



State of Rhode Island

DEPARTMENT OF BUSINESS REGULATION
Office of Cannabis Regulation

1511 Pontiac Avenue, Bldg. 68-1
Cranston, Rhode Island 02920

Medical Marijuana Program Bulletin Number 2020-5

FAQs – Packaging and Labeling

This Bulletin is issued by the Rhode Island Department of Business Regulation (“DBR”), Office of Cannabis Regulation (“OCR”) to provide guidance regarding the packaging and labeling of medical marijuana products offered for sale at licensed compassion centers. This guidance is issued in accordance with Rhode Island General Laws § 21-28.6-12 et seq., and the Rules and Regulations Related to the Medical Marijuana Program Administered by the Department of Business Regulation 230-RICR-80-5-1, as amended (the “Regulations”).

This document should not replace a thorough reading of the rules found here:

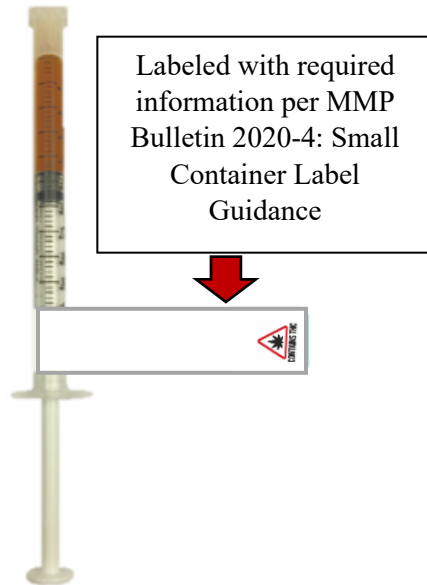
<https://rules.sos.ri.gov/regulations/part/230-80-05-1>.

I don't use a solvent to extract my product. Does my concentrate meant for inhalation need to adhere to the 500mg limit?

- Extracts or concentrates produced without the use of a solvent, are not required to adhere to the 500 mg THC limit per packaged unit. The Medical Marijuana Product Designation List has been updated to reflect this clarification.

Rick Simpson Oil (“RSO”) is intended for ingestion and is sold in a syringe type container. What are the requirements for this product?

- Has been designated as an “ingestible” product. As such, this product does not have to adhere to the 500mg THC limit per unit.
- The syringe must be placed into a secondary opaque container that is certified as child resistant and is labeled in accordance with [MMP Bulletin 2020-4: Small Container Label Guidance](#).
- A flag label is allowable and must contain, at a minimum, the required small container
 - THC/CBD
 - Tradename of the producer of the product
 - Product Identity, and
 - **“Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children.”**



Do all concentrate jars have to be opaque and black and white, even if placed into a secondary container?

- All concentrate containers must be opaque but are not restricted to black and white. They can be of a neutral color.
- *Neutral colors include but are not limited to: black, white, gray, beige, brown, and tan. Neutral colors do not include primary and secondary colors (such as red, orange, yellow, green, blue, or purple) or any variant of primary or secondary colors.*

The Universal symbol is too large for some of the small containers, does it have to be 1 inch by 1 inch?

- The Small Container Guidance document has been updated to include a size reduction of the Universal ONLY on small containers from 1 inch by 1 inch to at least **0.48 inches wide by 0.35 inches tall**.
- The approved logo must be equal to or smaller than the universal symbol.

What if I have a product that isn't already designated as medical marijuana?

- Per Section 1.7 of the Regulation, please submit to Erica.Ferrelli@dbr.ri.gov the following information for review:
 1. Licensee Name:
 2. Product Name:
 3. Product Description:
 4. Picture(s) of the product:
 5. Any known health impacts, both positive and negative.
 6. A complete ingredient list.
- Before submitting the product for review, please ensure that:

1. The form is not designed to evade recognition as a marijuana product or otherwise hide the fact that it is a marijuana product.
2. The product does not target or appeal to minors.
3. The product is not designed to appear solely as a non-medical or adult-use product for consumption and/or use by the general public.

Many questions were asked regarding specific labeling requirements per product types.

A document has been created which outline specific labeling requirements with examples for each product type and is available on our [website](#).

Is the universal symbol required to be imprinted onto my edible/ingestible?

- The following categories of marijuana products must be imprinted with a universal symbol:
 - Chocolate;
 - Soft confections;
 - Hard confections or lozenges;
 - Consolidated baked goods (e.g. cookie, brownie, cupcake, granola bar); and
 - Pressed pills and capsules.

Can a customer reuse a continually certified as child-resistant and resealable cap for their medical marijuana infused liquid products?

- A continually certified as child-resistant and resealable cap must accompany each product at the point of sale. If the customer wants to reuse a continually certified child-resistant and resealable cap, they must present it at the time of sale. One must be presented for each purchased product.
- Compassion Centers should have in place a procedure that includes at a minimum the wearing of gloves to handle the cap, disposing of gloves between customers and sanitizing the area between customers.

If I am packaging multiple single serving edible/ingestible products together, does each single serving have to be individually wrapped?

- Multiple single serving units may be packaged together into one certified child resistant and continually resealable package.
- All THC limits for edible products must be followed. (10 mg per serving and 100 mg per package)

If my immediate container for flower or concentrate is child-resistant, does the secondary container also have to be child resistant?

- If the immediate container is certified as child-resistant, the secondary container can be certified as child-resistant but is not required to be. If both the immediate and secondary containers are not child-resistant they both must be placed in an Exit Package that is certified as child-resistant upon sale.

I want to use a secondary package to provide an airtight seal and further protect my product. What is required to be on the secondary package if I can fit everything on the immediate package?

- [MMP Bulletin 2020-4: Small Container Label Guidance](#) outlines what the **minimum** requirements are for immediate containers. Additional required information can be put on the immediate container but is not required.
- If a licensee decides to use a secondary package even though all information is displayed on the immediate container, the following information must still be displayed on the secondary package:
 - 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

Isn't a secondary package really just an Exit Package?

- All required information must be on the immediate and secondary package BEFORE the product is available for sale at a Compassion Center.
- An Exit package is used strictly by a Compassion Center in which product that is labeled in accordance with § 1.5 is then placed into a certified child-resistant package **after** a purchase has been completed.

Does my immediate container have to be labeled with the unique identifier generated by the Compassion Center's Tracking System?

- Per [MMP Bulletin 2020-4: Small Container Label Guidance](#) this is not required. However, the secondary package must contain the required unique identifier along with all other required information.

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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