

# **CAMP USER GUIDE** Packaging & Labeling

Oregon Liquor & Cannabis Commission Updated March 21, 2024





### **OVERVIEW**

The Cannabis and Alcohol Management Program (CAMP) is where marijuana licensees, hemp certificate holders, medical registrants, and hemp-vapor item manufacturers must submit their packaging and labeling for pre-approval before they can be compliantly used.

CAMP will allow users to submit packaging and labeling for pre-approval, review their previously approved labels, and make changes to approved labels and packages. Users that had applications in the OLCC's legacy licensing system will automatically have their applications migrated to CAMP.

This guide covers the specifics of packaging and labeling functionality of CAMP. It will discuss how to create an application, what happens after you submit your application, managing your applications, how to modify approved applications, and FAQs.

The guide does not address specific rule requirements and does not supersede or modify any OLCC administrative rule or law. See the <u>Packaging and Labeling Guide</u> and <u>Generic</u> <u>Label Checklist</u> on the OLCC website for more information regarding OLCC administrative rule requirements.

If you have questions, email <u>marijuana.packaging@oregon.gov</u> or call 503-872-5459.

## **APPLY FOR A NEW APPLICATION – GETTING STARTED**

1. Under **Home** select *Packaging and Labeling*:



## **Packaging and Labeling**

In Packaging and Labeling, you can apply for new approvals and view your approved Packaging and Labels. For already approved Labels, you can upload new images, and submit corrections or additional information.

SELECT

2. Navigate to the **Packaging** and **Labeling menu** and select *Apply*:



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## **Select an Action**

**IMPORTANT**: CAMP has one application pathway for packages and labels.

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- 3. **Enter** the **required information** about the applicant for the application.
- 4. At any time, you can **select** the *green icon* to save your application or the *red trashcan* to delete the application. Saved applications will appear under Dashboard then Actions Required with a status of <u>Submit Application</u>.



## PACKAGING

#### Add Existing Packaging

- 1. **Adding Packages**: You must select at least one package to associate with your label. This is done via the Search Packaging bar.
- If you are using multiple packages, you must associate them all with your application. You can either select a child-resistant or non-child-resistant package from the OLCC's pre-approved choices. If your preferred package is not among those preapproved by OLCC, then see <u>Add New Packaging</u> section below.

## Packaging

Search Packaging

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Select the packaging that is to be used for the label.

3. Searching: This can be done by using various search terms, like the manufacturer's name, Package ID, application title, or physical characteristics (e.g. jar, bottle, etc.). CAMP now features a public-facing search capability for child-resistant packaging that you can review prior to submitting your label. This search is on the main CAMP landing page; you will need to completely sign out of CAMP to see it (or open an incognito browser window). If you see the package you would like to use on the public list, note the Package ID number and enter it into the search bar in your application. The OLCC will also be leaving the pre-approved child-resistant package list online and the Package IDs on this list will correspond in CAMP (it will not be updated after March 18, 2024).

#### **Add New Packaging**

1. **Adding New Packages**: If the package(s) you are using is not pre-approved (you cannot find it on the public list or search), you will need to add it to your application as an approval request. Select *Add new packaging*. The system will ask you questions about the package later in the application.



- 2. **Images, Documents, and Variants**: You will be asked to provide an image of the package (JPG, JPEG, GIF, or PNG) or a document (PDF). This should be a <u>plain</u> image of the package with no labeling elements. Variants are not required, but if you have different sizes of the package, this is where they should be included.
- Child Resistant Packages: If you select that the package is *child resistant*, in the <u>Documents</u> portion on <u>Step 4</u>, you must **upload** the **16** *CFR* **1700** *child resistance certificate*. Failure to do so will cause your application to be considered incomplete and it will be returned to you.

**IMPORTANT:** Packages just cover the physical structure and no aspect of the labeling. **Upload** a **plain photo** of the **package** and **upload all labeling elements** under the Labels section.



**IMPORTANT:** The last question under *Getting Started* will ask you "whether the label you are using on the package requires pre-approval?" If you are using a non-generic label, you should select *Yes*. Examples of non-generic labels are labels that exceed the rule requirements and have extra graphics, colors, branding, text, etc. See the <u>Generic Label</u> <u>Checklist</u> for more information.

## LABELS

**Information & Label ID** 

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1. **On the Labels portion** of the application, first select what product <u>type</u> you are applying for (these generally correspond to the definitions in rule). The <u>name</u> should be something that can assist OLCC in understanding what the label will be used for and can help you organize your labels. The <u>description</u> can be where you can provide additional information to explain your application to the OLCC, such as how the product will be packaged and labeled.

2. **Label ID**: You must have a Label ID displayed on your outermost container and the suggested format is "Label ID: 0000". You must fill in the Label ID on the labels you upload before they will be approved. You can see this number below Variant Images:





The Label ID is <u>not</u> the same as the file number.



#### Variants

1. **Each product's entire label is considered a variant**. For example, if you have a label for an infused pre-roll, you would need to upload <u>all</u> the labeling elements into one variant. You could upload one file that shows all the labeling, or you could upload multiple files showing the required information. However, as an example, you <u>cannot</u> separate the front and back of a label into separate variants.

2. You may **upload multiple label variants** for the same product type in one application. For example, you can upload multiple flavor variations of a gummy (berry, cherry, and peach). However, you **cannot combine** an infused pre-roll and a gummy **in one application**.

3. To better **manage your labels** and assist OLCC in the review and approval process, you are encouraged to use the variant functionality. For example, if you have three flavors of a gummy, you would create three versions (berry, cherry, and peach) and upload the front and back of each flavor into the respective variant.

**IMPORTANT:** CAMP supports JPEG, JPG, PNG, GIF, and PDF. You are encouraged to use JPEG, JPG, PNG, or GIF because it will display a thumbnail. *PDFs cannot display a thumbnail*. Under <u>Variants</u>, the image files can be uploaded under <u>Images</u> and PDFs can be uploaded under <u>Documents</u> (do not confuse this with the Documents section of the application). If you had applications from OLCC's legacy system migrated to your Dashboard, they will all be under one Variant.

JPEG, JPG, PNG, and GIF are **limited** to <u>10,000x10,000 pixels</u>. If your files exceed this, you will get an error message and you must downsize the files. Keep in mind all text must still be legible.

## DOCUMENTS

#### **Required Documents**

1. The **documents portion** of the application is where you can upload required information that is not part of the label. Examples include photos of the edible showing scoring, required forms, or supplemental files to provide more detail about your application.



**IMPORTANT: Do not upload labels under the Documents portion** of the application. This will cause your application to be returned to you.

2. If you **fail to upload required documentation**, your application will be returned to you so it is important to understand what documents may be required before you submit your application.

**IMPORTANT:** If you are submitting a child resistant package application, you <u>must</u> **upload the child resistance certificate showing it meets the 16 CFR 1700 requirements.** 

## FINISHING THE APPLICATION & WHAT HAPPENS NEXT?

**Finishing the Application** 

1. **The last step** is to **finish** and **pay** for your application. You can use checking or savings accounts, debit cards and all major credit cards. If you want to pay with <u>cash</u>, please email <u>marijuana.packaging@oregon.gov</u> to make arrangements.

2. Your application will then enter the OLCC queue to be reviewed.

**IMPORTANT:** Your application **will not be reviewed or approved by OLCC until payment is made**. Packaging and labeling fees are <u>non-refundable</u>.

**Label Review** 

1. In your **Dashboard under Applications** and then **Labels**, labels that have not been reviewed or approved show as *In Review* status. This means the OLCC has received your application, but has not taken any action on it.

2. When the **OLCC acts on your application** (either approves it or returns it back to you for corrections), you will receive an automatically generated email to the email associated with your account that will provide you with an update on the status of your application. In your **Dashboard**, if your application was approved, it will show under Labels as *Active* and under Applications it will show as *Approved*. If your application was not approved, it will show under Actions Required as *Provide Information*.

3. **If your application was not approved** and is in the status of *Provide Information*, you can find what actions you need to take detailed under the **Dashboard** and **Actions Required tab**. Click the file number link, navigate to *Provide Additional Information* and click the *Review* button.

#### Provide Additional Information

Review additional information that is required for the application.

REVIEW



4. Under **Requested Information**, you can see what notes the OLCC has left about your application.

## **Requested Information**

Review the usable marijuana labeling rules in OAR 845-025-7070

Please submit the additional information below.

Additional Information \*

5. **Update** your **application** and **leave notes** for the OLCC about what you have done.

6. During this process, this is your **chance to remove non-compliant labels** and based on OLCC feedback, upload complaint ones.

#### **Application Approval**

1. **Once the OLCC approves your application**, you will receive an automated message that it has been approved.

2. To **view** your **approved labels** in your **Dashboard**: navigate to *Labels* and in the *Status* column, your approved labels will show as *Active*.

Labels View your Labels here.					
				Filter by Registered in the last 30 da	ays • 🕚
Label ID 🔺	Description	Applicant	License Number 👙	Registration Date 👙	Status 👙
<u>10013</u>	Cannabis Gummy (Active) - Edible 100 -			Feb 28, 2024	Active

3. You can also **click the link in the Label ID number** to see the files associated with your application and download them. CAMP will only display to you what has been approved.



**IMPORTANT: Only** the **Variants** that have been **approved** in your application may be compliantly used. Do not assume that everything you uploaded is approved. It is your responsibility to understand what has been approved so you may compliantly use it.

**IMPORTANT:** *Your approved labels* <u>are not</u> <u>under Applications</u>. Applications will allow you to see more information about your application, including documents that were accepted by OLCC.

## MAKING CHANGES TO AN APPROVED APPLICATION

How to change your Approved application

1. OAR <u>845-025-7160(8)</u> **lists what you can change on your approved label**. If the changes you would like to make are outside the scope of this rule, you need to request a label amendment. If you are using a new package with your application, this process will allow you to add it to your application. The amendment fee is \$25 per <u>application</u>.

2. To **make a change to your approved application**: navigate to your Dashboard, *Labels tab,* then click on the *Label ID* for the label you want to change.

3. Click the Request button:

## **Label Activities**

Request Label Amendment

Request an Amendment to the Label.

REQUEST

#### 4. You can **amend existing variants** or submit new ones.

5. CAMP will ask you questions like those in this guide outlined above regarding the submission of an application; the review and approval process is the same as submitting a new application.



#### FAQ

#### 1. How can I communicate with OLCC about my application?

The best way is to either use the File Number, Label ID, or your license number.

#### 2. What is the application number that starts with a P in my Dashboard?

You may notice an application that starts with P followed by several digits in your Dashboard (e.g. P1234). These are slightly modified package applications from the OLCC's legacy online licensing system, and you do not need to take any action on them. If you do have questions, email <u>marijuana.packaging@oregon.gov</u>.

#### 3. What does the red Withdraw button mean?

This button allows you withdraw your application. In most scenarios, you should not use this function. The OLCC must approve this action. Keep in mind that fees are nonrefundable. If you have mistakenly created a label application, but have not paid for it, you can use the red trash can icon to remove the application from your dashboard.

#### 4. Where can I find the Documents, I uploaded in my application?

The accepted Documents will appear under your Dashboard, Labels, then Applications.

5. There is a public facing label search, but I can't download or see the labels? CAMP features a publicly available label search that anyone can access. As of March 2024, there is a limited amount of information that is displayed. This can help licensees verify compliance of products they receive but should not be considered a substitute for doing their own due diligence regarding compliance.

#### 6. Where do I find my applications?

- **New** applications that have been submitted to OLCC, but not reviewed will show under Labels, then Applications and have the status of *In Review*.
- **Reviewed** applications that were <u>not approved</u>, will show under Actions Required and have the status of *Provide Information*.
- **Approved** applications will show under Labels with a status of *Active*.
- 7. Why can't I see all my applications? You may need to change the filters to show "all labels" (top) and increase the rows per page (bottom).