

June 18, 2025

Department of Cannabis Control
Legal Affairs Division
2920 Kilgore Road
Rancho Cordova, CA 95670

**RE: Department of Cannabis Control California Code of Regulations, Title 4, Division 19
Notice of Proposed Rulemaking Action: Animal Cannabis Product Standards**

Dear Department of Cannabis Control (DCC),

The California Veterinary Medical Association (CVMA), on behalf of its 7,000 veterinary professional members, wishes to comment on your proposed rulemaking action regarding animal cannabis product standards.

The CVMA respectfully requests your consideration of the following in your potential revision of the draft regulations:

- 1) Proposed section 17350(d)¹ is arbitrary, unsupported by current scientific literature, and should be removed.

Section 17350(d) of the rulemaking package proposes that “[a] n animal cannabis product may not contain more than one milligram of total THC per package.” The DCC states in its justification that “[r]estricting animal cannabis products to not more than one milligram of total THC per package will reduce the risk of toxicosis and death from exposure to unsafe levels of THC.” The CVMA disagrees with this proposed THC threshold and the rationale used to establish it.

To date, there is no established lethal dose of tetrahydrocannabinol (THC) in any animal species. Common signs of poisoning in dogs include lethargy, CNS depression, ataxia, vomiting (especially if plant material was ingested), urinary incontinence/dribbling, increased sensitivity to motion or sound, mydriasis, hyperesthesia, ptialism, and bradycardia. These effects can be distressing to animal owners but again are not documented to result in patient death.

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¹ All regulatory references herein are to Title 4, Division 19 of the California Code of Regulations.

“One milligram of total THC per package” can still cause side effects in an animal depending on the size and species of animal receiving the product. The risk is also proportionate to the size of each package unit and the number of them included in the finished retail product.

The CVMA is concerned that the DCC proposed limit of “one milligram of total THC per package” would deprive California animals and consumers of any future potential benefits of THC. Because research does not yet exist to prove or disprove the clinical value of such a limit, it seems both medically and legally arbitrary. Veterinarians need to be afforded the flexibility of recommending different types of cannabis products to clients based on the individual conditions and circumstances of the animal patient. It is up to veterinarians to follow current research on cannabis use in animals in order to recommend products based on a good standard of medical care. While high doses of THC or potentially other chemical compounds in cannabis may present some side effects in animals, the same can be said for any drug.

- 2) Reconsider Alternative #1 in the DCC Initial Statement of Reasons Consideration of Alternatives section.

The CVMA requests that in regard to regulating THC levels in animal cannabis products, that the DCC reconsider its own proposed alternative (Alternative # 1 in the Initial Statement of Reasons Consideration of Alternatives section.) This alternative would allow animal products to contain the same levels of THC currently approved for cannabis products for human consumption.

Indeed, the CVMA was heavily involved in the passage of AB 1885 (2022) and distinctly recalls that the Author of the bill wished to place the decision-making capabilities in the hands of the veterinarians to choose what was appropriate for their patients on a case-by-case basis and based on prevailing scientific research. By reconsidering Alternative #1, the DCC will closer align with the intent of the law.

- 3) Prohibition of substances that *are* toxic to animals

Several common substances that may be included in manufactured cannabis products are toxic to animals. The list includes xylitol, chocolate, coffee, caffeine, macadamia nuts (and nuts in general), raisins, grapes, avocado, black walnut, onions, garlic, and chives. The CVMA requests that the proposed regulation prohibit these substances in animal cannabis products. This will serve to protect animals and consumers by ensuring that a cannabis product manufacturer does not produce an animal cannabis product that is potentially harmful.

- 4) Warning label requirement for animal cannabis products

To help ensure that animals are receiving appropriate cannabis products for their given conditions, the CVMA requests that a warning be required on all animal cannabis product labels stating: “Do not administer this product to an animal without the recommendation of a California-licensed veterinarian.”

The CVMA appreciates the DCC's consideration of these comments and is available to discuss them further if needed.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant Miller". The signature is fluid and cursive, with the first name "Grant" and last name "Miller" clearly distinguishable.

Grant Miller, DVM
CVMA Director of Regulatory Affairs