

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 2020-6

# **Product Labeling Guidance**

This Bulletin is issued by the Rhode Island Department of Business Regulation ("DBR"), Office of Cannabis Regulation ("OCR") to provide guidance regarding the labeling of products holding 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.

# **Flower Products**

Required Information on the package:



1. The business(es) or tradename(s) and license number(s) of the licensee(s) who produced the product;

- 2. The business or tradename and license number of the compassion center selling the product;
- 3. The unique identifier generated by the Medical Marijuana Program Tracking System;
- 4. Total THC and Total CBD;
- 5. Universal Symbol;
- 6. Use by date (recommended but not required);
- 7. American Association of Poison Control Center (800) 222-1222;

8. Net weight of the medical marijuana product prior to its placement in the package; and 9.Strain

Required information that can be on the package or on an insert:

- 1. A complete list of all nonorganic pesticides, herbicides, and fertilizers; and
- 2. Date of the harvest batch;

#### Required on the package:

- 1. 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 generated by the Medical Marijuana Program Tracking System;
- The unique identifier generated by the Medical Marijuana Program Tracking S
   Total THC and Total CBD
- Total THC and Total
   Universal Symbol
- 6. Use by date (recommended but not required)
- American Association of Poison Control Center (800) 222-1222,
   Net weight of the medical marijuana product prior to its placement in the package; and
- Net weight of the medical marijuana producion
   Strain

Required to be on an insert or can be on the package:

A complete list of all nonorganic pesticides, herbicides, and fertilizers; and
 Date of the harvest batch;

#### Warnings

- 1. "Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
- 2. "Warning: It is unlawful to transport this product outside of Rhode Island."
- 3. "Warning: For medical use by a registered patient only. Not for resale."
- 4. "Warning: Smoking and Vaping is hazardous to your health."



# Non-Solvent Concentrate Products

#### **Required Information on the package:**

- 1. The business(es) or tradename(s) and license number(s) of the licensee(s) who produced the product;
- 2. The business or tradename and license number of the compassion center selling the product;
- 3. The unique identifier generated by the Medical Marijuana Program Tracking System;
- 4. Total THC and Total CBD
- 5. Universal Symbol
- 6. Use by date (recommended but not required)
- 7. American Association of Poison Control Center (800) 222-1222, and
- 8. Net weight of the medical marijuana product prior to its placement in the package

#### Required to be on an insert or can be on the package:

- 1. The date on which the manufacturing batch was created;
- 2. Processing technique

#### Required Information on the package:

- 1. The business(es) or tradename(s) and license number(s) of the licensee(s) who produced the product;
- 2. The business or tradename and license number of the compassion center selling the product;
- The unique identifier generated by the Medical Marijuana Program Tracking System;
   Total THC and Total CBD
- Total THC and Total
   Universal Symbol
- 6. Use by date (recommended but not required)
- 7. American Association of Poison Control Center (800) 222-1222, and
- 8. Net weight of the medical marijuana product prior to its placement in the package

#### Required to be on an insert or can be on the package:

- 1. The date on which the manufacturing batch was created;
- 2. Processing technique

Who made the non-solvent concentrate?

#### Warnings

- 1. "Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
- 2. "Warning: It is unlawful to transport this product outside of Rhode Island."
- 3. "Warning: For medical use by a registered patient only. Not for resale."
- 4. "Warning: Smoking and Vaping is hazardous to your health."

 "Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
 "Warning: It is unlawful to transport this product outside of Rhode Island."
 "Warning: For medical use by a registered patient only. Not for resale."
 "Warning: Smoking and Vaping is hazardous to your health."

### Solvent- Based Concentrate Products

Required Information on the package:

- 1. The business(es) or tradename(s) and license number(s) of the licensee(s) who produced the product;
- 2. The business or tradename and license number of the compassion center selling the product;
- 3. The unique identifier generated by the Medical Marijuana Program Tracking System;
- 4. Total THC and Total CBD
- 5. Universal Symbol
- 6. Use by date (not required but recommended)
- 7. American Association of Poison Control Center (800) 222-1222, and
- 8. Net weight of the medical marijuana product prior to its placement in the package

Required to be on an insert or can be on the package:

- 1. The date on which the manufacturing batch was created;
- 2. The processing technique or solvent(s) used to produce the product;

3. A list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the medical marijuana product or that were added to the medical marijuana product;

Who made the solvent-based

concentrate?

#### Required Information on the package:

- 1. 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 generated by the Medical Marijuana Program Tracking System;
- 4. Total THC and Total CBD
- 5. Universal Symbol
- 6. Use by date (recommended but not required)
- 7. American Association of Poison Control Center (800) 222-1222, and 8. Net weight of the medical marijuana product prior to its placement in the package

#### Required to be on an insert or can be on the package:

1. The date on which the manufacturing batch was created;

<sup>2.</sup> The processing technique or solvent(s) used to produce the product; 3. A list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the medical marijuana product or that were added to the medical marijuana product;

#### Warnings

- 1. "Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
- 2. "Warning: It is unlawful to transport this product outside of Rhode Island."
- 3. "Warning: For medical use by a registered patient only. Not for resale."
- 4. "Warning: Smoking and Vaping is hazardous to your health."
- 5. "Warning; Vaping can expose you to toxic chemicals that may lead to death"



## **Edibles/Ingestibles meant for oral ingestion**

#### **Required Information on the package:**

- 1. The business(es) or tradename(s) and license number(s) of the licensee(s) who produced the product;
- 2. The business or tradename and license number of the compassion center selling the product;
- 3. The unique identifier generated by the Medical Marijuana Program Tracking System;

#### 4. Total THC and Total CBD in milligrams (mgs) per serving

- 5. Universal Symbol
- 6. Use by date (recommended but not required)
- 7. American Association of Poison Control Center (800) 222-1222,
- 8. Net weight of the medical marijuana product prior to its placement in the package
- 9. The serving size; and
- 10. The number of servings per package.

#### Required to be on an insert or can be on the package:

1. The date on which the manufacturing batch was created

2. A list of all ingredients used to manufacture the marijuana infused product, including identification of any major allergens contained in the product in accordance with the Food Allergen Labeling and Consumer Protection Act of 2004, 21 U.S.C. § 343 (2010), specifically milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat and soybeans; and 3. For medical marijuana edibles and ingestibles, a nutritional fact panel in accordance with 21 C.F.R. Part 101, incorporated above at § 1.1.7(B) of this Part.

#### Required Information on the package:

- 1. 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 generated by the Medical Marijuana Program Tracking System;
- 4. <u>Total THC and Total CBD in milligrams (mgs) per serving</u>

<sup>5.</sup> Universal Symbol

<sup>6.</sup> Use by date (recommended but not required)

American Association of Poison Control Center (800) 222-1222,
 Net weight of the medical marijuana product prior to its placement in the package

<sup>9.</sup> The serving size; and

<sup>10.</sup>The number of servings per package.

#### Required to be on an insert or can be on the package:

1. The date on which the manufacturing batch was created

2. A list of all ingredients used to manufacture the marijuana infused product, including identification of any major allergens contained in the product in accordance with the Food Allergen Labeling and Consumer Protection Act of 2004, 21 U.S.C. § 343 (2010), specifically milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat and soybeans; and 3. For medical marijuana edibles and ingestibles, a nutritional fact panel in accordance with 21 C.F.R. Part 101, incorporated above at § 1.1.7(B) of this Part.

#### Warnings

- 1. "Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
- 2. "Warning: It is unlawful to transport this product outside of Rhode Island."
- 3. "Warning: For medical use by a registered patient only. Not for resale."

### 4. "Effects of this product may be delayed by 3 or more hours."

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"Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
"Warning: It is unlawful to transport this product outside of Rhode Island."
"Warning: For medical use by a registered patient only. Not for resale."
"Effects of this product may be delayed by 3 or more hours."
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## **Topicals**

Required Information on the package:

- 1. The business(es) or tradename(s) and license number(s) of the licensee(s) who produced the product;
- 2. The business or tradename and license number of the compassion center selling the product;
- 3. The unique identifier generated by the Medical Marijuana Program Tracking System;
- 4. Total THC and Total CBD in milligrams (mgs) per serving
- 5. Universal Symbol
- 6. Use by date (recommended but not required)
- 7. American Association of Poison Control Center (800) 222-1222,
- 8. Net weight of the medical marijuana product prior to its placement in the package
- 9. The serving size; and
- 10. The number of servings per package.

Required to be on an insert or can be on the package:

- 1. The date on which the manufacturing batch was created
- 2. A list of all ingredients in descending order of predominance by weight or volume as applicable; and
- 3. The amount recommended for use at any one time.

Required Information on the package:

- 1. 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 generated by the Medical Marijuana Program Tracking System;
- 4. <u>Total THC and Total CBD in milligrams (mgs) per serving</u>

<sup>5.</sup> Universal Symbol

<sup>6.</sup> Use by date (recommended but not required)

American Association of Poison Control Center (800) 222-1222,
 Net weight of the medical marijuana product prior to its placement in the package

Net weight of the medical
 The serving size; and

<sup>10.</sup> The number of servings per package.

#### Required to be on an insert or can be on the package:

1. The date on which the manufacturing batch was created

A list of all ingredients in descending order of predominance by weight or volume as applicable; and
 The amount recommended for use at any one time.

#### Warnings

- 1. "Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
- 2. "Warning: It is unlawful to transport this product outside of Rhode Island."
- 3. "Warning: For medical use by a registered patient only. Not for resale."
- 4. "For Topical Application Do Not Eat or Smoke."

### 5. "Effects of this product may be delayed by 3 or more hours."

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

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Erica Ferrelli

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