

PACKAGING REQUIREMENTS

CANNABIS AND CANNABIS PRODUCTS



The Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) included basic requirements for how cannabis and cannabis products must be packaged before sale. These requirements apply to all cannabis flower, pre-rolls and manufactured cannabis products. They do not apply to shipping or transport containers.

DOs

- ✔ Package manufactured cannabis products prior to transfer to a distributor as finished product. Cannabis flower may be packaged by a cultivator, manufacturer or distributor.
- ✔ Protect the product from contamination.
- ✔ If a product has multiple layers of packaging, the packaging requirements can be fulfilled using any one of those layers.

DON'Ts

- ✘ Cannot imitate packaging used for products typically marketed to children.
- ✘ Cannot imitate packaging used for non-cannabis food products.

PACKAGING CHECKLIST

- Tamper Evident** – A consumer knows if the package has been opened.
Ex: a plastic seal, a sticker across the lid that is ripped when opened, a jar with a lid that pops up after opening, etc.
- Child Resistant** – The packaging meets the standard for child-resistant under the federal Poison Prevention Packaging Act of 1970. See back of this handout for more information.
- Resealable [For products with multiple uses]** – The package can be closed after each use.
Ex: a lid, adhesive closure, box top closure, etc.
- Opaque [For edibles only]** – The package is not transparent; consumers cannot see the product through the packaging.

CHILD RESISTANT PACKAGING

Child-resistant packaging (CRP) is packaging that is designed to be difficult for children under five years of age to open. The standards for child-resistant packaging are listed in the federal Poison Prevention Packaging Act of 1970 (PPPA, 16 CFR §1700.1).

State law requires all cannabis and cannabis products to be in child-resistant packaging.

Types of CRP:

- **Single Use (“Initial CRP”)** – the package is initially child resistant, but once opened, it is no longer child resistant.
- **Multiple Use (“Lifetime CRP”)** – the package maintains its child resistance throughout the life of the package. It can be opened and closed, and it remains child resistant.

FAQs

What type of CRP does my product need?

Under the Emergency Regulations, only edibles must be packaged in lifetime CRP. Cannabis and all other cannabis products must be packaged in initial CRP.

Is my package child resistant?

Packaging receives certification after it passes testing and is proven to meet the PPPA standard. Ask your packaging supplier if the packaging you are considering has proof of certification.

Why can't exit packages be used to satisfy CRP requirements?

Exit packaging, used at the time of retail sale, is not required to be child-resistant and therefore cannot be used to satisfy the statutory requirement for child-resistant packaging.

For More Information on CRP

The Consumer Product Safety Commission, which administers the PPPA, has additional information about what qualifies as child-resistant, the procedures for testing and certification, and a list of testing firms: <https://www.cpsc.gov/Regulations-Laws-Standards/Statutes/Poison-Prevention-Packaging-Act>.