AB 384 is lacking necessary safeguards to prevent dangers to animals whose owners seek out medical cannabis for their pet with or without a veterinary recommendation because the bill:

- **Fails to provide a mechanism**, such as a written recommendation, for veterinarians to be the actual decision makers as to the potency and structure of medical cannabis supplements to be administered to animals. The key question - who decides how much cannabis is appropriate medicine - is not addressed in the bill and leaves a gap.
 - Much like the human paradigm in CA in 1996 which allowed physicians to “recommend” cannabis without further criteria, pet parents will likely self-determine dosing/potency based on market availability, rather than data and research filtered and understood by veterinarians. This represents a clear danger of THC toxicity for pets.
- **Appears to duplicate MAUCRSA’s 10 mg per serving** for edible cannabis products into the animal use environment, which is excessive and dangerous for pets.
 - *AB 384 in Section 4, 26130 (e) appears to equate animal products with the defined term “Cannabis Product” (see Section 11018.1 of Health and Safety

Code), which is coupled with edible cannabis product in Section 26001(u), means that the 10 mg THC limit would apply to animal products covered by AB 384

The Veterinary Cannabis Society recommends the following solutions to make AB 384 a bill that protects pet safety and the veterinary profession:

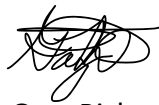
- Reduce the 10 mg THC per serving maximum to 1 mg per serving for products sold in adult use dispensaries. Cannabis products for animals in excess of 1 mg THC per serving must be sold through an M-licensed dispensary and only with a veterinary recommendation. **This particular amendment is absolutely essential for the safety of pets.**
- Create a mechanism by which veterinarians are able to provide a written recommendation specifying the recommended cannabinoid profile and dosage for an individual patient.

The Veterinary Cannabis Society's members include some of the most experienced veterinarians in the world with regard to cannabis research and therapeutic implementation, and our mission is to promote the safe and effective use of cannabis for animals. With the appropriate amendments made to ensure patient safety, the VCS is looking forward to supporting AB 384. We are available to Assemblyman Kalra and the committee to provide input and guidance on these issues.

Sincerely,



Trina Hazzah, DVM, DACVIM (Oncology)
President



Gary Richter, MS, DVM
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Secretary