

Labeling Requirements: Non-manufactured Products In Final Form

Cannabis must be properly labeled to make sure consumers are informed about what they are buying and to prevent unintended use. These guidelines cover labeling requirements for non-manufactured cannabis goods 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, 17403, 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.

Labeling dos (4 CCR §§ 17402, 17403)

- Display information clearly and legibly
- Use English
- Use type size no smaller than 6 point font
- Make sure all labeling information is shown on the outer layer of packaging in a manner that is unobstructed and conspicuous so that it can be read for 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 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 individuals under the age of 21 — 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.
- 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 indicate that the cannabis is organic. This includes using the word “organic” or any variations, such as “organix”.
- Don't make any claims that the cannabis is “OCal” unless the cannabis meets the standards set in Business and Professions Code §26062

Labeling checklist (for outer layer of packaging)

Primary panel

(4 CCR §§ 17403, 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 item (e.g., flower or pre-roll).
- Net weight of the cannabis in the package — List weight in both metric and U.S. customary units. (Example: NET WT. 3.5 oz. (99.2 g))
- 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 www.cannabis.ca.gov/cannaconnect.



Informational panel

(4 CCR § 17406) – any part of the label that is not the primary panel

- UID number — The unique tracking number issued through the track and trace system
- Licensee name and phone number or website — The licensee name can be either the name of the licensed cultivator or licensee packaging the product and must be a name listed on the license certificate (either the legal business name or the registered DBA).
- Date of packaging for retail sale — Include month, day and year. (Example: PKG: 02/23/19)
- Government warning statement for nonmanufactured cannabis goods (in capital and bold letters)

“GOVERNMENT WARNING: THIS PACKAGE CONTAINS CANNABIS, A SCHEDULE I CONTROLLED SUBSTANCE. KEEP OUT OF REACH OF CHILDREN AND ANIMALS. CANNABIS MAY ONLY BE POSSESSED OR CONSUMED BY PERSONS 21 YEARS OF AGE OR OLDER UNLESS THE PERSON IS A QUALIFIED PATIENT. CANNABIS USE WHILE PREGNANT OR BREASTFEEDING MAY BE HARMFUL. CONSUMPTION OF CANNABIS IMPAIRS YOUR ABILITY TO DRIVE AND OPERATE MACHINERY. PLEASE USE EXTREME CAUTION.”

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:

- Total THC expressed as a percentage (Total THC is the sum of THC, delta 8 THC, and THCA. For information on how to calculate Total THC, see Cal. Code Regs., tit. 4, § 15700(rrr))

Labeled after testing:

- Total THC expressed as a percentage
- Any cannabinoid that is 5% or more of the cannabinoid content

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).