MEDICAL & RECREATIONAL MARIJUANA PACKAGING AND LABELING GUIDE

July 2016

This document is meant to help explain the packaging and labeling rules. However, this guide should not replace a thorough reading of the rules.

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BEFORE YOU BEGIN

** The packaging and labeling rules discussed in this document apply to marijuana items that are for ultimate sale to a consumer, patient, or designated primary caregiver. They do not apply to lab sampling or bulk transfers of product from one licensee to another. For the rules governing those types of transfers, refer to OAR 845-025-7700. **

For the purposes of this document, the following terms are defined as follows:

Licensee - any person who holds a license issued by the Oregon Liquor Control Commission (OLCC) under ORS 475B.070 (Production license), 475B.090 (Processor license), 475B.100 (Wholesale license), 475B.110 (Retail license), or 475B.560 (Laboratory license).

Registrant - means a person registered with the Oregon Health Authority (OHA) under ORS 475B.420, 475B.435, or ORS 475B.450.

Applicant - a person who is in the process of applying to be a licensee or registrant. Applicants cannot receive package or label approval until they become a licensee or registrant.

Please take a look at the Definitions section for a full list of term definitions.

The OHA and OLCC may have additional requirements that are not covered in this guide so it is important to read the rules. This guide is not a replacement for reading the rules.

PACKAGING

General Requirements

Each marijuana item must be packaged in a container that conforms to the rules found in OAR 845-025-7000 through 845-025-7060. A "container" is a sealed, hard or soft-bodied receptacle in which a marijuana item is placed. OAR 845-025-7060 requires all licensees and registrants who package marijuana items for ultimate sale to a consumer, patient, or designated primary caregiver to get all packages and labels approved through the OLCC pre-approval process (see Pre-approval Process Section). If the marijuana item is produced by an OLCC licensee, the package and label must be approved before any marijuana item is sold to a consumer.

If the marijuana item is produced by an OHA registrant, the package and label must be approved before the **October 1, 2016** compliance date in order to continue to be sold to a patient or designated primary caregiver on and after **October 1, 2016**.

Packages must protect the marijuana items they hold. Containers and packaging that hold marijuana items must protect those items from contamination and must not expose the marijuana item to any toxic or harmful substance. See OAR 845-025-7020.

Packages cannot contain false or misleading statements. A false or misleading statement is one that is either not true or a statement that implies something about the product that is not true. For example, making a claim that the product treats or cures a disease, when there is no significant scientific information to back that claim up would be a misleading statement. Similarly, labeling your product or product ingredients as "organic" when they have not properly certified would also be a misleading statement. See the sections on Organic and Health Claims for more information.

Marijuana items cannot be packaged in a manner that is attractive to minors. Any of the following items would be considered "attractive to minors:"

(1) Cartoons;

(2) Designs, brands, or names that resemble a non-cannabis product that is typically marketed to minors;

(3) Symbols or celebrities that are commonly used to market products to minors would be considered "attractive to minors;" or

(4) Images of minors.

Both images are "cartoons." The penguin (above) has comically-exaggerated features, and the winged character (below) displays unnatural or extra-human abilities.

A "cartoon" is any drawing or depiction of an object, person, animal, creature or any similar caricature that:

(1) Uses comically-exaggerated features;[i]

(2) Attributes human characteristics to animals, plants or other objects; or

(3) Attributes unnatural or extra-human abilities, such as imperviousness to pain or injury, X-ray vision, tunneling at very high speeds, or transformation (i.e. Superheroes).[ii]

A package holding a marijuana item cannot appear similar to any consumer product that is typically marketed towards minors or use the same types of symbols that are used to market products to children.

All marijuana items, except plants and seeds, must be sold in child-resistant packages. Child-resistant packages come in two forms: single-use and resealable, continually child-resistant. A single-use, child-resistant package is one that meets the child-resistance standard until it is opened. A resealable, continually child-resistant package is one that is capable of being resealed after being opened and maintains its child-resistance throughout the life of the product.

This photo is an example of a single-use package.

If the marijuana item being sold is a marijuana plant or marijuana seeds, no child resistant packages are required. If the marijuana item is a single-serving cannabinoid product or comprised only of usable marijuana, the item can be packaged in a single-use, child-resistant package. If the item contains multiple servings of an edible, extract, concentrate, tincture, or topical, the item must be packaged in a resealable, continually child-resistant package. The marijuana item may be placed directly in a container that meets the child-resistance standard or the container may be placed in an approved child-resistant, exit package. See Table Below.

Type of Packaging Required	Re-sealable & Child-Resistant throughout Life of the Product	Child-Resistant when Product Leaves Store	Child-Resistant Packaging Not Required
Type of Marijuana Item Sold	Multiple-servings of: Edibles Topicals Tinctures Concentrates and Extracts	Single-serving products Usable Marijuana	Plants Seeds

Child-Resistant Packaging

The term "child resistant" is defined in OAR 845-025-7000 as packaging that is designed or constructed to be significantly difficult for children under five years of age to open and not difficult for adults to use properly. Under OAR 845-025-7020, all marijuana items for sale to a consumer, patient, or designated primary caregiver, except for plants and seeds, must:

(1) Be packaged in a container that is child-resistant as certified by a qualified third party child-resistant package testing firm;

(2) If the marijuana item is an edible, topical, marijuana product, extract or concentrate that contains more than a single serving, be packaged in a container or be placed in an exit package that is capable of being resealed and made child resistant again after it has been opened, as certified by a qualified third party child-resistant package testing firm.

This photo is an example of a resealable, child-resistant package.

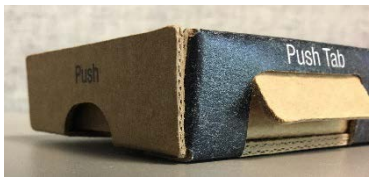
The standard for child-resistant packaging is set by the Consumer Product Safety Commission (CPSC). To determine whether a package meets the standard for child-resistance, a third-party testing firm follows the testing procedure found in 16 CFR 1700.20. If a package has been tested by a qualified firm, proof of certification must be provided to the OLCC before the OLCC can approve the package as meeting the child-resistant standard.

The CPSC maintains a list of testing firms. A copy of that list can be found in the Child-Resistant Testing Firms section. The OLCC does not endorse any of the firms listed.

Exit Packaging

OAR 845-025-7000 defines “exit package” as “a sealed container provided at the retail point of sale in which any marijuana items already within a container are placed.” Exit packages can be used to add child resistance to a container that is not child resistant on its own. All marijuana items, except plants and seeds, must leave the dispensary or retail store in a child-resistant container. Marijuana items can be displayed in the store in non-child resistant packages but must be placed in child-resistant exit packages at the point of sale. Multiple products can be placed in the same exit package at the point of sale. Exit packages may also be reused as long as they are re-sealable and remain child resistant throughout the life of the product.

All exit packages must be approved by the OLCC Pre-approval Process. The fee for approval is $100 per package. Once the OLCC begins accepting applications and approving packages, any package on the approved list may be used without additional approval. When certain changes are made to an approved package or label, the new package and / or label must be resubmitted to the OLCC. See the Pre-Approval Process section for more information.



Pursuant to OAR 333-007-0090, all exit packaging must contain a label that reads: "Keep out of the reach of children" in at least 8 point Times New Roman, Helvetica, or Arial font. An exit package that has only this required warning printed on it without any additional text, graphics, logos, or pictures, would have a generic label and would not require OLCC label pre-approval. However, if the exit package contained any logos, pictures, graphics, or additional text not required by rule, the label would not be generic and would need to be submitted for label pre-approval with an additional $100 fee.

The exit package may be provided by the producer, processor, or wholesaler that packaged the marijuana item for sale to a consumer, patient, or designated primary caregiver or the retail store or dispensary where the marijuana item is sold. Regardless who provides the exit package, it must be approved for use by the OLCC.

Retailer / Dispensary Responsibility

The retailer or dispensary is responsible for making sure that products that require a child-resistant exit package leave the retail store in one. If the container holding the marijuana item is child resistant and on the OLCC approved list, it does not need an exit package. However, if the item is not in a child-resistant package, the retailer or dispensary is responsible for making sure that the marijuana item leaves the store in an OLCC-approved exit package.

Re-using Packaging

Only packaging that is resealable and continually child-resistant may be re-used. If a marijuana item is placed in a package that is being re-used, the old label or labels must be removed, and the package must have a new label or labels attached to it. Additionally, any packaging that is being re-used cannot contaminate the marijuana items and must not expose the item to any toxic or deleterious substances.

LABELING

General Requirements

A label is any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed, molded into, embossed on, or appearing upon or adjacent to a package containing a marijuana item for purposes of branding, identifying, or giving any information with respect to the item or to the contents of the package.

Each marijuana product type has specific requirements that must be included on the label. The label requirements for each product type can be found in OAR 333-007-0010 through 333-007-0100. All labeling requirements outlined in the rules is considered required information that must be included on the product's label. Failure to include required information on a label may result in the denial of a label application. For a checklist of the specific requirements for each product type, go to the Label Checklist Section. Regardless of the product type, all labels must follow the same general requirements.

All the required information on a label must:

1. Be in at least 8 point Times New Roman, Helvetica or Arial font, although the font can be larger;
2. Be in English, but the information can be included in other languages; and
3. Be unobstructed and conspicuous, meaning that all required information must be visible on the outside of the package.

Additionally, every label must contain:

1. A principal display panel as defined by OAR 333-007-0020. (See the Principal Display Panel Section for more information).
2. The universal symbol (at least 0.48 inches wide by 0.35 inches tall); and
3. All of the information required by rule for the specific product type (plant, seed, usable marijuana, edible, topical, concentrate, extract, or tincture).

Universal Symbol minimum size.

Non-required information can be in any font or size. Only three fonts can be used to display the required information. Any information that is required must be no smaller than 8 point font. Additional information that is not required by rule may be in any font type and size as long as that text complies with the rest of the rules.

A package may have more than one label panel attached or affixed to it. Label information can be printed directly on the package, affixed to the package (i.e. with glue or as a sticker), or embossed or blown into the package.

This photo shows a package with two label panels. The text of the panel on the left is horizontal while the text of the panel on the right is vertical.

If your product falls into one or more categories that item must comply with the labeling requirements for both categories. For example, a concentrate that can also be consumed like an edible must have the labeling requirements for both concentrates and edibles, with the

exception of the "DO NOT EAT" warning because the product is intended for human consumption and the "BE CAUTIOUS" warning if the effects of the product are customarily felt immediately.

Testing information for all laboratories and tests must be included on the label. If a marijuana item was tested by more than one lab or has more than one test batch number and / or test analysis date associated with it, each lab, test batch number, and test analysis date must be included on the label. For example, if one lab tests for THC concentration and a different lab tests for pesticides, the information for both labs and tests must be included on the label. (See example of lab information on the right.) Similarly, if a first test fails and a subsequent re-test passes, the information for both tests must be included on the label.

Licensed Lab One
125879658245125874563258
Date Tested: 06/20/16

Licensed Lab Two,
569856741236589754120369
Date Tested: 07/01/16

Every lab name, batch test number, and test date that is associated with the product must be included on the label.

The THC and CBD concentrations must be the value calculated by the laboratory that did the testing in accordance with OAR 333-064-0100.

Label Prohibitions

A label may not:

1. Contain any untruthful or misleading statements, including incorrectly using the term "organic" or making an unsubstantiated health claim; or
2. Be attractive to minors, as defined in OAR 845-025-7000.

Activation Time

Activation time is the amount of time it is likely to take for an individual to begin to feel the effects of ingesting or inhaling a marijuana item. Activation time may be expressed in words or through a pictogram. If a user will begin to feel the effects right away, the activation time can be listed as immediate. If the product has a delayed reaction, the licensee or registrant can determine what the activation time is for their particular product. To show activation time on a label, you may simply state, “Activation Time: Immediate” or you may use a pictogram (See example on right), as long as the pictogram is clear and easily understood.

Pictogram Example.

Cannabis Oil Concentrate

THC: 900 mg
CBD: 1500 mg

Growing Green, LLC, 1000026J04D
UID 1A4018297310677118742955

DO NOT EAT. For use by adults 21 and older. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana.

1 fl oz (29.6 ml)

The above example of the information required on a small container label.

Small Containers

Under OAR 333-007-0090, if the container holding the marijuana item is too small to fit all of the required label information, a licensee or registrant may put <u>only</u> the following information on the container label:

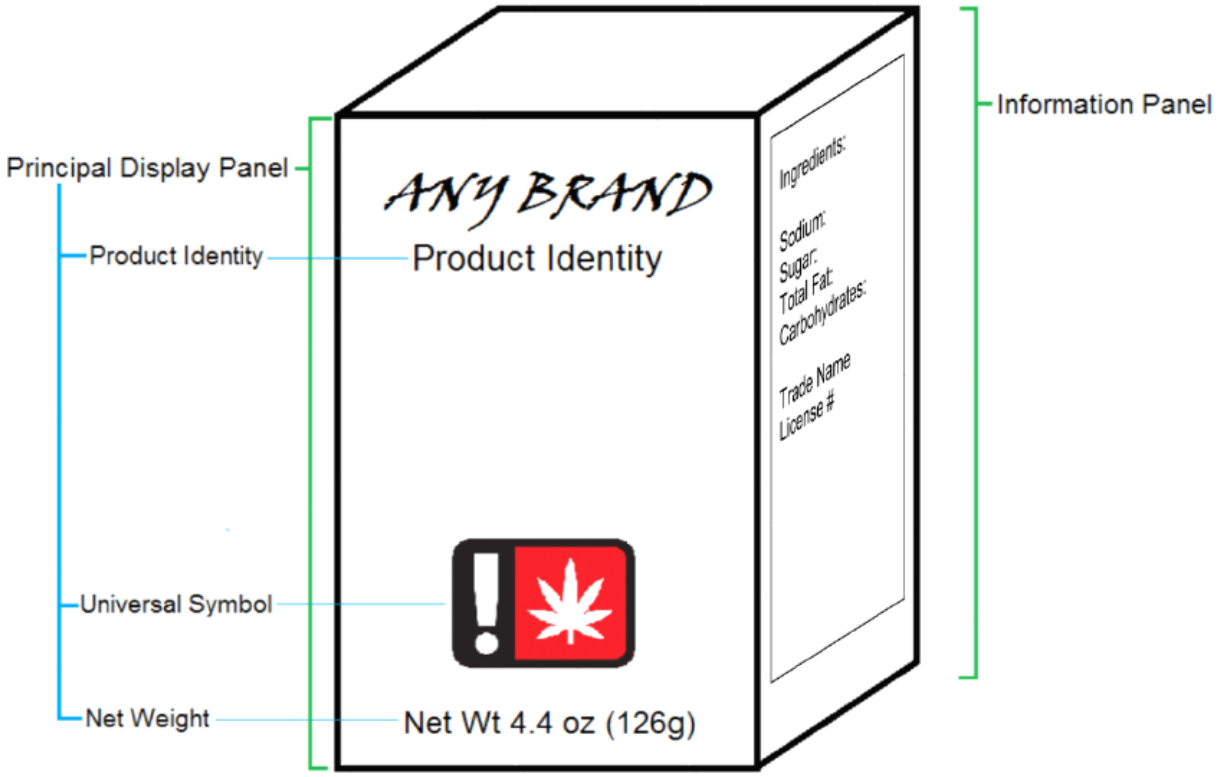
1. Principal display panel that includes the net weight, universal symbol, and product identity;
2. Licensee or registrant business or trade name and licensee or registrant number;
3. For licensees, package unique identification number and for registrants, batch or process lot number;
4. Concentration of THC and CBD; and
5. Required warnings.

All required information must be in at least 8 point Arial, Helvetica, or Times New Roman font. The remaining required information must be included on an outer package or container or on a leaflet or tag that accompanies the marijuana item. If an outer package is used, all of the information required by rule must be on the outer container, even if some of the information is already included on the inner container. In other words, if a small container is packaged inside a larger container, the outer container must have a full label.

Elements of a Label

Principal Display Panel

The principal display panel is defined as the part of a label on a package or container that is most likely to be displayed, presented, shown or seen under customary conditions of display for sale or transfer, generally the front of the package. For most marijuana items, three items must appear on the principal display panel: (1) the universal symbol; (2) the net weight or quantity; and (3) the product identity.



Product Identity

The product identity is the common or usual name of the product. This is a descriptive name for the product and not a fanciful name or the brand name of the product. For example, on a package of Starburst®, the name "Starburst®" is the brand name of the candy, and the term "fruit chews" is the product identity. (See Definitions section for definitions of concentrate and extract.)

Universal Symbol

The universal symbol was created by the Oregon Health Authority and may only be used on the label of a product that is going through the pre-approval process or has received approval from the OLCC. The universal symbol

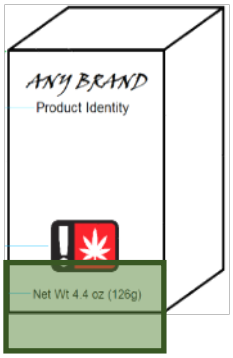
Universal Symbol

indicates that the product contains marijuana. The universal symbol must be on the principal display panel and must be at least 0.48 inches wide by 0.35 inches tall. The universal symbol must be red, black, and white and cannot be changed from how it appears in the example to the right.

Beginning on October 1, 2016, all registrants must include the universal symbol on the label of every marijuana item. Registrants may use the universal symbol on their labels prior to October 1st, but only if their products conform with the labeling requirements found in OAR 333-007-0010 through 333-007-0100. Registrants must have all labels approved in time for the October 1, 2016 compliance deadline.

For recreational licensees, the universal symbol is required on all labels. Additionally, licensees must receive OLCC approval for all labels prior to any sale to a consumer. (See the Pre-Approval Process section for more information)

The universal symbol may be downloaded at www.healthoregon.org/marijuana.



The shaded green area is the bottom 30% of the principal display panel where the net weight should be displayed.

Net Weight

The net weight is the gross weight of the final product minus the weight of the packaging. Except on plant labels, the net weight should appear in the bottom 30 % of the principal display panel and generally parallel to the base of the container. The area surrounding net quantity shall be free of printed information.

Displaying Net Weight

For all marijuana items, except plants, net weight must be listed in both the US Customary Units and the International System of Units (SI Units). When both are required, use the following units:

US Customary	*SI Units*
Weight (dry) displayed in ounces or pounds	Weight (dry) displayed in grams or milligrams
Volume (liquid) displayed in fluid ounces	Volume (liquid) displayed in milliliters

Net weight should be displayed as a number between 1 and 1000. When choosing a unit, use the following examples. If using a decimal, use no more than three decimal places.

Examples:

500 mg, not 0.5 g

1.96 g, not 1960 mg

750 mL, not 0.75 L

Net weight should not be expressed in mixed units.

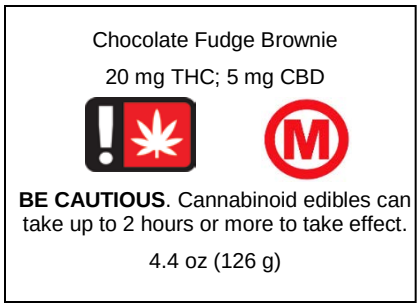
Example:

1.5 g, not 1 g 500 mg

Medical Grade Symbol

The medical grade symbol was established by the Oregon Health Authority and made available to licensees. The medical grade symbol is a symbol that is used by licensees that produce cannabinoid products, concentrates, or extracts that have a THC concentration that is above the recreational concentration limit. The medical grade symbol is used only on products sold at OLCC licensed retail stores. Products that contain a medical grade symbol can only be sold or transferred to a designated primary caregiver or patient, for use by a patient. Licensees who want to produce medical grade products must follow the requirements set out in OAR 845-025-3300, as well as the rest of the rules.

Medical grade symbol



Example of a principal display panel showing how the medical grade symbol can be used.

The medical grade symbol must appear on the principal display panel and be at least 0.35 inches in diameter.

RECREATIONAL THC CONCENTRATION

Marijuana Item Type	Maximum THC per serving	Maximum THC per container
Edibles	5 mg	50 mg
Topicals	N/A	6%
Tinctures	N/A	1,000 mg
Capsules	10 mg	100 mg
Concentrates or Extracts	N/A	1,000 mg

MEDICAL THC CONCENTRATION

Marijuana Item Type	Maximum THC per serving	Maximum THC per container
Edibles	N/A	100 mg
Topicals	N/A	6%
Tinctures	N/A	4,000 mg
Capsules	100 mg	4,000 mg
Suppositories	100 mg	4,000 mg
Transdermal Patches	100 mg	4,000 mg
Concentrates or Extracts	N/A	4,000 mg

** To see the actual tables, see Table 1 (OAR 333-007-0210) and Table 2 (OAR 333-007-0220).

Additional Edible Labeling

For cannabinoid edibles, it is required that the following information be placed on the label:

1. *List of all ingredients* in descending order of predominance by weight or volume used to process the cannabinoid edible.
2. *The amount, in grams, of sodium, sugar, carbohydrates and total fat per serving*. A licensee or registrant must have documentation that demonstrates the validity of the calculation of the amount of sodium, sugar, carbohydrates and total fat in a cannabinoid edible and must make that documentation available to the Commission or the Authority upon request.
3. *If the edible is perishable, a statement that the edible must be refrigerated or kept frozen*. If the edible is not perishable, no statement is needed.

4. List of potential major food allergens.

A licensee or registrant must list major food allergens on the label if the edible contains:

- Milk, egg, fish, crustacean shellfish, tree nuts, wheat, peanuts, or soybeans as an ingredient or
- Any ingredient that contains protein derived from: milk, egg, fish, crustacean shellfish, tree nuts, wheat, peanuts, or soybeans.

Licensees and registrants must label major food allergens in one of two ways.

The first option is to include the name of the food source in parenthesis following the common or usual name of the major food allergen in the list of ingredients whenever the name of the food source of the major allergen does not appear elsewhere in the ingredient statement.

For example:

> Ingredients: Enriched flour (**wheat** flour, malted barley, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid), sugar, partially hydrogenated **soybean** oil, and/or cottonseed oil, high fructose corn syrup, whey (**milk**), **eggs**, vanilla, natural and artificial flavoring) salt, leavening (sodium acid pyrophosphate, monocalcium phosphate), lecithin (**soy**), mono-and diglycerides (emulsifier)

In the example above, the major food allergens are in bold to highlight their location. However, the allergens do not need to be in bold on an edible label.

The second option is to use the word "Contains" followed by the name of the food source from which the major food allergen is derived, immediately after or adjacent to the list of ingredients, in a font size that is the same font size used for the list of ingredients.

For example, after the list of ingredients, the following statement would appear:

> Contains Wheat, Milk, Egg, and Soy

Gluten-Free

Gluten is the protein that occurs naturally in wheat, rye, barley, and crossbreeds of these grains. Although certain grains may contain gluten, some grains can be made gluten-free. An ingredient that has been derived from a gluten-containing grain can be labeled as "gluten-free" if it has been processed to remove the gluten and use of that ingredient results in the presence of less than 20 parts per million (ppm) gluten in the food. The "gluten-free" claim is a voluntary one, however, licensees and registrants who decide to use this term are responsible for using the claim in a truthful and not misleading manner, and for complying with the requirements established by the U.S. Food and Drug Administration.

Gluten-free means that the food either is inherently gluten free or does not contain an ingredient that is: (1) a gluten-containing grain (e.g. Spelt wheat); (2) derived from a gluten-containing grain that has not been processed to remove gluten (e.g. Wheat flour); or (3) derived from a

gluten-containing grain that has been processed to remove gluten (e.g. Wheat starch), if the use of that ingredient results in the presence of 20 parts per million (ppm) or more gluten in the food. Any presence of gluten in the food must be less than 20 ppm.

Organic

Licensees and registrants that want to label their products as organic must follow strict requirements. First, if a licensee or registrant wants to make a claim that a product or its ingredients are organic, the product or certain ingredients need to be certified as organic. If it is not certified, the licensee or registrant cannot make any organic claim on the principal display panel or use the USDA organic seal anywhere on the package. Doing so will be considered misleading and could result in a denial of the label approval request. To learn more about organic certification, please contact the Oregon Department of Agriculture at 503.986.4550.

Example of consumer product using the "Made with Organic" statement.

*"Made with organic ***" statement*

Licensees and registrants that want to label their products with the "Made with organic ***" statement must contain at least 70 percent certified organic ingredients (not including salt or water). These products may contain up to 30 percent of allowed non-organic ingredients. (See National list of Allowed and Prohibited Substances) All ingredients must be produced without GMOs or other prohibited substances. If a product meets these requirements, its label may include a statement such as "made with organic wheat" that lists the specific organic products. The generic statement, "made with organic ingredients" is not allowed. The organic ingredients also must be identified in the ingredient list. Additionally, the label must identify the USDA-accredited certifying agent on the information panel.

Specific Ingredient Listings

If the product contains less than 70 percent organic contents, the specific organic ingredients may be listed in the ingredient statement. You may only, on the information panel, identify the certified organic ingredients as organic and the percentage of organic ingredients. Licensees and registrants cannot include the USDA organic seal anywhere or use the word "organic" on the principal display panel.

Health Claims

Health claims describe a relationship between a food substance and a reduced risk of a disease or health-related condition. Health claims are regulated and evaluated by the U.S. Food and Drug Administration. OAR 333-007-0090 prohibits the use of a health claim that is not supported by the totality of publicly available scientific evidence (including evidence from well-designed studies conducted in a manner which is consistent with generally recognized scientific procedures and principles), and for which there is significant scientific agreement, among experts qualified by scientific training and experience to evaluate such claims. A statement claiming cure, mitigation, or treatment of disease cannot be made. Any statement that makes such a claim would be considered a misleading statement and could lead to a denial of a label application.

Additional Labeling Requirements

National Institute of Standards and Technology (NIST) Handbook 130 (2016)

The NIST Handbook has been incorporated by reference into the labeling rules. The NIST Handbook provides uniform packaging and labeling regulations. You can find the NIST Handbook here: http://www.nist.gov/pml/wmd/pubs/upload/iva-pkglblgreg-16-h130-final.pdf

Hemp

Products derived from industrial hemp, as defined in ORS 571.300, may be sold in OLCC licensed retail locations if they are packaged, labeled, and tested in accordance with the OLCC rules. This means that hemp products must follow all of the package and label requirements including displaying the universal symbol on the principal display panel. The warning for a hemp label can be altered to say "For use by adults 21 and older. Keep out of reach of children." Additionally, the "BE CAUTIOUS" warning is also not required for edible products made from products derived from industrial hemp.

Products derived from industrial hemp cannot be sold in medical dispensaries.

Additional Prohibitions

In addition to the packaging and labeling rules, both the OHA and OLCC prohibit the sale or transfer of marijuana items that are likely to appeal to minors because of its shape, design, or flavor. This includes:

- Products that are modeled after non-cannabis products primarily consumed by and marketed to children;
- Products in the shape of an animal, vehicle, person or character;
- Products made by applying cannabinoid concentrates or extracts to commercially available candy or snack food items; or
- Products that contain dimethyl sulfoxide (DMSO).

Additionally, a processor may not treat or otherwise adulterate a medical or recreational cannabinoid product, concentrate, or extract with any additives that would increase potency, toxicity, or addictive potential, or that would create an unsafe combination with other psychoactive substances. The prohibited additives include, but are not limited to, nicotine, caffeine, or chemicals that increase carcinogenicity.

Cannabinoid products may be added to an item that has naturally occurring caffeine (such as coffee or chocolate) but cannabinoid products cannot be added to an item that contains artificial or added caffeine (such as a caffeinated soda or energy drink).

PRE-APPROVAL PROCESS

Licensees and registrants who are packaging marijuana items for ultimate sale to a consumer, patient, or designated caregiver must have the packages and labels reviewed and approved by the OLCC. This applies to both medical and recreational products.

Licensees must apply for and receive approval from the OLCC before selling a marijuana item to a consumer.

Registrants must apply for and receive approval from the OLCC by October 1, 2016. Only marijuana items with approved packages and labeling may be transferred to dispensaries after October 1, 2016.

Only licensees, registrants, and applicants can apply for pre-approval. Package or label approval will not be given until the applicant has a license or is properly registered with the OHA. The initial application for the pre-approval process may be made online but the licensee or registrant may be required to submit a physical prototype, if requested by the OLCC.

Before Applying

Determine what your package is and what your label is. A package is a container. It includes both inner and outer containers. If your marijuana item is packaged in a bag that is put inside of a box, both containers will be considered packages.

The label is any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed, molded into, embossed on, or appearing upon or adjacent to a package containing a marijuana item for purposes of branding, identifying, or giving any information with respect to the item or to the contents of the package.

Both items above are examples of packages.

Application Checklist

An application for approval must include:

1. Completed online application
2. Correct fee
3. For packages, documentation that the package has been certified for child resistance by a qualified third-party package testing firm
4. Clear photograph of the package
5. Clear photographs of all label panels (scale must be provided)
6. Description of the marijuana item that will be sold in the package
7. Clear photograph of the marijuana item that will be sold in the package

Once you have submitted a complete application and paid the fee, the Commission will evaluate the packaging and label in order to determine whether:

The packaging:

1. Has been certified as child resistant by a qualified third party child-resistant package testing firm;
2. Is not marketed in a manner attractive to minors;

3. Does not contain any untruthful or misleading content;
4. Contains a marijuana item that is not compliant with the rest of the rules.

The label:

1. Is in at least 8 point Times New Roman, Helvetica or Arial font;
2. Is unobstructed and conspicuous, meaning that all required information must be visible on the outside of the package.
3. Has a principal display panel
4. Has a universal symbol that is the at least the minimum size;
5. Complies with the OHA's labeling rules, OAR 333-007-0010 to 333-007-0100.

The OLCC will review the submission materials and notify the licensee, licensee applicant, or registrant whether or not the package and/or label have been approved. If the application was not approved, the OLCC will provide a description of all of the package and/or label deficiencies. The licensee, applicant, or registrant will have 30 days to correct the deficiencies and re-submit the materials. No additional fee is necessary for the first resubmission. If the OLCC evaluates the submission a second time and finds that the deficiencies have not been corrected, the application will be denied and the licensee, registrant, or applicant will have to submit a new application and pay an additional fee.

If a licensee, registrant, or applicant's original packaging is deficient because it is not child resistant, the licensee, registrant, or applicant may:

1. Correct the deficiencies and resubmit the packaging for pre-approval; or

2. Notify the OLCC that they wish to satisfy the child-resistant requirement by using a child-resistant exit package that has been certified or is on the pre-approved list.

Correcting the deficiencies of a package means either getting the package certified as meeting the child-resistance standards by a qualified third-party testing firm or changing the package to one that has previously been certified.

A licensee, registrant, or applicant may submit multiple variants of packaging and labeling for approval on the same application for a product that may have different flavors, colors, or sizes as long as the product and packaging are otherwise identical. Applications for approval of packaging and labeling are subject to a single application fee.

Fee

The application fee for packaging and labeling pre-approval is **non-refundable**. It is the responsibility of the applicant to check the list of approved packages prior to applying to make sure that the package isn't already approved. Additionally, if an applicant submits payment and the applicant's license or registration gets denied, the packaging and labeling application fee will not be refunded.

The fee for a new application is $100 for each package and $100 for each label. If a licensee was submitting one package and one label for approval, the fee would be $200. If a licensee or registrant wants to use a package that is on *the* approved list, that licensee or registrant would not need to submit a separate application.

Approved Packages

Once the OLCC begins to approve packages, the list of approved packages will be published on the OLCC website. Once a package is on the approved list, a licensee or registrant may use it without seeking additional packaging approval.

Label Checklist and Generic Label Examples

A **generic label** is a label that contains only the required information listed in the rule and has no graphics, pictures, or logos. Generic labels do not need to be submitted to the OLCC for approval.

The chart below provides the required information for each product type and an example of a generic label. Keep in mind that these are only examples - generic labels do not have to list information in exactly the same way. As you can see below, only the required information appears on the label. The required information can appear on more than one panel. If using more than one panel, please remember that the principal display panel is the portion of the label that is most likely to be seen when on display for sale.

The generic labels are only examples. The names and information are fake.

MARIJUANA PLANT

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Licensee **or** registrant number ☐ Universal symbol ☐ Strain name ☐ Product Identity	Growing Green, LLC 1000026J04D Hindu Kush Marijuana Plant

Net weight is not required for a marijuana plant label.

MARIJUANA SEED

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Licensee **or** registrant number ☐ Strain Name ☐ Product Identity ☐ Harvest date ☐ Universal symbol ☐ Number of seeds **or** net weight (Could have also used, "10 Seeds" or "10 Count")	Growing Green, LLC 1000026J04D Hindu Kush Marijuana Seeds Harvested on 6/9/16 600 mg (0.021 oz)

USABLE MARIJUANA

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Licensee **or** registrant number ☐ UID number or Harvest lot number ☐ Harvest date ☐ Strain name ☐ Product Identity ☐ Net weight in U.S. customary & metric units ☐ Concentration of THC **and** CBD ☐ Activation Time ☐ Name of lab that performed any test ☐ Any associated test batch number ☐ All test analysis dates ☐ Universal symbol ☐ Required Warnings (see section following the checklist)	Hindu Kush Usable Marijuana UID1A4018297310677118742955 Harvested on 6/11/16 THC 15.26% CBD 1.05% Activation Time: Immediate For use by adults 21 and older. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana. 4 g (0.141 oz) Licensed Lab, 1000066352874652125892 54 Tested on 6/20/16 Growing Green, LLC, 1000026J04D

In this example, there are two label panels instead of one. The principal display panel is the panel on the left. When the product is displayed on the shelf, this is the panel that will be seen by the consumer, patient, or designated primary caregiver. Note that the principal display panel contains the universal symbol, the product identity, and the net weight. Also note that the net weight is on the bottom 30% of the label and the area surrounding the net weight is free of text. Any required information can appear on a secondary label except for the information that must be on the principal display panel. The side label panel can be oriented vertically instead of horizontally.

CANNABINOID TOPICAL

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Licensee **or** registrant number ☐ UID or Process lot number ☐ Product Identity ☐ Date product was made ☐ Net weight **or** volume using the metric scale (g/L) ☐ Amount suggested for use by consumer at any one time ☐ Concentration of THC **and** CBD in container ☐ List of ingredients in descending order of predominance by weight or volume ☐ Activation Time ☐ Name of lab that performed any test ☐ Any associated test batch number ☐ All test analysis dates ☐ Universal symbol ☐ Required Warnings (see below on this page) ☐ The words "**DO NOT EAT**" in bold, capital letters ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease." ☐ For licensees, a medical grade symbol, if applicable	Skin Balm THC 6% CBD 10% Apply to skin as needed. **DO NOT EAT** For use by adults 21 and older. Keep out of reach of children. 3 fl oz (89 ml) Ingredients: Beeswax, Coconut Oil, Hemp Oil, Cannabis extract, Vitamin E, Honey, Vanilla Extract This product is not approved by the FDA to treat, cure, or prevent any disease. Activation Time: No effects felt 1A4018297310677118742955 Product made on 6/11/16 Lab Name, Test Date 6/20/16 1000066352874652125892 54 Growing Green, LLC, 1000026J04D 1234 Main Avenue, Portland, OR 97223

The warning on a topical label is slightly different and does not include the reference to driving a motor vehicle.

Medical topical product: "For use by OMMP patients only. Keep out of reach of children."

Recreational topical product: "For use only by adults 21 and older. Keep out of reach of children."

CANNABINOID EDIBLE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Licensee **or** registrant number ☐ Place of Address ☐ Product Identity ☐ UID number or process lot number ☐ Date product was made ☐ Net weight **or** volume in both US (lb./oz.) and the metric scale (g/L) ☐ Serving size **and** number of servings per container ☐ Concentration of THC **and** CBD in each serving ☐ Concentration of THC **and** CBD in the entire container ☐ List of all ingredients in descending order of predominance by weight or volume ☐ List of potential major food allergens, if appropriate ☐ Amount, in grams, of sodium, sugar, carbohydrates, and total fat, per serving ☐ If perishable, a statement that edible must be refrigerated/frozen ☐ Activation Time ☐ Name of lab that performed any test ☐ Any associated test batch number ☐ All test analysis dates ☐ Universal symbol ☐ Required Warnings (see section following the checklist) ☐ "**BE CAUTIOUS**" in bold, capital letters, followed by "Cannabinoid edibles can take up to 2 hours or more to take effect." ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease." ☐ For licensees, a medical grade symbol, if applicable	6 Shortbread Cookies UID 1A4018297310677118742955 Made on 6/11/16 **BE CAUTIOUS**. Cannabinoid edibles can take up to 2 hours or more to take effect. THC: 5mg/serving; 40m/container CBD: 2mg/ serving; 16mg/ container Growing Green, LLC, 1000026J04D 1234 Main Avenue, Portland, OR 97223 4.4 oz (126 g) Serving Size 1 Cookie (26 g) Servings per Container 6 Amount per Serving Total Fat 5g Sodium 170mg Total Carbohydrate 24g Sugar 8g **Ingredients**: Wheat Flour, Butter, Sugar, Wheat Starch, Cannabis Concentrate, Salt. **Contains**: Milk, Wheat Licensed Lab, 1000066352874652125892 54, 6/20/16 This product is not approved by the FDA to treat, cure, or prevent any disease. For use by adults 21 and older. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana.

CANNABINOID CONCENTRATES AND EXTRACTS

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Licensee **or** registrant number ☐ UID or process lot number ☐ Product Identity ☐ Date product was made ☐ Net weight **or** volume using the metric scale ☐ Serving size and number of servings per container **or** amount suggested for use by consumer at any one time ☐ Concentration of THC **and** CBD in amount suggested for use **and** in the container ☐ Activation Time ☐ Name of lab that performed any test ☐ Any associated test batch number ☐ All test analysis dates ☐ Universal symbol ☐ Required Warnings (see section following the checklist) ☐ The words "**DO NOT EAT**" in bold, capital letters ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease." ☐ For licensees, a medical grade symbol, if applicable	CO2 Cannabis Oil Concentrate Cartridge Activation Time: Immediate THC: 6 mg/serving; 900 mg/container CBD: 10 mg/serving; 1500 mg/container Growing Green, LLC License Number: 1000026J04D UID 1A4018297310677118742955 Product Made on 6/11/16 **DO NOT EAT.** For use by adults 21 and older. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana. This product is not approved by the FDA to treat, cure, or prevent any disease. Suggested serving size is one 5-second draw. Each cartridge provides about 150 servings with a 5 second draw. Lab Name, Test Date 6/20/16 1000066352874652125892 54 1 fl oz (29.6ml)

CANNBINOID TINCTURE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Licensee **or** registrant number ☐ Place of Address ☐ Product Identity ☐ UID or process lot number ☐ Date product was made ☐ Net weight **or** volume in both US (lb./oz.) and the metric scale (g/L) ☐ Serving size **and** number of servings per container ☐ Concentration of THC **and** CBD in each serving ☐ Concentration of THC **and** CBD in the entire container ☐ List of all ingredients in descending order of predominance by weight or volume ☐ Activation Time ☐ Name of lab that performed any test ☐ Any associated test batch number ☐ All test analysis dates ☐ Universal symbol ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease." ☐ Required Warnings (see section following the checklist)	Cannabis Tincture UID 1A4018297310677118742955 Made on 6/11/16 THC 15.26% CBD 1.05% **BE CAUTIOUS**. Cannabinoid edibles can take up to 2 hours or more to take effect. THC: 5mg/serving; 40mg/container CBD: 2mg/ serving; 16mg/ container Growing Green, LLC, 1000026J04D 1234 Main Avenue, Portland, OR 97223 1 fl oz (30 ml) **Ingredients**: Cannabis flower, grain alcohol, chicory, orange, anise. Serving Size: one dropper (1 ml); Servings per Container: 30 Licensed Lab, Date Tested: 6/20/16 1000066352874652125892 54 This product is not approved by the FDA to treat, cure, or prevent any disease. For use by adults 21 and older. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana.

There are two label panels for this example. As long as the universal symbol, net weight, and product identity appear on the principal display panel, the rest of the information may appear anywhere on the label.

WHOLESALER PACKAGING EXAMPLE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Producer's license number ☐ Wholesaler's business / trade name ☐ Wholesaler's license number ☐ UID number or Harvest lot number ☐ Harvest date ☐ Strain name ☐ Product Identity ☐ Net weight in U.S. customary & metric units ☐ Concentration of THC **and** CBD ☐ Activation Time ☐ Name of lab that performed any test ☐ Any associated test batch number ☐ All test analysis dates ☐ Universal symbol ☐ Required Warnings (see section following the checklist)	Hindu Kush - Usable Marijuana UID1A4018297310677118742955 Harvested on 6/11/16 THC 15.26% CBD 1.05% Activation Time: Immediate Licensed Lab, 10000663528746521258925 4 Tested on 6/20/16 Produced by: Growing Green, LLC, 1000026J04D Packaged by: Wholesaler Co., Inc., 10000546L55 For use by adults 21 and older. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana. 4 g (0.141 oz)

Note that this example includes both the producer's business name and license number as well as the wholesaler's business name and license number.

Required warnings

Medical warning: For use by OMMP patients only. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana.

Recreational warning: For use only by adults 21 and older. Keep out of reach of children. It is illegal to drive a motor vehicle while under the influence of marijuana.

Package / Label Consultations

The OLCC will review packages and labels before they are submitted to the pre-approval process. Any licensee, registrant, or applicant that would like feedback can send questions of photographs of their package or label to marijuana.packaging@oregon.gov at any time. You will receive a response with feedback regarding whether you should make any changes to your package or label. Please note that the feedback you receive during a consultation is not approval, and you will need to apply through the OLCC pre-approval process when it becomes available. After August 1, 2016, OLCC staff will be reviewing applications so it may take additional time to receive feedback.

Making Changes to Label after approved

After receiving approval, a licensee or registrant may want to make changes to a package or label. If any of the following items are changed on the label, the label **does not** need to be resubmitted:

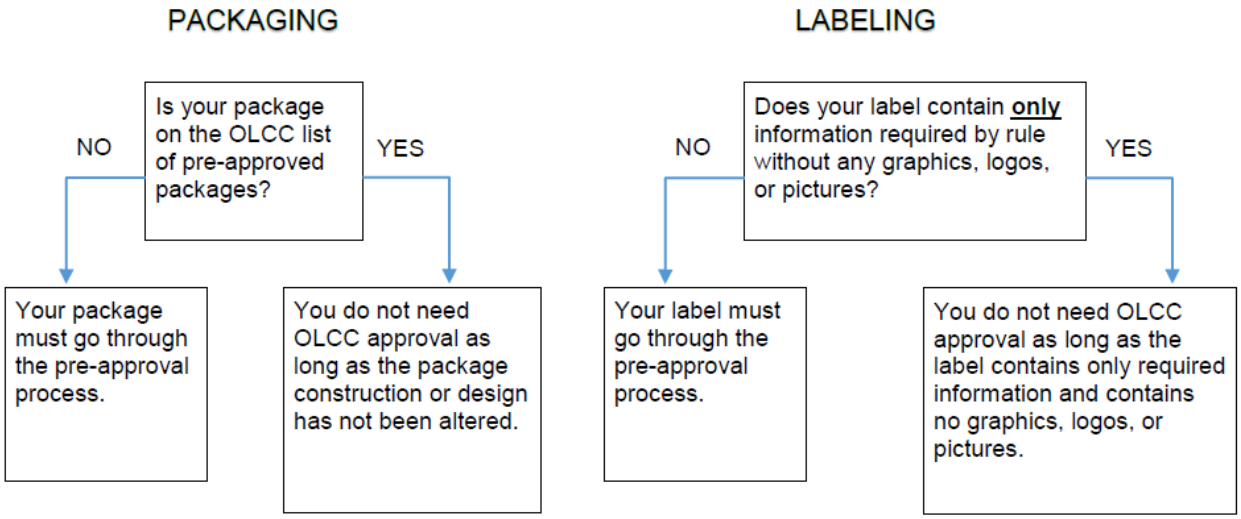
1. Harvest or processing date;
2. Strain name;
3. Test results;
4. Net weight or volume; or
5. Harvest or process lot number

If any non-mandatory label information is deleted or there is an addition, deletion, or change in the UPC or 2D mobile barcode, website address, phone number, fax number, or zip code of a licensee or registrant, the label **does not** need to be resubmitted. Additionally, if any of the label information is repositioned, the label **does not** need to be resubmitted as long as the repositioning is consistent with the labeling rules.

If any other change is made, a licensee or registrant must resubmit the label and / or package changes with a $25 fee.

WHEN PACKAGE OR LABEL APPROVAL IS REQUIRED

To determine whether you need to apply for approval, ask yourself the following questions:



STILL HAVE QUESTIONS?

If you have more questions regarding packaging and labeling, please visit the OLCC website: marijuana.oregon.gov. You can also send an email to marijuana.packaging@oregon.gov or call (503) 872-5459.

CHILD-RESISTANT TESTING FIRMS

Most of the companies on the following list of testing firms were pulled from the Consumer Product Safety Commission (CPSC) website. **THE OLCC AND CPSC DO NOT APPROVE, CERTIFY, OR ENDORSE ANY OF THESE FIRMS.**

Tread Global
4340 Harlan Street
Denver, CO 80033
www.treadglobal.com

Bird Dog Marketing Group LLC
3125 Nolt Road
Lancaster, PA 17601
Contact: Mark D. Perkins
(717) 615-9022
David Hipple
(717) 475-9751
www.birddogmarketinggroup.com

IVM Institut VerpackungsMarktforschung GmbH
Friedrich-Seele-Str. 20
38122 Braunschweig
Germany
+49(0)531-28509245
fax: 0049-5371-5947-999< ;/span>
www.ivm-childsafe.de
contact: Dr. Rolf Abelmann
rolf.abelmann@ivm-childsafe.de
+49(0)531-28509247

BITNER Associates, Inc.
1001 Forest Trail
Sugar Grove, IL 60554
Contact: John Bitner, CPP
(630) 880-0030
e-mail: john.bitner@jbitner.com

Laboratoire National d'Essais
29 Avenue Roger Hennequin
78197 Trappes Cedex
France
Contact: Bernard Picque
33 1 30 69 10 54
Fax: 33 1 30 69 12 34
e-mail: bernard.picque@lne.fr

Burford Research Consultants
Burford House, Dean Lane
Cookham Dean
Berkshire SL6 9AQ
United Kingdom
Contact: Hugo Cawthorne
+44 (0) 1628 898616
e-mail: info@burfordresearch.com

Maritz Market Research
1355 North Highway Drive
Fenton, Missouri 63099
(800) 325 3338

Cambridge Materials Testing Limited
6991 Millcreek Drive, Unit #13
Mississauga, Ontario
L5N 6B9
Contact: Frank Mangiardi / Derek Wild
(905) 812-3856

Milford Consulting Associates
80 Ocean Avenue
Milford, CT 06460
Contact: Gerald Cavallo, Ph.D.
(203) 876 0948

Child Related Research, Inc.
448 East Winchester Street, Suite 140
Murray, UT 84107
Contact: Cindee Green
email: cgreen@crr.net
(801) 904-3893

National Child Resistant Testing, Inc.
610 W. Cuming St.
Lincoln, NE 68521
Contact: Chris Novosad
(ph) 402-438-0216
(fax) 402-438-0217
e-mail: info@nationalcrt.com

Davies Development and Testing Ltd
Halghton Mill
Whitchurch Road
Bangor-on-Dee
Wrexham LL13 0BN
United Kingdom
Contact: Stephen Wilkins
+44 (0)1978 780978
Fax: +44 (0)1978 780805 e-mail:stephenandwendy@mac.com

pacAGEnRx, Inc.
1001 Forest Trail
Sugar Grove, IL 60554
Contact: Debbie Brooks
(708) 738 - 5598
e-mail: john@pacAGEnRx.com

Forensic Packaging Concepts, Inc.
380 River Bend Way
Del Rio, TN 37727-0070
Contact: Jack Rosette, Ph.D.
(423) 613-0911
(888) 818-0091
Fax: (423) 625-0911

Perritt Laboratories
145 So. Main Street
P.O. Box 147
Hightstown, N.J. 08520-0147
Contact: Richard Ward
(609) 443 4848
e-mail: rward@perrittlab.com
www.perritt.com

Gene Miller Testing Service
524 Wheatfield Drive
Lititz, PA 17543
Contact: David S. Hipple
717-581-6602 (Fax) 717-581-1762

Promatura Group
142 Highway 30
Oxford, MS 38655
Contact: Margaret Wylde, Ph.D.
(662) 234-0158

Great Lakes Marketing
The Executive Building
3103 Executive Parkway
Toledo, Ohio 43606 1311
Contact: Lori Dixon, Ph.D.
(419) 534 4700
e-mail: ldixon@greatlakesmarketing.com

Sunbeam Packaging Services
12518 Oak Gate Road
Evansville, Indiana 47725
Contact: Jeff Minette
(812) 204-3945
Fax 812-867-5322
e-mail: jminnette@sunbeampackaging.com

Home Arts Guild Research Center
35 E. Wacker Drive
Chicago, Illinois 60601
Contact: Roy Roberts
(312) 726 7406

Walker Information
3939 Priority Way South Drive
Indianapolis, IN 46240
(317) 843-8680

International Research Services
222 Grace Church Street
Port Chester, NY 10573
Contact: Edward Boisits, Ph.D.
(914) 937-6500

DEFINITIONS

"**Activation time**" means the amount of time it is likely to take for an individual to begin to feel the effects of ingesting or inhaling a marijuana item.

"**Attractive to minors**" means packaging, labeling and marketing that features:

(1) Cartoons;

(2) A design, brand or name that resembles a non-cannabis consumer product of the type that is typically marketed to minors;

(3)Features symbols or celebrities that are commonly used to market products to minors.

"**Cannabinoid**" means any of the chemical compounds that are the active constituents of marijuana.

"**Cannabinoid concentrate**" means a substance obtained by separating cannabinoids from marijuana by:

(1) A mechanical extraction process;

(2) A chemical extraction process using a nonhydrocarbon-based solvent, such as vegetable glycerin, vegetable oils, animal fats, isopropyl alcohol or ethanol;

(3) A chemical extraction process using the hydrocarbon-based solvent carbon dioxide, provided that the process does not involve the use of high heat or pressure, or

(4) Any other process authorized by the OHA or OLCC rules.

"**Cannabinoid edible**" means food or potable liquid into which a cannabinoid concentrate or extract or the dried leaves or flowers of marijuana have been incorporated.

"**Cannabinoid extract**" means a substance obtained by separating cannabinoids from marijuana by:

(1) A chemical extraction process using a hydrocarbon-based solvent, such as butane, hexane or propane; or

(2) A chemical extraction process using the hydrocarbon-based solvent carbon dioxide, if the process uses high heat or pressure.

"**Cannabinoid product**" means a cannabinoid edible or any other product intended for human consumption or use, including a product intended to be applied to a person's skin or hair, that contains cannabinoids or the dried leaves or flowers of marijuana. "Cannabinoid product" does not include:

(1) Usable marijuana by itself;

(2) A cannabinoid concentrate or extract by itself; or

(3) Industrial hemp, as defined in ORS 571.300.

"**Cannabinoid tincture**" means a solution of alcohol, cannabinoid concentrate or extract, and perhaps other ingredients intended for human consumption or ingestion, and that is exempt from the Liquor Control Act under ORS 471.035.

"**Cannabinoid topical**" means a cannabinoid product intended to be applied to skin or hair.

"**Cartoon**" means any drawing or other depiction of an object, person, animal, creature or any similar caricature that satisfies any of the following criteria:

(1) The use of comically exaggerated features;
(2) The attribution of human characteristics to animals, plants or other objects, or the similar use of anthropomorphic technique; or
(3) The attribution of unnatural or extra-human abilities, such as imperviousness to pain or injury, X-ray vision, tunneling at very high speeds or transformation.

"**CBD**" means cannabidiol.

"**Child resistant**" means designed or constructed to be significantly difficult for children under five years of age to open and not difficult for adults to use properly.

"**Consumer**":

(1) means a person who purchases, acquires, owns, holds or uses marijuana items other than for the purpose of resale; or
(2) Means a patient or designated primary caregiver receiving a transfer from a medical marijuana dispensary.

"**Commission**" means the Oregon Liquor Control Commission.

"**Container**" means a sealed, hard or soft-bodied receptacle in which a marijuana item is placed prior to being sold to a consumer.

"**Date of harvest**" means the date the mature marijuana plants in a harvest lot were removed from the soil or other growing media. If the harvest occurred on more than one day, the "date of harvest" is the day the last mature marijuana plant in the harvest lot was removed from the soil or other growing media.

"**Exit Package**" means a sealed container provided at the retail point of sale in which any marijuana items already within a container are placed.

"**Generic Label**" means a label that contains **only** the required information listed in the rules and has no graphics, pictures, or logos.

"**Harvest lot**" means marijuana that is uniform in strain, cultivated utilizing the same growing practices and harvested at the same time.

"**Human consumption**" means to ingest, generally through the mouth, food, drink or other substances such that the substance enters the human body but does not include inhalation.

"**Licensee**" means any person who holds a license issued under ORS 475B.070 (Production license), 475B.090 (Processor license), 475B.100 (Wholesale license), 475B.110 (Retail license), or 475B.560 (Laboratory license).

"**Major food allergen**" means an ingredient that is one of the five foods listed in subsections (1) to (5) of this section, or from one of the three food groups listed in subsections (6) to (8) of this section, or is an ingredient that contains protein derived from one of the following:

(1) Milk;
(2) Egg;
(3) Fish;
(4) Crustacean shellfish;
(5) Tree nuts;
(6) Wheat;
(7) Peanuts; and
(8) Soybeans.

"**Marijuana**" means the plant Cannabis family Cannabaceae, any part of the plant Cannabis family Cannabaceae and the seeds of the plant Cannabis family Cannabaceae. "Marijuana" does not include industrial hemp, as defined in ORS 571.300.

"**Marijuana item**" means marijuana, usable marijuana, a cannabinoid product or a cannabinoid concentrate or extract.

"**Medical grade cannabinoid product, cannabinoid concentrate or cannabinoid extract**" means a cannabinoid product, cannabinoid concentrate or cannabinoid extract that has a concentration of THC that is permitted under ORS 475B.625 in a single serving of the cannabinoid product, cannabinoid concentrate or cannabinoid extract for a patient.

"**Medical grade symbol**" means the image established by the Authority and made available to licensees indicating the cannabinoid product, concentrate or extract may only be sold or transferred to a designated primary caregiver or patient, for use only by a patient.

"**Medical marijuana dispensary**" means a facility registered under ORS 475B.450.

"**Net weight**" means the gross weight minus the tare weight of the packaging.

"**Package unique identification number**" mean the unique identification number that was generated by the Commission's seed to sale tracking system at the time the

marijuana item was packaged and labeled for sale to the consumer, patient, or designated primary caregiver.

"**Place of address**" means the name, mailing address, city, state and zip code of the processor who made the cannabinoid edible.

"**Principal display panel**" means the part of a label on a package or container that is most likely to be displayed, presented, shown or seen under customary conditions of display for sale or transfer.

"**Processing**" means the compounding or conversion of marijuana into cannabinoid products or cannabinoid concentrates or extracts.

"**Process lot**" means:

(1) Any amount of cannabinoid concentrate or extract of the same type and processed at the same time using the same extraction methods, standard operating procedures and batches from the same or different harvest lots; or

(2) Any amount of cannabinoid products of the same type and processed at the same time using the same ingredients, standard operating procedures and batches from the same or different harvest lots or process lots of cannabinoid concentrate or extract.

"**Producing**" means:

(1) Planting, cultivating, growing, trimming or harvesting marijuana; or

(2) Drying marijuana leaves and flowers.

"**Product identity**" means a truthful or common name of the product that is contained in the package.

"**Registrant**" means a person registered with the Authority under ORS 475B.420, 475B.435, or ORS 475B.450.

"**THC**" means tetrahydrocannabinol and has the same meaning as delta-9 THC.

"**Unique identification number**" means the tracking number provided by Metrc.

"**Universal symbol**" means the image, established by the Authority and made available to licensees and registrants, indicating the marijuana item contains marijuana.

"**Usable marijuana**" means the dried leaves and flowers of marijuana. "Usable marijuana" does not include:

(1) The seeds, stalks and roots of marijuana; or

(2) Waste material that is a by-product of producing or processing marijuana.

ATTRIBUTION

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[i] [i] Cartoon Penguin Clip Art by Vladimir Zuñiga available at www.foca.tk under a Creative Commons Attribution 3.0 license, https://creativecommons.org/licenses/by/3.0/us/. No changes were made.

[ii] PFalcon72 by Storn available at http://story-games.com/forums/discussion/4631/game-art-art-from-and-for-games/p4 under a Creative Commons Attribution-NonCommercial-ShareAlike 2.5 License, http://creativecommons.org/licenses/by-nc-sa/2.5/. No changes were made.