PACKAGING REQUIREMENTS

CANNABIS AND CANNABIS PRODUCTS

The Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) includes basic requirements for how cannabis and cannabis products must be packaged before sale. These guidelines apply to all cannabis flower, pre-rolls and manufactured cannabis products sold within California.

PACKAGING CHECKLIST

☐ Tamper Evident – A consumer knows if the package has been opened.
  Example: 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 package is designed to be difficult for children under five years of age to open. See below for more information about what qualifies as child resistant.

☐ Resealable (for products with multiple uses) – The package can be closed after each use.
  Example: 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.
  *Amber-colored bottles are considered opaque.
  *Opaque bottles used for beverages may use a single, vertical, clear strip less than 0.25” wide to indicate serving sizes.

DOs

- Cannabis flower may be packaged by a cultivator, manufacturer or distributor. Manufactured cannabis products must be packaged and labeled by the manufacturer prior to transfer to a distributor as finished products.
- Protect products from contamination and exposure to any toxic or harmful substances
- 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

CHILD-RESISTANT PACKAGING (CRP)

State law requires all cannabis and cannabis products to be in child-resistant packaging. Until December 31, 2019, a child-resistant exit package, used by a retailer at the time of sale, may be used to fulfill the CRP requirement. Beginning January 1, 2020, every individual product must be in a child-resistant package.

What qualifies as child-resistant packaging?

- Packages that have been certified as child-resistant, in accordance with the federal Poison Prevention Packaging Act (PPPA, 16 CFR §1700.1)
- A bottle sealed with a pry-off metal crown bottle cap
- Plastic packaging that is at least 4 mils. thick and heat-sealed without an easy-open tab, dimple, corner or flap

Types of CRP:

- Single Use (“Initial CRP”) – the package is initially child-resistant, but once opened, it is no longer child-resistant. If used, the package's label must say “This package is not child-resistant after opening.”
- Multiple Use (“Lifetime CRP”) – the package maintains its child-resistance throughout the life of the package. It can be opened and closed, but still remains child-resistant.

WHAT REQUIRES INITIAL CRP?

- Flower and flower-only pre-rolls
- Inhaled concentrates (infused pre-rolls, vape cartridges, shatter, wax, etc.)
- Topicals
- Single-serving cannabis products

WHAT REQUIRES LIFETIME CRP?

- Edibles
- Orally-consumed concentrates (tinctures, capsules, etc.)
- Suppositories

NOTE: A package containing multiple servings is not required to be in lifetime CRP if each individual serving is in child-resistant packaging.