



PACKAGING AND LABELING GUIDE

FOR MEDICAL AND RECREATIONAL MARIJUANA – VERSION 4.0

August 2018



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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This document is meant to help explain the packaging and labeling rules. However, this guide should not replace a thorough reading of the rules. All licensees and registrants required to follow the packaging and labeling rules are required to know and understand the rules as found in OAR 845-025-7000 through 845-025-7190.

BEFORE YOU BEGIN

** The packaging and labeling rules discussed in this document apply to marijuana items and hemp items that are for ultimate sale to a consumer, patient, or designated primary caregiver. This means packages and labels that are going to be sold or transferred to a patient, caregiver, or consumer. These rules do not apply to items that are undergoing lab sampling/testing or bulk transfers of product from one licensee to another. For the rule governing transportation of bulk product between licensees, refer to OAR 845-025-7700. **



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

Licensee - any person or entity who holds a license issued by the Oregon Liquor & Cannabis Commission (OLCC) under ORS 475B.070 (Production license), 475B.090 (Processor license), 475B.100 (Wholesale license), 475B.105 (Retail license), or 475B.560 (Laboratory license).

Registrant - means a person or entity registered with the Oregon Health Authority (OHA) under ORS 475B.785 to 475B.949.

Applicant - a person or entity 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, but an applicant can submit package and label applications for review.

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

The OLCC, Oregon Health Authority (OHA), or Oregon Department of Agriculture (ODA) may have additional requirements that are not covered in this guide so it is important to read and understand the rules.

This guide is not a replacement for reading the rules.

DIFFERENCE BETWEEN PACKAGES AND LABELS

When applying for package or label approval, it is important to understand the difference between packages and labels. A package is a physical structure that holds and protects the product. The label is all of the text, graphics, pictures, and logos printed on or affixed to the package.



PACKAGE – the Mylar bag on its own without any design or text elements



LABEL – includes the printed design, the logo, and all the text anywhere on package

PACKAGING

General Requirements

Each marijuana and hemp item must be packaged in a container that conforms to the rules found in OAR 845-025-7000 through 845-025-7190. A "container" is defined as a sealed, hard or soft-bodied receptacle in which a marijuana or hemp item is placed and any outer receptacle intended to display a marijuana item for ultimate sale to a consumer. This definition refers to any package or receptacle that holds a marijuana or hemp item and all outer packages used to display the marijuana or hemp item. For example, if a licensee packages an extract in a small round jar and then puts that jar into a cardboard box, both the jar and the box will be considered containers.



Small round jar placed inside of a cardboard box. Both the jar and the box are considered "containers."



OAR 845-025-7160 requires all licensees and registrants who package marijuana or hemp items for ultimate sale to a consumer, patient, or designated primary caregiver to get packages and labels approved through the OLCC pre-approval process (see Pre-approval Process Section).¹ "Ultimate sale" means the final sale from a retail location or dispensary to a consumer, patient, or designated primary caregiver. Packages and labels must be approved before any marijuana or hemp item is sold, offered for sale, or transferred between licensees or to a consumer, patient, or caregiver, unless subject to an exception.

¹ Generic labels and pre-approved packages do not need to be approved by the OLCC. More information about these topics is included later in this guide.

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Packages must protect the marijuana and hemp items they hold. Packages and containers that hold marijuana or hemp items must protect those items from contamination and must not expose the marijuana or hemp item to any toxic or harmful substance. [OAR 845-025-7020\(1\)](#).



Packages cannot contain untruthful or misleading statements. A false or misleading statement is one that is either not true or a statement that implies something about the product or package that is not true. For example, a label making a claim that the product in the package treats or cures a disease, when there is no significant scientific information to support that claim, would be a misleading statement. Similarly, labeling a product or its ingredients as "organic" when the product has not been properly certified would also be a misleading statement. See the sections on [Organic](#) and [Health Claims](#) for more information.

Packages must be labeled as required by OAR 845-025-7000 to 845-025-7190. A package must contain a complete and compliant label. The label can be printed directly on the package, securely affixed to the package, or both. All label information must comply with the labeling rule requirements.

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



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



- (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;"
- (4) Images of minors; and
- (5) Words that refer to products that are commonly associated with minors or marketed by minors.

A "cartoon" is defined in rule as 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

Packages cannot appear similar to any consumer product typically marketed towards minors or use the same types of symbols or designs that are used to market products to minors.

All marijuana and hemp items, except plants and seeds, must leave the retail store in a child-resistant package. The marijuana or hemp item can either be packaged in a container that is child-resistant or the item can be placed into a child-resistant exit package at the point of sale.



IMPORTANT! In order for a package to be considered child-resistant, the package must be tested and certified as meeting the federal standards set out in 16 CFR 1700 by a qualified, third-party testing firm. A list of [Testing Firms](#) can be found at the end of this guide.

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Child-resistant packages come in two forms: (1) single-use and (2) resealable, continually child-resistant. A single-use, child-resistant package is one that meets the child-resistance standard for a single use and is child resistant until it is opened. A resealable, continually child-resistant package is one that is capable of being resealed after being opened and maintains child-resistant properties throughout the life of the product. See [Child-Resistant Packaging](#) section on the next page.

Resealable and Continually,
Child-Resistant

vs.

Single-Use,
Child-Resistant



This vial is an example of a resealable and continually, child-resistant package because it is child-resistant every time it is properly closed.



This Mylar bag is an example of a single-use package because once it is opened, it is no longer child-resistant.

The type of child-resistant packaging required depends on the marijuana or hemp item being sold in the container. **Immature marijuana plants and seeds do not require the use of child-resistant packages.** If the item is usable marijuana, the item can be packaged in a single-use, child-resistant package. All other items must be packaged in a resealable, continually child-resistant package. The item may be placed directly in a container that meets the child-resistance standard outlined in the table below or a non-child-resistant 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	Single-Use Child-Resistant	Child-Resistant Packaging Not Required
Type of Marijuana Item Sold	<ul style="list-style-type: none"> • Edibles • Topicals • Tinctures and Capsules • Concentrates • Extracts • Transdermal Patches and Suppositories • Cannabinoid Products 	<ul style="list-style-type: none"> • Usable Marijuana 	<ul style="list-style-type: none"> • Immature Plants • Seeds



IMPORTANT! Products may be package directly into containers that are OLCC approved **and certified child resistant** or the packaged product may be placed into an approved exit package at the point of sale.

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 and hemp items for sale to a consumer, patient, or designated primary caregiver, except for plants and seeds, must be packaged in a container that is child-resistant as certified by a qualified third party child-resistant package testing firm.

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 or recommend any of the firms listed.

Exit Packaging

OAR 845-025-7000 defines “exit package” as “a sealed, child-resistant certified receptacle into which marijuana items already within a container are placed at the retail point of sale.” Exit packages can be used to add child resistance to a container that is not child resistant on its own. Because all marijuana and hemp items, except plants and seeds, must leave the dispensary or retail store in a child-resistant container, placing a non-child resistant container inside of an approved exit package will satisfy the child-resistant requirement. Marijuana items can be displayed in the store in non-child resistant packages but those packages must be placed in child-resistant exit packages at the point of sale. Additionally, multiple products can be placed in the same exit package at the point of sale.



Just like other types of packages, all exit packages must be approved through the OLCC Pre-approval Process. The fee for approval is \$100 per package. 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 845-025-7030(21), all exit packaging must contain a label that reads: "Keep out of the reach of children" in legible, typed font. This warning is the only required label information for an exit package. An exit package that has only this required warning printed on it² without any additional text, graphics, logos, or pictures, would have a generic label that would not require OLCC label pre-approval. However, if the exit package contains any logos, pictures, graphics, or additional text not required by rule, the label is not generic and would need to be submitted for label pre-approval with an additional \$100 fee.

² A generic label on an exit package may also contain instructions for opening or using the child-resistant package. The instructions will not make the label non-generic.

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The exit package may be provided by the producer, processor, or wholesaler that packaged the marijuana item for sale 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 store in an approved exit package. 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. If the package has not been approved by the OLCC, it cannot be used.

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 must be clean. The package cannot contaminate the marijuana or hemp item and must not expose the item to any toxic or deleterious substances. Exit packages may be reused as long as they are re-sealable, remain child resistant throughout the life of the product, and are in good working order.

LABELING

General Requirements

All containers must be properly labeled. This includes any container that holds a marijuana or hemp item as well as any container used to display a marijuana or hemp item for sale. For information on small or tiny container labels, please read the [Small Container Labeling](#) section.

A label is any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed, molded into, embossed on, printed on, or appearing upon or adjacent to a package containing a marijuana or hemp item for purposes of branding, decorating, identifying, or giving any information with respect to the item or to the contents of the package. If a package contains multiple stickers or has some information printed directly on the container and the rest of the information on a sticker, all of the information is considered part of one label.



IMPORTANT! The container holding the item must be properly labeled no matter how small it is. Additionally, any outer container must also be properly labeled. The label information required on each label depends on the type of product and the size of the container.

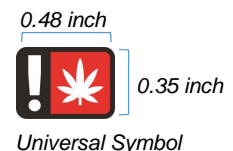
Each marijuana product type has specific requirements that must be included on the label. The label requirements for each product type can be found in OAR 845-025-7000 through 845-025-7190. All labeling requirements outlined in the rules are considered required information that must be included on the label. Failure to include required information on a label may result in the denial of a label application or a license violation. For a checklist of the specific requirements for each product type, go to the [Label Checklist](#) Section. If a container is too small to fit all of the required information, a small or tiny container label may be utilized. See [Small Container Labeling](#) 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 typed, legible font that is at least 1/16th of an inch in height based on the uppercase “K,” although the font can be larger;
2. Be in a font that is easy to read and contrasts sufficiently with the background;
3. Be in English, but the information can be included in other languages;
4. Be unobstructed and conspicuous, meaning that all required information must be visible on the outside of the package; and
5. Be printed on or securely affixed to the package, meaning that the label will not fall off or be removed during transportation or normal use of the product.

Additionally, every label must contain:

1. A principal display panel as defined by OAR 845-025-7000. (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).



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Non-required information can be in any font or size. Although there is a font size requirement for all required information, any 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 into or printed directly on the package. For example, printing some required information directly onto a Mylar bag and including the rest of the required information as a sticker is compliant under the rules. Both the sticker and the information printed directly on the bag will be considered to be two parts of one label.

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 an item was tested by more than one lab or has more than one test analysis date associated with it, each lab 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.

Under OAR 845-025-7030 when listing the potency on a label, the amount of THC and CBD must be the value calculated by the laboratory that did the testing in accordance with OAR 333-064-0100. The potency value shall be expressed as an average of the samples taken and tested under OAR 333-007-0360. A label may **not** have a THC value that exceeds the applicable maximum concentration limit. For more information about labeling THC and CBD, see the Potency section below.

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;
2. Be attractive to minors, as defined in OAR 845-025-7000;
3. Specifically encourage the transportation of marijuana items across state lines;
4. Assert that marijuana items are safe because they are regulated by the Commission or because they have been tested by a certified laboratory or otherwise make claims that any government agency endorses or supports marijuana;
5. Make claims that recreational marijuana has curative or therapeutic effects;
6. Display consumption of marijuana items;
7. Contain material that encourages the use of marijuana because of its intoxicating effect; or
8. Contain material that encourages excessive or rapid consumption.

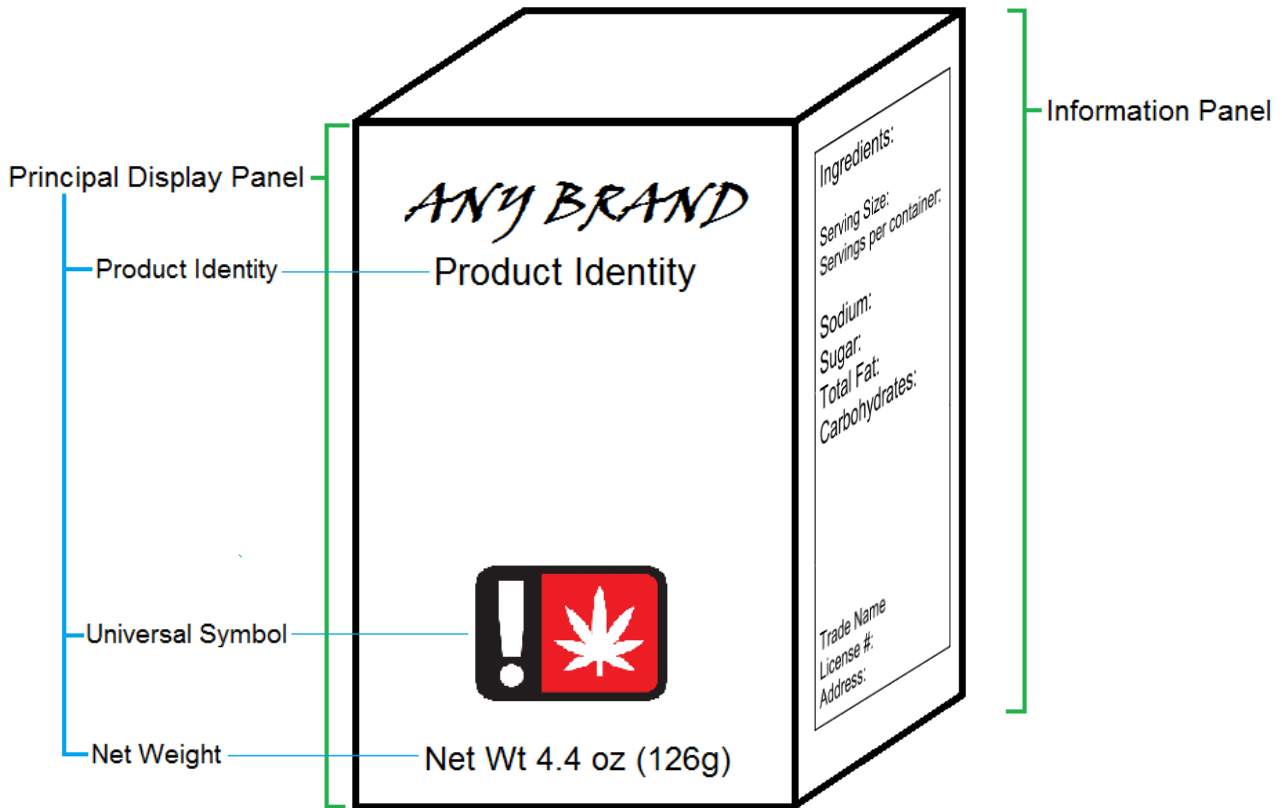


This photo shows a package with two label panels. Both label panels are considered part of one label.

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 that contains logos and branding. A package may have more than one principal display panel and, if so, all principal display panels must be properly labeled.



Example of a Package with two Principal Display Panels



In the above example, the package contains branding on the front and the top of the package. Both are considered principal display panels and both must be labeled properly

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- Clearly identify whether the item is derived from marijuana or hemp.



IMPORTANT! An item that contains both industrial hemp and marijuana must identify the item as a marijuana item. **For concentrates and extracts, the product identity must correctly identify the product as either a concentrate or an extract.** (See [Definitions](#) section for definitions of concentrate and extract.)

Net Weight or Volume (Net Quantity of Contents)

The net quantity of contents means the amount of product being sold in the container. It can be expressed on the label as either the net weight or the net volume.

The net weight is the gross weight of the final product minus the weight of the packaging and is expressed on the label in both ounces and grams (or milligrams for weights under one gram). A label should include the net weight if the product is a solid, semi-solid, or viscous product. A standard net weight declaration looks as follows: Net wt 1.0 g (0.035 oz)

The net weight is the weight of the final product. For pre-rolls, the net weight is the weight of the finished pre-roll, which includes the dried marijuana leaves and flowers, the rolling paper, and the filter or tip.

The net volume is the fluid measure of a liquid product expressed as milliliters and fluid ounces (fluid ounces are different than ounces). A label should include the net volume if the product is a liquid.

Displaying Net Weight or Volume

The net quantity of contents provided on the principal display panel must be the average quantity of contents in all of the packages in the batch. The net quantity declaration must be:

- A distinct item separated from other printed label information on all sides by at least a space equal to the height of the lettering used in the declaration;
- In **bold** type;
- In the bottom 30 % of the principal display panel;
- In lines generally parallel with the base of the container; and
- Listed in both the US Customary Units and the International System of Units (SI Units).



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

<i>US Customary</i>	<i>SI Units</i>
Weight (dry) displayed in ounces	Weight (dry) displayed in grams or milligrams
Volume (liquid) displayed in fluid ounces	Volume (liquid) displayed in milliliters

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The net quantity of contents 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 or volume should not be expressed in mixed units.

Example:

1.5 g, **not** 1 g 500 mg

When The First Digit Dropped is:	The Last Digit Retained is:	Examples
less than 5	Unchanged	2.44 to 2.4 2.429 to 2.4
more than 5, or 5 followed by at least 1 digit other than 0	Increased by 1	2.46 to 2.5 2.451 to 2.5
5 followed by zeros	Unchanged if Even, or Increased by 1 if Odd	2.450 to 2.4 2.550 to 2.6

Rounding

Use Table 1 (above) from the NIST Handbook 130 (2015) to help with rounding the net quantity.

Universal Symbol

The universal symbol was created by the Oregon Health Authority and must be used on the label of a marijuana item that will ultimately be sold to a consumer. The universal symbol must be located 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 provided.



Universal Symbol

The universal symbol is required on all marijuana item labels. Additionally, licensees and registrants must receive OLCC approval for all labels prior to any sale to a consumer, patient, or caregiver. (See the [Pre-Approval Process](#) section for more information).

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

Hemp Symbol

The hemp symbol must be used in the place of the universal symbol when the product is made of hemp derived product. If an item contains both marijuana and hemp products, the item is considered a marijuana product and the label will not contain the hemp symbol. Hemp items have different labeling requirements than marijuana or mixed marijuana/hemp items. Please read OAR 845-025-7140 for more information.



Hemp Symbol

Medical Grade Symbol

The medical grade symbol was established by the Oregon Health Authority and made available to OLCC licensees. The medical grade symbol is a symbol that is **used only by OLCC licensees** that produce cannabinoid products, concentrates, or extracts that have a THC concentration that is above the recreational concentration limit.



Principal display panel with medical grade symbol.

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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. Any licensee that wants to process or sell medical grade products must register with the OLCC by completing the form found here: http://www.oregon.gov/olcc/marijuana/Documents/Licensing_Forms/mj_opt_med_req_FILLABLE.PDF



IMPORTANT! The medical grade symbol is used in addition to the universal symbol - both symbols are required. The medical grade symbol must appear on the principal display panel and be at least 0.35 inches in diameter. Any medical grade product should contain the warning “For use by OMMP patients only” rather than the recreational warning, “For use only by adults 21 and older.”

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
Other Products	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
Other Products	N/A	4,000 mg

** To see the actual tables, see [Table 1](#) (OAR 333-007-0210) and [Table 2](#) (OAR 333-007-0220). Products that are not listed in the recreational table, such as suppositories and transdermal patches, will follow the concentration limits set for edibles.

Potency

The THC concentration on a label cannot exceed the maximum concentration limit as determined by the [Retail](#) and [Medical](#) Concentration Limit Tables. A marijuana item labeled with a THC concentration in excess of the amount listed in the Retail THC Concentration Limit Table will be considered mislabeled and will need to be fixed before it can be sold or transferred.

The THC and CBD amounts required to be on a label must be the value calculated by the laboratory that did the testing in accordance with OAR 333-064-0100. The potency value shall be expressed as an average of the samples taken and tested under OAR 333-007-0360.

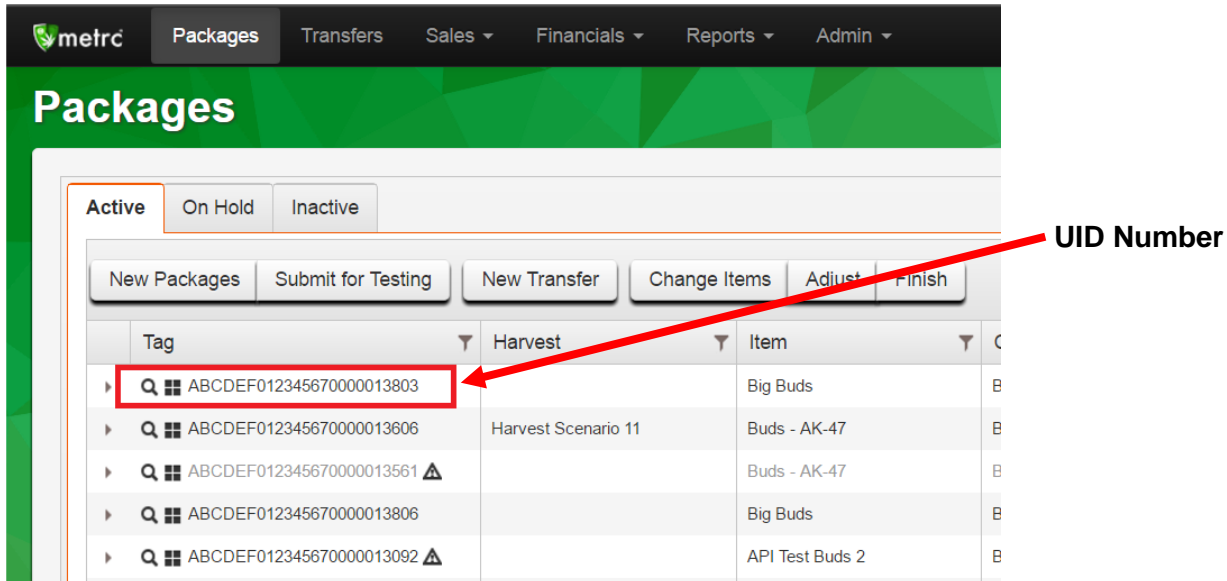
A label may provide a target potency amount on the principal display panel as long as:

- The target amount listed is within 10% of the THC and CBD amounts calculated by the lab; and
- The actual THC and CBD amounts calculated by the laboratory are also provided elsewhere on the label.

Other Labeling Requirements

UID Number

All licensees must use the unique identification (UID) number provided by Metrc on the label. This number is the 24-digit Metrc tag number. The UID number on the label should be the number associated with the product at the time the product is packaged and labeled.



The screenshot shows the Metrc web application interface. At the top, there is a navigation bar with the Metrc logo and several menu items: Packages, Transfers, Sales, Financials, Reports, and Admin. Below the navigation bar, the main heading is "Packages". Underneath, there are tabs for "Active", "On Hold", and "Inactive". A row of buttons includes "New Packages", "Submit for Testing", "New Transfer", "Change Items", "Adjust", and "Finish". A table lists packages with columns for "Tag", "Harvest", "Item", and "Status". The first row in the table has a red box around the "Tag" value "ABCDEF012345670000013803". A red arrow points from the text "UID Number" to this box.

Tag	Harvest	Item	Status
ABCDEF012345670000013803		Big Buds	B
ABCDEF012345670000013606	Harvest Scenario 11	Buds - AK-47	B
ABCDEF012345670000013561		Buds - AK-47	B
ABCDEF012345670000013806		Big Buds	B
ABCDEF012345670000013092		API Test Buds 2	B

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, inhaling, or using 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 must determine what the activation time is for their particular product. To show activation time on a label, you may simply state, "Activation Time: 30 minutes" or you may use a pictogram (see example on right), as long as the pictogram is clear and easily understood.



Pictogram Example.

Business or Trade Name and License or Registration Number

All labels require the business or trade name and the license number (if you are an OLCC licensee) or a registration number (if you are an OHA registrant). These two pieces of information should be listed together on the label. Providing the business or trade name as part of a logo or other branding is not sufficient to meet this requirement. The label must be clearly marked with the identifying information for the licensee or registrant responsible for the product.

Serving Size and Measuring Devices

Some labels must provide a serving size and the number of servings in the container. The serving size is the amount of product that is suggested for a consumer to use. The serving size is NOT the potency of the product. Instead the serving size should explain to the consumer the amount of product he or she should use to reach a specific potency. The serving size is determined by the processor, but the label must follow the rules regarding concentration limits. For example, if product being sold was a cookie that contained 10 mg THC, the serving size could be ½ of the cookie

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because the concentration limit per serving for an edible is 5 mg THC. In this example the label would say, “Serving Size: ½ cookie, Number of Servings per Container: 2.”

If the product being sold was a concentrate, the processor would decide how much a consumer should consume at one time and list that amount on the label. For example if the container held one gram of concentrate, the processor could decide that the serving size should be 0.03 grams or 30 milligrams. The label would say, “Serving Size: 30 milligrams or an amount equal to a grain of rice, Number of Servings per Container: 33.”

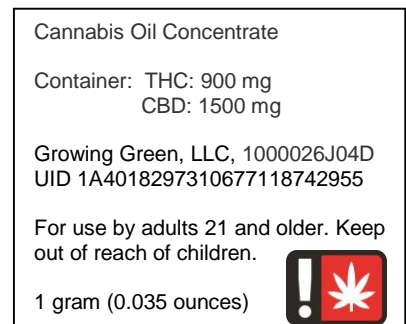
Edible products must either be scored or if the product cannot be scored, the package must contain a measuring device that measures single servings or the package must clearly enable a person to determine when a single serving has been consumed. Measuring devices must be large enough for the consumer to use as a reliable guide for measuring single servings. A small pictogram on a label will not be sufficient.

Labeling Small Containers

Small Container Labels

All containers that hold a marijuana item must be properly labeled. Under OAR 845-025-7030(11), if the container holding the marijuana or hemp item is too small to fit all of the required label information, a licensee or registrant may put at a minimum the following information on a label that is securely affixed to the small container:

1. Principal display panel that includes the net weight, universal symbol, and product identity;
2. Licensee or registrant business/trade name;
3. License or registrant number;
4. UID number;
5. Concentration of THC and CBD; and
6. Required warnings.
 - For a retail marijuana item or industrial hemp commodity or product, the following warning is required on the label: “For use only by adults 21 and older. Keep out of reach of children.”
 - For a medical marijuana item, the following warning is required on the label: “For use by OMMP patients only. Keep out of reach of children.”



Example of a small container label for a concentrate.

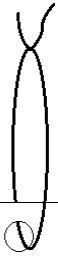
The remaining required information must be included on an outer package or container or on a hangtag attached to the small container. If an outer package is used, all of the information required by rule must be on the outer container, even if some of the information is already included on the inner container. In other words, if a small container is packaged inside a larger container, the outer container must have a full label. If a hangtag is used, the hangtag must be securely attached to the small container and contain the rest of the required information that is not already listed on the small container label (for example: lab name, test date, serving size, etc.). Small containers can utilize accordion or peel back labels but the information required on a small container label must be visible on the outside of the accordion or peel back label.

Small Container Label Example

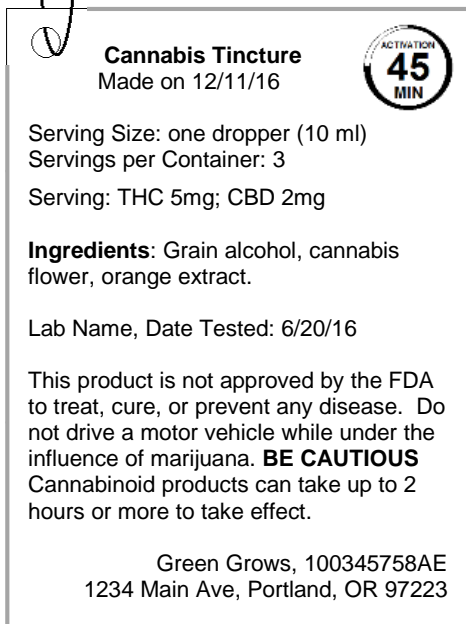
Small Container Label on Bottle *(not to scale)*

In this example, the small tincture bottle is too small to fit a full label. The small bottle must have at least the information required by the small container label rule printed directly on or affixed to the small container.

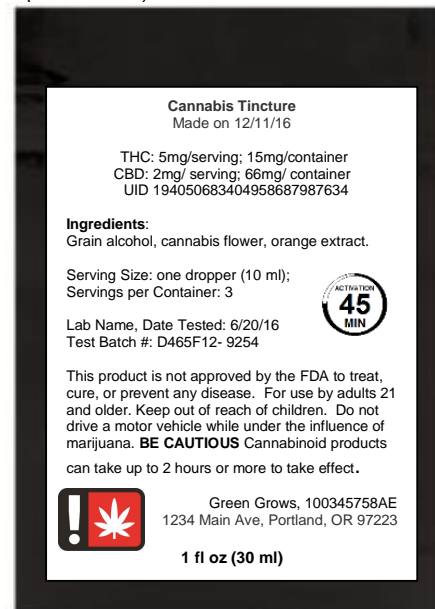
The remaining information must either go on a leaflet, hangtag, or outer container. Please see the examples below.



Hangtag for small container



Full Label on Bag *(not to scale)*



Marijuana Packaging and Labeling Guide

Tiny Container Labels

Under OAR 845-025-7030(12), a marijuana or hemp item that is packaged in a container that has a complete surface area available for applying a label that is less than 2 inches squared may have a label printed on or affixed to the container that includes at a minimum the following information:

1. A principal display panel with the universal symbol and product identity;
2. UID number;
3. Concentration or amount of THC and CBD in the container;
4. Licensee or registrant business/trade name;
5. License or registrant number; and
6. A warning that reads: "Keep out of reach of children."

Similar to a small container label, the remaining required label information must be included on a hangtag attached to the tiny container or the tiny container can be packaged inside of an outer container that contains a full and compliant label.

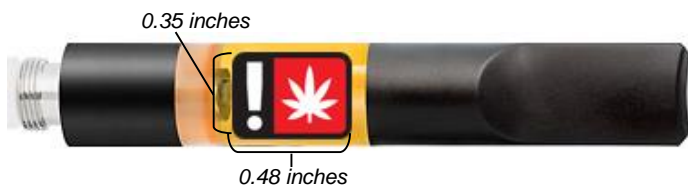


Tiny Container Label Example

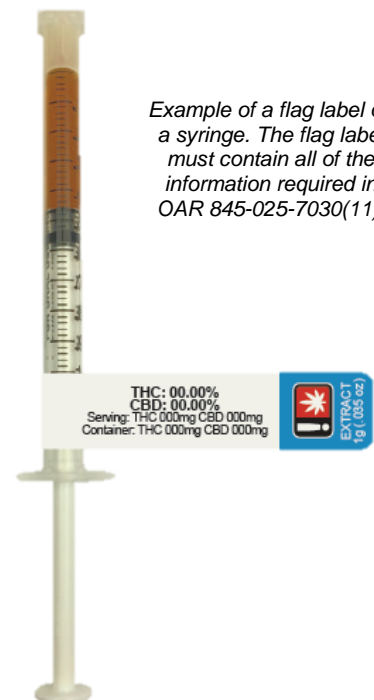
Cartridge Labeling

All cartridges and vaporizing devices containing a cannabinoid concentrate or extract or product intended for use with an inhalant delivery system must be labeled with the universal symbol. The universal symbol must be 0.48 inches wide by 0.35 inches tall. The universal symbol can either be printed directly on the cartridge or it can be attached to the cartridge as a sticker. Cartridges are not required to have a small container label.

Syringes do not fall under this rule and must have a small container label attached to them. In order to fit all of the required information, a flag label (see example on right) may be used. For more information about small container labels, please see the Small Container Labeling section.



Example of the universal symbol on a cartridge. The universal symbol must be at least 0.48 inches wide by 0.35 inches tall.



Example of a flag label on a syringe. The flag label must contain all of the information required in OAR 845-025-7030(11).

Marijuana Packaging and Labeling Guide

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. The list of ingredients must include any substance used in processing, preparing, manufacturing, packaging, or holding the cannabinoid product that is present in the final product, including any cooking or release spray. The list of ingredients must correctly identify the type of marijuana item or industrial hemp ingredient used to make the product.

- This includes all ingredients and sub ingredients. For example, in a chocolate chip cookie recipe, the ingredient list may be as follows:

Ingredients: Enriched Flour, Brown Sugar, Chocolate Chips, Cottonseed Oil, Baking Soda, Salt.

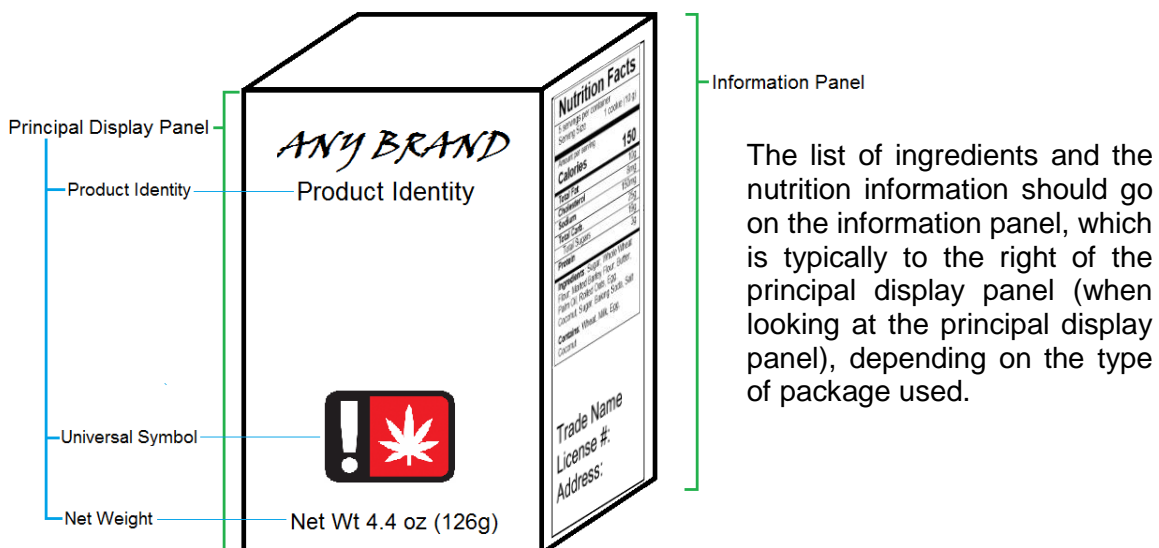
However, both enriched flour and chocolate chips are composed of other sub-ingredients. For this example, the chocolate chips are made of cane sugar, chocolate liquor, cocoa butter, milkfat, and soy lecithin and the enriched flour is made of wheat flour, malted barley flour, niacin, iron, thiamin mononitrate, riboflavin, and folic acid. Because these two ingredients have ingredients of their own, you must list all of the ingredients and sub-ingredients in one of two ways:

- First, you can list the names of the ingredients and then list any sub ingredients in parenthesis.

Ingredients: Enriched Flour (Wheat Flour, Malted Barley Flour, Niacin, Iron, Thiamin Mononitrate, Riboflavin, Folic Acid), Brown Sugar, Chocolate Chips (Cane Sugar, Chocolate Liquor, Cocoa Butter, Milkfat, Soy Lecithin), Cottonseed Oil, Baking Soda, Salt.

- Second, you could list out each ingredient in descending order of predominance by weight or volume.

Ingredients: Wheat Flour, Malted Barley Flour, Niacin, Iron, Thiamin Mononitrate, Riboflavin, Folic Acid, Brown Sugar, Cane Sugar, Chocolate Liquor, Cocoa Butter, Milkfat, Soy Lecithin, Baking Soda, Salt.



The list of ingredients and the nutrition information should go on the information panel, which is typically to the right of the principal display panel (when looking at the principal display panel), depending on the type of package used.

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2. *The amount of calories, sodium, protein, added sugars, cholesterol, total carbohydrates, and total fat per serving.* A cannabinoid edible shall use one of the nutrition information formats provided by the Commission to display the amount of calories, sodium, protein, added sugars, cholesterol, total carbohydrates, and total fat per serving, the serving size and number of servings per container, and the list of ingredients and potential allergens.

- Even if the amount per serving is zero, it must still be listed on the label.

Variations of the Nutrition Facts Panel

Nutrition Facts	
5 servings per container	
Serving Size	1 cookie (10 g)
Amount per serving	
Calories	150
Total Fat	10g
Cholesterol	8mg
Sodium	150mg
Total Carb.	25g
Total Sugars	19g
Protein	3g
Ingredients: Sugar, Whole Wheat Flour, Malted Barley Flour, Butter, Palm Oil, Rolled Oats, Egg, Coconut, Sugar, Baking Soda, Salt	
Contains: Wheat, Milk, Egg, Coconut	

Nutrition Facts		Servings: 5, Serv. Size: 1 cookie (10g),	
Amount per serving: Calories 150, Total Fat 10g, Cholest. 8mg, Sodium 150mg, Total Carb. 25g, Total Sugars 19g, Protein 3g.			
Ingredients: Sugar, Whole Wheat Flour, Malted Barley Flour, Butter, Palm Oil, Rolled Oats, Egg, Coconut, Sugar, Baking Soda, Salt			
Contains: Wheat, Milk, Egg, Coconut			

Nutrition Facts		Amount/serving		Amount/serving	
5 servings per container		Total Fat	10g	Total Carb.	25g
Serv. Size: 1 cookie (10g)		Cholesterol	8mg	Total Sugars	19g
Calories , per serving	150	Sodium	150mg	Protein	3g
Ingredients: Sugar, Whole Wheat Flour, Malted Barley Flour, Butter, Palm Oil, Rolled Oats, Egg, Coconut, Sugar, Baking Soda, Salt					
Contains: Wheat, Milk, Egg, Coconut					

The rules do not require a specific type of analysis to determine the nutrient amounts displayed in the Nutrition Facts Panel but you may use one of the following methods to determine those values:

- Database analysis.** Using a list of ingredients and specific processing information for your product, you can use a food ingredient database to determine the specific nutrient amounts for your product. This method may be a better predictor of nutrient values across multiple batches versus a single laboratory test from one batch. However, how the analysis is performed affects the validity of the results. You must be extremely detail-oriented and have a general knowledge of food and nutrient values, be able to understand and account for processing changes, and be able to keep detailed records.
- Lab analysis.** A lab can determine the nutrient values for the sample submitted to the lab. The results will only be specific to the sample tested so you may want to consider testing your product throughout the year to get the most accurate results. Lab analysis may be more beneficial if you are using unique ingredients that do not have nutrient information available or when the specific process you are using to make the edible is going to change the nutrient composition of the product in an unpredictable way.
- A combination of database and lab analysis.** You can verify a claim or cross check results using both methods.



IMPORTANT! You do not need to submit your nutrient analysis to the OLCC but a licensee or registrant must have documentation that demonstrates the validity of the calculations 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

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

When labeling allergens, always use the specific food name for nuts, fish or crustacean shellfish and not the category of allergen. For example, use the word “almonds” instead of “tree nuts” in the Contains statement. 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**), **pecans**, **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, Pecans, 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.



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.

False or Misleading Claims

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. Second, licensees and registrants cannot use the word "organic" or any variation of the word in a way that implies the product is organic, the product has been certified organic, or that the marijuana in the product is organic. This means the logo and branding on a principal display panel or elsewhere on the label cannot use the word organic. To learn more about organic certification, please contact the Oregon Department of Agriculture at 503.986.4550.



*"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 and the product must be certified. 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.

To learn more about the USDA Organic Program, check out the USDA Organic website: <https://www.usda.gov/topics/organic>

Health Claims

Health claims describe a relationship between a substance and a reduced risk of a disease or health-related condition. OAR 845-025-7030 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 that the product or an ingredient in the product can cure, mitigate, or treat any disease or health-related condition cannot be made or implied. Any statement that makes such a claim would be considered a misleading statement and could lead to a denial of a label application.

Strain Names

The label cannot contain any words that refer to products that are commonly associated with minors, marketed by minors, or any names that are false or misleading. To help clarify which strain names are

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not allowed on labels or advertising, please look at the categories of names below and the examples under each category. This is not an exhaustive list of prohibited strain names but a few examples of what is **NOT** allowed.

First Category - Names of children's toys or any character or other item in a children's book, TV show, or movie. The following names are examples of the types of names that would be prohibited:

Incredible Hulk
Ewok
Optimus Prime
Light Saber

Second Category - Food Products Marketed to or by Children. The following names are examples of the types of names that would be prohibited:

Any Girl Scout Cookie - Thin Mints, Dosidos, etc.
Frosted Flakes
Lucky Charms
Skittles

Third Category - False or Misleading. The following names are examples of the types of names that would be prohibited:

Green Crack
Opium
Special K

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-pkglblqreg-16-h130-final.pdf>

Hemp

Hemp items are products that only contain cannabinoids derived from hemp plants. If a product contains both hemp and marijuana ingredients, the item is considered a marijuana product.

Hemp items must be labeled under OAR 845-025-7140. Hemp items that are for ultimate sale to a consumer or patient must be labeled and packaged as outlined in 845-025-7000 to 845-025-7120 with the following exceptions:

1. The principal display panel must contain the hemp symbol instead of the universal symbol;
2. The label shall contain 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."



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3. If the item is a hemp extract, concentrate, topical, or a hemp product other than an edible, tincture, or capsule, the label shall contain the warning, “DO NOT EAT” in bold, capital letters.



IMPORTANT! If the item contains cannabinoids derived solely from hemp, the label must carry the hemp symbol and should NOT contain the universal symbol.

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) or polyethylene glycol (PEG)

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 medical, recreational, and hemp products.

Persons submitting package and label applications must receive approval from the OLCC before selling a marijuana item or hemp item to a consumer or patient.

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

Before Applying

Determine what part of your application constitutes the package and what constitutes the label. 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. Wrapping or materials that provide only structural support are not 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. This includes any information that is printed directly on the package.



Both items above are examples of packages.

Application Checklist

Package Application

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, if applicable
4. Clear photograph of the package
5. Description of the marijuana item that will be sold in the package
6. Clear photograph of the marijuana item that will be sold in the package

Label Application

1. Completed online application
2. Correct fee
3. Clear photographs of all label panels (this includes any text, pictures, graphics, or logos anywhere on the package)
4. Description of the marijuana item that will be sold in the package
5. Clear photograph of the marijuana item that will be sold in the package

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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 marketed in a manner attractive to minors;
3. Contains any untruthful or misleading content;
4. Contains a marijuana item that is compliant with the rest of the rules.



The label:

1. Has all the required rule information in the correct font size;
2. Information is unobstructed and conspicuous, meaning that all required information must be visible on the outside of the package.
3. Has a properly labeled principal display panel
4. Has a universal symbol or hemp symbol that is at least the minimum size;
5. Complies with the labeling requirements.

The OLCC will review the submission materials and notify the 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.

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.

Application Changes

After a label or package has been approved, changes can be made to the application but those changes will need to be evaluated by the OLCC. To make a change to an application, please find and fill out the Change Request Form on the Packaging and Labeling portion of the OLCC website. You will need to submit the form and a \$25 fee by mail to the OLCC. After receiving and processing the request, the OLCC will open up the application for editing. Please see the Making Changes to a Label after Approval section below for more information.

Approved Packages

The lists of the approved packages can be found on the Packaging and Labeling section of the OLCC website.

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 anywhere on the package. Generic labels do not need to be submitted to the OLCC for approval.




The label example to the left is not a generic label. The label includes everything printed on or affixed to the package. In this example, the background, logo, and stars are a part of the label; therefore the label is not generic.

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.

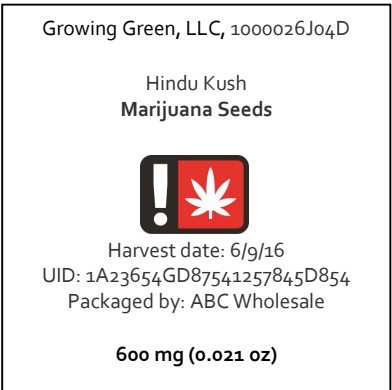
The generic labels are just examples to demonstrate how the required information could be displayed on the label. The names and information are fake.

MARIJUANA IMMATURE PLANT

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
<ul style="list-style-type: none"> <input type="checkbox"/> Producer’s business / trade name <input type="checkbox"/> Producer’s OLCC license number <input type="checkbox"/> Name of licensee who packaged product, if different than producer <input type="checkbox"/> Strain name <input type="checkbox"/> UID number <input type="checkbox"/> Universal symbol <input type="checkbox"/> Product Identity <p style="margin-left: 150px;">} Principal Display Panel</p>	<p>Growing Green, LLC 1000026J04D</p>  <p>Hindu Kush Marijuana Plant</p> <p>Packaged by: ABC Wholesale UID: 1A23654GD87541257845D854</p>

The net weight is not required for a marijuana plant label.

MARIJUANA SEED

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
<ul style="list-style-type: none"> <input type="checkbox"/> Producer’s business / trade name <input type="checkbox"/> Producer’s OLCC license number <input type="checkbox"/> Business/trade name of business that packaged the product, if different than the producer <input type="checkbox"/> Strain Name <input type="checkbox"/> Harvest date <input type="checkbox"/> UID number <input type="checkbox"/> Product Identity <input type="checkbox"/> Universal symbol <input type="checkbox"/> Net weight (g / oz.) or number of seeds <p style="text-align: right; margin-right: 20px;">} Principal Display Panel</p>	



Full Label on one side of the package



Same Package




*Front of Package
(Principal Display Panel)*



Back of Package

Label information can be placed on different parts of the package and still be compliant. For example, all of the rule requirements can be included on one sticker or the information can be split up on different parts of the package. However, certain information must always appear on the front of the package on the principal display panel.




USABLE MARIJUANA

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
<ul style="list-style-type: none"> <input type="checkbox"/> Producer’s business / trade name <input type="checkbox"/> Producer’s OLCC license number <input type="checkbox"/> Business/trade name of business that packaged the product, if different than the producer <input type="checkbox"/> UID number <input type="checkbox"/> Harvest date <input type="checkbox"/> Strain name <input type="checkbox"/> Concentration of THC and CBD (%) <input type="checkbox"/> Name of lab that performed any test <input type="checkbox"/> All test analysis dates <input type="checkbox"/> Required Warnings: “For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.” <input type="checkbox"/> Product Identity <input type="checkbox"/> Universal symbol <input type="checkbox"/> Net weight in grams and ounces <input type="checkbox"/> For prerolls only: weight of usable marijuana in grams <div style="margin-left: 200px;"> <p>} Principal Display Panel</p> </div>	<div style="border: 1px solid black; padding: 10px; width: fit-content; margin: auto;"> <p>Growing Green, LLC, 1000026Jo4D</p> <p>Hindu Kush Marijuana Preroll THC 00%, CBD 00%</p> <p>For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.</p>  <p>1 g (0.035 oz)</p> </div> <div style="margin-top: 10px; text-align: right; font-size: small;"> <p>Packaged by: ABC Wholesale Harvest date: 6/9/16, Marijuana wt.: 0.8g Licensed Lab Name, Tested 00/00/00 UID: 1A45678F896547DE21563475</p> </div>

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.

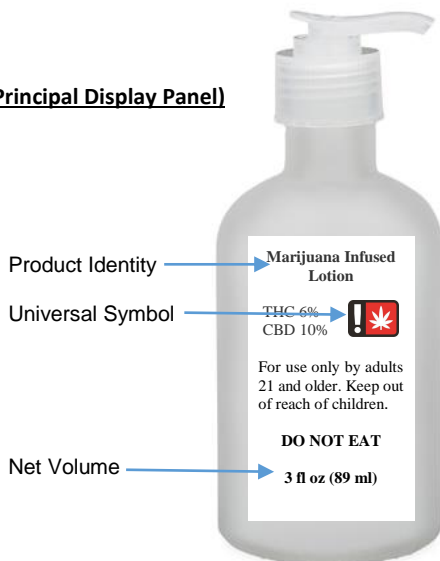


CANNABINOID TOPICAL

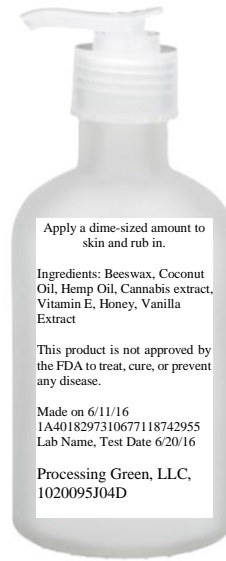
REQUIRED INFORMATION	GENERIC LABEL EXAMPLE				
<ul style="list-style-type: none"> <input type="checkbox"/> Processor’s business / trade name <input type="checkbox"/> Processor’s OLCC license number <input type="checkbox"/> Business/trade name of business that packaged the product, if different than the processor <input type="checkbox"/> UID number <input type="checkbox"/> Date product was made <input type="checkbox"/> Amount suggested for use by consumer at any one time <input type="checkbox"/> Concentration of THC and CBD in container (%) <input type="checkbox"/> List of ingredients in descending order of predominance by weight or volume <input type="checkbox"/> Name of lab that performed any test <input type="checkbox"/> All test analysis dates <input type="checkbox"/> Required Warnings: “For use only by adults 21 and older. Keep out of reach of children.” <input type="checkbox"/> The words “DO NOT EAT” in bold, capital letters <input type="checkbox"/> A statement that reads: “This product is not approved by the FDA to treat, cure, or prevent any disease.” <input type="checkbox"/> Universal symbol <input type="checkbox"/> Product Identity <input type="checkbox"/> Net weight (g and oz) or volume (fl oz and mL) <div style="margin-left: 200px;"> <p>} Principal Display Panel</p> </div>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> <p>Marijuana Infused Lotion</p> <p>THC 6% CBD 10%</p>  <p>For use only by adults 21 and older. Keep out of reach of children.</p> <p>DO NOT EAT</p> <p>3 fl oz (89 ml)</p> </td> <td style="width: 50%; padding: 5px;"> <p>Apply a dime-sized amount to skin and rub in thoroughly.</p> <p>Ingredients: Beeswax, Coconut Oil, Hemp Oil, Cannabis extract, Vitamin E, Honey, Vanilla Extract</p> <p>This product is not approved by the FDA to treat, cure, or prevent any disease.</p> <p>Made on 6/11/16 1A4018297310677118742955 Lab Name, Test Date 6/20/16</p> <p>Processing Green, LLC, 1020095J04D</p> </td> </tr> <tr> <td style="text-align: center; padding: 5px;">Front (Principal Display Panel)</td> <td style="text-align: center; padding: 5px;">Back</td> </tr> </table>	<p>Marijuana Infused Lotion</p> <p>THC 6% CBD 10%</p>  <p>For use only by adults 21 and older. Keep out of reach of children.</p> <p>DO NOT EAT</p> <p>3 fl oz (89 ml)</p>	<p>Apply a dime-sized amount to skin and rub in thoroughly.</p> <p>Ingredients: Beeswax, Coconut Oil, Hemp Oil, Cannabis extract, Vitamin E, Honey, Vanilla Extract</p> <p>This product is not approved by the FDA to treat, cure, or prevent any disease.</p> <p>Made on 6/11/16 1A4018297310677118742955 Lab Name, Test Date 6/20/16</p> <p>Processing Green, LLC, 1020095J04D</p>	Front (Principal Display Panel)	Back
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Front (Principal Display Panel)	Back				

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



Front (Principal Display Panel)



Back



CANNABINOID EDIBLE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE																						
<ul style="list-style-type: none"> <input type="checkbox"/> Processor’s business / trade name <input type="checkbox"/> Processor’s OLCC license number <input type="checkbox"/> Business/trade name of business that packaged item, if different than processor <input type="checkbox"/> Place of Address for Processor and Packager <input type="checkbox"/> UID number <input type="checkbox"/> Date product was made <input type="checkbox"/> Serving size and number of servings per container <input type="checkbox"/> Amount, in milligrams, of THC and CBD in each serving <input type="checkbox"/> Amount, in milligrams, of THC and CBD in the entire container <input type="checkbox"/> List of all ingredients in descending order of predominance by weight or volume <input type="checkbox"/> List of potential major food allergens, if appropriate <input type="checkbox"/> Amount of calories, sodium, protein, added sugars, cholesterol, total carbohydrates, and total fat per serving <input type="checkbox"/> If perishable, a statement that edible must be refrigerated/frozen <input type="checkbox"/> Activation Time <input type="checkbox"/> Name of lab that performed any test <input type="checkbox"/> All test analysis dates <input type="checkbox"/> Required Warnings: “For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.” <input type="checkbox"/> “BE CAUTIOUS” in bold, capital letters, followed by “Cannabinoid edibles can take up to 2 hours or more to take effect.” <input type="checkbox"/> A statement that reads: “This product is not approved by the FDA to treat, cure, or prevent any disease.” <input type="checkbox"/> A medical grade symbol and warning, if applicable <input type="checkbox"/> Universal symbol <input type="checkbox"/> Product Identity <input type="checkbox"/> Net weight (g and oz) or volume (fl oz and mL) 	<div style="border: 1px solid black; padding: 10px; margin-bottom: 10px;"> <p style="text-align: center;">Marijuana Shortbread Cookies</p> <p style="text-align: center;">THC: 5 mg/serving; 25 mg/container CBD: 2 mg/serving; 16 mg/container</p> <div style="text-align: center;">  <p>4.4 oz (126 g)</p> </div> </div> <p style="text-align: center;">FRONT (Principal Display Panel)</p> <div style="border: 1px solid black; padding: 10px; margin-bottom: 10px;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2" style="text-align: left;">Nutrition Facts</th> </tr> </thead> <tbody> <tr> <td colspan="2">5 servings per container</td> </tr> <tr> <td>Serving Size</td> <td>1 cookie (10 g)</td> </tr> <tr> <td colspan="2">Amount per serving</td> </tr> <tr> <td>Calories</td> <td style="text-align: right;">150</td> </tr> <tr> <td>Total Fat</td> <td style="text-align: right;">10g</td> </tr> <tr> <td>Cholesterol</td> <td style="text-align: right;">8mg</td> </tr> <tr> <td>Sodium</td> <td style="text-align: right;">150mg</td> </tr> <tr> <td>Total Carb.</td> <td style="text-align: right;">25g</td> </tr> <tr> <td>Total Sugars</td> <td style="text-align: right;">19g</td> </tr> <tr> <td>Protein</td> <td style="text-align: right;">3g</td> </tr> </tbody> </table> <p>Ingredients: Sugar, Whole Wheat Flour, Malted Barley Flour, Butter, Palm Oil, Rolled Oats, Egg, Coconut, Sugar, Baking Soda, Salt</p> <p>Contains: Wheat, Milk, Egg, Coconut</p> </div> <p style="font-size: small;">This product is not approved by the FDA to treat, cure, or prevent any disease.</p> <p style="font-size: small;">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.</p> <p>BE CAUTIOUS. Cannabinoid edibles can take up to 2 hours or more to take effect.</p> <div style="text-align: right; margin-top: 10px;">  </div> <p>Made on 6/11/16 UID: 1A4018297310677118742955 Licensed Lab, Test: 6/20/16</p> <p style="font-size: small;">Processed and Packaged by: Processing Green, LLC, 1000026J04D, 1234 Main Avenue, Portland, OR 97223</p>	Nutrition Facts		5 servings per container		Serving Size	1 cookie (10 g)	Amount per serving		Calories	150	Total Fat	10g	Cholesterol	8mg	Sodium	150mg	Total Carb.	25g	Total Sugars	19g	Protein	3g
Nutrition Facts																							
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Marijuana Chocolate Chip Cookies

THC: 5 mg/serv; 25 mg/pkg
CBD: 2 mg/serv; 16 mg/pkg

4.4 oz (126 g)





Nutrition Facts	
5 servings per container	
Serving Size	1 cookie (10 g)
Amount per serving	
Calories	150
Total Fat	10g
Cholesterol	8mg
Sodium	150mg
Total Carb.	25g
Total Sugars	19g
Protein	3g

Ingredients: Sugar, Whole Wheat Flour, Malted Barley Flour, Butter, Palm Oil, Rolled Oats, Egg, Coconut, Sugar, Baking Soda, Salt

Contains: Wheat, Milk, Egg, Coconut

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.


BE CAUTIOUS. Cannabinoid edibles can take up to 2 hours or more to take effect.






Made on 6/11/16
UID: 1A4018297310677118742955
Licensed Lab, Test: 6/20/16

Processed and Packaged by: Processing Green, LLC, 1000026J04D, 1234 Main Avenue, Portland, OR 97223

CANNABINOID CONCENTRATES AND EXTRACTS

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
<ul style="list-style-type: none"> <input type="checkbox"/> Processor’s business / trade name <input type="checkbox"/> Processor’s OLCC license number <input type="checkbox"/> Business/trade name of business that packaged the product, if different than the processor <input type="checkbox"/> UID number <input type="checkbox"/> Date product was made <input type="checkbox"/> Serving size and number of servings per container <input type="checkbox"/> Amount, in milligrams, of THC and CBD in each serving and in the container <input type="checkbox"/> Activation Time <input type="checkbox"/> Name of lab that performed any test <input type="checkbox"/> All test analysis dates <input type="checkbox"/> Required Warnings: “For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.” <input type="checkbox"/> The words “DO NOT EAT” in bold, capital letters <input type="checkbox"/> A statement that reads: “This product is not approved by the FDA to treat, cure, or prevent any disease.” <input type="checkbox"/> A medical grade symbol and warning, if applicable <input type="checkbox"/> Universal symbol <input type="checkbox"/> Product Identity with “extract” or “concentrate” <input type="checkbox"/> Net weight (g and oz) or volume (fl oz and mL) <div style="margin-left: 200px; margin-top: 10px;"> <p>— Principal Display Panel</p> </div>	<div style="border: 1px solid black; padding: 10px; margin-bottom: 10px;"> <p>CO2 Cannabis Oil Concentrate Cartridge</p> <p>Suggested serving size is one 5-second draw. Each cartridge provides about 150 servings with a 5 second draw.</p> <p>THC: 6 mg/serving; 900 mg/container CBD: 10 mg/serving; 1500 mg/container Immediate Activation</p> <div style="text-align: right;">  </div> <p>UID 1A4018297310677118742955 Made: 6/11/16, Lab Name, Tested: 6/20/16 Processing Green, LLC, 1000026J04D</p> <p>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</p> <p>1 gram (0.035 ounces)</p> </div> <p><i>In this example, the processor has packaged its own product. If another licensee had packaged the product, the name of that business would need to appear on the label.</i></p>

CANNBINOID TINCTURE AND CAPSULE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
<ul style="list-style-type: none"> <input type="checkbox"/> Processor’s business / trade name <input type="checkbox"/> Processor’s OLCC license number <input type="checkbox"/> Business/trade name of business that packaged the product, if different than the processor <input type="checkbox"/> Place of Address for Processor and Packager <input type="checkbox"/> UID number <input type="checkbox"/> Date product was made <input type="checkbox"/> Serving size and number of servings per container <input type="checkbox"/> Amount, in milligrams, of THC and CBD in each serving <input type="checkbox"/> Amount, in milligrams, of THC and CBD in the entire container <input type="checkbox"/> List of all ingredients in descending order of predominance by weight or volume <input type="checkbox"/> Activation Time <input type="checkbox"/> Name of lab that performed any test <input type="checkbox"/> All test analysis dates <input type="checkbox"/> Required Warnings: “For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.” <input type="checkbox"/> “BE CAUTIOUS” in bold, capital letters, followed by “Cannabinoid products can take up to 2 hours or more to take effect.” <input type="checkbox"/> A statement that reads: “This product is not approved by the FDA to treat, cure, or prevent any disease.” <input type="checkbox"/> A medical grade symbol and warning, if applicable <input type="checkbox"/> Universal symbol <input type="checkbox"/> Product Identity <input type="checkbox"/> Net weight (g and oz) or volume (fl oz and mL) <div style="text-align: right; margin-top: 10px;">  <p>Principal Display Panel</p> </div>	<div style="border: 1px solid black; padding: 10px; margin-bottom: 10px;"> <p style="text-align: center;">Cannabis Tincture</p> <p>BE CAUTIOUS. Cannabinoid products can take up to 2 hours or more to take effect.</p> <p>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.</p> <div style="display: flex; align-items: center; justify-content: center;">  <p>1 fl oz (30 ml)</p> </div> </div> <p style="text-align: center;">FRONT OF PACKAGE</p> <div style="border: 1px solid black; padding: 10px; margin-bottom: 10px;"> <p>Ingredients: Cannabis flower, grain alcohol, chicory, orange, anise.</p> <p>Serving Size: one dropper (1 ml); Servings per Container: 30 THC: 5mg/serving; 40mg/container CBD: 2mg/ serving; 16mg/ container</p> <div style="display: flex; justify-content: flex-end; align-items: center;">  </div> <p>Licensed Lab, Date Tested: 6/20/16 UID 1A4018297310677118742955 Made on 6/11/16</p> <p>This product is not approved by the FDA to treat, cure, or prevent any disease.</p> <p style="text-align: center; margin-top: 20px;">Processing Green, LLC, 1000026J04D 1234 Main Avenue, Portland, OR 97223</p> </div> <p style="text-align: center;">BACK OF PACKAGE</p> <p><i>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.</i></p>

See the next page for a tincture label example.

Example of a generic tincture label – the label wraps around the jar and is securely affixed to the bottle. This view allows you to see the entire label.



Medical Grade Product Labels

If a licensee is making a medical grade product – one that is intended for OMMP patients only – the product will need to be labeled using the same checklist above but with two changes:

1. The required warning language will be changed as follows: “For use by OMMP patients only. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.”
2. The licensee must add the medical grade symbol (pictured on the right) to the principal display panel.



Before a licensee can make or sell a medical grade product, the licensee must properly register with the OLCC. Please check out the “Forms and Publications” page on the OLCC website for the registration form.

Marijuana Packaging and Labeling Guide

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 or 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 before you can sell the marijuana item in the package or with the label.

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, including potency and testing information;
4. Net weight or volume; or
5. UID 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, or instructions on how to open or use a package, 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. To make a change to an application, please find and fill out the Change Request Form on the Packaging and Labeling portion of the OLCC website. You will need to submit the form and a \$25 fee by mail to the OLCC. After receiving and processing the request, the OLCC will open up the application for editing.

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
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

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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.

"Added substances" means any additional component or ingredient added to usable marijuana, cannabinoid concentrate or cannabinoid extract during or after processing that is present in the final product. This includes added flavors, terpenes, and any substances used to change viscosity or consistency of the cannabinoid product.

"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" for the purposes of labeling, means any of the chemical compounds that are the active constituents of marijuana or industrial hemp.

"Cannabinoid capsule" means a small, soluble pill, tablet, or container that contains liquid or powdered cannabinoid product, concentrate or extract and is intended for human ingestion.

"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 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:

- (1) Food or potable liquid into which a cannabinoid concentrate or extract or the dried leaves or flowers of marijuana have been incorporated; or
- (2) For purposes of labeling, includes any marijuana, cannabinoid concentrate, extract or cannabinoid product that is intended for human consumption or marketed in a manner that implies the item is for human consumption.
- (3) For purposes of labeling "cannabinoid edible" does not include a cannabinoid tincture or capsule.

“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:

- (1) 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; or
- (2) Usable marijuana, cannabinoid extracts and cannabinoid concentrates that have been combined with an added substance.
- (3) "Cannabinoid product" does not include:
 - (A) Usable marijuana by itself;
 - (B) A cannabinoid concentrate or extract by itself; or
 - (C) Industrial hemp, as defined in ORS 571.300.

"Cannabinoid tincture" means a liquid cannabinoid product packaged in a container of 4 fluid ounces or less that consists of either:

- (1) A non-potable solution consisting of at least 25% non-denatured alcohol, in addition to cannabinoid concentrate, extract or usable marijuana, and perhaps other ingredients intended for human consumption or ingestion, that is exempt from the Liquor Control Act under ORS 471.035; or
- (2) A non-potable solution comprised of glycerin, plant-based oil, or concentrated syrup; cannabinoid concentrate, extract or usable marijuana; and perhaps other ingredients that does not contain any added sweeteners and is intended for human consumption or ingestion.

"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**” has the meaning given that term in ORS 475B.015 and does not include a patient or designated primary caregiver.

"**Commission**" means the Oregon Liquor & Cannabis Commission.

“**Container**” means a sealed, hard or soft-bodied receptacle in which a marijuana item is placed and any outer receptacle intended to display a marijuana item for ultimate sale to a consumer. Does not mean:

- (1) Inner wrapping or lining;
- (2) An exit package; or
- (3) A shipping container used to transfer marijuana items or industrial commodities or products in bulk from one licensee or registrant to another.

"**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, child-resistant certified receptacle into which marijuana items already within a container are placed at the point of sale.

“**Generic Label**” means a label that contains only the information required by rule. A generic label may not contain any graphics, pictures, or logos other than symbols required by these rules. A generic label may include additional test information not required by rule or additional information described in OAR 845-025-7160(7)(c).

“**Health claim**” means any claim made on the label that expressly states or implies a relationship between a substance and a disease or health-related condition.

“**Hemp symbol**” means the image, established by the Commission and made available to licensees, indicating the item contains industrial hemp.

“**Industrial hemp commodity or product**” means an item processed by a handler or processor containing any industrial hemp or containing any chemical compounds derived from industrial hemp, including CBD derived from industrial hemp. “Industrial hemp commodity or product” does not include industrial hemp that has been minimally processed or has not been processed in any form.

“**Intended for human consumption**” means intended for a human to eat, drink, or otherwise put in the mouth but does not mean intended for human inhalation.

“**Intended for human use**” means intended to be used by applying it to a person’s skin or hair, inhalation or otherwise consuming the product except through the mouth.

Marijuana Packaging and Labeling Guide

“Label” means any display of written, printed, or graphic matter printed on or affixed to any container, wrapper, liner, or insert accompanying the marijuana item or industrial hemp commodity or product.

“Licensee” has the meaning given that term in ORS 475B.015.

“Major food allergen” means an ingredient that contains any of the foods or food groups listed in subsections (a) to (h) or an ingredient that contains protein derived from one of the foods listed in subsections (a) to (h)

- (a) Milk;
- (b) Egg;
- (c) Fish;
- (d) Crustacean shellfish;
- (e) Tree nuts;
- (f) Wheat;
- (g) Peanuts; and
- (h) 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.

“Net quantity of contents” means a statement on the principal display panel of the net weight or net volume of the product expressed in the terms of weight, measure, or numerical count.

“Net volume” means the fluid measure of a liquid product expressed as milliliters and fluid ounces.

“Net weight” means the gross weight minus the tare weight of the packaging expressed as ounces and grams or milligrams. “Net weight” as applied to pre-rolled marijuana includes the dried marijuana leaves and flowers, the rolling paper, and the filter or tip.

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“Other Cannabinoid Product” means a cannabinoid product that contains two or more ingredients and is not intended for human consumption, including but not limited to products that combine usable marijuana and concentrates or extracts; or usable marijuana, concentrates or extracts that contain added substances. “Other Cannabinoid Product” does not include pre-rolled marijuana consisting of only dried marijuana leaves and flowers, an unflavored rolling paper and a filter or tip.

"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.

“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.785 to 475B.949.

"THC" means tetrahydrocannabinol and includes both THCA and delta 9 THC.

“UID number” for the purpose of labeling, means the unique identification number generated by CTS at the time the marijuana item was packaged and labeled for ultimate sale to a consumer, patient, or designated primary caregiver.

“Ultimate sale” means the final sale from a retail location or dispensary to a consumer, patient, or designated primary caregiver.

"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

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.

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