

# SUMMARY OF 15-DAY CHANGES

## PROPOSED REGULATIONS FOR CANNABIS MANUFACTURING

The California Department of Public Health (CDPH) published proposed regulations for cannabis manufacturing on July 13, 2018, the first step toward adopting non-emergency regulations. CDPH received valuable feedback during the 45-day public comment period and, in response, modified the proposed regulations.

These changes, published on October 19, 2018, mark the next step in the formal rulemaking process and the opening of a 15-day public comment period. All changes are sufficiently related to the Notice of Proposed Action published in July at the start of the rulemaking process.

*Note: The summary below describes language in the proposed regulations. These are not effective until the rulemaking process is complete. Until then, the emergency regulations remain in effect.*

### Summary of Modifications to the Proposed Regulations

#### Post-Testing Labeling of Cannabinoids

Proposed revisions to the Labeling section allow cannabinoid content to be labeled either by the manufacturer before release to the distributor or at the distribution premises after regulatory compliance testing. This revision seeks to ease constraints on the supply chain caused by label claim failures and to provide consumers with the information needed to make informed purchases.

#### Child-Resistant Packaging

Proposed revisions to the Packaging section reincorporate the requirement for product packaging to be child resistant beginning January 1, 2020. The revisions permit the use of either child-resistant exit packaging or child-resistant product packaging until January 1, 2020 to fulfill the statutory requirement.

#### Good Manufacturing Practices

Proposed revisions to the Good Manufacturing Practices (GMPs) section provide greater clarity to the processes and documentation required when manufacturing cannabis products, and the relationship between best practices and the prevention of product contamination, adulteration and misbranding.

The revised language incorporates existing law in the California Health & Safety Code and provides more specificity on how to meet the requirements.

#### Repackaging of Edible Products

Proposed revisions to the Remediation section permit edible cannabis products to be repackaged if they are found during regulatory compliance testing to exceed the 'per package' limit of 100 mg THC. Repackaging of edible products requires submission and approval of a corrective action plan. The edible cannabis product itself cannot be altered in any way.

To view the proposed regulations or learn more about public participation in the rulemaking process, visit [www.cdph.ca.gov/mcsb/rulemaking](http://www.cdph.ca.gov/mcsb/rulemaking).