



**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**

The Office of Cannabis Regulation

Packaging and Labeling Guide for Medical Marijuana

Version 1 March 2020

This document is meant to help explain the packaging and labeling rules effective on March 25, 2020.

However, this guide should not replace a thorough reading of the rules found here:
<https://rules.sos.ri.gov/regulations/part/230-80-05-1>.

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Flower

Packaging Requirements



Packaging must be:

- Opaque.
- Light-Resistant.
- Tamper- Evident.
- Neutral in Color.
- Certified as Child-Resistant (see page 24 for additional requirements).
- Resealable.

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Flower

Labeling Requirements

Font Requirements for required information:

- No smaller than size 6 font.
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Must be in Black or White.
- Clearly printed in the English language.

This required information **MUST** be on the package and adhere to the font requirements above:

- The business(es) 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.
- Unique identifier.
- Total THC.
- Total CBD.
- Weight.
- Poison Control Contact Information (American Association of Poison Control Center (800) 222-1222).

This information may be placed on an insert **OR** it can be printed on the package but either way, must adhere to the font requirements above:

- A complete list of all nonorganic pesticides, herbicides, and fertilizers that were used in the cultivation and production of the medical marijuana product.
- Date of the harvest batch.

Required Warnings must adhere to their own font requirements:

- No smaller than size 8 font
- **Bolded**
- Black font
- **In a bright yellow box**
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Clearly printed in the English language.

These Required Warnings must be on the package:

- “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."

The OCR's Universal Symbol must be on the package:

- Prominently displayed
- Larger or equal to 1 inch by 1 inch

Concentrates

Packaging and Device Requirements

Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant (see page 24 for additional information)
- Resealable

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

The cartridge AND the device must have a consumer testing certificate that shows it is safe for its intended use.

- A consumer testing certificate may already come with your purchased cartridge and/or device.
- There are labs in Rhode Island that provide consumer testing.

The device must have internal or external temperature controls to prevent combustion.

- Temperature control gives the consumer the option to change the power output on the device.
- Vaporizers that have this feature usually feature a display that shows the power selected.
- It may have buttons that give the consumer the ability to accurately adjust the temperature upward and downward.
- Devices with preset temperatures will be considered compliant as long as the temperature range is between 315 to 450 degrees Fahrenheit.

The device must contain a heating element made of inert material.

- Inert materials are very stable and have difficulty reacting with other substances.
- Inert materials include but are not limited to glass and ceramic.

Concentrates

Labeling Requirements

Font Requirements for required information:

- No smaller than size 6 font.
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Must be in Black or White.
- Clearly printed in the English language.

This required information **MUST** be on the package and adhere to the font requirements above:

- The business(es) 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.
- Unique identifier.
- Total THC ***Cannot Exceed 500 mg***
- Total CBD.
- Weight.
- Poison Control Contact Information (American Association of Poison Control Center (800) 222-1222).

This Information may be placed on an insert **OR** it can be printed on the package but either way, must adhere to the font requirements above:

- A complete list of all nonorganic pesticides, herbicides, and fertilizers that were used in the cultivation and production of the medical marijuana product.
- Processing technique or solvent(s) used to produce the product.
- A list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the product or that were added to product.
- The date on which the manufacturing batch was created.

Required Warnings must adhere to their own font requirements:

- No smaller than size 8 font
- **Bolded**
- Black font
- **In a bright yellow box**
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Clearly printed in the English language.

These Required Warnings must be on the package:

- “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.”

The OCR’s Universal Symbol must be on the package and on the device:

- Prominently displayed on both the package and the device.
- Larger or equal to 1 inch by 1inch on the package and clear and conspicuous on the device.

Edibles -Solid- Single Serving Unit

Packaging Requirements



This cookie is an example of a single serving unit.

It must contain equal to or less than 10mgs of THC

It must be stamped with the Universal symbol



Stamped Universal Symbol must:

Appear one side of the medical marijuana infused product in a manner to cause the universal symbol to be **distinguishable and easily recognizable**

Be centered either horizontally or vertically on each single serving of marijuana;

If only imprinted on one-side, the imprinted side must be the front or most predominantly displayed area of medical marijuana infused product

If centered horizontally on a serving, the height and width of the universal symbol shall be of a size that is at least 25% of the serving's width, but **not less than ¼ inch by ¼ inch**; or

If centered vertically on a serving, the height and width of the universal symbol shall be of a size that is at least twenty-five

Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable is recommended but not required

Confirm the Packaging:

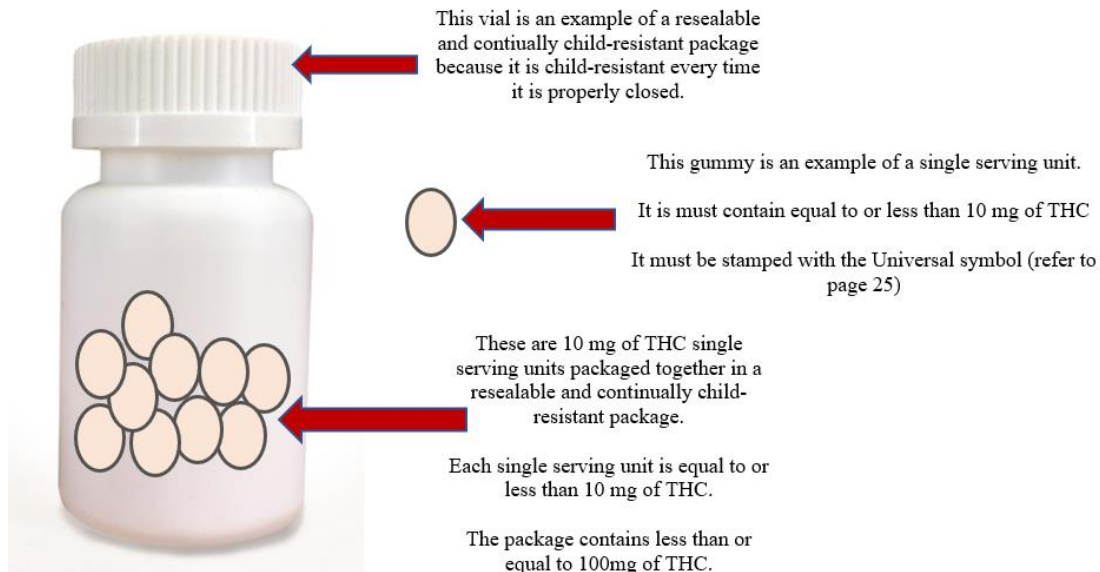
- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Single Serving Unit THC

- A single serving unit cannot exceed **10 mg** of THC.

Edibles -Solid- Multiple Single Serving Units

Packaging Requirements



Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Single Serving Unit THC

- A single serving unit cannot exceed **10 mg** of THC

Multiple Single Serving Units packaged together

- A single serving unit cannot exceed **10 mg** of THC
- A package of multiple single serving units cannot exceed **100 mg** of THC

Edibles – Liquid – Single Serving Unit

Packaging Requirements



Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- May be sealed by a metal crown, cork style or bottle cap type closure
- Resealable is recommended but not required

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Single Serving Unit THC

- A single serving unit cannot exceed 10 mg of THC

Edibles – Liquid – Multiple Single Serving Units

Packaging Requirements



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

Each container can only contain 100mgs or less of THC with each single serving containing equal to or less than 10mgs



The measuring device that must be sold with the product must measure out a single serving unit that is equal to or less than 10mgs.

Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Single Serving Unit THC

- A single serving unit cannot exceed **10 mg** of THC

Multiple Single Serving Units THC

- Each single serving unit cannot exceed **10 mg** of THC
- The total THC per package must not exceed **100 mg**
- The package must contain a measuring device such as a measuring cap or cup.
 - Hash marks on the package do not qualify as a measuring device.

Edibles – Bundled Packages

A bundled package may contain up to the allowable amount of single serving units a patient/caregiver/authorized purchaser is allowed to purchase. Please refer to section 1.14 of the regulations.



Edibles

Labeling Requirements

Font Requirements for required information:

- No smaller than size 6 font
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica
- Must be in Black or White
- Clearly printed in the English language

This required information **MUST** be on the package and adhere to the font requirements above:

- The business(es) 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
- Unique identifier
- Total THC and CBD (Must be in font larger than size 6, **bolded**, underlined and in **red**).
 - Per Single Serving Unit - Cannot Exceed **10 mg** of THC.
 - Per Package - Cannot Exceed **100 mg** of THC.
- Serving Size
- The number of servings per package
- "Use By" Date or Expiration Date
- Poison Control Contact Information (American Association of Poison Control Center (800) 222-1222)

This Information may be placed on an insert **OR** it can be printed on the package but either way, must adhere to the font requirements above:

- A complete list of all nonorganic pesticides, herbicides, and fertilizers that were used in the cultivation and production of the medical marijuana product.
- Net weight of the product prior to its placement in the package.
- 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.
- A nutritional fact panel in accordance with 21 C.F.R. Part 101.
- For **medical marijuana topicals**, a list of all ingredients in descending order of predominance by weight or volume as applicable.
- For **medical marijuana topicals**, the amount recommended for use at any one time
- The date on which the manufacturing batch was created.
- If applicable, the processing technique or solvent(s) used to produce the product.
- If applicable, a list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the product or that were added to product.

Required Warnings must adhere to their own font requirements:

- No smaller than size 8 font
- **Bolded**
- Black font
- **In a bright yellow box**
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Clearly printed in the English language.

These Required Warnings must be on the package:

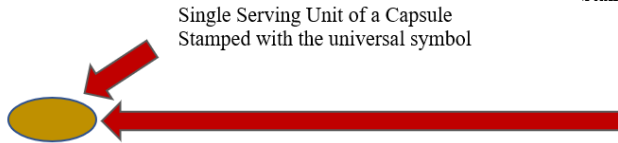
- “Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children.”
- “Warning: It is unlawful to transport this product outside of Rhode Island.”
- “Warning: For medical use by a registered patient only. Not for resale.”
- Slightly larger font, bolded with priority placement -“Effects of this product may be delayed by 3 or more hours.”
- If applicable, “For Topical Application – Do Not Eat or Smoke.”

The OCR’s Universal Symbol must be on the package

- Prominently displayed
- Larger or equal to 1 inch by 1inch.

Ingestible- Solid -Single Serving Unit

Packaging Requirements



Single Serving Unit of a Capsule
Stamped with the universal symbol

Stamped Universal Symbol must:

Appear on one side of the medical marijuana infused product in a manner to cause the universal symbol to be **distinguishable and easily recognizable**

Be centered either horizontally or vertically on each single serving of marijuana;

If only imprinted on one-side, the imprinted side must be the front or most predominantly displayed area of medical marijuana infused product

If centered horizontally on a serving, the height and width of the universal symbol shall be of a size that is at least 25% of the serving's width, but **not less than ¼ inch by ¼ inch**; or

If centered vertically on a serving, the height and width of the universal symbol shall be of a size that is at least twenty-five percent (25%) of the serving's height, but **not less than ¼ inch by ¼ inch**.

Packaging must be:

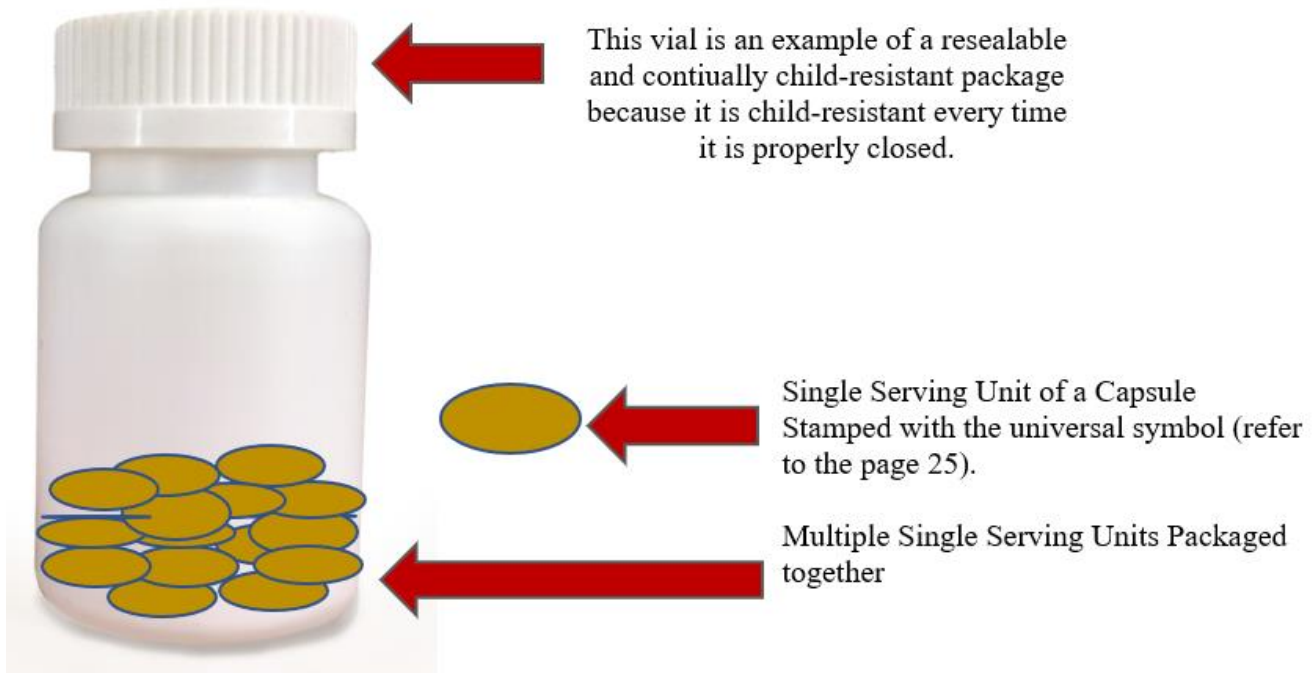
- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable is recommended but not required

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Ingestible – Solid -Multiple Unit Servings

Packaging Requirements



Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Ingestible - Liquid -Single Serving Unit

Packaging Requirements



This cap happens to be resealable and maintains child-resistant standards. It could also be sealed with a cork or metal crown

Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- May be sealed by a metal crown, cork style or bottle cap type closure
- Resealable is recommended but not required

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.

Ingestible – Liquid- Multiple Single Serving Unit

Packaging Requirements



This is child resistant, resealable and maintains child-resistant standard,

Packaging must be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable

Confirm the Packaging:

- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.
- Contains a measuring device such as a measuring cap, cup.
 - Hash marks on the package do not qualify as a measuring device.

Ingestible – Bundled Packages

A bundled package may contain up to the allowable amount of single serving units a patient/caregiver/authorized purchaser is allowed to purchase. Please refer to § 1.14 of the Regulations.



Ingestible

Labeling Requirements

Font Requirements for required information:

- No smaller than size 6 font
- Permitted Types: Times New Roman, Calibri, Arial, Helvetica
- Must be in Black or White
- Clearly printed in the English language

This required information **MUST** be on the package and adhere to the font requirements above:

- The business(es) 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
- Unique identifier
- Total THC and CBD (Must be in font larger than size 6, **bolded**, underlined and in **red**).
 - Per Single Serving Unit
 - Per Package
- Serving Size
- The number of servings per package
- "Use By" Date or Expiration Date
- Poison Control Contact Information (American Association of Poison Control Center (800) 222-1222)

This Information may be placed on an insert **OR** it can be printed on the package but either way, must adhere to the font requirements above:

- A complete list of all nonorganic pesticides, herbicides, and fertilizers that were used in the cultivation and production of the medical marijuana product.
- Net weight of the product prior to its placement in the package.
- 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.
- A nutritional fact panel in accordance with 21 C.F.R. Part 101.
- For **medical marijuana topicals**, a list of all ingredients in descending order of predominance by weight or volume as applicable.
- For **medical marijuana topicals**, the amount recommended for use at any one time
- The date on which the manufacturing batch was created.
- If applicable, the processing technique or solvent(s) used to produce the product.
- If applicable, a list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the product or that were added to product.

Required Warnings must adhere to their own font requirements:

- No smaller than size 8 font
- **Bolded**
- Black font
- **In a bright yellow box**
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Clearly printed in the English language.

These Required Warnings must be on the package:

- “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.”
- Slightly larger font, bolded with priority placement -“Effects of this product may be delayed by 3 or more hours.”
- If applicable, “For Topical Application – Do Not Eat or Smoke.”

The OCR’s Universal Symbol must be on the package

- Prominently displayed.
- Larger or equal to 1 inch by 1inch.

Child-Resistant

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.

The Consumer Product Safety Commission (CPSC) maintains a list of testing firms. A link to that list can be found below. The Office of Cannabis Regulation and CPSC does not approve, certify or endorse any of these firms.

<https://www.cpsc.gov/Regulations-Laws--Standards/Statutes/Poison-Prevention-Packaging-Act/Child-Resistant-Package-Testing>

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 (link below).

<https://www.govinfo.gov/content/pkg/CFR-2012-title16-vol2/pdf/CFR-2012-title16-vol2-sec1700-20.pdf>

It is the licensee's responsibility to ensure that each package is certified as meeting the federal standards set out in 16 CFR 1700 by a qualified, third-party testing firm. Documentation of certification can be requested by OCR at any time.

The Office of Cannabis Regulation will not certify, provide approval, or otherwise deem any packaging as "Child Resistant"

Exit Packaging

Rules and Requirements



- Only medical Marijuana **Flower** and **Concentrates** can be placed into a child-resistant exit package to remain compliant with the child-resistant requirement.
- The Exit Package is not required to be labeled.
- The Exit Package must be opaque, of a neutral color and child resistant.
- The package(s) within the Exit Package containing the retail-ready medical marijuana product must comply with all labeling requirements

Stamped Universal Symbol

Rules and Requirements

- Each single serving unit of a medical marijuana infused product shall be marked, stamped or otherwise imprinted with the OCR-selected universal symbol.



- The symbol must be directly on at least one side of the medical marijuana infused product.
- The stamp must be in a manner to cause the universal symbol to be distinguishable and easily recognizable.
- The universal symbol shall:
 - Be centered either horizontally or vertically on each standardized serving of marijuana; and
 - If only imprinted on one-side, the imprinted side must be the front or most predominantly displayed area of medical marijuana infused product; and
 - The size and width of the universal symbol shall be of a size that is at least twenty-five percent (25%) of the serving's height or width, depending on if the symbol is placed horizontally or vertically, but not less than ¼ inch by ¼ inch.
- The following medical marijuana infused products must be stamped with the universal symbol:
 - Chocolate
 - Soft confections
 - Hard confections or lozenges
 - Consolidated baked goods (e.g. cookie, brownie, cupcake, granola bar)
 - Pressed pills and capsules.