

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. Cannabis products must be in their final form and packaged and labeled for retail sale before they can be transferred to a licensed distributor for regulatory compliance testing. These guidelines apply to manufactured cannabis products that are ready to be sold by a licensed retailer.

The checklist below will help you verify that your labeling complies with Department requirements. A complete list of requirements can be found in the [Department of Cannabis Control's regulations](#). (Cal. Code Regs., tit. 4, Div. 19).

Labeling placement (4 CCR §§ 17402, 17404, 17406)

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 cannabis 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. For vape cartridges and vaporizers, the universal symbol cannot be smaller than 0.25 inch by 0.25 inch on the product itself.

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 (e.g., hanging tags, fold-out or booklet label, and package inserts).

Note: Supplemental labeling must be affixed to the cannabis product; QR codes, websites and other methods that separate the information from the cannabis product are not acceptable types of supplemental labeling



Labeling dos (4 CCR §§ 17402, 17404)

- Display information clearly and legibly
- Use English
- Use type size no smaller than 6 point font
- Make sure all required labeling is displayed on the outer layer of packaging in a manner that is unobstructed and conspicuous so that it can be read by customers
- Additional cannabis product information may be added as long as it is truthful and not misleading

Labeling don'ts (4 CCR §§ 17408, 17409)

- Don't use California city, county, or city and county names —The name of a California city, county, or city and county can only be used on the label if 100% of the cannabis in the cannabis product is produced there. A cannabis plant is considered to have been produced within a city, county, or city and county if it was cultivated within that jurisdiction starting from the time the plant was no taller or wider than 18 inches.
- 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 untrue or misleading information — This includes anything untrue or unproven, or information that leads consumers to have an inaccurate impression of the cannabis product.
- 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 scientific 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) — Edibles must be in opaque packaging to reduce the risk of a child being attracted to the product – except for beverages which may be packaged in glass containers that are clear or any color. 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 — Cannabis products shall not be labeled as beer, wine, liquor, spirits, or any other term used to describe a type of alcohol or alcoholic beverage that may create a misleading impression that the product is an alcoholic beverage as defined in division 9 of the Business and Professions Code.



- 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

(4 CCR §§ 17404, 17405, 17410) – 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 (e.g., chocolate, fruit chew, vape cartridge, lotion, tincture).
- Net weight or volume (in both metric and U.S. customary units) of the contents of the package.
- Universal symbol – The California symbol that identifies an item as containing cannabis. It must be printed in black or white and made conspicuous by printing the symbol on a contrasting color. It must be no smaller in height than 0.5 inch.
- Note: The symbol can be downloaded at cannabis.ca.gov/cannaconnect.

Edible cannabis product labels must also include:

- "Cannabis-Infused" or "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

(4 CCR § 17406) – 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 (e.g., PKG: 02/23/19).
- Government warning statement for cannabis products* (in capital and bold letters).
- "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;”

- UID number — The unique tracking number issued through the track and trace system.
- Batch or lot number.
- Instructions for use and any preparation needed* (e.g., 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, sesame, 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

(4 CCR § 17407) – 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 package 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 package 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).

