



## 2022 CALIFORNIA PACKAGING AND LABELING REQUIREMENTS FOR “CANNABIS PRODUCTS”

Note: This checklist is for **manufactured cannabis products only** and is not to be used for non-manufactured cannabis such as flower, leaf, kief, shake, and non-infused pre-rolls.

### PACKAGING:

Packaging for cannabis products must: (1) Protect the product from contamination; (2) Be tamper-evident; (3) Be child-resistant (multiple-use CRP for edibles, orally-consumed products, and suppositories) and resealable if multiple-use; (4) Not imitate products typically marketed to children; (5) Be opaque, if the product is an edible. Beverages may be packaged in glass containers that are clear or any color. (6) Tinctures containing 0.5% alcohol or less must be packaged in a container no larger than 2 fluid ounces and include a calibrated dropper or other similar measuring device; (6) Edible cannabis products are limited to 10 milligrams THC per serving and 100 milligrams THC per package, except orally-dissolving products “FOR MEDICAL USE ONLY” which may contain up to 500 mg per package. Topicals may contain up to 1,000 mg THC per package, and 2,000 if “FOR MEDICAL USE ONLY”. (7) Packaging (but not labeling) requirements can be met using any one of multiple layers.

### LABELING:

Labels, except supplemental labels, must be unobstructed, conspicuous and located on the outside of the container or wrapper. Labels must use fonts that are sized in relation to the size of the panel or label and container. Minimum font size is 6 pt. If the product container is separable from the outermost packaging (e.g., a container placed inside a box), the container itself must also include: (1) For edibles, topicals, suppositories, and orally consumed concentrates: all of the primary panel requirements applicable to manufactured cannabis products (including the words “cannabis-infused” for edibles), but not cannabinoid content; (2) For inhaled products (e.g., vape cartridges, dab, shatter, and wax): the universal symbol which on vape cartridges may be sized ¼ x ¼ inches.

**PRIMARY PANEL:** The Primary Panel is to be placed on the part of the packaging usually displayed, and first seen by the consumer. Usually this is the front or top of the packaging. The Primary Panel must include (1) The identity of the product in a text size reasonably related to the most prominent printed matter on the panel; (2) ½ x ½ inch Universal symbol. (3) The net weight or volume of the contents of the package, listed in both metric and U.S. customary units; (4) For edibles only, the words “cannabis-infused” immediately above the identity of the product in bold type and a text size larger than the text size used for the identity of the product. The primary panel may include cannabinoid content, and additional information that does not violate labeling restrictions. Informational Panel requirements, such as the Government Warning, may be placed on the Primary Panel, but if they are, they must be repeated on the Informational Panel.

**INFORMATIONAL PANEL:** The Informational Panel(s) consists of all of the visible outer packaging except the Primary Panel. It must include: (1) The licensed name of the packager and a phone number or website address; (2) The month, day and year of packaging; (3) The following statement in bold print: **“GOVERNMENT WARNING: THIS PRODUCT CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS PRODUCTS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. THE INTOXICATING EFFECTS OF CANNABIS PRODUCTS MAY BE DELAYED UP TO TWO HOURS. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS PRODUCTS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION”**; (4) If applicable, the statement “FOR MEDICAL USE ONLY”; (5) A list of all product ingredients and sub-ingredients in descending order of predominance by weight or volume in the same manner as found on FDA approved food labeling; (6) If the cannabis product contains an allergen, the word “contains,” followed by a list of and applicable major food allergens; (7) The names of any food colorings contained in the product; (8) If an edible, the amount, in grams or milligrams, of sodium, sugar, carbohydrates, and total fat per serving; (9) Instructions for use, such as the method of consumption or application, and any preparation necessary prior to use; (10) The product expiration date, use-by or best-by date, if any; (11) The UID; (12) The batch or lot number; (13) If the cannabis product is perishable or is perishable after opening, the statement, “KEEP REFRIGERATED” or “REFRIGERATE AFTER OPENING,” as applicable; and (14) Cannabinoid content if not included on the Primary Panel. Additional information that does not violate labeling restrictions may be included on the Informational Panel.

**SUPPLEMENTAL LABEL FOR SMALL PACKAGES:** Except for the licensee name, UID and the batch or lot number which must be visible on the outside of the package, Informational Panel requirements may be fulfilled through the use of supplemental labeling, which may include an insert, fold-out or booklet label, or a hang tag. Minimum font size is 6 pt.

**CANNABINOID CONTENT LABELING:** Each package for retail sale must be labeled with the cannabinoid content on either the primary panel or an informational panel. Required content: (1) For edibles, Total THC and CBD content in milligrams per serving and per package. (2) For a topicals and concentrates without serving designations, Total THC and CBD content in milligrams per package. If Total THC or CBD concentration that is less than two (2) milligrams per serving or per package, the THC or CBD may be labeled as “<2.0 mg per serving” or “<2.0 mg per package.” If labeling is done after the Cert. of Analysis is issued then any cannabinoid that is 5% or more of the cannabinoid content must be included. A manufacturer may arrange for cannabinoid content labeling by the distributor after testing but the manufacturer must identify the label location on the outer packaging of the product which is large enough for the label and will not obscure other label information.

**PROP 65 WARNING and SYMBOL.** The “cancer” warning (6 pt type) and symbol must be displayed somewhere on the outside of the package. Use the “short form” “cancer and reproductive warning shown below. Do not use a long form warning that specifies the problematic substance(s) - it is not necessary and is not advised for on-product warnings. The symbol must be printed in black. The rest of the wording may be printed in any contrasting color and does not need to be black. The word “WARNING” must be bolded and all in caps. The interior of the triangle must be yellow (or white if yellow is not otherwise used on the labeling). Instructions and download are at [www.P65warnings.ca.gov](http://www.P65warnings.ca.gov).



WARNING: Cancer and reproductive harm - P65Warnings.ca.gov

**LABELING RESTRICTIONS:** Cannabis product labeling must not contain any of the following: (1) The name of a California county, an appellation of origin, or a similar name (a city or other place name) that is likely to mislead consumers as to the origin of the product, unless one hundred percent of the cannabis contained in the product was grown in that county or place; (2) Content that is, or is designed to be, attractive to children or individuals under the age of 21, including cartoons, images, characters, or phrases that are popularly used to advertise to children; Any imitation of candy packaging or labeling or use of the terms “candy” or “candies” or any variants; (3) Any information that is false or misleading. This includes any health-related statement that is untrue or misleading. Health-related statements must be “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”. “False or misleading” also includes any use of the term “organic”, or any variant, anywhere on the labelling; (4) If the product is an edible, a picture of the product inside; (5) Labeling that states or creates a misleading impression that the product is an alcoholic beverage.

DISCLAIMER: This checklist is believed to be accurate, but it is not all-inclusive and is subject to change. It should not be relied upon for compliance with all laws and regulations relating to packaging and labeling in California. California Department of Public Health (CDPH) checklists for packaging and labeling can be found on the Cannabis Portal at [cannabis.ca.gov](https://cannabis.ca.gov).