



State of Rhode Island and Providence Plantations
DEPARTMENT OF BUSINESS REGULATION
Office of Cannabis Regulation
1511 Pontiac Avenue, Bldg. 68-1
Cranston, Rhode Island 02920

Medical Marijuana Program Bulletin Number 2020-4

Small Container Label Guidance

This Bulletin is issued by the Rhode Island Department of Business Regulation (“DBR”), Office of Cannabis Regulation (“OCR”) with respect to the new packaging and labeling requirements for retail-ready marijuana products set forth in § 1.5 of the Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation, 230-RICR-80-05-1, which were amended effective on March 25, 2020 (the “Regulations” or “230-RICR-80-05-1”). This guidance is issued in accordance with Rhode Island General Laws § 21-28.6-1 *et seq.* (the “Act”) and the Regulations. **This document is intended to provide an overview of certain regulatory requirements and should not replace a thorough reading of the regulations found here: <https://rules.sos.ri.gov/regulations/part/230-80-05-1>**

For the purposes of this Bulletin, “immediate container” means the container or other form of packaging immediately in contact with the product. “Immediate container” is differentiated from “secondary container” or “outer packaging” in which the immediate container is placed.

Immediate Small Container Requirements

If the immediate container holding the medical marijuana product is too small to fit all the required label information, a licensee may put **at a minimum** the following information on a label that is securely affixed to the small container:

- Universal Symbol
 - If it’s a cartridge:
 - 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 but are required to be placed into a secondary container that meets all the labeling requirements.
- THC/CBD content
- Tradename of the producer of the product
- Product Identity (flower, concentrate type)
- “Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children.”

Secondary Container Requirements

The immediate small container must be placed into a secondary container that is labeled with the below information:

- All Required Warnings
- Universal Symbol

- The business(es) or tradename(s) and license number(s) of the licensee(s) who produced the product;
- The business or tradename and license number of the compassion center selling the product
- The unique identifier
- Total THC and Total CBD
- Poison Control Contact Information
- Net Weight

Text Requirements for both Immediate and Secondary Containers

Warning text requirements:

- Clearly written or printed in the English language;
- Be in Times New Roman, Calibri, Arial, or Helvetica font;
- Be in text no smaller than size 8 font and bolded;
- Not be covered or obscured;
- Be displayed in a bright yellow box as to stand out from other labeling requirements, unless otherwise stated.

All other required text requirements:

- No smaller than size 6 font.
- In Times New Roman, Calibri, Arial or Helvetica font;
- In black or white, unless otherwise specified.
- Clearly written or printed in the English language.

Additional required information by 230-RICR-80-05-1 in § 1.5.3(G), may be placed on the immediate container, the secondary container, or may be placed on an insert but must accompany each retail-ready medical marijuana product sold.

If the immediate container or secondary container are not certified as child-resistant both must be placed into an Exit Package in compliance with 230-RICR-80-05-1, § 1.5.2(C) upon sale.

Any questions concerning this Bulletin or requirements under the Act and Regulations should be directed to dbr.mmpcompliance@dbr.ri.gov.



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