

Labeling Requirements: Manufactured Cannabis Products in Final Form

Cannabis goods must be labeled to ensure consumers are informed about what they are buying and to prevent unintended use. These guidelines apply to manufactured cannabis products that are ready to be sold by a licensed retailer.

Labeling placement

Where does the required labeling go?

Most of the required labeling must be placed on the outer layer of packaging or be easily visible through the outer layer of packaging (for example, if the outer-most layer is a clear cellophane wrapper). The outer labeling requirements are divided into two categories, based on the part of the package where it belongs.

- Primary Panel – The part of the label most likely to be displayed to the consumer at retail; usually the front or top of the package
- Informational Panel – Any other part of the label that is not the primary panel

If the product is packaged in a way that the immediate container holding the cannabis good can be separated from the outer packaging (such as a jar placed inside of a box), the immediate container must be labeled with the universal symbol.

What if my package is small and I can't fit all the required information on the outer layer?

You can use a supplemental label to include some of the required information. Examples include: hang-tags, peel-back labels, and inserts.

- Note: QR codes, websites and other methods that separate the information from the product are not acceptable types of supplemental labeling.*

Labeling dos:

- Display information clearly and legibly
- Use English
- Use at least 6-point font
- Make sure all required labeling is displayed on the outer layer of packaging



Labeling don'ts

- Don't use California city or county names — The name of a California city or county can only be used on the label if 100% of the cannabis in the product is grown there.
- Don't make the label attractive to children — This includes using cartoons, images popularly used to advertise to children, imitating candy labeling, and using the words “candy,” “candies” or a variation, such as “kandy” or “kandeez,” anywhere on the label.
- Don't include false or misleading information — This includes anything untrue or unproven, or information that leads consumers to have an inaccurate impression.
- Don't make unproven health claims — Health-related statements, such as claims about a product's ability to treat or cure disease, may not be made unless there is significant scientific agreement and the claims are supported by a totality of publicly-available peer-reviewed evidence. Anecdotal information and preliminary study results do not meet these criteria. *Note: Health-related statements are heavily regulated by the FDA, and cannabis businesses are not exempt from federal prosecution for misleading health statements.*
- Don't include a picture of the product (for edible cannabis products only) — State law requires edibles to be in opaque packaging to reduce the risk that a child would be attracted to the product. Photographs or other images of the product cannot be on the label for the same reason.
- Don't market the product as an alcoholic beverage — More information on this label restriction can be found in Department regulations §15040.1.
- Don't indicate that the cannabis or cannabis good is organic, unless the cannabis or cannabis product is authorized by the National Organic Program. This includes using the words organic or any variations, such as “organix”.
- Don't make any claims that the cannabis or cannabis good is “OCal” certified or made with “OCal” cannabis unless the cannabis or cannabis good meets the standards set in Business and Professions Code §26062.

Labeling checklist (for outer layer of packaging)

Primary panel — The part of the label displayed to consumers at retail; usually the front or top of the package.

- Product identity — A generic or common name that describes the product. Examples include chocolate, fruit chew, vape cartridge, lotion, and tincture.
- Universal symbol — The California symbol that identifies an item as containing cannabis. It must be printed in black and no smaller in height than 0.5 inch (except for vape cartridges, where it cannot be smaller than 0.25 inch by 0.25 inch)
- Net weight or volume (in both metric and U.S. customary units) — The weight or volume of the contents of the package.



Edible cannabis product labels must also include:

- “Cannabis-Infused”— These words must be listed above the product identity, in a bold font and larger text size than the one used for the product identity.

Informational panel— any part of the label that is not the primary panel.

- Manufacturer name and contact information* — Must be a name listed on the license certificate (either the legal business name or the registered DBA), and their phone number or website.
- Date of packaging for retail sale — Include month, day and year. (Example: PKG: 02/23/19)
- Government warning statement for cannabis products* (capital letters and bold font).
- UID number — The unique tracking number issued through the track and trace system
- Batch or lot number.
- Instructions for use and any preparation needed*— For example, the method of consumption or application.
- List of all ingredients* (in descending order by weight or volume) — Include sub-ingredients, if any. *Note: listing of flavorings must be compliant with 21 Code of Federal Regulations section 101.22*
- Allergens* (if applicable) — The word “Contains,” followed by a list of any major food allergen in the product. The major food allergens are milk, egg, tree nuts, wheat, peanuts, soybeans, fish or crustacean shellfish. Use the format prescribed by the US FDA for food labeling (21 USC §343(w), paragraph (1)(A) or (1)(B).)
- Artificial food colorings* (if applicable)
- “KEEP REFRIGERATED” or “REFRIGERATE AFTER OPENING” * (if perishable after opening).
- “FOR MEDICAL USE ONLY” * (if applicable) — Manufacturers must include these words on the label if the product contains a THC concentration that can only be sold in the medicinal market.

Edible product labels must also include:

- Sodium, sugar, carbohydrates, and total fat per serving* (in milligrams or grams).

** Indicates labeling information that may be placed on a supplemental label*

Cannabinoid content labeling – May be on either the primary or informational panel and can be placed on the label before releasing to distribution or by the distributor on the licensed distribution premises after issuance of a regulatory compliance testing Certificate of Analysis for the batch.

Labeled before testing:

- For infused pre-rolls:
 - THC and CBD in milligrams per serving or
 - The Total THC of the dried flower expressed as a percentage and the added THC and CBD in milligrams
- For manufactured cannabis products:
 - THC and CBD in milligrams per package (for all manufactured products)
 - THC and CBD in milligrams per serving (for edibles and concentrates with designated serving sizes)

NOTE: THC or CBD content that is less than 2 mg per package or per serving can be labeled as “<2 mg per package” or “<2 mg per serving”

Labeled after testing:

- For infused pre-rolls:
 - THC and CBD in milligrams per serving or
 - The Total THC of the dried flower expressed as a percentage and the added THC and CBD in milligrams
- For manufactured cannabis products:
 - THC and CBD in milligrams per package (for all manufactured products)
 - THC and CBD in milligrams per serving (for edibles and concentrates with designated serving sizes)
 - Any other cannabinoid that makes up 5% or more of the total cannabinoid content

NOTE:

- The cannabinoid amount reflected in the COA may be rounded to the nearest whole number, except that the labeled amount cannot exceed the legal limit for cannabinoid content.*
- If the THC or CBD content is listed on the COA as “non-detect” or “below LOQ,” the content must be labeled as either “0 mg” or “<2 mg”*

The Department of Cannabis Control (DCC) licenses and regulates commercial cannabis activity within California. To learn more about the California cannabis market, state licenses or laws, visit cannabis.ca.gov. Email questions to info@cannabis.ca.gov or call 1-844-61-CA-DCC (1-844-612-2322).

