

# LABELING REQUIREMENTS

## MANUFACTURED CANNABIS PRODUCTS



Cannabis products must be properly labeled to ensure consumers are informed about what they are purchasing and to prevent unintended use. These guidelines apply to manufactured cannabis.

### LABELING PLACEMENT

#### Where does the required labeling go?

Most of the required labeling must be placed on the outer layer of packaging. 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; typically the front or top of the package
- **Informational Panel** – any other part of the label that is not the primary panel

If the product has multiple layers of packaging, you must also include basic labeling on the inner container that holds the cannabis product:

- Inhaled cannabis products (vape cartridges, shatter, wax, etc.) – must include the universal symbol
- Non-inhaled cannabis products (edibles, tinctures, topicals, etc.) – must include the product identity, universal symbol and net weight or volume. Edible products must also include the words “Cannabis-Infused.”

#### What if my package is small and I can't fit all of 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.

### DOs

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

### DON'Ts (§40410)

- **California county names** – Unless 100% of cannabis in the product is grown in the county, the name of a California county cannot be included on the label.
- **Cannot be 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.
- **Cannot include false or misleading information** – This includes anything untrue or unproven, or information that leads consumers to have an inaccurate impression, or the use of the word “organic” anywhere on the label.
- **Cannot 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 this criteria.

Note: Health-related statements are heavily regulated by the FDA, and cannabis businesses are not exempt from federal prosecution for misleading health statements.

- **Cannot include a picture of the product (for edible cannabis products only)** – State law required 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.
- **Cannot market the product as an alcoholic beverage** – More information on this label restriction can be found in the Bureau of Cannabis Control regulations §5041.1.

#### FIND MORE HELP ONLINE

Visit the CDPH website for more information on the packaging and labeling requirements: [www.cdph.ca.gov/mcsb](http://www.cdph.ca.gov/mcsb)

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### LABELING CHECKLIST (FOR OUTER LAYER OF PACKAGING)

**PRIMARY PANEL** — the part of the label displayed to consumers at retail; typically 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, tincture, etc.
- Universal symbol** (in black, at least 0.5" x 0.5") — The California symbol that identifies items as containing cannabis. Download the symbol at [www.cdph.ca.gov/mcsb](http://www.cdph.ca.gov/mcsb).
- 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 manufacture/packaging\*** — One date may be used. Include month, day and year. (Example: MFG/PKG: 02/23/19)
- Government warning statement for cannabis products\*** (capital letters and bold font)
- UID number**— The unique tracking number issued through Track-and-Trace  
Note: This requirement will begin when you receive your Track-and-Trace login. Do not create a placeholder UID number.
- 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
- 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 specific food name when disclosing allergens (i.e. "almonds" instead of "tree nuts").
- Artificial food colorings\*** (if applicable)
- Expiration, use-by or best-by date\*** (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)

**OTHER LABELING** — may be on either the primary or informational panel

- Cannabinoid content** (in milligrams) — Cannabinoid content may be added to the label by the manufacturer before testing or on the distribution premises after testing.
  - THC and CBD per package (for all manufactured products)
  - THC and CBD per serving (for edibles and concentrates with designated serving sizes)
  - Any other cannabinoid that makes up 5% or more of the total cannabinoid content (if labeled after testing)

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

### ADDITIONAL REQUIREMENTS

**Prop 65 Warning** (if applicable) — Proposition 65 requires businesses to provide a clear and reasonable warning before knowingly and intentionally exposing anyone to chemicals that are known to the state to cause cancer or birth defects or other reproductive harm. For more information on Prop 65 and applicable requirements, visit <https://oehha.ca.gov/proposition-65>.

**CRV Recycling** (for beverages, if applicable) — Beverage manufacturers are responsible for labeling qualifying beverage containers with recycling information. For more information, visit <https://www.calrecycle.ca.gov/bevcontainer>.