

State of California
Department of Cannabis Control
California Code of Regulations, Title 4, Division 19
Final Statement of Reasons:
Animal Cannabis Product Standards

UPDATE TO INITIAL STATEMENT OF REASONS

The Economic Impact Assessment (EIA), included in the rulemaking record as Attachment 1 to the Initial Statement of Reasons (ISOR) incorrectly states that proposed subsections 17350(c) and (d) apply only to the sale of animal cannabis products (EIA, p.5). As clearly stated throughout the remainder of the EIA, as well as all other documents in the rulemaking record, these rules apply to the manufacture, distribution, and sale of animal cannabis products.

Additionally, the ISOR misstates the title of Document Relied Upon #11 (ISOR, p.6). The document identified as “Guidelines for veterinarian recommendation of cannabis” is actually titled “Guidelines for Veterinarian Discussion and Recommendation of Cannabis Within the Veterinarian-Client-Patient Relationship.” Reference to this document, including the provided weblink, was otherwise accurate and all Documents Relied Upon were made available for the entirety of the rulemaking period.

LOCAL MANDATE DETERMINATION

The proposed regulations do not impose a mandate on local agencies or school districts.

ALTERNATIVES THAT WOULD LESSEN THE ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES

No alternative that would lessen any adverse economic impact on small businesses was proposed to the Department.

CONSIDERATION OF ALTERNATIVES

No alternative considered by the Department would be more effective in carrying out the purpose for which the regulations are proposed, as effective and less burdensome to affected private persons than the adopted regulations, or more cost effective to affected private persons and equally effective in implementing the statutory policies.

The amendments adopted by the Department are the only regulatory provisions identified by or brought to the attention of the Department that accomplish the goals of restricting THC content in animal cannabis products to a safe, minimal level without restricting the levels of other cannabinoids, protecting animals while allowing therapeutic and otherwise beneficial products to be manufactured and sold, and allowing development of a robust and varied market for animal cannabis products while

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ensuring that animals are not exposed to potentially harmful forms of cannabis products, such as combustible and inhalable products.

SUMMARIES OF, AND RESPONSES TO, COMMENTS RECEIVED DURING THE 45-DAY COMMENT PERIOD

See the following table. The Department did not make any changes in response to comments received.

Note regarding comment #147 (and other comments that include or otherwise reference comment #147, in whole or in part): Commenter indicated that the weblink for document relied upon #2 “is not working in the department document.” This weblink was functional and accurate at the time of ISOR publication and continues to be functional and accurate today. The Department has no reason to believe that the weblink was ever non-functional or inaccurate during the rulemaking period. The Department further believes that the commenter was able to obtain a copy of the document despite their inability to access it via weblink, as evidenced by their analysis of the document in their comment letter. The Department did not receive any other comments or notifications about this document or the weblink in the ISOR; regardless, the document was readily available from the Department, as provided in the Notice of Proposed Action, at all times during the rulemaking period.

Section	Commenter Number(s)	Comment Summary	Department Response
General	002	CA should not allow cannabis products for animal use because no cannabis products have been tested for safety in animals.	As described in the ISOR as Alternative #2, the Department considered prohibiting the manufacture, distribution, or sale of animal cannabis products. However, the Department rejected this option because evidence suggests while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The claim that no cannabis products have been tested for safety in animals is incorrect. The "Technical, Theoretical, and/or Empirical Studies, Reports, or Documents" section of the ISOR lists the research that informed this rulemaking proposal, including research on the safety of cannabis in animals.
General	002	Giving cannabis to animals is cruel and the state should not even tacitly encourage it.	Business and Professions Code section 26130 requires the Department to promulgate regulations for animal product standards. As described in the ISOR as Alternative #2, the Department considered prohibiting the manufacture, distribution, and sale of animal cannabis products. However, the Department rejected this option because evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing

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Section	Commenter Number(s)	Comment Summary	Department Response
			<p>therapeutic and otherwise beneficial products to be made available to animal owners and handlers. Adopting regulations pursuant to a legislative mandate to allow an action is not the same thing as encouraging individuals to take that action.</p>
General	002	CA should not allow cannabis products for animal use because animals cannot consent to become intoxicated.	<p>The Department understands that animals cannot clearly communicate to their owners or handlers that they are experiencing negative effects from consumption of THC, nor can animals choose to reduce their THC consumption if they experience negative effects. However, evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Committer Number(s)	Comment Summary	Department Response
General	005	More testing should be funded and conducted before further regulations and restrictions are implemented on manufacturers and consumers.	Business and Professions Code section 26130 requires the Department to adopt animal cannabis product standards and prohibits cannabis products from being marketed or sold for use on, or consumption by, animals before these regulations for animal standards take effect. If the proposed regulations are not adopted, the existing prohibition on animal cannabis products will remain; thus, the proposed regulations expand rather than restrict licensee privileges. In developing the proposed regulations, the Department engaged in extensive stakeholder outreach, including speaking with numerous veterinarians specializing in animal cannabis research, emergency veterinary care, and treatment of animals with cannabis toxicosis. We also spoke to veterinarians with experience administering cannabis to animals and veterinarians who have their own lines of cannabis or hemp animal products. Additionally, the Department reviewed numerous scientific studies and journal articles, as cited in the ISOR. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers.

Section	Commenter Number(s)	Comment Summary	Department Response
General	005	The proposed changes don't make sense scientifically until scientific research confirms or clarifies the currently unsubstantiated claim of harm.	<p>The Department disagrees that the claim of harm to animals from cannabis is unsubstantiated. In developing the proposed regulations, the Department engaged in extensive stakeholder outreach, including speaking with numerous veterinarians specializing in animal cannabis research, emergency veterinary care, and treatment of animals with cannabis toxicosis. We also spoke to veterinarians with experience administering cannabis to animals and veterinarians who have their own lines of cannabis or hemp animal products. Additionally, the Department reviewed numerous scientific studies and journal articles, as cited in the ISOR. The rulemaking documents summarize existing animal cannabis research, which is nuanced. As stated in the ISOR, available scientific evidence overwhelmingly indicates that animal cannabis consumption or use of THC may result in acute toxic harm, adverse effects, and death. The ISOR does clarify that there are a few studies showing that THC appears to be well-tolerated in healthy dogs. However, the ISOR identifies the limitations of these studies. These limitations, such as incredibly small sample sizes, testing on only a specific weight and breed of dog, and testing only on healthy animals, mean that the results of these studies cannot reasonably be extrapolated to apply to the population of animals for which these products will be available. Animal cannabis products will be available for many different types of animals, not just dogs. Though some animals, including dogs, may tolerate THC, there is still a lack of research proving the safety of THC in all</p>

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			<p>animals at higher doses across the board. While most animals that experience cannabis toxicosis recover completely (suggesting that most cannabis toxicoses do not result in long-term negative effects), animals may still experience acute harm and negative effects from THC consumption. Further, the Department expects many animal cannabis product purchasers to seek out products for therapeutic use on unhealthy animals, for whom the safety and efficacy of THC are largely unknown. The purpose of the proposed regulations is to prevent animal suffering and harm regardless of the species or weight of the animal. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
General	005	<p>The rulemaking documents accept or dismiss the science based on an agenda, and studies finding favorable results are minimized while unsubstantiated claims that only specific breeds and animals within a certain weight range benefit therapeutically are stated as fact.</p>	<p>The Department disagrees that the rulemaking documents minimize favorable studies and state unsubstantiated claims as fact. The Department has been tasked by the Legislature with establishing regulations for animal cannabis products. In developing the proposed regulations, the Department engaged in extensive stakeholder outreach, including speaking with numerous veterinarians specializing in animal cannabis research, emergency veterinary care, and treatment of animals with cannabis toxicosis. We also spoke to veterinarians with experience administering cannabis to animals and veterinarians who have their own lines of cannabis or hemp animal products. Additionally, the Department reviewed numerous scientific studies and journal articles, as cited in the ISOR. The rulemaking documents summarize existing animal cannabis research, which is nuanced. As stated in the ISOR, available scientific evidence overwhelmingly indicates that animal cannabis consumption or use of THC may result in acute toxic harm, adverse effects, and death. The ISOR does clarify that there are a few studies showing that THC appears to be well-tolerated in healthy dogs. However, the ISOR identifies the limitations of these studies. These limitations, such as incredibly small sample sizes, testing on only a specific weight and breed of dog, and testing only on healthy animals, mean that the results of these studies cannot reasonably be extrapolated to apply to the population of animals for which these products will be available. Animal cannabis products will be available for many</p>

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			<p>different types of animals, not just dogs. Though some animals, including dogs, may tolerate THC, there is still a lack of research proving the safety of THC in all animals at higher doses across the board. While most animals that experience cannabis toxicosis recover completely (suggesting that most cannabis toxicoses do not result in long-term negative effects), animals may still experience acute harm and negative effects from THC consumption. Further, the Department expects many animal cannabis product purchasers to seek out products for therapeutic use on unhealthy animals, for whom the safety and efficacy of THC are largely unknown. The purpose of the proposed regulations is to prevent animal suffering and harm regardless of the species or weight of the animal. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
General	005	The text claims knowledge of harm while simultaneously stating that nobody really knows since thorough testing has not been done.	Assuming that the commenter is referring to the ISOR, not the proposed regulation text, the Department disagrees with their interpretation. The ISOR states: "Due to cannabis' federal classification as a Schedule I controlled substance, it is difficult, burdensome, and expensive to perform research on the effects of THC on animals. Still, available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death." The ISOR further states: "The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals."
General	007, 008	The proposed regulations feel like an attack on the legal cannabis industry, which has worked tirelessly to provide safe, regulated products.	As explained in the ISOR, the purpose of the proposed regulations is to protect the well-being of animals. The proposed regulations would allow cannabis licensees to manufacture, distribute, and sell animal cannabis products, something that is currently prohibited. By establishing clear standards for animal cannabis products, the Department is setting the stage for the manufacture and sale of high-quality products that pet owners can trust. These clear standards not only protect animal health but also encourage responsible innovation, paving the way for growth in this evolving market.

Section	Committer Number(s)	Comment Summary	Department Response
General	007, 049, H12.2	The proposed regulations will hurt a lot of pets.	Business and Professions Code section 26130 prohibits cannabis products from being marketed or sold for use on, or consumption by, animals before these regulations for animal standards take effect. The proposed regulations will protect the health and safety of animals by establishing clear standards specifically tailored to govern manufacture, distribution, and sale of high-quality animal cannabis products that pet owners can trust.
General	008	Overlooking scientific research does a disservice to veterinarians and pet owners seeking safe and effective options for their beloved animals.	In developing the proposed regulations, the Department engaged in extensive stakeholder outreach, including speaking with numerous veterinarians specializing in animal cannabis research, emergency veterinary care, and treatment of animals with cannabis toxicosis. We also spoke to veterinarians with experience administering cannabis to animals and veterinarians who have their own lines of cannabis or hemp animal products. Additionally, the Department reviewed numerous scientific studies and journal articles, as cited in the ISOR. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers.

Section	Commenter Number(s)	Comment Summary	Department Response
General	008	Instead of stifling access to valuable remedies, DCC should focus on ensuring proper education, strict labeling, and tighter controls around product safety and quality in the legitimate market.	The proposed regulations do not restrict access to animal cannabis products. Instead, the proposed regulations will allow for the legal sale of animal cannabis products for the first time. The Department is committed to educating licensees and consumers, ensuring licensees comply with the labeling requirements, and ensuring product safety and quality in the legal market. The Department is capable of developing standards for animal cannabis products and accomplishing other regulatory goals at the same time.

Section	Commenter Number(s)	Comment Summary	Department Response
General	009, 010, 033, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 060, 061, 063, 064, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 092, 093, 094, 095, 096, 097, 098, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110, 113, 114, 115, 119, 120, 122, 123, 124, 126, 127, 128, 129, 131, 133, 135, 136, 138, 143, 144, 146, 148,	Support the Department's commitment to establishing safe, responsible oversight over animal cannabis products.	The Department appreciates this comment.

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Section	Commenter Number(s)	Comment Summary	Department Response
	149, 150, 151, 152, 153, 154, 157, 158, 159, 160, 161, 162, 164, 166, 168, 170, 174, 177, 180, 182, 184, 185, 186, 193, 194, 205, 216, 219, 220, 221, 223, 226, 229, 231, 234, 235, 237, 241, 242, H10.1		

Section	Commenter Number(s)	Comment Summary	Department Response
General	019, 049, 192	Request that DCC not restrict access to pet products containing CBD and THC.	The proposed rule would not prohibit animal cannabis products from containing both THC and CBD, but the proposed rule would limit animal cannabis products to 1 milligram of Total THC per package.
General	030, 137, H4.3, H6.5, H14.3	Consider requiring a recommendation from a licensed veterinarian to purchase animal cannabis products. DCC has statutory authority to allow a veterinarian to recommend cannabis for an animal and have the recommendation be as valid as any physician's recommendation for human medicinal cannabis.	Adopting regulations that restrict total THC content to a safe, minimal level protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication even if the animal owner or handler chooses not to consult a veterinarian prior to use. Additionally, Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market, which requires only that the purchaser be 21 years of age or older. The Department does not have authority to mandate that an individual possess a veterinarian's recommendation prior to purchasing products in the adult-use market.
General	030, H3.1	There is no recreational use for pet cannabis and pet cannabis is purely a medicinal thing. Recommend making animal cannabis products a "medical only" category and treating cannabis as a	Business and Professions Code sections 26000 and 26001 place animal cannabis products in the adult-use market. Under the Administrative Procedure Act, any regulation proposed by the Department to change this statutory classification would be unauthorized and inconsistent with governing law.

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		therapeutic medication rather than a dangerous product.	
General	098	CBD oil can provide relief to dogs.	The proposed regulations would not prohibit or limit CBD in animal cannabis products.

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General	116	<p>The USDA has been assessing the impact of cannabinoids in domestic farm animal feed and some types of feed have already been approved. USDA's analysis is far more significant and complete than the scientific analysis of house pets. The proposed regulations are premature, misplaced, and lack scientific basis, and DCC should stay out of USDA business.</p>	<p>The Department could not verify the commenter's claim that some types of animal feed containing cannabinoids have been approved for use by the federal government. According to the US Department of Agriculture, final determination and approval for the legal use of hemp products in animal feeds remain with the U.S. Food and Drug Administration. According to the US Food and Drug Administration's website: "[I]t is a prohibited act to introduce or deliver for introduction into interstate commerce any food (including any animal food or feed) to which THC or CBD has been added. FDA is not aware of any evidence that would call into question these conclusions. Interested parties may present the agency with any evidence that they think has bearing on this issue. Our continuing review of information that has been submitted thus far has not caused us to change our conclusions."</p> <p>https://www.fda.gov/news-events/public-health-focus/fda-regulation-cannabis-and-cannabis-derived-products-including-cannabidiol-cbd#food. There is therefore no way to determine whether the USDA's analysis of cannabinoids in manufactured animal products is "significant and complete," or even exists at all, considering that cannabis is still a Schedule I substance under federal law. At any rate, the Department is mandated under California law to adopt standards for products being marketed or sold for use on, or consumption by, animals. Regarding the available science, in developing the proposed regulations, the Department engaged in extensive stakeholder outreach, including speaking with</p>

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			<p>numerous veterinarians specializing in animal cannabis research, emergency veterinary care, and treatment of animals with cannabis toxicosis. We also spoke to veterinarians with experience administering cannabis to animals and veterinarians who have their own lines of cannabis or hemp animal products. Additionally, the Department reviewed numerous scientific studies and journal articles, as cited in the ISOR. Existing scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

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General	125, 147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233, H8.3, H11.2, H12.1	Common ingredients that are toxic to animals should be prohibited in animal products. These include xylitol, chocolate, coffee, caffeine, macadamia nuts (and nuts in general), raisins, grapes, avocado, black walnut, onions, garlic, and chives. This will ensure cannabis manufacturers do not produce animal cannabis products that are potentially harmful to animals. Many animal cannabis products are made with cheap MCT oil, which is not well-tolerated by dogs.	The Department considered adopting a list of prohibited ingredients for animal cannabis products but determined such a list may do more harm than good. Inclusion of a list of prohibited ingredients might give manufacturers the false impression that any ingredient not on the list is implicitly safe for any animal to consume and therefore could be included in any animal product. Additionally, the Department does not - and cannot - know of every ingredient that is poisonous to every animal. The Department did not want to give the impression of tacit approval or safety for any non-prohibited ingredient. Instead, the Department plans to address the concerns raised by this comment by creating informational resources for animal cannabis product manufacturers to educate them that just because they commonly use an ingredient in an adult-use product does not mean that that ingredient is safe for inclusion in animal products, and that manufacturers should carefully research ingredients they plan to use in animal products to ensure those ingredients are not harmful to the animal for which the product is intended. Just because the Department is not adopting a list of prohibited ingredients does not mean that any ingredient can be used in animal cannabis products. As cannabis products, animal cannabis products must comply with all existing legal requirements, including the provisions in Business and Professions Code section 26039.6 prohibiting adulteration of cannabis products and the manufacture or sale of adulterated products. Business and Professions Code section 26039.6, subdivision (a)

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			<p>defines what it means for a cannabis product to be adulterated, including if the product "bears or contains any poisonous or deleterious substance that may render it injurious to users under the conditions of use suggested in the labeling or under conditions that are customary or usual."</p>

Section	Commenter Number(s)	Comment Summary	Department Response
General	132	One of the studies cited in the ISOR is cited twice with conflicting information: once to say that cannabis may result in acute toxic harm to animals, and once to say that cannabis appears to be well-tolerated in healthy dogs.	The ISOR's summary of the academic research is nuanced because the academic research on cannabis and animals is nuanced. The cited study is Vaughn, D., Kulpa, J., & Paulionis, L. (2020), which looked at the safety of escalating cannabinoid doses in healthy dogs. This study found that a CBD-dominant cannabis oil was safer and better tolerated in dogs than cannabis oil formulations containing higher concentrations of THC. Cannabis preparations with higher THC concentrations caused the dogs in the study to experience adverse events (AEs) at a higher rate and severity than dogs on the CBD-dominant formulation: "Compared to dogs receiving the CBD oil, dogs receiving the THC oil experienced 2.6-fold more total AEs and, more specifically, 7-fold more neurological and constitutional AEs, 5-fold more dermatological AEs, and 3-fold more ocular and respiratory AEs." Despite the higher rate and severity of AEs related to THC, the authors do find that CBD-dominant cannabis formulations are well-tolerated in healthy dogs. These findings led the Department to the conclusions stated in the ISOR: that cannabis can cause acute toxic harm to animals and that some forms of cannabis appear to be well-tolerated in healthy dogs. This conclusion aligns with the proposed regulations, which limit the amount of total THC to 1 milligram per package to reduce the risk of animal harm and suffering.

Section	Commenter Number(s)	Comment Summary	Department Response
General	132	The claim in the ISOR that it is "difficult, burdensome, and expensive" to perform research on the effects of THC on animals betrays an utter lack of understanding for how cannabis is studied because most research on cannabis is performed on animals, as studies performed on people must have a negative hypothesis. Therefore, there is better research on the effects of cannabis on animals than on people.	The statement in the ISOR regarding the difficulty of performing animal cannabis research is accurate and was informed by numerous conversations with veterinary professionals and researchers. But, regardless of whether it is easy or difficult to research animals and cannabis, available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.
General	132	Thoroughly support the proposed requirement that animal products adhere to the same rigorous quality, safety, and testing standards as human products.	The Department appreciates this comment.

Section	Commenter Number(s)	Comment Summary	Department Response
General	134	The proposed regulations provide no added public safety.	The Department disagrees. The proposed regulations will protect the health and safety of animals by establishing clear standards specifically tailored to govern manufacture, distribution, and sale of animal cannabis products. In general, animal cannabis products must meet the same standards as cannabis products intended for human consumption currently on the market. These standards include strict compliance with manufacturing quality control programs, and packaging, labeling, and testing requirements that will ensure animal products are not adulterated or misbranded. Restricting manufacture to edible products, orally consumed concentrates, and topical products will allow for and encourage the development of a robust and varied market for animal cannabis products while ensuring that animals are not exposed to potentially harmful forms of cannabis, such as combustible and inhalable products. Restricting 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.
General	147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233, H7.3, H8.2, H13.6	Recommend requiring warning label language on animal cannabis products recommending consultation of a veterinarian, such as: "Do not administer this product to an animal without the recommendation of a licensed veterinarian."	The Department considered adopting an additional warning statement like that suggested by the commenter, but ultimately decided that such a statement was not necessary at this time. Adopting regulations that restrict total THC content to a safe, minimal level protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products

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			<p>manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication even if the animal owner or handler chooses not to consult a veterinarian prior to use.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
General	167	It is an absolute disgrace that cannabis use in veterinary medicine is so much more limited than in human medicine.	Limiting the THC in animal cannabis products to prevent animal harm and suffering reflects the realities of the commercial cannabis industry. The Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare. Regarding animal cannabis product quality standards, animal cannabis products must meet the same standards as cannabis products intended for human consumption currently on the market. These standards include strict compliance with

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			<p>manufacturing quality control programs, and packaging, labeling, and testing requirements that will ensure animal products are not adulterated or misbranded. Restricting manufacture to edible products, orally consumed concentrates, and topical products will allow for and encourage the development of a robust and varied market for animal cannabis products while ensuring that animals are not exposed to potentially harmful forms of cannabis, such as combustible and inhalable products. Additionally, while the proposed regulations limit total THC, they do not restrict or limit other cannabinoids, like CBD. There are a multitude of studies showing the tolerability and efficacy of CBD in a wide range of animals. These studies typically do not show the same negative adverse events seen in some animal THC exposure studies, especially those with elevated doses of THC. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers.</p>

Section	Committer Number(s)	Comment Summary	Department Response
General	172	Suggest possibly requiring someone to read and sign some sort of literature before being allowed to purchase animal cannabis medication, due to the possibility that not all people will follow directions thoroughly.	The Department considered placing additional restrictions on purchasers of animal cannabis products, but ultimately determined they would place additional burdens on retailers while providing little to no benefit. A customer who ignores clear and robust cannabis product labeling and directions is likely to also ignore additional literature provided at time of product purchase. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.

Section	Commenter Number(s)	Comment Summary	Department Response
General	213, H8.4	<p>The Pet Poison Helpline has managed more than 200,000 pet exposures to THC, most involving dogs. Based on this data, dogs and cats may develop mild adverse clinical signs from oral THC exposure at 0.3-0.5 mg/kg (mg per kg bodyweight). These signs are expected to be transient and self-limiting, with most resolving within 24 hours. Such cases may or may not require veterinary intervention. Moderate adverse clinical signs are expected at 2 mg/kg, and the lethal dose of THC in dogs is greater than 3,000 mg/kg. Fatality in pets from exposure to THC is extremely rare and generally involves contributing factors like concurrent ingestion of other toxins to animals, like chocolate, or exposure to highly concentrated THC products intended for human use. Drugs commonly prescribed to animals are more lethal than cannabis.</p>	<p>The Department does not disagree that cannabis products, including products with THC, may be tolerated by certain animals of certain sizes. However, based on the latest research, it is apparent that the effects of THC on animals are highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. Animal cannabis products will be available for many different types of animals, not just dogs. Though some animals may tolerate THC, there is still a lack of research proving the safety of THC in all animals at higher doses across the board. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication. The Department agrees that levels of THC in human products are not appropriate for animals, which is why Alternative #1 in ISOR was rejected. The Department also agrees with the commenter that drugs commonly prescribed to animals are potentially much more lethal than cannabis. However, these drugs are prescribed to animals by licensed veterinarians after careful examination and diagnosis of the animal's condition. The very reason these drugs require a prescription is to ensure they are used responsibly. In contrast to</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
			<p>veterinarian-prescribed animal drugs, animal cannabis products will be widely available to adults 21 years of age or older. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor is there a way to restrict animal cannabis product purchases only to persons with a veterinarian's recommendation or prescription. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.</p>
15000	132	<p>Recommend defining "animal" in regulation to make it clear the term is being used in a legal, non-biological sense,</p>	<p>"Animal" is defined in Business and Professions Code section 26001(c). The proposed regulations adopt the statutory definition, which needs no additional clarification.</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
		since humans are biologically animals.	
15000(w)	132	The definition of "edible cannabis product" is problematic because it includes products that are consumed orally and products that "dissolve or disintegrate in the mouth." Products that dissolve or disintegrate in the mouth are not "edible" cannabis products because they are sublingual and use the mucus membrane under the tongue rather than the digestive system. This conflicts with Government Code section 6129, which requires government documents to be written in plain, straightforward language. Request that the Department add a definition for "sublingual cannabis products" or provide other clarification.	As stated in the ISOR, this provision is being non-substantively reorganized. The substantive definition - including interpreting "edible" products to include products that dissolve or disintegrate in the mouth - was already reviewed and approved by the Office of Administrative Law as being clear under the Administrative Procedure Act.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(c)	H7.1, H7.5, H13.7	<p>Recommend considering limiting animal products to tinctures only. People commonly administer tinctures to their pets because tinctures are easy and safe to dose. Unlike animal treats, tinctures are not appealing to animals so there is less risk of accidental consumption.</p>	<p>The proposed regulations would allow for edible cannabis products, orally consumed concentrates, and topical products to be sold as animal cannabis products. Existing research involving animals and cannabis has mostly been done using tinctures, but studies do exist for topicals and edible cannabis products. The proposed regulations would prohibit some product types, such as suppositories and inhalable and combustible products, because whether these products can be administered safely to animals is not sufficiently studied and still largely unknown. Allowing for the manufacture of topical and edible animal cannabis products in addition to tinctures will provide pet owners and handlers with sufficient flexibility to administer cannabis in a form best suited to their animal's needs, while avoiding the unknowns and risks that other product types may pose. Like all cannabis, animal cannabis products must be packaged in child-resistant packaging, which will reduce the likelihood of accidental animal consumption.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(c) & (d)	134	The proposed definition and limitations fail to account for the nuanced and evolving role of cannabinoid therapies in animal health, and risk removing safe, effective options from responsible pet owners and veterinarians.	The Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.
17350(c) & (d)	134	Object to the restrictions on product types and the 1 milligram total THC limit, which would directly and negatively impact their ability to care for a pet who relies on cannabis-	Notwithstanding any concerns regarding the proposed animal cannabis product types and THC limits, which have been thoroughly described and justified in the ISOR, importation of cannabis products into California is prohibited by law.

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Section	Commenter Number(s)	Comment Summary	Department Response
		based products from out of state.	
17350(d)	001	Products currently being sold, even in the smallest size, contain more THC than would be allowed under the proposed rules.	Notwithstanding the fact that Business and Professions Code section 26130 expressly prohibits cannabis products from being marketed or sold for use on, or consumption by, animals until the Department adopts implementing regulations, the Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence as described in the ISOR rather than on current industry practices.
17350(d)	001, 004	Clarify whether the limit of 1 milligram total THC per package was meant to be 1 gram total THC per package. Explain the reasoning behind the 1 mg limit.	The proposed 1 milligram total THC per package limit is intentional, as explained in the Department's ISOR. The ISOR provides detailed statements of purpose and rationale to support adoption of the proposed regulations. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	003, 005, 026, 030, 033, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 060, 061, 062, 063, 064, 065, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 078, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 092, 093, 094, 095, 096, 097, 098, 099, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 113, 114, 115, 117, 119, 120, 121, 122, 123, 124, 126, 127, 128,	Oppose the limit of 1 milligram total THC per package as it will remove existing animal products from the market and recommend that the Department require various CBD-to-THC dosing ratios for animal cannabis products. Recommended dosing ratios include 10:1, 20:1, and 30:1 ratios of CBD to THC. Specific ratios have been proven for treating various medical conditions, and there are existing charts and other examples of ratio dosing guidelines based on the targeted therapeutic areas that could be used to develop accurate dosing regardless of animal size. Given the broad range of animal sizes and the complexity of animal needs, a CBD-to-THC ratio will be more effective than a per-package THC limit for ensuring safety while maintaining therapeutic value. Recommend that animal cannabis products be formulated at a ratio of CBD to THC with a THC limit equal to	Existing scientific research does not agree about the appropriateness of ratios at all, much less support a particular CBD-to-THC ratio. If a ratio was warranted, it would likely be dependent on the animal being given the product, including the weight, species, and underlying medical conditions of the animal, which is not something that could be applied universally for all animals across the board. The Department is committed to making decisions regarding cannabinoid concentration, ratios, and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence to support a specific dose for animal cannabis products at specific ratios for specific animal species of specific weights and with specific underlying health conditions. Available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. Scientific evidence has not shown that THC combined with a specific ratio of CBD is less harmful to animals than the same dose of THC alone. As Alternative #1 in the ISOR states, the Department considered allowing the manufacture, distribution, and sale of animal cannabis products with the same level of THC currently allowed in products for human consumption. This alternative was rejected in consideration of all available veterinary science regarding the dangers of THC toxicosis in animals. It would be irresponsible to adopt regulations permitting, with implicit claims of safety and harmlessness, animal owners or handlers to administer or feed products with adult-use levels of THC to small dogs, cats, rabbits,

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Section	Commenter Number(s)	Comment Summary	Department Response
	<p>129, 130, 131, 132, 133, 135, 136, 138, 139, 141, 143, 144, 146, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 166, 168, 170, 174, 177, 180, 182, 184, 185, 186, 187, 189, 190, 193, 194, 195, 196, 197, 198, 200, 201, 202, 203, 205, 206, 207, 208, 212, 214, 215, 216, 218, 219, 220, 221, 223, 226, 227, 228, 229, 230, 231, 232, 234, 235, 236, 237, 239, 241, 242, H1.1, H2.1, H2.3, H2.4, H3.3, H4.1, H6.1,</p>	<p>the current per-package limit for human products, which will enable veterinarian-recommended and controlled dosing, and will avoid underdosing and intoxication while allowing for the production of effective full-spectrum formulations. Typically, the industry measures and markets the ratio of THC-to-CBD, and that DCC makes no mention of this raises concerns about DCC credibility.</p>	<p>and the like. The purpose of the regulations is to ensure that, regardless of the amount of CBD in a single package and regardless of the species or weight of the animal, the possibility of harm to the animal from THC toxicosis is minimized. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. Nothing in the proposed regulations would prohibit an animal cannabis product package with 10, 20, or 30 milligrams of CBD combined with 1 milligram of THC. The proposed regulations do not prohibit full-spectrum animal cannabis products, nor do they mandate that animal cannabis products be manufactured using only CBD isolate. For example, if a manufacturer had a full-spectrum cannabis extract with 10 milligrams of total THC and 100 milligrams of CBD, they would be permitted to make 10 packages of animal products containing that extract, such that each package has no more than 1 milligram total THC (the amount of CBD allowed is not restricted, but in this example, each package would have 10 milligrams CBD, with a ratio of 10:1 CBD to THC). While the THC limit may reduce the amount of full-spectrum extract that can be added to a cannabis product, it does not prohibit full-spectrum animal cannabis products. The Department believes that animal cannabis products manufactured in</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
	H7.2, H9.1, H9.2, H13.10		accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	003, 006, 008, 009, 030, 033, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 060, 061, 063, 064, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 092, 093, 094, 095, 096, 097, 098, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110, 113, 114, 115, 119, 120, 121, 122, 123, 124, 126, 127, 128, 129, 131, 133, 135, 136, 138,	Generally oppose the limit of 1 milligram total THC per package. The limit does not allow a sufficient amount of THC for medium- to large-sized animals. The only way for larger animals to receive effective relief will be to use multiple packages per administration, which is impractical and cost-prohibitive. Humans need the freedom to give their animals the proper dosages.	Available scientific evidence overwhelmingly indicates that animal consumption of THC can cause acute toxic harm, suffering, and death. The effect of THC on animals is highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. What might be a safe dose for a large animal could cause significant harm or death to a small animal. Animal cannabis products will be available for many different types of animals, not just pets of certain sizes. Because existing scientific research has yet to settle on a recommended THC dose for all animals of all different sizes, the Department opted to limit harm to animals by preventing animal cannabis products from containing potentially dangerous levels of THC. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is not to provide people with the ability to provide large amounts of THC to their animal but rather

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Section	Commenter Number(s)	Comment Summary	Department Response
	143, 144, 146, 148, 149, 150, 151, 152, 153, 154, 157, 158, 159, 160, 161, 162, 164, 166, 168, 170, 174, 177, 178, 180, 182, 185, 186, 193, 194, 205, 216, 219, 220, 221, 223, 226, 229, 231, 234, 235, 237, 241, 242		<p>to reduce the possibility for animal suffering and harm to occur. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	005, 007, 008, 009, 031, 033, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 060, 061, 063, 064, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 092, 093, 094, 095, 096, 097, 098, 099, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110, 113, 114, 115, 119, 120, 121, 122, 123, 124, 126, 127, 128, 129, 130, 131, 132, 133,	The proposed limit of 1 milligram total THC per package may incentivize consumers to remain in the less-regulated hemp market, where products lack rigorous testing, veterinary guidance, and dosing instructions. Or the limit will cause consumers to seek out adult-use human products, which are not dosed for animals and may contain ingredients toxic to animals, such as xylitol or chocolate. A successful regulated market should offer a clear benefit over existing, alternative options. The proposed regulations would create an illicit market for animal cannabis products, diminishing public health and reducing tax revenues. Tackling the illicit market and those committing actual crimes would have a far greater impact on public safety and the industry than restricting access to vital medical products for animals.	The Department cannot stop an individual who has purchased an adult-use cannabis product from a licensed cannabis retailer, or a hemp product from a traditional retail store, from administering the product to their animal. However, available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. While the Department cannot stop animals from consuming such products, which may have dangerous levels of THC for animals, we can prevent animal cannabis products containing potentially dangerous levels of THC from being widely manufactured, advertised, and sold across California. Business and Professions Code section 26130 requires the Department to promulgate regulations for animal product standards and prohibits cannabis products from being marketed or sold for use on, or consumption by, animals before these regulations for animal standards take effect. These regulations will not restrict access to animal cannabis products, but will legalize their manufacture and sale in the commercial cannabis market for the first time. The Department is capable of establishing standards for animal cannabis products and enforcing against illegal activity at the same time.

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Section	Commenter Number(s)	Comment Summary	Department Response
	135, 136, 138, 141, 143, 144, 146, 147, 148, 149, 150, 151, 152, 153, 154, 157, 158, 159, 160, 161, 162, 164, 166, 167, 168, 169, 170, 171, 173, 174, 175, 176, 177, 179, 180, 181, 182, 183, 185, 186, 188, 191, 193, 194, 195, 202, 204, 205, 206, 207, 209, 211, 216, 219, 220, 221, 22, 223, 224, 225, 226, 229, 231, 233, 234, 235, 237, 241, 242, H2.2, H5.4, H13.8. H15.5		

Section	Committer Number(s)	Comment Summary	Department Response
17350(d)	005, 008, 033, 130, 132, H6.6	The proposal will disrupt manufacturing and take beneficial products off the market. The limit will undermine legitimate medical options for animals struggling with health conditions and will result in few products specifically for pets being available at retail.	Business and Professions Code section 26130 prohibits cannabis products from being marketed or sold for use on, or consumption by, animals before these regulations for animal standards take effect. Therefore, there can be no disruption of existing legal manufacturing. The proposed regulations do not require licensees to make or sell animal cannabis products. By establishing clear guidelines for manufacturing, packaging, labeling, and testing, the Department is setting the stage for high-quality products that pet owners can trust. These clear standards not only protect animal health but also encourage responsible innovation, paving the way for growth in this evolving market.
17350(d)	005, 010, 033	The limit of 1 milligram total THC per package is not scientific or meaningful when a package can have any range of doses. Dosage control matters more than total package content for safety and efficacy, and a per-dose approach better aligns with how products are formulated, consumed, and tested.	The available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The purpose of the regulations is to ensure that, regardless of the number of doses in a single package and regardless of the species or weight of the animal, the possibility of harm to the animal from THC toxicosis is minimized. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products manufactured in

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Section	Committer Number(s)	Comment Summary	Department Response
			<p>accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	005, 031, 139, 140, 142, 187, 189, 190, 196, 197, 198, 199, 200, 201, 203, 208, 212, 214, 217, 218, 227, 228, 230, 232, 236, 238, 239	<p>General concerns regarding impacts to small businesses. The limit of 1 milligram total THC per package will effectively ban full-spectrum products and necessitate that products be made only from CBD isolate, which will give exclusivity to volatile-solvent manufacturers because the use of volatile solvents is necessary to create CBD isolates with less than 1 milligram total THC per package. Request that the Department not shut out small, traditional cannabis medicine makers. Costly regulations unnecessarily burden mid-level businesses while benefiting larger corporations that can absorb compliance costs and changes to business practices, and burdensome regulations reduce the number of suppliers providing quality products and raise prices for consumers, until only large manufacturers are left in the market. The regulations should set a quality standard based upon what is</p>	<p>The proposed regulations do not mandate new burdens for cannabis businesses; they establish standards for businesses who seek to begin producing and selling animal cannabis products. Business and Professions Code section 26130 requires the Department to promulgate regulations for animal product standards and prohibits cannabis products from being marketed or sold for use on, or consumption by, animals before these regulations for animal standards take effect. The proposed regulations do not prohibit full-spectrum animal cannabis products, nor do they mandate that animal cannabis products be manufactured using only CBD isolate. For example, if a manufacturer had a full-spectrum cannabis extract with 10 milligrams of total THC and 100 milligrams of CBD, they would be permitted to make 10 packages of animal products containing that extract, such that each package has no more than 1 milligram total THC (the amount of CBD allowed is not restricted, but in this example, each package would have 10 milligrams CBD, with a ratio of 10:1 CBD to THC). While the THC limit may reduce the amount of full-spectrum extract that can be added to a cannabis product, it does not prohibit full-spectrum animal cannabis products. The Economic and Fiscal Impact Analysis prepared for this rulemaking package found that the proposed regulations would not result in direct costs to businesses or new direct costs to small businesses. The Department agrees that regulations should prioritize protecting the public, including the well-being of animals. Business and Professions Code section</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
		good for the end user, not the large corporations only.	26011.5 establishes that protection of the public shall be the highest priority for the department in exercising licensing, regulatory, and disciplinary functions.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	005, 195, 202, 206, 207	The limit of 1 milligram total THC per package will make animal cannabis products unaffordable. The proposed regulations will raise prices for the consumer as manufacturers pass down the cost of compliance.	The Economic and Fiscal Impact Assessment included with the rulemaking package found that the proposed regulations would decrease the price of low-THC animal cannabis products at retail by around 3.15% on average. The purpose of the proposed regulations is to ensure the safety and well-being of animals in California. Business and Professions Code section 26011.5 establishes that protection of the public shall be the highest priority for the department in exercising licensing, regulatory, and disciplinary functions. Available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	006, 009, 132	<p>Oppose the limit of 1 milligram total THC per package and recommend that the Department use higher THC caps per package with segmentable delivery systems, detailed usage guidelines, and prominent cautionary labeling and child-resistant packaging. If the intent is to remind people that pet size matters for amount of THC, then the Department should mandate a warning label instead. Recommend adopting tiered THC limits based on weight ranges or dose-per-serving, alongside strict labeling, safety, and manufacturing standards, which would allow for safe, effective, and medically justified formulations to remain accessible, including to larger animals, while preventing accidental overexposure in dogs, which are more sensitive to THC.</p>	<p>The proposed regulations clarify that, except where specified, animal cannabis products are subject to the same statutory and regulatory requirements that apply to adult-use cannabis products. This includes existing rules requiring packaging to be child-resistant and that certain products be packaged in a manner allowing a single serving to be identified and measured. Additionally, cannabis products must be labeled with instructions for use, such as the method of consumption or application, certain statutorily mandated warnings, and any preparation necessary prior to use. The available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The purpose of the regulations is to ensure that, regardless of the number of doses in a single package and regardless of the species or weight of the animal, the possibility of harm to the animal from THC toxicosis is minimized. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that</p>

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Section	Committer Number(s)	Comment Summary	Department Response
			<p>many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is not to provide people with the ability to provide large amounts of THC to their animal but rather to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	006, 125, 147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233, H8.1, H15.3, H15.5	Recommend reconsidering Alternative #1 in the ISOR and allowing animal cannabis products to contain the same levels of THC currently approved for adult-use human products. Recommend that the Department use the same standards for adult-use cannabis since the best science suggests the effects are similar.	As Alternative #1 in the ISOR states, the Department considered allowing the manufacture, distribution, and sale of animal cannabis products with the same level of THC currently allowed in products for human consumption. This alternative was rejected in consideration of all available veterinary science regarding the dangers of THC toxicosis in animals. It would be irresponsible to adopt regulations permitting, with implicit claims of safety and harmlessness, animal owners or handlers to administer or feed products with adult-use levels of THC to small dogs, cats, rabbits, and the like.
17350(d)	008	There is sufficient evidence to support the safe use of THC in appropriate doses for pets and a growing body of veterinary research backs the therapeutic potential of cannabis for alleviating pain, reducing anxiety, and managing other serious conditions.	Available scientific research overwhelmingly indicates that animal consumption or use of THC, especially in higher doses, may result in acute toxic harm, adverse effects, suffering, and death. The Department agrees that while "appropriate doses" of cannabis may be safe for animals, in the absence of evidence of what these "appropriate doses" are for animals of all species and sizes, the Department opted to restrict animal cannabis products to 1 milligram of total THC per package. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	008, 033, 125, 130, 137, 147, 165, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 210, 222, 224, 225, 233, H4.4, H5.3, H5.5, H6.3, H9.3, H11.3, H13.1, H14.1, H15.1, H15.3	Oppose the limit of 1 milligram total THC per package. The Department should reconsider the proposed regulations taking into account the feedback received by experts, including those currently in the space, pet owners, and veterinarians. Veterinarians need to be afforded the flexibility to recommend different types of cannabis products to clients based on the individual conditions and circumstances of the animal patient. The proposed THC limit strips veterinarians of the ability to provide tailored, evidence-based care. Instead of promoting safety, the proposed policy undermines the role of veterinary professionals. Recommend assigning oversight of cannabis-based medicines for animals to veterinarians who are licensed, skilled, and trusted sources to guide pet parents in the use of cannabis.	The Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	009	<p>The most effective and widely accepted dosing protocol is 1 mg of THC per 20 lbs. of bodyweight, and science supports this. 2018 Cornell University veterinary studies on CBD in dogs highlight the importance of standardized formulations with scalable dosing. Colorado State University veterinary studies showed dose-dependent efficacy in seizure reduction and arthritis-related pain. The findings of these studies are echoed across peer-reviewed studies, which uniformly emphasize weight-based dosing for both CBD and THC, especially for chronic pain or severe mobility issues.</p>	<p>The Department agrees that based on the latest research, it is apparent that the effects of THC on animals are highly dependent on the species and weight of the animal. This makes safe THC dosing in animals across the board incredibly difficult. Existing scientific research has yet to settle on a recommended THC dose for all animals of all different sizes. Both of the studies cited by the commenter focused on CBD but not the safety of THC, so conclusions about the safety and dosing of THC in animals cannot be drawn from the referenced studies. Consistent with the findings of the referenced studies, the proposed regulations do not limit the amount of CBD that may be included in animal cannabis products. In the absence of robust scientific evidence for safe THC dosing, the Department opted to limit harm to animals by preventing animal cannabis products from containing higher levels of THC. Additionally, animal cannabis products will be available to all Californians, not just those with knowledge of animal cannabis product dosing and the potential adverse effects of THC on animals. Animals cannot clearly communicate to their owners or handlers that they are experiencing negative effects from consumption of THC, nor can animals choose to reduce their THC consumption if they experience negative effects. Among all other factors considered, these are perhaps the most persuasive. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
			<p>the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	009, 010, 033, 139, 147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233, H7.4, H13.5	<p>Recommend animal cannabis product dosing be tailored to individualized factors like body weight, species, metabolism, and condition severity or diagnosis. or mirroring what already exists in the veterinary pharmaceutical space for weight-based dosing.</p> <p>Emerging clinical evidence suggests even smaller pets under 10 lbs. can tolerate doses of up to 0.5 to 0.75 milligrams of THC without noticeable behavioral effects and that a per-dose standard would be far more effective in safeguarding pet health while enabling legal businesses to make consistent and compliant products.</p>	<p>The US FDA's Center for Veterinary Medicine (CVM) regulates animal drugs, including the approval of new animal drugs. The drug approval process starts with the drug sponsor. The sponsor conducts initial research on a potential new animal drug, and if the research is promising, the sponsor contacts CVM to start discussions about the drug and the approval process. The drug sponsor is responsible for testing a new animal drug for safety and effectiveness. CVM reviews the results of the tests to determine if the drug is safe and effective and meets the approval requirements. The sponsor must prove that the drug is safe and effective for a specific use in a specific animal species when it is used according to the proposed label. If the drug sponsor decides the drug meets the requirements for approval, the sponsor submits a New Animal Drug Application (NADA) to CVM. The NADA includes all the information about the drug and the proposed label. A team of CVM personnel, including veterinarians, animal scientists, biostatisticians, chemists, microbiologists, pharmacologists, and toxicologists, reviews the NADA. If the Center's team agrees with the sponsor's conclusion that the drug meets the approval requirements—that it is safe and effective when it is used according to the proposed label—CVM approves the NADA and the drug sponsor can legally sell the drug. The California Department of Cannabis Control cannot apply the same standards for animal drugs to animal cannabis products because no animal cannabis product sponsor has gone through the NADA approval process to prove that cannabis is safe</p>

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			<p>and effective for specific uses in specific animal species. Further, the Department does not employ a team of veterinarians, animal scientists, biostatisticians, chemists, microbiologists, pharmacologists, and toxicologists to review animal cannabis product proposals and dosing in specific animal species. The available scientific research overwhelmingly indicates that animal consumption or use of THC has the potential to cause acute toxic harm, adverse effects, and death. The purpose of the proposed regulations is to prevent animal suffering and harm regardless of the species or weight of the animal. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Committer Number(s)	Comment Summary	Department Response
17350(d)	009, 125, 132, 141, H5.2, H8.5, H11.1, H14.2, H15.2	Oppose the limit of 1 milligram total THC per package, which is arbitrary, unsupported by science, and overly cautious.	The Department disagrees. The Department engaged in extensive stakeholder outreach, including speaking with numerous veterinarians specializing in animal cannabis research, emergency veterinary care, and treatment of animals with cannabis toxicosis. We also spoke to veterinarians with experience administering cannabis to animals and veterinarians who have their own lines of cannabis or hemp animal products. Additionally, the Department reviewed numerous scientific studies and journal articles, as cited in the ISOR. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, not current industry practices, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.
17350(d)	010	The current California cannabis testing infrastructure is not equipped to support the 1 milligram total THC per package limit due to inherent limitations in testing precision, standard error, and dilution calculations.	The Department disagrees. The 1 milligram total THC per package limit was established with existing commercial cannabis testing requirements and limitations in mind. The Department has no reason to believe that licensed testing laboratories cannot quantify whether a product contains more or less than 1 milligram of total THC. There are many existing cannabis products available in the California legal

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			cannabis market with less than 1 milligram of total THC that are tested without issue.
17350(d)	010	The proposed 1 milligram rule would result in frequent batch failures, resulting in product waste and increased production costs, deterring compliance and risking diversion.	The Department disagrees. There are many existing cannabis products available in the California legal cannabis market with less than 1 milligram of total THC that are tested without issue. As this demonstrates that manufacturers are already capable of creating these low-THC products, there is no reason to believe that low-THC animal cannabis products will present any additional manufacturing challenges. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	010, 011, 012, 013, 014, 015, 016, 017, 018, 019, 020, 021, 022, 023, 024, 025, 027, 028, 029, 030, 031, 033, 034, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 060, 061, 063, 064, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 091, 092, 093, 094, 095, 096, 097, 098, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110,	The limit of 1 milligram total THC per package will effectively ban full-spectrum products and necessitate that products are made only from CBD isolate. CBD isolates are less medicinally effective compared to full-spectrum products because full-spectrum products contain minor cannabinoids. CBD isolates can only be made using chemical solvents that strip away other beneficial compounds. Full-spectrum products, including those with small but meaningful amounts of ratio-controlled THC, have increased therapeutic potential due to the "entourage effect" (in which major and minor cannabinoids and terpenoids work together synergistically). While not completely understood, the entourage effect is universally recognized in the medical community as an important feature of medicinal cannabis. The proposed THC limit does not allow for a sufficient amount of	The proposed regulations do not prohibit full-spectrum animal cannabis products, nor do they mandate that animal cannabis products be manufactured using only CBD isolate. For example, if a manufacturer had a full-spectrum cannabis extract with 10 milligrams of total THC and 100 milligrams of CBD, they would be permitted to make 10 packages of animal products containing that extract, such that each package has no more than 1 milligram total THC (the amount of CBD allowed is not restricted, but in this example, each package would have 10 milligrams CBD, with a ratio of 10:1 CBD to THC). While the THC limit may reduce the amount of full-spectrum extract that can be added to a cannabis product, it does not prohibit full-spectrum animal cannabis products. The Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor is there a way to restrict animal cannabis product purchases only to persons with a veterinarian's recommendation or prescription. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and

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	112, 113, 114, 115, 116, 118, 119, 120, 121, 122, 123, 124, 126, 127, 128, 129, 131, 133, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 146, 148, 149, 150, 151, 152, 153, 154, 157, 158, 159, 160, 161, 162, 164, 166, 168, 170, 174, 177, 180, 182, 185, 186, 187, 189, 190, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 205, 206, 207, 208, 212, 214, 216, 217, 218, 219, 220, 221, 223, 226, 227, 228, 229, 230, 231, 232, 234, 235, 236, 237, 238, 239, 240,	<p>THC for the entourage effect to work. Even products with extremely high CBD to THC ratios, such as 500:1 for broad-spectrum or 25:1 for full-spectrum, would exceed the proposed THC cap. Full-spectrum tinctures are popular, safe, easy to dose and administer, and have a long history of being safe and well-tolerated in animals.</p>	<p>widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers.</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
	241, 242, H1.2, H3.2, H4.2, H12.1, H12.3, H13.9		

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	010, 030, 035, 036, 037, 038, 039, 040, 041, 042, 043, 044, 045, 046, 047, 048, 050, 051, 052, 053, 054, 055, 056, 057, 058, 059, 060, 061, 063, 064, 066, 067, 068, 069, 070, 071, 072, 073, 074, 075, 076, 077, 079, 080, 081, 082, 083, 084, 085, 086, 087, 088, 089, 090, 092, 093, 094, 095, 096, 097, 098, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110, 113, 114, 115, 119, 120, 121, 122, 123, 124, 126, 127, 128, 129, 131, 133, 135, 136, 138, 139, 141, 143, 144,	The limit of 1 milligram total THC per package will effectively ban full-spectrum products and necessitate that products are made only from CBD isolate. Since CBD products are already widely available at low costs in the unregulated hemp market, the proposed regulations will put cannabis manufacturers at a competitive disadvantage with the hemp market and potentially cede all animal products to the hemp market.	The proposed regulations do not prohibit full-spectrum animal cannabis products, nor do they mandate that animal cannabis products be manufactured using only CBD isolate. For example, if a manufacturer had a full-spectrum cannabis extract with 10 milligrams of total THC and 100 milligrams of CBD, they would be permitted to make 10 packages of animal products containing that extract, such that each package has no more than 1 milligram total THC (the amount of CBD allowed is not restricted, but in this example, each package would have 10 milligrams CBD, with a ratio of 10:1 CBD to THC). While the THC limit may reduce the amount of full-spectrum extract that can be added to a cannabis product, it does not prohibit full-spectrum animal cannabis products. The available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The proposed rule would limit animal cannabis products to 1 milligram of Total THC per package, but would not limit the amount of other cannabinoids that may be included. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. By establishing clear guidelines for manufacturing, packaging, labeling, and testing, the Department is setting the stage for the sale of high-quality products that pet owners can trust. These clear standards not only protect animal health but also

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Section	Commenter Number(s)	Comment Summary	Department Response
	146, 148, 149, 150, 151, 152, 153, 154, 157, 158, 159, 160, 161, 162, 164, 166, 168, 170, 174, 177, 180, 182, 185, 186, 193, 194, 195, 202, 205, 206, 207, 216, 219, 220, 221, 223, 226, 229, 231, 234, 235, 237, 241, 242, H6.2		encourage responsible innovation, paving the way for growth in this evolving market.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	011, 012, 013, 014, 015, 016, 017, 018, 020, 021, 022, 023, 024, 026, 027, 028, 029, 031, 034, 091, 112, 116, 118, 127, 139, 140, 142, 187, 189, 190, 196, 197, 198, 199, 200, 201, 203, 208, 212, 214, 217, 218, 227, 228, 230, 232, 236, 238, 239, 240, H1.1, H13.4	Oppose the limit of 1 milligram total THC per package and recommend that the Department adopt various alternative THC limits, such as animal cannabis tinctures with concentrations of up to 30mg THC per ounce or 25 mg THC per package. Recommend that specific CBD-to-THC ratios be combined with higher per-package THC limits.	Existing scientific research has yet to settle on a recommended THC dose or THC-to-CBD ratio for all animals of all different sizes. In the absence of such evidence, the Department opted to limit harm to animals by preventing animal cannabis products from containing higher levels of THC. Additionally, animal cannabis products will be available to all Californians, not just those with knowledge of animal cannabis product dosing and the potential adverse effects of THC on animals. Animals cannot clearly communicate to their owners or handlers that they are experiencing negative effects from consumption of THC, nor can animals choose to reduce their THC consumption if they experience negative effects. Among all other factors considered, these are perhaps the most persuasive. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	032	THC is toxic to all dogs, causes animal pain and suffering, and should not be allowed in animal cannabis products.	While the available scientific evidence overwhelmingly indicates that animal consumption or use of THC has the potential to cause acute toxic harm, adverse events, and death, as described in the ISOR, there are several studies showing that THC appears to be well-tolerated in healthy dogs. As described in the ISOR as Alternative #2, the Department considered prohibiting the manufacture, distribution, or sale of animal cannabis products. However, the Department rejected this option because evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers.

Section	Committer Number(s)	Comment Summary	Department Response
17350(d)	125	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.	<p>The Department agrees that drugs can have side effects, which is why most animal drugs require a prescription from a veterinarian. The Department does not deny that cannabis products, including products with THC, may be effective for treating medical conditions in animals under experienced veterinary care. However, the Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare. Available scientific research overwhelmingly indicates that</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
			<p>animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. Animal research shows that the effects of THC on animals are highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	125	1 milligram of total THC per package can still cause side effects in animals depending on the size and species of the animal, and the risk is proportional to the size of each package unit and the number of units included in the finished product.	The Department agrees that even small doses of THC, such as 1 milligram, can still produce side effects in animals depending on the size and species. The proposed regulations would limit animal cannabis products to no more than 1 milligram of total THC per package. However, the regulations do not mandate a dose or serving size because existing animal cannabis research is not sufficient to recommend a specific dose or to prove or disprove the safety or efficacy of a specific clinical value of THC that can be administered to any animal across the board. Based on the latest research, it is apparent that the effects of THC on animals are highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. That is why the Department opted to limit THC to minimal levels. The 1 milligram total THC limit is not arbitrary: it was specifically selected to reduce the potential for animal harm or suffering, regardless of the species or bodyweight of the animal. It is important to recognize that animal cannabis products will be available on store shelves across California for any adult to purchase, not just individuals who consulted a veterinarian beforehand or have prior knowledge about the safety of cannabis in animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.

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Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	125	Because research does not yet exist to prove or disprove the clinical value of a limit of 1 milligram total THC per package, it seems medically and legally arbitrary.	The Department agrees that existing animal cannabis research is not sufficient to recommend a specific dose or to prove or disprove the safety or efficacy of a specific clinical value of THC that should be administered to any animal across the board. Business and Professions Code section 26130 requires the Department to adopt animal cannabis product standards and prohibits cannabis products from being marketed or sold for use on, or consumption by, animals before these regulations for animal standards take effect. Based on the latest research, it is apparent that the effects of THC on animals are highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. That is why the Department opted to limit THC to minimal levels. The 1 milligram total THC limit is not arbitrary: it was specifically selected to reduce the potential for animal harm or suffering, regardless of the species or bodyweight of the animal. It is important to recognize that animal cannabis products will be available on store shelves across California for any adult to purchase, not just individuals who consulted a veterinarian beforehand or have prior knowledge about the safety of cannabis and animals.

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	125	<p>There is no established lethal dose of THC in any animal species. Common signs of poisoning in dogs are lethargy, CNS depression, ataxia, vomiting, urinary incontinence/dribbling, increased sensitivity to motion or sound, mydriasis, hyperesthesia, ptyalism, and bradycardia. While these effects can be distressing to animal owners, they are not documented to result in patient death.</p>	<p>Commenter's statement regarding lethal doses is incorrect. For example, according to "<i>Comparison of acute oral toxicity of cannabinoids in rats, dogs and Monkeys</i>," a study referenced in the ISOR, administering 225–3600 mg/kg Δ9-THC and Δ8-THC to rats resulted in their death. Death consistently occurred between 36 and 72 hours after treatment. Mortality in rats apparently resulted from severe hypothermia and other central effects. Toxicity was characterized by severe hypothermia, bradypnea, rapid weight loss, inactivity, wide stance, ataxia, muscle tremors, and prostration. In contrast, in dogs and monkeys, single oral doses of Δ9-THC and Δ8-THC between 3000 and 9000/mg/kg were nonlethal. Predominant toxic signs in dogs included drowsiness, ataxia, prostration, anesthesia, tremors, mild hypothermia, salivation, emesis, and anorexia. Toxic signs in monkeys included hyperreactivity to stimuli, lethargy, drowsiness, characteristic huddled posture, slow movements, abnormal eating procedures and sedation (Thompson et al., 1973). However, the purpose of the proposed regulations is to prevent not just animal death, but animal harm and suffering. While the symptoms described in the comment would certainly be distressing for animal owners, they would likely be even more distressing for the animals themselves. While most animals that experience cannabis toxicosis recover completely (suggesting that most cannabis toxicoses do not result in long-term negative effects), animals may still experience acute harm and negative effects from THC consumption.</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
			<p>Further, the Department expects many animal cannabis product purchasers to seek out products for therapeutic use on unhealthy animals, for whom the safety and efficacy of THC are largely unknown. Animals cannot clearly communicate to their owners or handlers that they are experiencing negative effects from consumption of THC, nor can animals choose to reduce their THC consumption if they experience negative effects. Among all other factors considered, these are perhaps the most persuasive. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	125, H5.1	<p>The author of AB 1885 (2022) wanted to empower veterinarians with the ability to choose what was appropriate for their patients based on prevailing scientific research. By reconsidering Alternative #1 in the ISOR, the DCC will closer align with the intent of the law.</p>	<p>The Department disagrees that reconsidering Alternative #1 (allowing animal products to contain the same level of THC currently allowed for human products) would align with the goal of having veterinarians set standards for animal products because the current human product THC limits were not set by veterinarians or with animals in mind at all. Allowing the manufacture, distribution, and sale of animal products with the same level of THC currently allowed in products for human consumption does not align with prevailing scientific research. It would be irresponsible to adopt regulations permitting, with implicit claims of safety and harmlessness, animal owners or handlers to administer or feed products with adult-use levels of THC to small dogs, cats, rabbits, and the like. The Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
			<p>widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare, and the bill mandating these regulations did not change that.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	132	<p>The Department cherry-picked seven studies out of thousands to support its claim that THC can cause harm to animals, even though two of the studies actually show THC can be used safely under veterinary guidance.</p>	<p>The Department disagrees, finding over the course of developing this proposal that the scope and quality of existing animal cannabis research are not nearly as broad as the commenter contends. The number of high-quality studies utilizing double-blind, randomized controlled trials, widely considered the "gold standard" for clinical research, is extremely small. A systemic review of animal cannabis research in 2022 found only six randomized clinical trials that met eligibility criteria for inclusion in the review based on study quality. Notably, these six studies focused on CBD, not THC. Even the studies cited by this commenter contradict the commenter's claims that there is an abundance of animal cannabis research. The abstracts for the studies cited by the commenter include the following and similar statements: "literature on phytocannabinoids in veterinary patients is limited" (Pinto and Requicha 2024), and "cannabis is used in the treatment of several human conditions; however, its use is still less explored in veterinary medicine" (Lima et al. 2022). The Department focused objectively on high-quality studies that utilized THC, the compound of chief concern when it comes to animal safety and well-being. The ISOR's summary of existing research reflects the nuances of existing animal cannabis research, including the quality and limitations of that research. The Department does not deny that cannabis products, including products with THC, may be effective for treating medical conditions in animals under experienced veterinary care. However, the Department is responsible for regulating commercial</p>

Section	Commenter Number(s)	Comment Summary	Department Response
			<p>cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.</p>

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17350(d)	132	The ISOR states that there is more research on humans than animals, and because this is the Department's justification for limiting THC in animal products, the justification falls apart.	The ISOR states: "Due to cannabis' federal classification as a Schedule I controlled substance, it is difficult, burdensome, and expensive to perform research on the effects of THC on animals. Still, available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death." Over the course of developing this proposal, the Department found that the scope and quality of existing animal cannabis research are not nearly as broad as the commenter contends. The number of high-quality studies utilizing double-blind, randomized controlled trials, widely considered the "gold standard" for clinical research, is extremely small. A systemic review of animal cannabis research in 2022 found only six randomized clinical trials that met eligibility criteria for inclusion in the review based on study quality. Notably, these six studies focused on CBD, not THC. Even the studies cited by this commenter contradict the commenter's claims that there is an abundance of animal cannabis research. The abstracts for the studies cited by the commenter include the following and similar statements: "literature on phytocannabinoids in veterinary patients is limited" (Pinto and Requicha 2024), and "cannabis is used in the treatment of several human conditions; however, its use is still less explored in veterinary medicine" (Lima et al. 2022). The Department focused objectively on high-quality studies that utilized THC, the compound of chief concern when it comes to animal safety and well-being. The ISOR's summary of existing research is not

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			<p>biased: it simply reflects the nuances of existing animal cannabis research, including the quality and limitations of that research. The Department reiterates the following statement from the ISOR: "Whether [suppositories and inhalable and combustible products, such as vapes, dabs, shatter, and wax] can be safely administered to animals is largely unknown and not sufficiently studied. After an extensive review of available scientific literature and consultation with leading veterinary scientists and researchers, the Department determined that prohibiting the manufacture and sale of these products is necessary to ensure the safety and well-being of animals."</p>

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17350(d)	132	<p>Research shows that dogs have more CB1 receptors than humans, making dogs more sensitive to THC. However, other animals are less sensitive to THC and even dogs can safely use THC under the guidance of a veterinarian. The Department should consider the full range of animals out there, including livestock and animals in zoos, who have a much larger body mass and lower sensitivity to THC than dogs.</p>	<p>The Department did not consider THC toxicity only in dogs, but also THC toxicity in all animals across the board. Based on the latest research, it is apparent that the effects of THC on animals are highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. As noted in the ISOR, animal cannabis products will be available for many different types of animals, not just dogs. Though some animals, including dogs, may tolerate THC, there is still a lack of research proving the safety of THC in all animals at higher doses across the board. While most animals that experience cannabis toxicosis recover completely (suggesting that most cannabis toxicoses do not result in long-term negative effects), animals may still experience acute harm and negative effects from THC consumption. Further, the Department expects many animal cannabis product purchasers to seek out products for therapeutic use on unhealthy animals, for whom the safety and efficacy of THC are largely unknown. Animals cannot clearly communicate to their owners or handlers that they are experiencing negative effects from consumption of THC, nor can animals choose to reduce their THC consumption if they experience negative effects. Among all other factors considered, these are perhaps the most persuasive. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The</p>

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Section	Commenter Number(s)	Comment Summary	Department Response
			<p>Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

Section	Committer Number(s)	Comment Summary	Department Response
17350(d)	132	<p>The Department ignored recent research on animal cannabis products that found therapeutic value of cannabinoids and cannabis derivatives, including CBD and low-dose THC, for treating a variety of health conditions.</p>	<p>The Department does not deny that cannabis products, including products with THC, may be effective for treating medical conditions in animals under experienced veterinary care. However, the Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as are an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.</p>

Section	Commenter Number(s)	Comment Summary	Department Response
17350(d)	132	<p>The limit of 1 milligram total THC per package is unsupported by current scientific literature. Chicoine et al 2020 found that a 1:20 THC-to-CBD formulation was well-tolerated in dogs at low and moderate doses. The Department cites this study twice in the ISOR, both to say that THC is not safe for dogs and to say it is "well-tolerated in healthy dogs." The Department should clarify how one study found two paradoxically different things.</p>	<p>The ISOR's summary of the academic research is nuanced because the academic research on cannabis and animals is nuanced. Chicoine et al 2020 found that healthy dogs tolerated a 1:20 THC-to-CBD cannabis product well at low and medium doses, but clinically meaningful neurological signs were observed at higher doses. During the study, administration of the high dose formulation was discontinued by the researchers because dogs on the high dose showed obvious neurological signs and adverse events. The findings of this study, in addition to the other studies cited in the ISOR, led the Department to conclude that cannabis can cause acute toxic harm to animals and that some forms of cannabis appear to be well-tolerated in healthy dogs. This conclusion aligns with the proposed regulations which would limit the amount of total THC to 1 milligram per package to reduce the risk of animal harm and suffering.</p>
17350(d)	137, H6.4	<p>The Department should amend the proposed regulations, including removal of the 1-milligram total THC limit, to more accurately reflect a realistic, safe, and medically effective use of cannabis-based medicines for animals.</p>	<p>The Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only</p>

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			<p>persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.</p>
17350(d)	139	<p>Most full-spectrum tinctures that use a 30:1 CBD:THC flower will produce around 350mg CBD and 12mg THC per fluid ounce of tincture. Even if diluted down to 100mg CBD per package, the THC would still be about 3mg per package. The THC levels in this scenario would be under the 0.3% threshold for the definition of hemp. Explain why the proposed per-package THC limit is significantly lower than the 0.3% hemp threshold for tinctures.</p>	<p>Available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. Based on the latest research, it is apparent that the effects of THC on animals are highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. The purpose of the 1 milligram total THC per package limit is to reduce the likelihood for animal suffering and harm resulting from THC exposure, regardless of the amount of cannabis product administered or the weight of the animal. The Department's THC per package limit differs from the 0.3% THC on a dry-weight basis limit for hemp because the 0.3% THC hemp definition was not adopted with animals in mind. A THC percentage limit for animal cannabis products would be meaningless from a safety standpoint, since simply adding more non-THC weight to a product could allow</p>

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			any amount of THC to be added and still be below the percentage threshold.
17350(d)	139, 140, 142, 187, 189, 190, 196, 197, 198, 200, 201, 203, 208, 212, 214, 218, 227, 228, 230, 232, 236, 238, 239, H6.2, H13.3	Oppose the limit of 1 milligram total THC per package. There is a long history of safety with animals taking tinctures containing various CBD to THC ratios, such as 10:1, 20:1, and 30:1 ratios of CBD to THC, and full-spectrum infusion tinctures with no more than 25 mg of THC and specific CBD:THC ratios.	Available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication. The proposed regulations do not prohibit full-spectrum animal cannabis products. For example, if a manufacturer had a full-spectrum cannabis extract with 10 milligrams of total THC and 100 milligrams of CBD, they would be permitted to make 10 packages of animal products containing that extract, such that each package has no more than 1 milligram total THC (the

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			<p>amount of CBD allowed is not restricted, but in this example, each package would have 10 milligrams CBD, with a ratio of 10:1 CBD to THC). While the THC limit may reduce the amount of full-spectrum extract that can be added to a cannabis product, it does not prohibit full-spectrum animal cannabis products.</p>

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17350(d)	139, H13.2	An exception allowing animal tinctures to contain 25mg THC per fluid ounce or a 20:1 CBD-to-THC ratio would align with DCC regulations for human tinctures, which can have up to 1,000mg THC per package, compared to the THC package limits for human edibles of 100mg THC.	The adult-use THC serving and package limits are not appropriate for animals, nor can the logic applicable to adult-use limits be applied to animal products. The relative THC limits for adult products were developed solely with adult humans in mind, not animals. As Alternative #1 in the ISOR states, the Department considered allowing the manufacture, distribution, and sale of animal cannabis products with the same level of THC currently allowed in products for human consumption. This alternative was rejected in consideration of all available veterinary science regarding the dangers of THC toxicosis in animals. It would be irresponsible to adopt regulations permitting, with implicit claims of safety and harmlessness, animal owners or handlers to administer or feed products with adult-use levels of THC to small dogs, cats, rabbits, and the like. The purpose of the regulations is to ensure that, regardless of the amount of CBD in a single package and regardless of the species or weight of the animal, the possibility of harm to the animal from THC toxicosis is minimized. Evidence suggests that while THC is potentially dangerous for animals, other cannabinoids are not. Adopting regulations that restrict total THC content to a safe, minimal level but do not restrict the levels of other cannabinoids is a reasonable balance that protects animals while allowing therapeutic and otherwise beneficial products to be made available to animal owners and handlers. Nothing in the proposed regulations would prohibit manufacturing or selling an animal cannabis product package with a total of 20 milligrams of CBD combined

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			with 1 milligram of THC. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.
17350(d)	147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233	Many of the studies cited by the Department in the ISOR involve products that far exceed 1 milligram total THC per package, yet still demonstrate safety when properly dosed under veterinary supervision.	The Department agrees that, when properly dosed under veterinary supervision, the risks of THC toxicosis are minimized. However, animal cannabis products will be available in cannabis retail stores across the state to anyone 21 years of age or older. The Department expects many people to purchase and administer cannabis products to their animals without prior veterinary consultation or guidance, and that most animal cannabis products will not be administered under veterinary supervision. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit,

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			and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication, even in the hands of individual owners and handlers who have no veterinary training.
17350(d)	147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233	Many conditions seen in veterinary medicine, such as epilepsy, cancer, and chronic pain, require higher doses of cannabinoids (including THC) to achieve clinical benefit.	The Department does not deny that cannabis products, including products with THC, may be effective for treating medical conditions in animals under experienced veterinary care. However, the Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as are an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever

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			<p>contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.</p>
17350(d)	147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233	Clinical and research data show that even full-spectrum products containing over 50 mg THC per package have been well-tolerated in dogs, cats, horses, and birds.	<p>The Department does not deny that cannabis products, including products with THC, may be tolerated by certain animals of certain sizes. However, based on the latest research, it is apparent that the effects of THC on animals are highly dependent on the species and weight of the animal, which makes safe THC dosing in animals across the board incredibly difficult. Animal cannabis products will be available for many different types of animals, not just dogs, cats, horses, and birds. Though some animals may tolerate THC, there is still a lack of research proving the safety of THC in all animals at higher doses across the board. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The</p>

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			<p>Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>
17350(d)	147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233, H10.2, H15.3	<p>Oppose the limit of 1 milligram total THC per package. According to National Animal Supplement Council Adverse Event Reporting System data regarding administration of hemp-derived products containing less than 0.3% THC, across 1.45 billion administrations of hemp-derived products, fewer than 0.02% adverse events were reported. It is undeniable that such products do not pose undue risk, or negative health consequences in dogs or cats.</p>	<p>Administration of industrial hemp products, which are inherently limited in the amount of THC they may contain, is not a good source of data for determining whether THC is safe and effective for animals, because the THC levels in hemp are orders of magnitude lower than the THC levels present in California's commercial cannabis industry. Available scientific research overwhelmingly indicates that animal consumption or use of THC may result in acute toxic harm, adverse effects, and death. The Department is committed to making decisions regarding cannabinoid concentration and product safety based on scientific evidence, and at this time, there is insufficient scientific evidence demonstrating the safety of high-THC products for animals. The Department believes that animal cannabis products manufactured in accordance with the proposed THC concentration limit, and used or administered responsibly, have low potential to cause animal suffering or harm from acute THC intoxication.</p>

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17350(d)	147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233, H15.3	<p>The limit of 1 milligram total THC per package demonstrates a fundamental misunderstanding of veterinary medicine and cannabinoid pharmacology. Recommend basing policy on the totality of scientific data and not outliers or misapplied toxicology. Animals vary greatly in size, metabolism, and therapeutic needs, and a one-size-fits-all cap ignores these differences.</p>	<p>The Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as are an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.</p>

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17350(d)	147, 167, 169, 171, 173, 175, 176, 179, 181, 183, 188, 191, 204, 209, 211, 222, 224, 225, 233, H15.4	Clinical and research data show adverse animal cannabis reactions occurred primarily when animals accidentally ingested human-use cannabis products or highly concentrated illicit forms (e.g., dabs, wax), not under professional supervision.	In developing the proposed regulations, the Department learned that one of the most common forms of animal THC exposure associated with adverse events is through accidental ingestion of human products left within reach of the animal. This is part of the reason for rejecting Alternative #1 in the ISOR, where the Department considered allowing animal cannabis products containing the same amount of THC as adult-use products. Adult-use products may contain highly concentrated forms of THC not appropriate for animals. Additionally, animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The Department expects that the majority of animal cannabis products will be given to animals not under professional supervision. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur.

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17350(d)	216	<p>Oppose the limit of 1 milligram total THC per package. As a veterinarian with over 10 years of animal cannabis experience, they have seen the effective use of cannabis (which includes the use of THC in formulations) in over 50 different species of animals. Cannabis is an effective treatment for pain, anxiety, inflammation, nausea, appetite loss, seizures, and cancer in animals.</p>	<p>The Department does not deny that cannabis products, including products with THC, may be effective for treating medical conditions in animals under experienced veterinary care. However, the Department is responsible for regulating commercial cannabis activity pursuant to Division 10 of the Business and Professions Code. There are two paths to purchase cannabis at retail: 1) as are an adult 21 years of age or older, or 2) as an adult 18 years of age or older with a valid physician's recommendation for medicinal cannabis. Business and Professions Code section 26000(b)(2) places animal products squarely within the adult-use market. There is no medicinal cannabis recommendation equivalent for pets that exists for medicinal human patients, nor a way to restrict animal cannabis product purchases to only persons with a veterinarian's recommendation. This means that animal cannabis products will be widely available in the adult-use cannabis market to anyone 21 years of age or older. Once legally and widely available for the first time, there is a high likelihood that many individuals will purchase animal cannabis products without ever contacting or obtaining a recommendation from a veterinarian. The purpose of the proposed regulations therefore is to reduce the possibility for animal suffering and harm to occur. The commercial cannabis industry in California is not a substitute or venue for veterinary healthcare.</p>