



# PACKAGING AND LABELING UPDATE

FOR MEDICAL AND RECREATIONAL MARIJUANA – August 15, 2018

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## INTRODUCTION

This update highlights changes in the packaging and labeling rules that took effect August 15, 2018. This document is not a substitute for licensees having a thorough understanding of the OLCC's marijuana packaging and labeling rules. All licensees and registrants are required to follow and understand the packaging and labeling rules. Read the specific rules at: OAR 845-025-7000 – 845-025-7190.

## EFFECTIVE DATE AND “SELL DOWN PERIOD”

On August 15, 2018, new packaging and labeling rules went into effect. As a result the status of all labels approved before August 15, 2018 have been changed to “Resubmission Required.”

**Producers, processors, and wholesalers** must transfer all of their previously approved label inventory to retailers **before April 1, 2019**. If they do not, the product will have to be relabeled or destroyed. **Retailers** may sell down products with previously approved labels through December 31, 2019. Starting January 1, 2020, marijuana items and industrial hemp commodities and products with labels approved prior to August 15, 2018, can no longer be sold, offered for sale, or transferred to a consumer, patient, or designated primary caregiver.

Read the specific rules at: [OAR 845-025-7190](#).

## LABEL ID

All labels approved by the Commission must have a label identification number displayed on the outermost container. The format is “Label ID:” and you may use a placeholder number when submitting a label application, for example “Label ID: 0000.” However, your final label must have an accurate Label ID number. If you are using a generic label, you do not receive a Label ID.

The images below illustrate where the Label ID can be found.

- To find the label identification number go to your licensing dashboard and click on the packaging/label tab.
- Click on an individual label application.
- The label identification number can be found at the end of the URL within each individual label application.

## My License Dashboard + Start a New Application

Your License Dashboard will help you stay up to date on the progress of applications and licenses. Use this tool to submit applications, view application details, check in on status, communicate with the OLCC, and manage your licenses.

[License Dashboard](#)
[Business Information](#)
[Applications](#)
[Packaging/Labels](#)

### Packaging

Please add all packaging you plan to use. If the packaging you plan to use is not already an approved item, please Apply for New packaging.

[+ Add Packaging](#)
[+ Add Pre-Approved Packaging](#)

Title & Description	Package #	License #	Created	Status	Details
<b>CRATIV case</b> Plastic, hard-sided box that is opened by squeezing the sides and pushing down and up on the front	000001503		6/14/2017 4:06:58 PM	<a href="#">\$ Review and Pay</a>	...
<b>Pollen Gear Pop-Box</b> Premium ASTM Child-Resistant Pop Top Pollen Gear Pop-Box	000001506	1008093230A	6/14/2017 5:11:55 PM	Compliant, Not Approved for Use	...

### Labels

Please add all labels you plan to use. You must associate a label with packaging. If your application for packaging has not yet been approved, you will not be able to have labels approved.

[+ Add Label](#)

Title & Description	Application/Registration ID	Created	Status	Details
<b>Pre-roll Label</b> Front and back panel with logo and required information	1008093230A	6/20/2017 5:20:23 PM	<a href="#">\$ Review and Pay</a>	...

<- Individual label application

Recreational Marijuana L x    Recreational Marijuana L x

Not secure | LabelAdminDetail?id=136 <- Label ID: 136

Apps For quick access, place your bookmarks here on the bookmarks bar. Import bookmarks now...

## Recreational Marijuana Licensing

Label Details for \_\_\_\_\_

[Action/Change Requests](#)
[Label Application](#)
[Business Information](#)

Assigned To \_\_\_\_\_

Under Review

Move to state:
 [Approved](#)
[Resubmission Required](#)
[Propose Denial](#)

Read the specific rules at: [OAR 845-025-7030\(24\)](#).

## EDIBLES

Edibles must use one of the nutrition formats provided by the Commission. The nutrition formats can be found [here](#) and see pages 18 – 22 of the [Packaging and Labeling Guide](#) for examples and additional labeling requirements. Both can be found on the OLCC marijuana program [website](#). Read the specific rules at: [OAR 845-025-7030\(19\)](#).

## HEMP

Industrial hemp commodities or products intended for human consumption or use have different labeling requirements. If the product contains *only* industrial hemp, you must use the hemp symbol which can be found [here](#). However, if your product contains *any* marijuana as defined by OLCC rule, you must use the [universal symbol](#). Read the specific rules at: [OAR 845-025-7140](#), [OAR 845-025-7000\(33\)\(a\)](#), and [OAR 845-025-7000\(4\)\(b\)](#).



*Hemp Symbol*



*Universal Symbol*

The label for a hemp item must have the following warning in place of the warnings required on items for sale to a consumer described in OAR 845-025-7070 to 845-025-7120: **“This product is derived from hemp and could contain THC. Keep out of reach of children.”** You must also include the FDA statement: **“This product is not approved by the FDA to treat, cure, or prevent any disease.”**

If the item is a hemp extract, concentrate, topical, or a hemp product ***other than an*** edible, tincture, or capsule, the label needs to contain the warning, **“DO NOT EAT”** in bold, capital letters. Read the specific rules at: OAR 845-025-7070 – 845-025-7120.

## TINCTURES

The definition of tinctures changed in the new rules. If your product contains any added sweeteners or does not otherwise meet the definition of a tincture, it must be labeled as an edible cannabinoid product.

Read the specific rules at: [OAR 845-025-7000\(10\)\(a\) and \(b\)](#).

## OTHER CANNABINOID PRODUCTS

There are unique/distinct labeling requirements for cannabinoid products **other than** cannabinoid edibles, topicals, tinctures, or capsules. This rule typically applies to usable marijuana and extracts and concentrates that contain any added ingredients or substances.

For example, *if an extract or concentrate has non-marijuana derived terpenes, the ingredient list must describe them as “non-marijuana derived terpenes.”*

Another example *is if pre-rolls contain added ingredients, the ingredients used in the product must be listed in descending order of predominance by weight.*

Read the specific rules at: [OAR 845-025-7120](#).

## PRODUCT IDENTITY

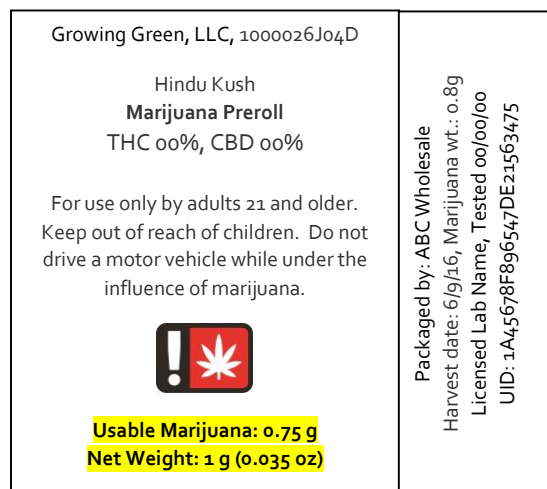
On the principal display panel, the product identity must clearly identify whether the product is derived from marijuana or hemp. When identifying a marijuana item, licensees and registrants are allowed to use either the term “marijuana” or “cannabis” depending on preference. *For example, “Cannabis Pre Roll,” “Hemp CBD Tincture,” or “Marijuana Balm.”*

Cannabinoid concentrates and extracts must correctly identify whether the product is an extract or concentrate. For example, “Cannabis Concentrate” or “Marijuana Extract.”

Read the specific rules at: [OAR 845-025-7030\(4\)\(b\)](#) and [OAR 845-025-7030\(4\)\(c\)](#).

## PRE-ROLLS

Pre rolls must list two weights: the net weight and the weight of the usable marijuana in the pre roll. On the principal display panel, licensees and registrants are required to list the net weight, which includes the weight of usable marijuana, paper, and filter/tip. The weight of usable marijuana, in grams, must be listed on the outermost label as well. Multi-packs of pre rolls must list the required information for *each* different pre roll in the package. See the next page for an example.



Read the specific rules at: [OAR 845-025-7070](#).

## NON-CHILD RESISTANT PACKAGES

If the container holding the marijuana item or industrial hemp commodity or product does not meet the child resistant standards, the outermost label must contain the statement “**This package is not child resistant.**” Read the specific rules at: [OAR 845-025-7030\(20\)](#).

## SMALL AND TINY CONTAINER LABELS

If a marijuana item or industrial hemp commodity or product that is in a container that because of its size does not have sufficient space for a label that contains all the information required for compliance with the packaging and labeling rules, a licensee or registrant may use a small or tiny container label, For more information and visuals see pages 15 – 17 of the [Packaging and Labeling Guide](#) found on the [OLCC marijuana program website](#).

Read the specific rules at: [OAR 845-025-7030\(11\) and \(12\)](#).

## CHANGE REQUEST FORM

Changes to an already approved package or label application are allowed. All change requests need to be made by completing the [OLCC Packaging and Labeling Change Request form](#) and submitting a \$25 change fee. The change form must be printed out and mailed through the US Postal Service to the OLCC, or delivered in person, along with the \$25 fee. The OLCC address is: 9079 SE McLoughlin Blvd., Portland, OR 97222.

Once the OLCC receives the form and payment, it will unlock the application so that changes can be made to the application which can then be resubmitted for approval. The Change Request form can be found [here](#).

## QUESTIONS?

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