

November 6, 2025

RE: Product Label and Potency Letter

To: All Licensees and Worker Permit Holders

OPS made important changes to label rules in 2025 to implement legislation and provide greater clarity to clients and facilitators about product potency. HB 2387 (Oregon Laws 2025, Chapter 147) amended ORS 475A to require psilocin content to be listed on psilocybin product labels, and OAR 333-333-2400 has been adjusted to reflect this requirement. OPS made additional changes to require product labels to display any other values regarding available, potential or equivalent psilocin or psilocybin that are identified by the laboratory who performed potency testing. This includes but is not limited to total potential psilocin as defined in Oregon Environmental Laboratory Accreditation Program (ORELAP) rules in OAR-333-064-0025.

OAR 333-333-2410 was also amended to include additional requirements in the product information document. If the label includes other potency values as described above, the product information document must include an explanation of how those values were calculated, including any formulas and assumptions that were used to calculate the listed values. Explanation of the formula for total potential psilocin is not required because that term is defined in Oregon Environmental Laboratory Accreditation Program (ORELAP) rules in OAR-333-064-0025. If applicable, licensees are encouraged to work with the testing laboratory to receive required explanation of values that will be included on product information document.

These rule amendments do not require re-testing or additional potency testing for psilocybin products. Existing test results contain sufficient information to meet the amended label requirements.

The rule and statute changes described above are effective on January 1, 2026. All psilocybin products transferred from manufacturers to service centers and from service centers to clients must be compliant as of this date. There is no sell through period for existing inventory. Licensees may correct labels by applying stickers or otherwise adding the required information to existing product labels as long as the labels remain compliant with other rule sections. Licensees may choose to add the additional information to product labels prior to January 1, 2026.

Thank you for your continued engagement in the administration of the nation's first regulatory framework for psilocybin services. We appreciate your partnership.

Sincerely,
The Oregon Psilocybin Services Section