PACKAGING AND LABELING GUIDE

FOR MEDICAL AND RECREATIONAL MARIJUANA – VERSION 6.2

December 2025

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This document is meant to help explain the packaging and labeling rules. However, this guide should not replace a thorough reading of the rules. All licensees, registrants, and hemp certificate holders are required to follow and understand the packaging and labeling rules as found in OAR 845-025-7000 through 845-025-7190.

BEFORE YOU BEGIN

** The packaging and labeling rules discussed in this document apply to marijuana and hemp items that are for ultimate sale to a consumer, patient, or designated primary caregiver. This means packages and labels that are going to be sold or transferred to a patient, caregiver, or consumer. These rules do not apply to items that are undergoing lab sampling/testing or bulk transfers of product from one licensee to another. For the rule governing transportation of bulk product between licensees, refer to OAR 845-025-7700. **

For the purposes of this document, the following terms are defined as follows:

- **Licensee**: any person or entity who holds a license issued by the Oregon Liquor & Cannabis Commission under ORS 475C.070 (Production license), 475C.090 (Processor license), 475C.100 (Wholesale license), 475C.105 (Retail license), or 475C.560 (Laboratory license).
- **Registrant**: means a person or entity registered with the Oregon Health Authority under ORS 475C.785 to 475C.949.
- **Hemp Certificate Holder**: a person or entity who has been issued an Industrial Hemp Certificate by the OLCC.

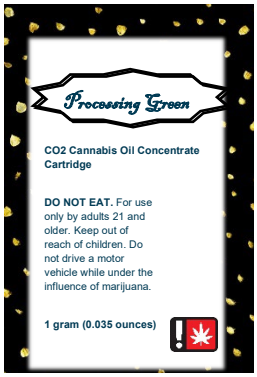
The Oregon Liquor and Cannabis Commission (OLCC), Oregon Health Authority (OHA), or Oregon Department of Agriculture (ODA) may have additional requirements that are not covered in this guide so it is important to read and understand the rules.

This guide is not a replacement for reading the rules.

DIFFERENCE BETWEEN PACKAGES AND LABELS

When applying for package or label approval, it is important to understand the difference between packages and labels. A package is a physical structure that holds and protects the product. The label is all of the text, graphics, pictures, and logos printed on or affixed to the package. **Packages and labels are two distinct things**.

PACKAGE – the Mylar bag on its own without any design or text elements



LABEL – includes the printed design, the logo, and all the text anywhere on package

PACKAGING

General Requirements

Small round jar placed inside of a cardboard box. Both the jar and the box are considered "containers."

Each marijuana and hemp item must be packaged in a container that conforms to the rules found in OAR 845-025-7000 through 845-025-7190. A "container" is defined as a sealed, hard or soft-bodied receptacle in which a marijuana or hemp item is placed and any outer receptacle intended to display a marijuana or hemp item for ultimate sale to a consumer. This definition refers to any package or receptacle that holds a marijuana or hemp item and all outer packages used to display the marijuana or hemp item. For example, if a licensee packages an extract in a small round jar and then puts that jar into a cardboard box, both the jar and the box will be considered containers.

OAR 845-025-7160 requires all licensees, registrants, and hemp certificate holders who package marijuana or hemp items for ultimate sale to a consumer, patient, or designated primary caregiver to get packages and labels approved through the OLCC pre-approval process (see Pre-approval Process Section).[1] "Ultimate sale" means the final sale from a retail location or dispensary to a consumer, patient, or designated primary caregiver. Packages and labels must be approved before any marijuana or hemp item is sold, offered for sale, or transferred between licensees or to a consumer, patient, or caregiver, unless subject to an exception.

[1] Generic labels and pre-approved packages do not need to be approved by the OLCC. More information about these topics is included later in this guide.

Packages must protect the marijuana and hemp items they hold. Packages and containers that hold marijuana or hemp items must protect those items from contamination and must not impart any toxic or deleterious substance to the packaged item. See OAR 845-025-7020(1).

Packages cannot contain untruthful or misleading statements. A false or misleading statement is one that is either not true or a statement that implies something about the product or package that is not true. For example, a label making a claim that the product in the package treats or cures a disease, when there is no significant scientific information to support that claim, would be a misleading statement. Similarly, labeling a product or its ingredients as "organic" when the product has not been properly certified would also be a misleading statement. See the sections on Organic and Health Claims for more information.

Packages must be labeled as required by OAR 845-025-7000 through 845-025-7190. A package must contain a complete and compliant label. The label can be printed directly on the package, securely affixed to the package, or both. All label information must comply with the labeling rule requirements.

All marijuana and hemp items, except usable marijuana and hemp (including plain pre-rolls), immature plants, and seeds, must leave the retail store in a continuously resealable child-resistant package. The marijuana or hemp item can either be packaged in a container that is child-resistant or the item can be placed into a child-resistant exit package at the point of sale.

IMPORTANT! ***In order for a package to be considered child-resistant, the package must be tested and certified as meeting the federal standards set out in 16 CFR 1700 by a qualified, third-party testing firm. A list of Testing Firms can be found at the end of this guide.***

Child-resistant packages come in two forms: (1) single-use and (2) resealable and continually child-resistant. A single-use, child-resistant package is one that meets the child-resistance standard for a single use and is child resistant until it is opened. A resealable and continually child-resistant package is one that is capable of being resealed after being opened and maintains child-resistant properties throughout the life of the product.

Resealable and Continually, Child-Resistant **vs.** **Single-Use, Child-Resistant**

This vial is an example of a resealable and continually, child-resistant package because it is child-resistant every time it is properly closed.

This Mylar bag is an example of a single-use package because once it is opened, it is no longer child-resistant.

Usable marijuana and hemp (including plain pre-rolls), immature plants, and seeds **do not** require the use of child-resistant packages. Prior to the final sale or transfer to a consumer, patient, or designated primary caregiver, all other marijuana and hemp items must be packaged in a resealable and continually child-resistant package – the item may be placed directly in a container that meets the child-resistance standard outlined in the table below or a non-child-resistant container may be placed in an approved child-resistant, exit package. If the container holding the marijuana or hemp item is not child resistant and continuously resealable, the exterior label must bear the warning "This package is not child resistant." and would require the use of a child resistant exit package. See the table on the next page.

Type of Packaging Required	Resealable & Child-Resistant	Child-Resistant Packaging Not Required
Type of Marijuana or Hemp Item Sold	• **Edibles** • **Topicals** • **Tinctures and Capsules** • **Concentrates and Extracts** • **Transdermal Patches and Suppositories** • **Cannabinoid Products (e.g. infused pre-rolls, & inhalable cannabinoid products with non-cannabis additives)**	• **Usable Marijuana** • **Usable Hemp** • **Immature Plants** • **Seeds**

***IMPORTANT!* Products may be packaged directly into containers that are OLCC approved and certified child resistant or the packaged product may be placed into an approved exit package at the point of sale.**

CHILD-RESISTANT PACKAGING

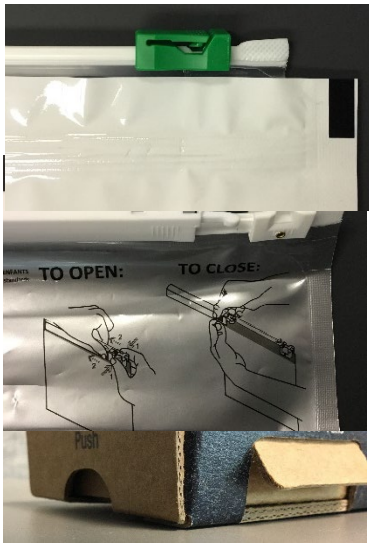
The term "child resistant" is defined in OAR 845-025-7000 as packaging that is designed or constructed to be significantly difficult for children under five years of age to open and not difficult for adults to use properly. Under OAR 845-025-7020, all marijuana and hemp items for sale to a consumer, patient, or designated primary caregiver, except for usable marijuana and hemp (including plain pre-rolls), immature plants, and seeds, must be packaged in a container that is child-resistant as certified by a qualified third party child-resistant package testing firm.

The standard for child-resistant packaging is set by the Consumer Product Safety Commission (CPSC). To determine whether a package meets the standard for child-resistance, a third-party testing firm follows the testing procedure found in 16.CFR.1700.20. If a package has been tested by a qualified firm, proof of certification must be provided to the OLCC before the OLCC can approve the package as meeting the child-resistant standard.

The CPSC maintains a list of testing firms. The OLCC does not endorse or recommend any of the firms listed.

EXIT PACKAGING

OAR 845-025-7000 defines "exit package" as "a sealed, child-resistant certified receptacle into which marijuana items or hemp items already within a container are placed at the retail point of sale." Exit packages can be used to add child resistance to a container that is not child resistant on its own. Because all marijuana and hemp items, except usable marijuana and hemp (including plain pre-rolls), immature plants, and seeds, must leave the dispensary or retail store in a child-resistant container, placing a non-child resistant container inside of an approved exit package will satisfy the child-resistant requirement. Marijuana or hemp can be displayed in the store in non-child resistant packages but those packages must be placed in child-resistant exit packages at the point of sale. Additionally, multiple products can be placed in the same exit package at the point of sale.



Just like other types of packages, all exit packages must be approved through the OLCC Pre-approval Process. The fee for approval is $100 per package. Any package on the approved list may be used without additional approval. When certain changes are made to an approved package or label, the new package and / or label must be resubmitted to the OLCC. See the ***Pre-Approval Process*** section for more information.

Pursuant to OAR 845-025-7030, all exit packaging must contain a label that reads: "Keep out of the reach of children" in legible, typed font. This warning is the only required label information for an exit package. An exit package that

has only this required warning printed on it[2] without any additional text, graphics, logos, or pictures, would have a generic label that would not require OLCC label pre-approval. However, if the exit package contains any logos, pictures, graphics, or additional text not required by rule, the label is not generic and would need to be submitted for label pre-approval with an additional $100 fee.

The exit package may be provided by the producer, processor, or wholesaler that packaged the marijuana or hemp item for sale or the retail store or dispensary where the marijuana or hemp item is sold. Regardless who provides the exit package, it must be approved for use by the OLCC.

Retailer / Dispensary Responsibility

The retailer or dispensary is responsible for making sure that products that require a child-resistant exit package leave the store in an approved exit package. If the container holding the marijuana or hemp item is child resistant and on the OLCC approved list, it does not need an exit package. However, if the item is not in a child-resistant package, the retailer or dispensary is responsible for making sure that the marijuana or hemp leaves the store in an OLCC-approved exit package. If the package has not been approved by the OLCC, it cannot be used. If the exterior label has the warning "This package is not child resistant." then the use of an exit package would be required.

Re-using Packaging

Only packaging that is resealable and continually child-resistant may be re-used. If a marijuana or hemp item is placed in a package that is being re-used, the old label or labels must be removed, and the package must have a new label or labels attached to it. Additionally, any packaging that is being re-used must be clean. The package cannot contaminate the marijuana or hemp item and must not expose the item to any toxic or deleterious substances. Exit packages may be reused as long as they are re-sealable, remain child resistant throughout the life of the product, and are in good working order.

LABELING

General Requirements

All containers must be properly labeled. This includes any container that holds a marijuana or hemp item as well as any container used to display a marijuana or hemp item for ultimate sale. For information on small or tiny container labels, read the Small and Tiny Container Labeling section.

A label is any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed, molded into, embossed on, printed on, or appearing upon or adjacent to a package containing a marijuana or hemp item for purposes of branding, decorating, identifying, or giving any information with respect to the item or to the contents of the package. If a package contains multiple stickers or has some information printed directly on the container and the rest of the information on a sticker, all of the information is considered part of one label.

IMPORTANT! ***The container holding the item must be properly labeled no matter how small it is. Additionally, any outer container must also be properly labeled. The label information required on each label depends on the type of product and the size of the container.***

[2] A generic label on an exit package may also contain instructions for opening or using the child-resistant package. The instructions will not make the label non-generic.

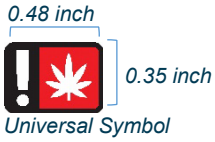
Each marijuana product type has specific requirements that must be included on the label. The label requirements for each product type can be found in OAR 845-025-7000 through 845-025-7190. All labeling requirements outlined in the rules are considered required information that must be included on the label. Failure to include required information on a label may result in the denial of a label application or compliance action. For a checklist of the specific requirements for each product type, go to the Label Checklist section. If a container is too small to fit all of the required information, a small or tiny container label may be utilized. See the Small and Tiny Container Labeling section. Regardless of the product type, all labels must follow the same general requirements.

All the required information on a label must:

1. Be in typed, legible font that is *at least* 1/16th of an inch in height based on the uppercase "K";
2. Be in a font that is easy to read and contrasts sufficiently with the background;
3. Be in English, but the information can be included in other languages;
4. Be unobstructed and conspicuous, meaning that all required information must be visible on the outside of the package; and
5. Be printed on or securely affixed to the package, meaning that the label will not fall off or be removed during transportation or normal use of the product.

Additionally, <u>every</u> label must contain:

1. A principal display panel as defined by OAR 845-025-7000. (See the Principal Display Panel Section for more information);
2. The universal symbol (at least 0.48 inches wide by 0.35 inches tall); and
3. All of the information required by rule for the specific product type (plant, seed, usable marijuana, edible, topical, concentrate, extract, or tincture).



Universal Symbol

Non-required information can be in any font or size. Although there is a font size requirement for all required information, any additional information that is not required by rule may be in any font type and size as long as that text complies with the rest of the rules.

A package may have more than one label panel attached or affixed to it. Label information can be printed directly on the package, affixed to the package (e.g. with glue or as a sticker), or embossed into or printed directly on the package. For example, printing some required information directly onto a mylar bag and including the rest of the required information as a sticker is compliant under the rules. Both the sticker and the information printed directly on the bag will be considered to be two parts of one label.

This photo shows a package with two label panels. Both label panels are considered part of one label.

If your product falls into one or more categories that item must comply with the labeling requirements for both categories. For example, a concentrate that can also be consumed like an edible must have the labeling requirements for both concentrates and edibles, with the exception of the "**DO NOT EAT**" warning because the product is intended for human consumption and the "**BE CAUTIOUS**" warning if the effects of the product are customarily felt immediately.

Testing information for all laboratories and tests must be included on the label. Under OAR 845-025-7030, when listing the potency on a label, the amount of THC and CBD must be the value calculated by the laboratory that did the testing in accordance with OAR 333-064-0100. The potency value shall be expressed as an average of the samples taken and tested under OAR 333-007-0360. A label may **not** have a THC value that exceeds the applicable maximum concentration limit by over 10 percent as specified in OAR 333-007-0200 through 333-007-0220. For more information about labeling THC and CBD, see the Potency section below.

If an item was tested by more than one lab or has more than one test analysis date associated with it, each lab and test analysis date must be included on the label. For example, if one lab tests for THC concentration and a different lab tests for pesticides, the information for both labs and tests must be included on the label. Similarly, if a first test fails and a subsequent re-test passes, the information for both tests must be included on the label.

Under OAR 845-025-7030, if the potency value for THC or CBD is reported by the laboratory as less than the limit of quantification, the value on the label must be listed as "<LOQ".

For cannabinoid edibles, cannabinoid tinctures, and cannabinoid capsules tested on and after January 1, 2025, if the delta-9-THC is less than 90% of the total THC, the label must separately display the delta-9-THC and THCA.

Label Prohibitions

OAR 845-025-8040 contains advertising restrictions, which apply to labels:

1. Contain any untruthful or misleading statements, including incorrectly using the term "organic" or making an unsubstantiated health claim;

2. Specifically encourage the transportation of marijuana items across state lines;

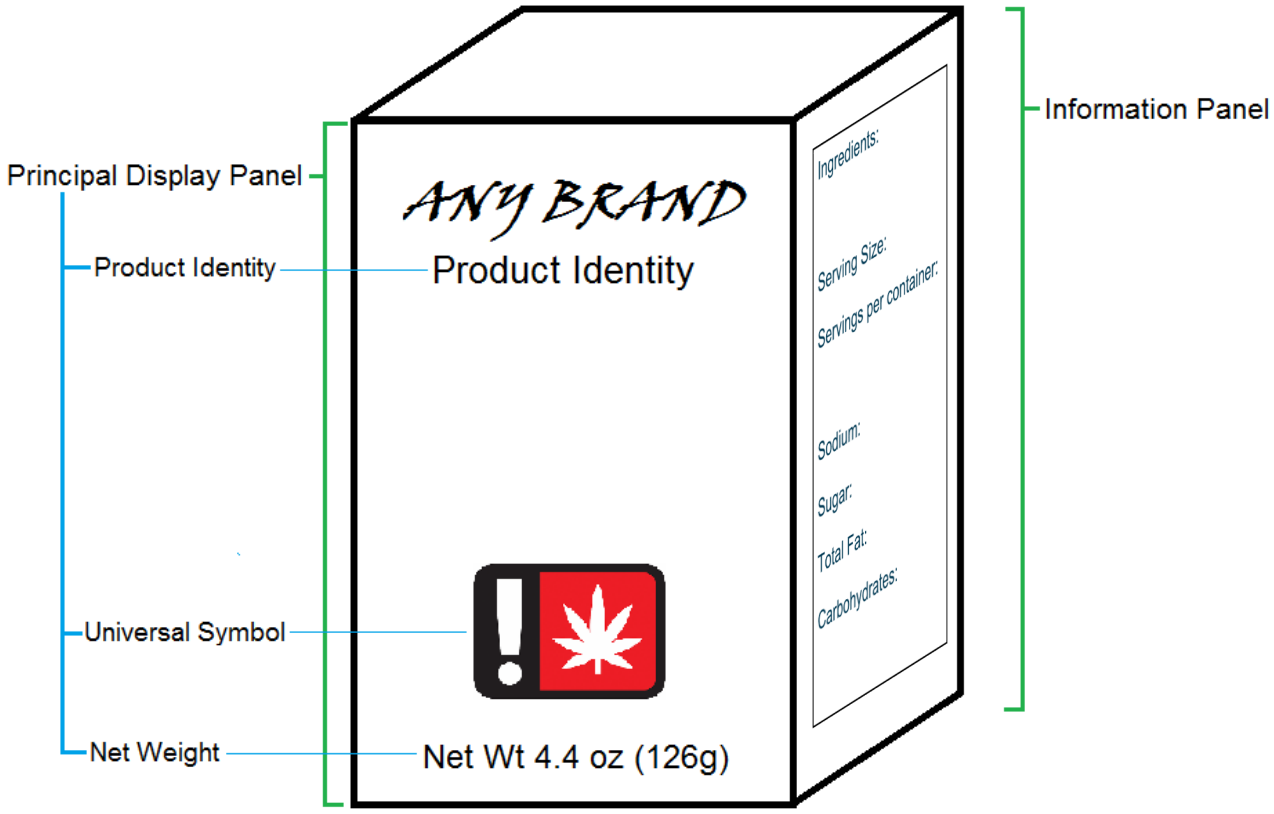
3. Assert that marijuana items are safe because they are regulated by the Commission or because they have been tested by a certified laboratory or otherwise make claims that any government agency endorses or supports marijuana;

4. Make claims that recreational marijuana has curative or therapeutic effects;
5. Display consumption of marijuana items;
6. Contain material that encourages the use of marijuana because of its intoxicating effect; or
7. Contain material that encourages excessive or rapid consumption.

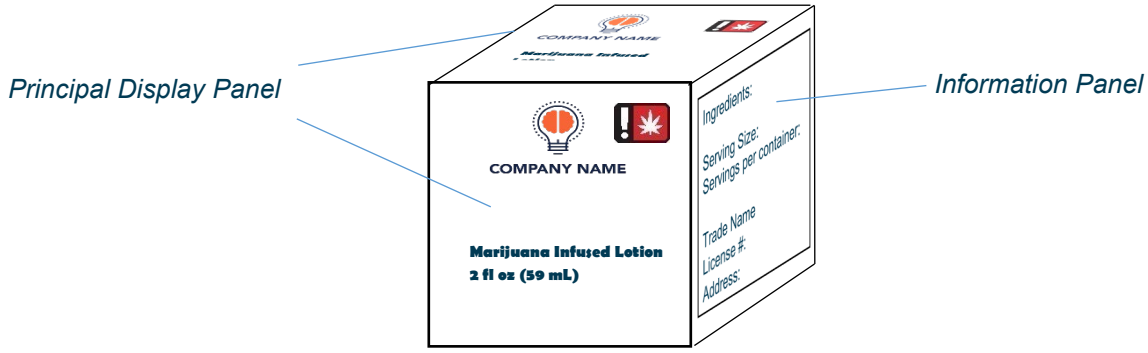
ELEMENTS OF A LABEL

Principal Display Panel

The principal display panel is defined as the part of a label on a package or container that is most likely to be displayed, presented, shown or seen under customary conditions of display for sale or transfer, generally the front of the package that contains logos and branding. A package may have more than one principal display panel and, if so, all principal display panels must be properly labeled.



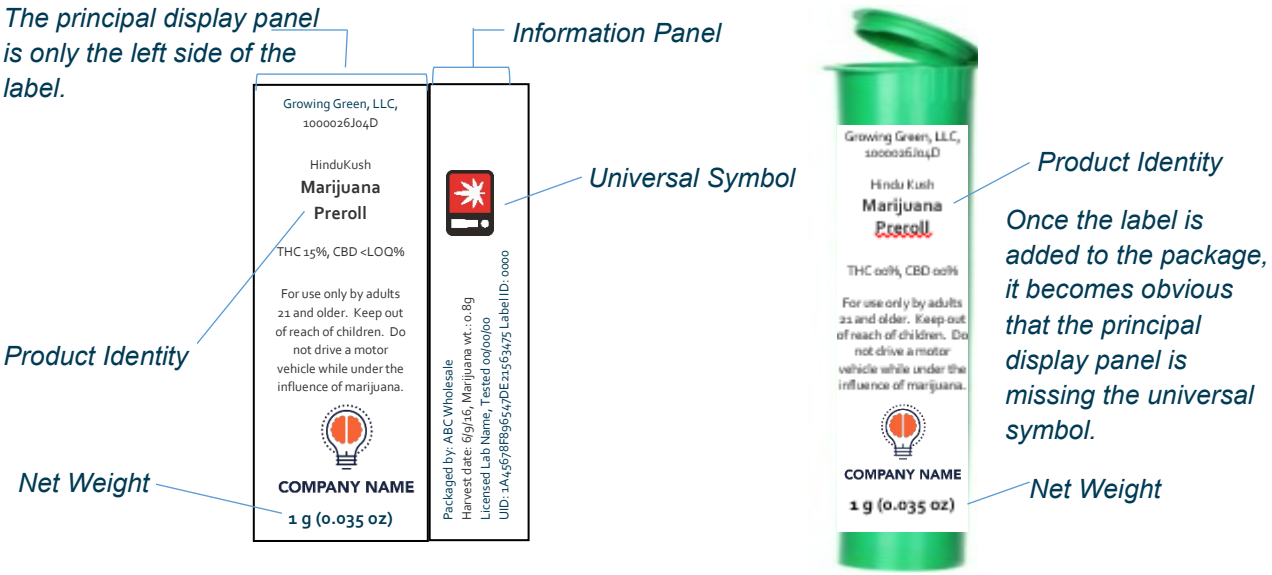
Example of a Package with two Principal Display Panels



In the previous example, the package contains branding on the front and the top of the package. Both are considered principal display panels and both must be labeled properly.

For most labels, three items must appear on the principal display panel: (1) the universal or hemp symbol; (2) the net weight or volume; and (3) the product identity. All three items must be visible on the package at the same time.

Example of an Incorrectly Labeled Principal Display Panel:



In the example above, the principal display panel is not labeled correctly. When the label is affixed to the package, only the product identity and net weight are visible on the principal display panel. To fix this label, the universal symbol must be moved so that the universal symbol is a part of the principal display panel.

PRODUCT IDENTITY

The product identity is the common or usual name of the product. This is a descriptive name for the product and not a fanciful name or the brand name of the product. For example, on a package of Starburst®, the name "Starburst" is the brand name of the candy, and the term "fruit chews" is the product identity.

Product Identity Example

The product identity must:

- Be in bold type;
- Be in a size reasonably related to the most prominent printed matter on the principal display panel;
- Be parallel to the base on which the package rests as it is designed and displayed; and
- Clearly identify whether the item is derived from marijuana or hemp.

IMPORTANT! ***An item that contains both industrial hemp and marijuana must identify the item as a marijuana item. For concentrates and extracts, the product identity must correctly identify the product as either a concentrate or an extract.***

Net Weight or Volume (Net Quantity of Contents)

The net quantity of contents means the amount of product being sold in the container. It can be expressed on the label as either the net weight or the net volume.

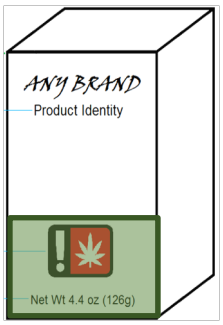
The net weight is the gross weight of the final product minus the weight of the packaging and is expressed on the label in both ounces and grams (or milligrams for weights under one gram). A label should include the net weight if the product is a solid, semi-solid, or viscous product. A standard net weight declaration looks as follows: Net wt 1.0 g (0.035 oz).

The net weight is the weight of the final product. For pre-rolls, the net weight is the weight of the finished pre-roll, which includes the dried marijuana leaves and flowers, the rolling paper, and the filter or tip.

The net volume is the fluid measure of a liquid product expressed as milliliters and fluid ounces (fluid ounces are different than ounces). A label should include the net volume if the product is a liquid.

DISPLAYING NET WEIGHT OR VOLUME

The net quantity of contents provided on the principal display panel must be the average quantity of contents in all of the packages in the batch. The net quantity declaration must be:



The shaded green area is the bottom 30% of the principal display panel

- A distinct item separated from other printed label information on all sides by at least a space equal to the height of the lettering used in the declaration;
- In **bold** type;
- In the bottom 30 % of the principal display panel;
- In lines generally parallel with the base of the container; and
- Listed in both the US Customary Units and the International System of Units (SI Units).

US Customary	*SI Units*
Weight (dry) displayed in ounces Volume (liquid) displayed in fluid ounces	Weight (dry) displayed in grams or milligrams Volume (liquid) displayed in milliliters

The net quantity of contents should be displayed as a number between 1 and 1000. When choosing a unit, use the following examples. If using a decimal, use no more than three decimal places.

Examples:

500 mg, not 0.5 g
1.96 g, not 1960 mg
750 mL, not 0.75 L

Net weight or volume should not be expressed in mixed units.

Example:
1.5 g, **not** 1 g 500 mg

Table 1. Rounding Rules

When The First Digit Dropped is:	The Last Digit Retained is:	Examples
less than 5	Unchanged	2.44 to 2.4 2.429 to 2.4
more than 5, or 5 followed by at least 1 digit other than 0	Increased by 1	2.46 to 2.5 2.451 to 2.5
5 followed by zeros	Unchanged if Even, or Increased by 1 if Odd	2.450 to 2.4 2.550 to 2.6

Rounding
Use Table 1 (above) from the NIST Handbook 130 (2015) to help with rounding the net quantity.

Universal Symbol
The universal symbol was created by OHA and must be used on the label of a marijuana item that will ultimately be sold to a consumer. The universal symbol must be located on the principal display panel and must be at least 0.48 inches wide by 0.35 inches tall.

Universal Symbol

The universal symbol must be red, black, and white and cannot be changed from how it is provided by OHA. The universal symbol is required on all marijuana item labels. The universal symbol can be downloaded here.

Hemp Symbol
The hemp symbol must be used in the place of the universal symbol when the product is only made of a hemp item. If an item contains both marijuana and hemp, the item is considered a marijuana item and the label will not contain the hemp symbol. Hemp items have different labeling requirements than marijuana or mixed marijuana/hemp items. The hemp symbol can be downloaded here. See OAR 845-025-7140 and the Hemp section below.

Hemp Symbol

Medical Grade Symbol

The medical grade symbol was established by OHA and made available to OLCC licensees. The medical grade symbol is a symbol that is **used only by OLCC licensees** that produce cannabinoid products, concentrates, or extracts that have a THC concentration that is above the recreational concentration limit.

Principal display panel with medical grade symbol.

The medical grade symbol is used **only on products sold at OLCC licensed retail stores**. Products that contain a medical grade symbol can only be sold or transferred to a designated primary caregiver or patient, for use by a patient.

Licensees who want to produce medical grade products must follow the requirements set out in OAR 845-025-3300, as well as the rest of the rules. Any licensee that wants to process or sell medical grade products must register with the OLCC by completing the form found here.

IMPORTANT! ***The medical grade symbol is used in addition to the universal symbol - both symbols are required. The medical grade symbol must appear on the principal display panel and be at least 0.35 inches in diameter. Any medical grade product should contain the warning "For use by OMMP patients only" rather than the recreational warning, "For use only by adults 21 and older."***

Potency

The OLCC sets the container and serving potency limits for marijuana and hemp items. For recreational marijuana see Table 1 (OAR 845-026-0210), for medical marijuana see Table 2 (OAR 845-026-0220), and for hemp see Table 1 (OAR 845-025-2760).

The THC concentration on a label cannot exceed the maximum concentration limit by over 10 percent as determined by the Retail and Medical Concentration Limit Tables. For example, a marijuana edible can have up to 110 mg THC in the container and be compliant with OLCC rules.

The THC and CBD amounts required to be on a label must be the value calculated by the laboratory that did the testing in accordance with OAR 333-064-0100. The potency value shall be expressed as an average of the samples taken and tested under OAR 333-007-0360.

A pre-approved label may provide a "target potency" on the principal display panel if:

- The actual potency of the item based on laboratory testing is within 10% of the target potency (anything outside of this range is considered misleading in violation of OAR 845-025-7030); and
- The actual THC and CBD amounts calculated by the laboratory are also provided elsewhere on the label.

Target potency is defined in OAR 845-025-7000 as "the intended potency included on the label for the amount or concentration of a cannabinoid, including but not limited to amount or concentration THC, CBD, or total amount of cannabinoids."

For example, a label that features a target potency of 100mg THC and has actual lab calculated values of 90mg THC would be compliant. In this example, anything less than 90mg would not be complaint.

A generic label **may not** have a target potency because it is not required by rule.

OTHER LABELING REQUIREMENTS

Non-Child Resistant Packages

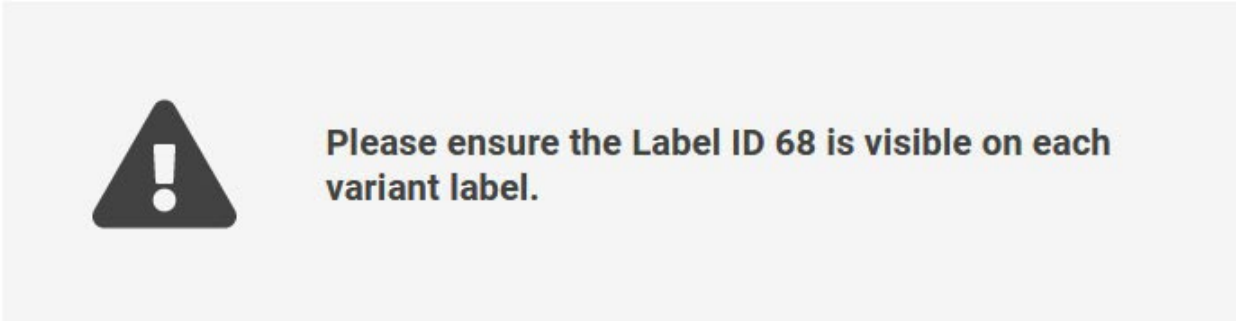
If the container holding the marijuana or hemp is not certified child resistant, the outermost label must contain the statement "This package is not child resistant." For example, if a non-child resistant jar holding a marijuana extract was placed inside an exterior container like a box, the box label would need to have the statement. See OAR 845-025-7030.

Small Jars & Principal Display Panel

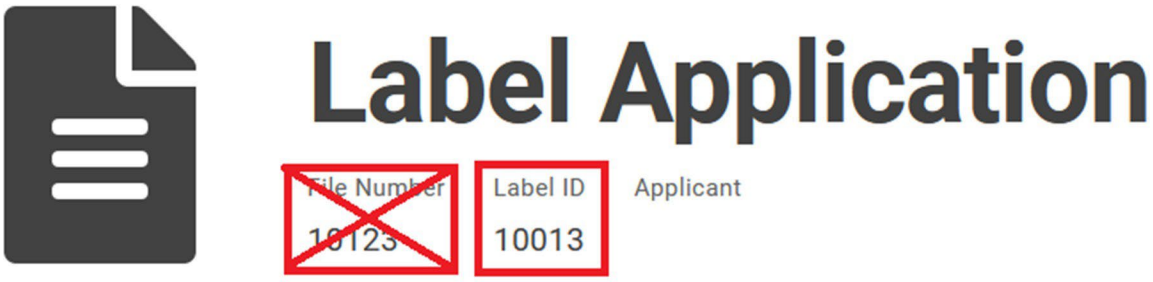
If the package or container is a jar and is 1.75 inches or less in height and has a lid with a width of two inches or less, then the principal display panel must be on the top of the lid. This requirement applies to all label types. The most common example is a small jar for an extract or concentrate. See OAR 845-025-7030.

Label ID

Labels approved by the OLCC are automatically assigned a unique label identification number ("Label ID"). This number must be prominently displayed on the label of the outermost container. When you submit your label, you can find this under the Variants section in the label application. Your approved labels will show the Label ID under your Dashboard, then Labels. The suggested format is "Label ID: 0000". The zeroes are placeholders and final labels must have an accurate Label ID number. See the following example of where to find the Label ID in your license dashboard.



The Label ID is not the same as the file number:



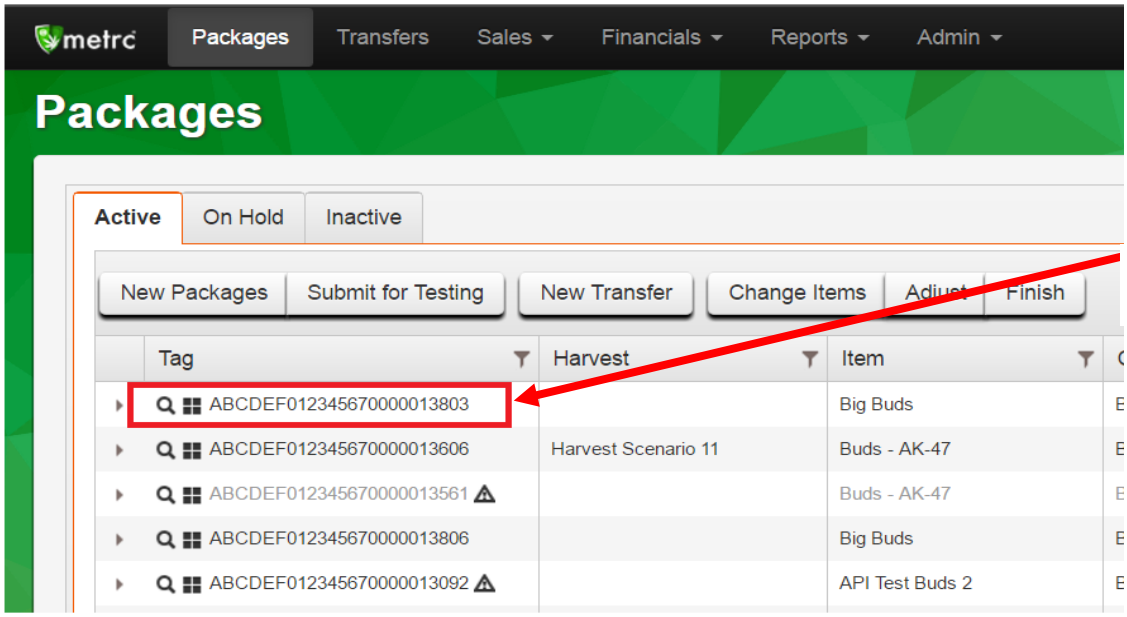
Activation Time

Activation time is the amount of time it is likely to take for an individual to begin to feel the effects of ingesting, inhaling, or using a marijuana or hemp item. Activation time may be expressed in words or through a pictogram. If a user will begin to feel the effects right away, the activation time can be listed as immediate. If the product has a delayed reaction, the licensee, hemp certificate holder, or registrant must determine what the activation time is for their particular product. To show activation time on a label, you may simply state, "Activation Time: 30 minutes" or you may use a pictogram (see example on right), as long as the pictogram is clear and easily understood.

Pictogram Example.

UID Number

All licensees and hemp certificate holders must use the unique identification (UID) number provided by Metrc on the label. This number is the 24-digit Metrc tag number. The UID number on the label should be the number associated with the product at the time the product is packaged and labeled. See the Oregon Metrc Wiki Packaging & Labeling Section for greater detail on the UID.



BUSINESS OR TRADE NAME AND LICENSE OR REGISTRATION NUMBER

All labels require the business or trade name and the license number (if you are an OLCC license), a registration number (if you are an OHA registrant), or an ODA registration ID (if you are an ODA hemp handler / grower and have a hemp certificate with the OLCC). These two pieces of information should be listed together on the label. Providing the business or trade name as part of a logo or other branding is not sufficient to meet this requirement. The label must be clearly marked with the identifying information for the licensee or registrant responsible for the product.

SERVING SIZE AND SCORING

Some labels must provide a serving size and the number of servings in the container. The serving size is the amount of product that is suggested for a consumer to use. The serving size is NOT the potency of the product. Instead, the serving size should explain to the consumer the amount of product they should use to reach a specific potency. The serving size is determined by the processor, but the label must follow the rules regarding concentration limits. For example, if product being sold was a cookie that contained 100 mg THC, the serving size could be at most 1/10th of the cookie because the concentration limit per serving for an edible is 10 mg THC. In this example the label would say, "Serving Size: 1/10th cookie (10 g), Number of Servings per Container: 10."

If the product being sold was a concentrate or extract, the processor would decide how much a consumer should consume at one time and list that amount on the label. For example if the container held one gram of concentrate, the processor could decide that the serving size should be 0.03 grams or 30 milligrams. The label would say, "Serving Size: 30 milligrams or an amount equal to a grain of rice, Number of Servings per Container: 33."

All marijuana edibles that exceed 55 mg THC in the container must be scored. "Scored" means: "to permanently physically demark a cannabinoid edible in a way that enables a reasonable person to: (a) Intuitively determine how much of the product constitutes a single serving; and (b) Easily physically separate the edible into single servings either by hand or with a common utensil, such as a knife." See OARs 845-026-0100 and 845-026-0210. You can also find visual examples of scoring in this Rule Update Series Session 1 (YouTube link).

These scoring requirements do not apply to medical marijuana edibles, see OAR 845-026-0220.

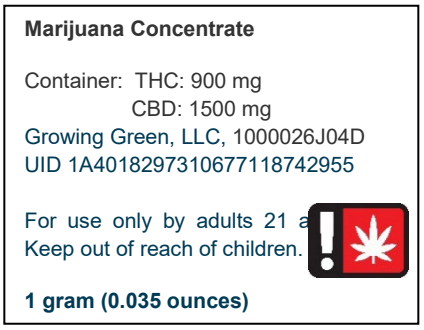
If the edible is less than 55 mg THC or is a medical marijuana edible, it must either be scored or if the product cannot be scored, the package must contain a measuring device that measures single servings or the package must clearly enable a person to determine when a single serving has been consumed. Measuring devices must be large enough for the consumer to use as a reliable guide for measuring single servings. A small pictogram on a label will not be sufficient.

Label applications for an edible must be accompanied by a clear and accurate photo of the edible showing the required scoring (if applicable).

LABELING SMALL AND TINY CONTAINERS

Small Container Labels

All containers that hold a marijuana or hemp item must be properly labeled. Under OAR 845-025-7030, if the container holding the marijuana or hemp is too small to fit all of the required label information, you may put at a minimum the following information on a label that is securely affixed to the small container:



Example of a small container label for a concentrate.

1. Principal display panel that includes the net weight, universal or hemp symbol, and product identity;
2. Licensee, registration, hemp certificate holder business/trade name;
3. License, registrant, or ODA registration number;
4. UID number;
5. Concentration of THC and CBD; and
6. Required warnings:
    - For a retail marijuana item, the following warnings are required on the label: "For use only by adults 21 and older. Keep out of reach of children."
    - For a medical marijuana item, the following warnings are required on the label: "For use by OMMP patients only. Keep out of reach of children."
    - For a hemp item, the following warnings are required: "This product is derived from hemp and could contain THC. Keep out of reach of children."

Important: If the package or container is a jar and is 1.75 inches or less in height and has a lid with a width of two inches or less, then the principal display panel must be on the top of the lid. This requirement applies to all label types. See OAR 845-025-7030.

The **remaining required information must be included on an outer package or container or on a hangtag attached to the small container**. If an outer package is used, all of the information required by rule must be on the outer container, even if some of the information is already included on the inner container. In other words, if a small container is packaged inside a larger container, the outer container must have a full label. If a hangtag is used, the hangtag must be securely attached to the small container and contain the rest of the required information that is not already listed on the small container label (for example: lab name, test date, serving size, etc.). Small containers can utilize accordion or peel back labels but the information required on a small container label must be visible on the outside of the accordion or peel back label.

SMALL CONTAINER LABEL EXAMPLE

Small Container Label on Bottle *(not to scale)*

In this example, the small tincture bottle is too small to fit a full label. The small bottle must have at least the information required by the small container label rule printed directly on or affixed to the small container.

The remaining information must either go on a leaflet, hangtag, or outer container. Please see the examples below.

The small container will either need to have a hangtag (on bottom) attached to it or be placed inside of a larger container that has a complete label (on bottom right). The hangtag only needs the information that is not included on the small container whereas the outer container label must have all of the information required by rule.

Hangtag for small container

Marijuana Tincture
Made on 12/11/16

ACTIVATION 45 MIN

Serving Size: one dropper (1 mL)
Servings per Container: 30

Serving: THC 5mg; CBD 2mg

Ingredients: Grain alcohol, marijuana extract, orange extract.

Lab Name, Date Tested: 6/20/16

This product is not approved by the FDA to treat, cure, or prevent any disease. Do not drive a motor vehicle while under the influence of marijuana. **BE CAUTIOUS.** Cannabinoid products can take up to 2 hours or more to take effect.

Green Grows, 100345758AE
1234 Main Ave, Portland, OR 97223

Full Label on Bag
(not to scale)

Marijuana Tincture
Made on 12/11/16

THC: 5mg/serving; 15mg/container
CBD: 2mg/ serving; 66mg/ container
UID 19405068340495868798763 4

Ingredients:
Grain alcohol, marijuana extract, orange extract.

Serving Size: one dropper (1 mL):
Servings per Container: 30

ACTIVATION 45 MIN

Lab Name, Date Tested: 6/20/16
Test Batch #: D465F12- 9254

This product is not approved by the FDA to treat, cure, or prevent any disease. For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana. **BE CAUTIOUS.** Cannabinoid products can take up to 2 hours or more to take effect.
Green Grows, 100345758AE1211
1234 Main Ave, Portland, OR 97223

1 fl oz (30 mL)

Tiny Container Labels

Under OAR 845-025-7030 a marijuana or hemp item that is packaged in a container that has a complete surface area available for applying a label that is less than 2 inches squared may have a label printed on or affixed to the container that includes at a minimum the following information:

1. A principal display panel with the universal symbol and product identity;
2. UID number;
3. Concentration or amount of THC and CBD in the container;
4. Licensee, registrant, or hemp certificate holder business/trade name;
5. License, registrant, or ODA registration number; and
6. A warning that reads: "Keep out of reach of children."

Important: If the package or container is a jar and is 1.75 inches or less in height and has a lid with a width of two inches or less, then the principal display panel must be on the top of the lid. This requirement applies to all label types. See OAR 845-025-7030.

Similar to a small container label, the **remaining required label information must be included on a hangtag attached to the tiny container or the tiny container can be packaged inside of an outer container that contains a full and compliant label**.

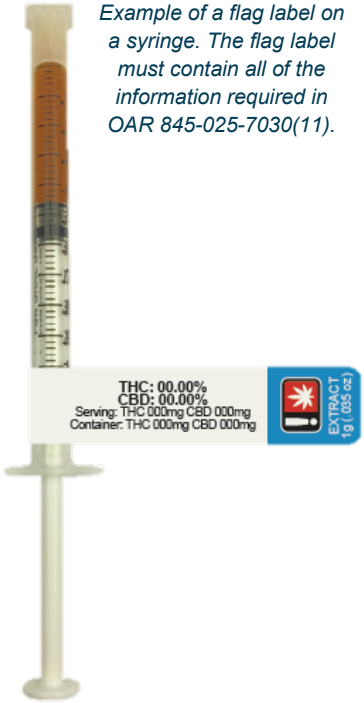
Tiny Container Label Example

Cartridge Labeling

All cartridges and vaporizing devices containing a cannabinoid concentrate, extract, or product intended for use with an inhalant delivery system must be labeled with the universal symbol. The universal symbol must be 0.48 inches wide by 0.35 inches tall. The universal symbol can either be printed directly on the cartridge or it can be attached to the cartridge as a sticker. Cartridges are not required to have a small container label.

Syringes do not fall under this rule and must have a small container label attached to them. In order to fit all of the required information, a flag label (see example on right) may be used. For more information about small container labels, please see the Small Container Labeling section.

Example of the universal symbol on a cartridge. The universal symbol must be at least 0.48 inches wide by 0.35 inches tall.



Example of a flag label on a syringe. The flag label must contain all of the information required in OAR 845-025-7030(11).

Edible Labeling

For cannabinoid edibles, it is required that the following information be placed on the label:

1. *List of all ingredients* in descending order of predominance by weight or volume used to process the cannabinoid edible. The list of ingredients must include any substance used in processing, preparing, manufacturing, packaging, or holding the cannabinoid product that is present in the final product, including any cooking or release spray. The list of ingredients must correctly identify the type of marijuana or hemp ingredient used to make the product. For example: "hemp extract" or "marijuana concentrate." Additional descriptors may be added (e.g. keif, isolate, or rosin) if the label is subject to pre-approval (i.e. non-generic).

   - This includes all ingredients and sub ingredients. For example, in a chocolate chip cookie recipe, the ingredient list may be as follows:

   Ingredients: Enriched Flour, Brown Sugar, Chocolate Chips, Cottonseed Oil, Baking Soda, Salt.

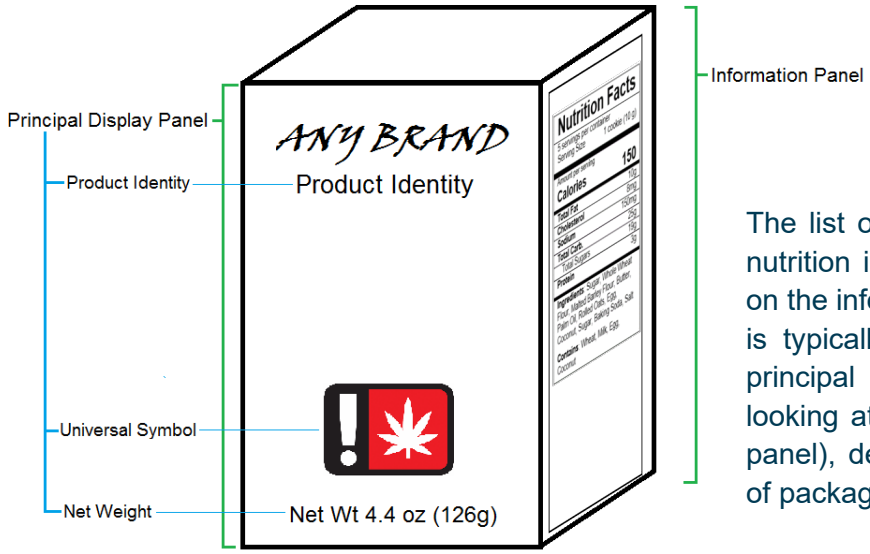
   However, both enriched flour and chocolate chips are composed of other sub-ingredients. For this example, the chocolate chips are made of cane sugar, chocolate liquor, cocoa butter, milkfat, and soy lecithin and the enriched flour is made of wheat flour, malted barley flour, niacin, iron, thiamin mononitrate, riboflavin, and folic acid. Because these two ingredients have ingredients of their own, you must list all of the ingredients and sub-ingredients in one of two ways:

   - First, you can list the names of the ingredients and then list any sub ingredients in parenthesis.

   Ingredients: Enriched Flour (Wheat Flour, Malted Barley Flour, Niacin, Iron, Thiamin Mononitrate, Riboflavin, Folic Acid), Brown Sugar, Chocolate Chips (Cane Sugar, Chocolate Liquor, Cocoa Butter, Milkfat, Soy Lecithin), Cottonseed Oil, Baking Soda, Salt.

   - Second, you could list out each ingredient in descending order of predominance by weight or volume.

   Ingredients: Wheat Flour, Malted Barley Flour, Niacin, Iron, Thiamin Mononitrate, Riboflavin, Folic Acid, Brown Sugar, Cane Sugar, Chocolate Liquor, Cocoa Butter, Milkfat, Soy Lecithin, Baking Soda, Salt.



The list of ingredients and the nutrition information should go on the information panel, which is typically to the right of the principal display panel (when looking at the principal display panel), depending on the type of package used.

- The required nutrient, vitamin, and mineral information in 21 CFR 101.9(c) for nutrition labeling of food must be listed in the Nutrition Facts Panel on the label. A cannabinoid edible shall use one of the nutrition information formats provided by the Commission. Optional nutrient, vitamin, and mineral information as allowed in 21 CFR 101.9(c) may be listed. See OAR 845-025-7090 and 21 CFR 101.9(c) for detailed requirements.
- If a required nutrient, vitamin, or mineral is not present at the value listed in 21 CFR 101.9(c), a statement "Not a significant source of _____" may be used, see 21 CFR 101.9(c) for specific requirements, language, and placement.

The rules do not require a specific type of analysis to determine the nutrient, vitamin, and mineral amounts displayed in the Nutrition Facts Panel but you may use one of the following methods to determine those values:

A. **Database analysis**. Using a list of ingredients and specific processing information for your product, you can use a food ingredient database to determine the specific nutrient, vitamin, and mineral amounts for your product. This method may be a better predictor of nutrient, vitamin, and mineral values across multiple batches versus a single laboratory test from one batch. However, how the analysis is performed affects the validity of the results. You must be extremely detail-oriented and have a general knowledge of food and nutrient values, be able to understand and account for processing changes, and be able to keep detailed records.

B. **Lab analysis**. A lab can determine the nutrient values for the sample submitted to the lab. The results will only be specific to the sample tested so you may want to consider testing your product throughout the year to get the most accurate results. Lab analysis may be more beneficial if you are using unique ingredients that do not have nutrient, vitamin, and mineral information available or when the specific process you are using to make the edible is going to change the nutrient, vitamin, and mineral composition of the product in an unpredictable way.

C. **A combination of database and lab analysis.** You can verify a claim or cross check results using both methods.

IMPORTANT! ***You do not need to submit your nutrient, vitamin, and mineral analysis to the OLCC, but a licensee, registrant, or hemp certificate holder must have documentation that demonstrates the validity of the calculations and must make that documentation available to the Commission or the Authority upon request.***

2. *If the edible is perishable, a statement that the edible must be refrigerated or kept frozen*. If the edible is not perishable, no statement is needed.

3. List of potential major food allergens.

- A licensee, registrant, or hemp certificate holder must list major food allergens on the label if the edible contains:
  - Milk, egg, fish, crustacean shellfish, tree nuts, wheat, peanuts, or soybeans as an ingredient;
  - Any ingredient that contains protein derived from: milk, egg, fish, crustacean shellfish, tree nuts, wheat, peanuts, or soybeans; or
  - Sesame.

When labeling allergens, always use the specific food name for nuts, fish or crustacean shellfish and not the category of allergen. For example, use the word "almonds" instead of "tree nuts" in the Contains statement. Licensees, registrants, and hemp certificate holders must label major food allergens in one of two ways.

As of January, 2025, the Food and Drug Administration no longer considers "Coconut" a "tree nut" allergen, see here.

The first option is to include the name of the food source in parenthesis following the common or usual name of the major food allergen in the list of ingredients whenever the name of the food source of the major allergen does not appear elsewhere in the ingredient statement. For example: Ingredients: Enriched flour (**wheat** flour, malted barley, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid), sugar, partially hydrogenated **soybean** oil, and/or cottonseed oil, high fructose corn syrup, whey (**milk**), **pecans**, **eggs**, vanilla, natural and artificial flavoring) salt, leavening (sodium acid pyrophosphate, monocalcium phosphate), lecithin (**soy**), mono- and diglycerides (emulsifier)

In the example above, the major food allergens are in bold to highlight their location. However, the allergens do not need to be in bold on an edible label.

The second option is to use the word "Contains" followed by the name of the food source from which the major food allergen is derived, immediately after or adjacent to the list of ingredients, in a font size that is the same font size used for the list of ingredients.

For example, after the list of ingredients, the following statement would appear:

Contains: Wheat, Milk, Pecans, Egg, and Soy

4. *Source of Marijuana or Hemp.* Ingredient lists must accurately list the source of marijuana or hemp used in the product. For example: "marijuana extract," "marijuana concentrate," or "hemp extract." If the label is subject to pre-approval (i.e. non-generic), parenthesis can be used to add descriptors regarding the process used, e.g. "cannabis extract (distillate)".

Gluten-Free

Gluten is the protein that occurs naturally in wheat, rye, barley, and crossbreeds of these grains. Although certain grains may contain gluten, some grains can be made gluten-free. An ingredient that has been derived from a gluten-containing grain can be labeled as "gluten-free" if it has been processed to remove the gluten and use of that ingredient results in the presence of less than 20 parts per million (ppm) gluten in the food. The "gluten-free" claim is a voluntary one, however, licensees and registrants who decide to use this term are responsible for using the claim in a truthful and not misleading manner, and for complying with the requirements established by the U.S. Food and Drug Administration.

Gluten-free means that the food either is inherently gluten free or does not contain an ingredient that is: (1) a gluten-containing grain (e.g. Spelt wheat); (2) derived from a gluten-containing grain that has not been processed to remove gluten (e.g. Wheat flour); or (3) derived from a gluten-containing grain that has been processed to remove gluten (e.g. Wheat starch), if the use of that ingredient results in the presence of 20 parts per million (ppm) or more gluten in the food. Any presence of gluten in the food must be less than 20 ppm.

FALSE OR MISLEADING CLAIMS

Organic

Licensees, registrants, and hemp certificate holders that want to label their products as organic must follow strict requirements. First, if you want to make a claim that a product or its ingredients are organic, the product or certain ingredients need to be certified as organic. If it is not certified, you cannot make any organic claim on the principal display panel or use the USDA organic seal anywhere on the package. Doing so will be considered misleading and could result in a denial of the label approval request. Second, licensees and registrants cannot use the word "organic" or any variation of the word in a way that implies the product is organic, the product has been certified organic, or that the marijuana in the product is organic. This means the logo and branding on a principal display panel or elsewhere on the label cannot use the word organic. To learn more about organic certification, please contact the Oregon Department of Agriculture at 503.986.4550.

"Made with organic ***" statement

Licensees, registrants, and hemp certificate holders that want to label their products with the "Made with organic ***" statement must contain at least 70 percent certified organic ingredients (not including salt or water). These products may contain up to 30 percent of allowed non-organic ingredients. (See National list of Allowed and Prohibited Substances) All ingredients must be produced without GMOs or other prohibited substances and the product must be certified. If a product meets these requirements, its label may include a statement such as "made with organic wheat" that lists the specific organic products. The generic statement, "made with organic ingredients" is not allowed. The organic ingredients also must be identified in the ingredient list. Additionally, the label must identify the USDA-accredited certifying agent on the information panel.

Specific Ingredient Listings

If the product contains less than 70 percent organic contents, the specific organic ingredients may be listed in the ingredient statement. You may only, on the information panel, identify the certified organic ingredients as organic and the percentage of organic ingredients. Licensees, registrants, and hemp certificate holders cannot include the USDA organic seal anywhere or use the word "organic" on the principal display panel.

To learn more about the USDA Organic Program, check out the USDA Organic website: https://www.usda.gov/topics/organic.

Health Claims

Health claims describe a relationship between a substance and a reduced risk of a disease or health-related condition. OAR 845-025-7030 prohibits the use of a health claim that is not supported by the totality of publicly available scientific evidence (including evidence from well-designed studies conducted in a manner which is consistent with generally recognized scientific procedures and principles), and for which there is significant scientific agreement, among experts qualified by scientific training and experience to evaluate such claims. A statement claiming that the product or an ingredient in the product can cure, mitigate, or treat any disease or health-related condition cannot be made or implied. Any statement that makes such a claim would be considered a misleading statement and could lead to a denial of a label application.

Additional Labeling Requirements

National Institute of Standards and Technology (NIST) Handbook 130 (2016)

The NIST Handbook has been incorporated by reference into the labeling rules. The NIST Handbook provides uniform packaging and labeling regulations. You can find the NIST Handbook here: http://www.nist.gov/pml/wmd/pubs/upload/iva-pkglblgreg-16-h130-final.pdf

Hemp

Hemp items are products that only contain cannabinoids derived from hemp plants. If a product contains both hemp and marijuana ingredients, the item is considered a marijuana item and is labeled as such.

Hemp items must be labeled under OAR 845-025-7140. Hemp items that are for ultimate sale to a consumer or patient must be labeled and packaged as outlined in OAR 845-025-7000 through 845-025-7120 with the following exceptions:

1. The principal display panel must contain the hemp symbol instead of the universal symbol;
2. The label shall contain the following warning in place of the warnings required on items for sale to a consumer described in OAR 845-025-7070 through 845-025-7120: "This product is derived from hemp and could contain THC. Keep out of reach of children."
3. If the item is a hemp extract, concentrate, topical, or a hemp product other than an edible, tincture, or capsule, the label shall contain the warning, "**DO NOT EAT**" in bold, capital letters.

There are concentration limits for Delta-9-THC for hemp items, see OAR 845-025-2760 and Table 1. To learn more about hemp in the OLCC marketplace, visit this portion of the Commission's website.

IMPORTANT! ***If the item contains cannabinoids derived solely from hemp, the label must carry the hemp symbol and should NOT contain the universal symbol.***

INHALABLE CANNABINOID PRODUCTS WITH NON-CANNABIS ADDITIVES

Inhalable cannabinoid products with non-cannabis additives (ICP) are cannabinoid products that are meant for human inhalation and have been combined with non-cannabis ingredients like non-cannabis terpenes (or "botanical terpenes"), or flavorings. The most common example is a vape cartridge with non-cannabis derived terpenes. Here are the relevant definitions from OAR 845-025-1015:

"Inhalable cannabinoid product" means a cannabinoid product or hemp cannabinoid product that is intended for human inhalation.

"Non-cannabis additive" means a substance or group of substances that are derived from a source other than marijuana or industrial hemp.

(a) "Non-cannabis additive" includes but is not limited to purified compounds, essential oils, oleoresins, essences or extractives, protein hydrolysates, distillates, or isolates.

(b) "Non-cannabis additive" does not include plant material that is in the whole, broken, or ground form.

There are very distinct labeling requirements for ICPs. Generic labels are not permitted for ICPs. Review Compliance Bulletin CE2020-07 for more information, including labeling requirements. The Non-cannabis Additive Documentation must also be included in the label application. Any change in additive supplier, ingredients, or new additives must be resubmitted and pre-approved before they can be compliantly used (see OAR 845-025-7160). There are also specific CTS requirements for ICPs, see the ICP How to Guide here.

Review the "Additional Prohibitions" section below for specific substances that are prohibited.

ARTIFICIALLY DERIVED CANNABINOIDS

There are labeling requirements for products with artificially derived cannabinoids that are allowed by rule, see OAR 845-025-7145 and Compliance Bulletin CE2025-05 for more information. The most common example is cannabinol (CBN).

INFUSED PRE-ROLLS & MOONROCKS

For labeling purposes, infused pre-rolls and moonrocks are considered "other cannabinoid products" and are labeled according to OAR 845-025-7120. The label must display an ingredients list in descending order of predominance by weight. The ingredients should be described according to their rule definitions (OAR 845-025-7000) and must use the word "marijuana" or "hemp". For example, "Ingredients: usable marijuana, marijuana extract, marijuana concentrate." Per OAR 845-026-0210, infused pre-rolls and moonrocks can have up to 2,000 mg THC in the container and there is no serving size requirement.

Additional Prohibitions

In addition to the packaging and labeling rules, the OLCC prohibits the sale or transfer of marijuana and hemp items that are likely to appeal to minors because of its shape, design, or flavor. This includes:

- Products that are modeled after non-cannabis products primarily consumed by and marketed to children;
- Products in the shape of an animal, vehicle, person or character;
- Products made by applying cannabinoid concentrates or extracts to commercially available candy or snack food items; or
- Products that contain dimethyl sulfoxide (DMSO) or polyethylene glycol (PEG).
- Additionally, a processor may not treat or otherwise adulterate a medical or recreational cannabinoid product, concentrate, or extract with any additives that would increase potency, toxicity, or addictive potential, or that would create an unsafe combination with other psychoactive substances. The prohibited additives include, but are not limited to, nicotine, caffeine, or chemicals that increase carcinogenicity.
- Marijuana or hemp items may be added to product that has naturally occurring caffeine (such as coffee or chocolate) but marijuana or hemp items cannot be added to a product that contains artificial or added caffeine (such as a caffeinated soda or energy drink). See OAR 845-025-3220.
- Inhalable cannabinoid products with non-cannabis additives may not contain: squalene, squalane, vitamin E acetate, triglycerides (e.g. MCT oil), or propylene glycol. See OAR 845-025-3265.

PRE-APPROVAL PROCESS

- Licensees, registrants, and industrial hemp certificate holders who are packaging marijuana or hemp items for ultimate sale to a consumer, patient, or designated caregiver must have the packages and labels reviewed and approved by the OLCC. This applies to medical, recreational, and hemp products.
- Applicants submitting package and label applications must receive approval from the OLCC before selling a marijuana or hemp item to a consumer or patient.
- Only licensees, registrants, and hemp certificate holders can apply for pre-approval. The initial application for the pre-approval process must be made online but it may be necessary to submit a physical prototype, if requested by the OLCC.
- Packaging and labeling pre-approval must be done online, through the OLCC's Cannabis and Alcohol Management Program (CAMP). Review the CAMP Packaging and Labeling User Guide for more information on how to use the system and make sure you are in compliance.

BEFORE APPLYING

- Determine what part of your application constitutes the package and what constitutes the label. A **package** is a container. It includes both inner and outer containers. If your marijuana or hemp is packaged in a bag that is put inside of a box, both containers will be considered packages. Wrapping or materials that provide only structural support are not considered packages. Package applications only cover the physical structure and no aspect of the labeling.

Both items above are examples of packages.

- The **label** is any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed, molded into, embossed on, or appearing upon or adjacent to a package containing a marijuana or hemp item for purposes of branding, identifying, or giving any information with respect to the item or to the contents of the package. This includes any information that is printed directly on the package.

APPLICATION CHECKLIST

Package Application

1. Completed online application;
2. Correct fee;
3. For packages, documentation that the package has been certified for child resistance by a qualified third-party package testing firm, if applicable;
4. Clear photograph of the package;
5. Description of the marijuana or hemp item that will be sold in the package; and
6. Clear photograph of the marijuana or hemp item that will be sold in the package.

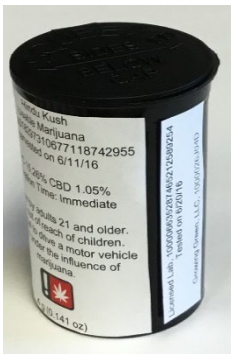
Label Application

1. Completed online application;
2. Correct fee;
3. Clear photographs of all label panels (this includes any text, pictures, graphics, or logos anywhere on the package);
4. Description of the marijuana item that will be sold in the package; and
5. Clear photograph of the marijuana or hemp item that will be sold in the package.

Once you have submitted a complete application and paid the fee, the Commission will evaluate the packaging and label in order to determine whether:

The packaging:

1. Has been certified as child resistant by a qualified third-party child-resistant package testing firm;
2. Contains any untruthful or misleading content; and
3. Contains a marijuana or hemp item that is compliant with the rest of the rules.



The label:

1. Has all the required rule information in the correct font size;
2. Information is unobstructed and conspicuous, meaning that all required information must be visible on the outside of the package;
3. Has a properly labeled principal display panel;
4. Has a universal symbol or hemp symbol that is at least the minimum size; and
5. Complies with the labeling requirements.

The OLCC may review the submission materials and notify the licensee, registrant, or hemp certificate holder whether or not the package and/or label have been approved. If the application was not approved, the OLCC will provide a description of all of the package and/or label deficiencies. No additional fee is necessary

for the first resubmission. If the OLCC evaluates the submission a second time and finds that the deficiencies have not been corrected, the application will be denied and the licensee, registrant, or hemp certificate holder will have to submit a new application and pay an additional fee.

A licensee, registrant, or hemp certificate holder may submit multiple variants of packaging and labeling for approval on the same application for a product that may have different flavors, colors, or sizes as long as the product and packaging are otherwise identical. For example, an edible gummy with five different flavor variations. Applications for approval of packaging and labeling are subject to a single application fee.

Fee

The application fee for packaging and labeling pre-approval is **non-refundable**. It is the responsibility of the applicant to check the list of approved packages prior to applying to make sure that the package isn't already approved.

The fee for a new application is $100 for each child-resistant package and $100 for each label. If you are submitting one child resistant package and one label for approval, the fee would be $200. If you would like to use a package that is on the pre-approved list, there is no fee.

Approved Packages

OLCC's online licensing system CAMP lets you search for pre-approved packages on a public facing search or during the application submission process. Alternatively, OLCC has lists of the approved packaging on the Packaging and Labeling section of the OLCC website. The OLCC will keep these lists available, but will not be updated after March, 2024.

Package / Label Consultations

The OLCC will review packages and labels before they are submitted to the pre-approval process. Any licensee, registrant, or hemp certificate holder that would like feedback can send questions of photographs of their package or label to marijuana.packaging@oregon.gov at any time. You will receive a response with feedback regarding whether you should make any changes to your package or label. Please note that the feedback you receive during a consultation is **not approval**, and you will need to apply through the OLCC pre-approval process before you can sell the marijuana or hemp item in the package or with the label.

Making Changes to Label After Approval

After receiving approval, you may want to make changes to a package or label. There is a very limited amount of information you can change on your label without resubmission and pre-approval. If any of the following items are changed on the label, the label does not need to be resubmitted:

1. Harvest or processing date;
2. Strain name;
3. Test results, including potency and testing information;
4. Net weight or volume;
5. UID number; or
6. A marijuana wholesaler or a marijuana retailer with an approved usable marijuana or hemp label may change the producer's business name, trade name, or license number without resubmission and pre-approval.

If any non-mandatory label information is deleted or there is an addition, deletion, or change in the UPC or 2D mobile barcode, website address, phone number, fax number, or zip code of a licensee, registrant, or hemp certificate holder or instructions on how to open or use a package, the label does not need to be resubmitted. Additionally, if any of the label information is repositioned, the label does not need to be resubmitted as long as the repositioning is consistent with the labeling rules. See OAR 845-025-7160 for the specific rule.

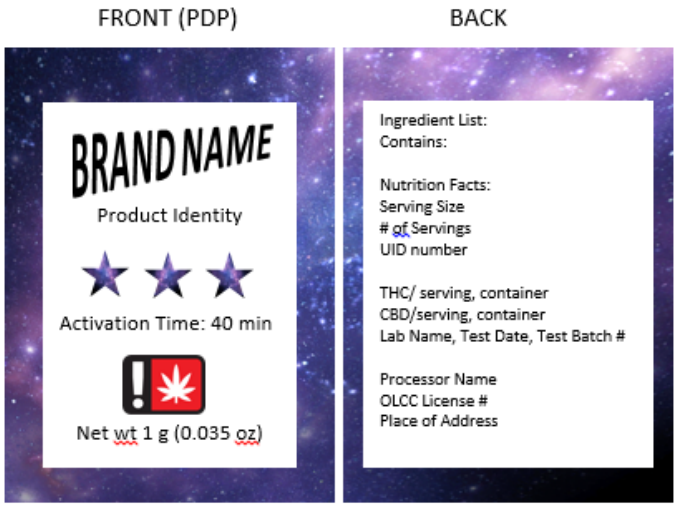
If any other change is made, the label must be resubmitted and pre-approved before it may be compliantly used. To make a change to an application, you must do this through CAMP, and the CAMP Packaging and Labeling User Guide provides more information. The fee is $25 per application.

Still have Questions?

If you have more questions regarding packaging and labeling, please visit the OLCC website. You can also send an email to marijuana.packaging@oregon.gov or call (503) 872-5459.

LABEL CHECKLIST AND GENERIC LABEL EXAMPLES

A **generic label** is a label that contains only the required information listed in the rule and has no graphics, pictures, or logos anywhere on the package. Generic labels do not need to be submitted to the OLCC for approval.



The label example to the left **is not a generic label**. The label includes everything printed on or affixed to the package. In this example, the background, logo, and stars are a part of the label; therefore the label is not generic.

The chart below provides the required information for each product type and an example of a generic label. Keep in mind that these are only examples - generic labels do not have to list information in exactly the same way. As you can see below, only the required information appears on the label. The required information can appear on more than one panel. If using more than one panel, please remember that the principal display panel is the portion of the label that is most likely to be seen when on display for sale. A standalone version of the Label Checklist and Generic Label Examples can be found here.

The generic labels are only examples. The names and information are fake

MARIJUANA IMMATURE PLANT

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Producer's OLCC License Number ☐ Business/trade name of business that packaged the product, if different than the producer. ☐ Strain name ☐ UID number ☐ Universal symbol ☐ Product identity **Principal Display Panel**	Growing Green, LLC 1000026J04D Hindu Kush **Marijuana Plant** Packaged by: ABC Wholesale UID: 1A23654GD87541257845D854

The net weight is not required for a marijuana plant label.

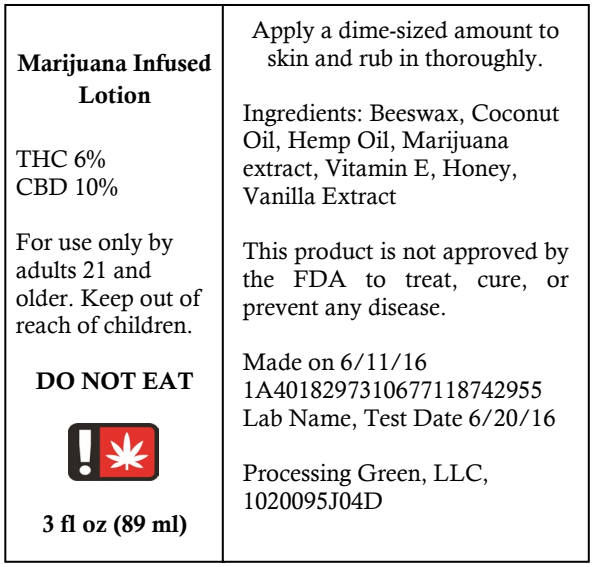
MARIJUANA SEED

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Producer's OLCC license number ☐ Business/trade name of business that packaged the product, if different than the producer. ☐ Strain name ☐ Harvest date ☐ UID number ☐ Product identity ☐ Universal symbol ☐ Net weight (g / oz) **or** number of seeds **Principal Display Panel**	Growing Green, LLC 1000026J04D Hindu Kush **Marijuana Plant**  Harvest date 6/9/16 UID: 1A23654GD87541257845D854 Packaged by: ABC Wholesale **1 g (0.035 OZ)**

USABLE MARIJUANA

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Producer's business / trade name ☐ Producer's OLCC license number ☐ Business/trade name of business that packaged the product, if different than the producer ☐ UID number ☐ Harvest date ☐ Strain name ☐ Concentration of THC **and** CBD (%) ☐ Name of lab that performed any test ☐ All test analysis dates ☐ Required Warnings: "For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana." ☐ Product identity ☐ Universal symbol ☐ Net weight in grams and ounces **Principal Display Panel** ☐ For pre-rolls only; weight of usable marijuana in grams	Growing Green, LLC, 1000026104D Hindu Kush **Marijuana Pre-Roll** THC 15.4%, CBD 1.2% For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.  **1 g (0.035 oz)** Front (Principal Display Panel) Packaged by ABC Wholesale Harvest date 6/9/16 Marijuana wt. 0.8g Licensed Lab Name, Tested 00/00/00 UID: 1A45678F896547DE21563475 Back

CANNABINOID TOPICAL

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Processor's business / trade name ☐ Processor's OLCC license number ☐ Business/trade name of business that packaged the product, if different than the processor ☐ UID number ☐ Date product was made ☐ Amount suggested for use by consumer at any one time ☐ Concentration of THC **and** CBD in container (%) ☐ List of ingredients in descending order of predominance by weight or volume ☐ Name of lab that performed any test ☐ All test analysis dates ☐ Required Warnings: "For use only by adults 21 and older. Keep out of reach of children." ☐ The words "**DO NOT EAT**" in bold, capital letters ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease." ☐ Universal symbol ☐ Product Identity ☐ Net weight (g and oz) **or** volume (fl oz and mL) **Principal Display Panel**	 Front (Principal Display Panel) Back

CANNABINOID EDIBLE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE

- ☐ Processor's business / trade name and license number
- ☐ Business/trade name of business that packaged item, if different than processor
- ☐ Place of Address for Processor and Packager
- ☐ UID number
- ☐ Date product was made
- ☐ Serving size **and** number of servings per container
- ☐ Amount, in milligrams, of THC **and** CBD in each serving
- ☐ Amount, in milligrams, of THC **and** CBD in the entire container
- ☐ List of all ingredients in descending order of predominance by weight or volume
- ☐ List of potential major food allergens, if appropriate
- ☐ Amount of calories, sodium, protein, added sugars, cholesterol, total carbohydrates, and total fat per serving
- ☐ If perishable, a statement that edible must be refrigerated/frozen
- ☐ Activation Time
- ☐ Name of lab that performed any test
- ☐ All test analysis dates
- ☐ Required Warnings: "For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana."
- ☐ "**BE CAUTIOUS.**" in bold, capital letters, followed by "Cannabinoid edibles can take up to 2 hours or more to take effect."
- ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease."
- ☐ A medical grade symbol and warning, if applicable
- ☐ Universal symbol
- ☐ Product Identity
- ☐ Net weight (g and oz) volume (fl oz and mL)

Principal Display Panel **or**

Marijuana Cookies

THC: 5 mg/serving; 25 mg/container
CBD: 2 mg/serving; 16 mg/container

4.4 oz (126 g)

FRONT (Principal Display Panel

Nutrition Facts

8 servings per container
Serving size **2/3 cup (55g)**

Amount per serving
Calories **230**

	% Daily Value*
Total Fat 8g	**10%**
Saturated Fat 1g	**5%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 160mg	**7%**
Total Carbohydrate 37g	**13%**
Dietary Fiber 4g	**14%**
Total Sugars 12g	
Includes 10g Added Sugars	**20%**
Protein 3g	
Vitamin D 2mcg	10%
Calcium 260mg	20%
Iron 8mg	45%
Potassium 240mg	6%

* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

This product is not approved by the FDA to treat, cure, or prevent any disease.

For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.

BE CAUTIOUS.
Cannabinoid edibles can take up to 2 hours or more to take effect.

Made on 6/11/16
UID: 1A4018297310677118742995
Licensed Lab, Test 6/20/16
Processed and Packaged by: Processing Green LLC
1000026J04D, 1234 Main Avenue, Portland, OR 97233

BACK

CANNABINOID CONCENTRATES AND EXTRACTS

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Processor's business / trade name ☐ Processor's OLCC license number ☐ Business/trade name of business that packaged the product, if different than the processor ☐ UID number ☐ Date product was made ☐ Serving size and number of servings per container ☐ Amount, in milligrams, of THC **and** CBD in each serving **and** in the container ☐ Activation Time ☐ Name of lab that performed any test ☐ All test analysis dates ☐ Required Warnings: "For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana." ☐ The words "**DO NOT EAT**" in bold, capital letters ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease." ☐ A medical grade symbol and warning, if applicable ☐ Universal symbol ☐ Product Identity with "concentrate" **or** "extract" ☐ Net weight (g and oz) volume (fl oz and mL) **Principal Display Panel**	**Marijuana Extract Cartridge** Suggested serving size is one 5-second draw. Each cartridge provides about 150 servings with a 5 second draw. THC: 6 mg/serving; 900 mg/container CBD: 10 mg/serving; 1,500 mg/container Immediate Activation **DO NOT EAT.** For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana. This product is not approved by the FDA to treat, cure, or prevent any disease. UID 1A4018297310677118742955 Made: 6/11/16, Lab Name, Tested: 6/20/16 Processing Green, LLC, 1000026J04D **1 gram (0.035 ounces)** ***In this example, the processor has packaged its own product. If another licensee had packaged the product, the name of that business or trade name would need to appear on the label.***

CANNABINOID TINCTURE AND CAPSULES

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE

- ☐ Processor's business / trade name and license number
- ☐ Business/trade name of business that packaged the product, if different than the processor
- ☐ Place of Address for Processor and Packager
- ☐ UID number
- ☐ Date product was made
- ☐ Serving size **and** number of servings per container
- ☐ Amount, in milligrams, of THC **and** CBD in each serving
- ☐ Amount, in milligrams, of THC **and** CBD in the entire container
- ☐ List of all ingredients in descending order of predominance by weight or volume
- ☐ Activation Time
- ☐ Name of lab that performed any test
- ☐ All test analysis dates
- ☐ Required Warnings: "For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana."
- ☐ "**BE CAUTIOUS.**" in bold, capital letters, followed by "Cannabinoid products can take up to 2 hours or more to take effect."
- ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease."
- ☐ A medical grade symbol and warning, if applicable
- ☐ Universal symbol
- ☐ Product Identity
- ☐ Net weight (g and oz) **or** volume (fl oz and mL)

Principal Display Panel

Marijuana Tincture

BE CAUTIOUS. Cannabinoid products can take up to 2 hours or more to take effect.

For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana.

1 fl oz (30 mL)

FRONT OF PACKAGE

ACTIVATION 45 MIN

Ingredients:
Grain alcohol, marijuana extract, chicory, orange extract, anise.

Serving Size: one dropper (1 mL); Servings per Container: 30
THC: 5mg/serving; 40mg/container
CBD: 2mg/ serving; 16mg/ container

Licensed Lab, Date Tested: 6/20/16
UID 1A4018297310677118742955
Made on 6/11/16

This product is not approved by the FDA to treat, cure, or prevent any disease.

BACK OF PACKAGE

There are two label panels for this example. As long as the universal symbol, net weight, and product identity appear on the principal display panel, the rest of the information may appear anywhere on the label.

OTHER CANNABINOID PRODUCT - INFUSED PRE-ROLL

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Processor's business / trade name and license number ☐ Business/trade name of business that packaged item, if different than processor ☐ UID number ☐ Date product was made ☐ Net weight or volume in U.S. Customary and metric units ☐ Serving size and number of servings per container ☐ Amount, in milligrams, of THC **and** CBD in each serving and in the container ☐ Name of lab that performed any test, All test analysis dates ☐ List of ingredients in descending order of predominance by weight or volume ☐ Activation Time ☐ The words "**DO NOT EAT**" in bold, capital letters ☐ Required Warnings: "For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana." ☐ A statement that reads: "This product is not approved by the FDA to treat, cure, or prevent any disease." ☐ Universal symbol ☐ Product Identity ☐ Net weight (g and oz) **Principal Display Panel**	**Infused Marijuana Pre-Rolls** Processed on: 6/11/16 UID: 1A4018297310677118742955 Licensed Lab: 6/20/16 **DO NOT EAT** For use only by adults 21 and older. Keep out of reach of children. Do not drive a motor vehicle while under the influence of marijuana. This product is not approved by the FDA to treat, cure, or prevent any disease. Activation time: Immediate THC 500mg/serving 1,000mg/Pkg CBD 500mg/serving 500mg/Pkg **Net Wt. 3 g (0.035oz)** Front (Principal Display Panel) Processed by Processing Green LLC Lice #1020095J04D Ingredients: Usable marijuana, marijuana concentrate Serving Size: 1 Infused Pre-Roll Servings per container: 2 Back

Infused pre-rolls are "other cannabinoid products" and are labeled according to OAR 845-025-7120.

SMALL AND TINY CONTAINER LABELS

OAR 845-025-7030(11) provides that if a container is too small to fit all of the information required that container may have a label that includes at a minimum the information in the "Small Container" checklist below.

OAR 845-025-7030(12) provides that if a container has a complete surface area available for applying a label that is less than two inches squared that container may have a label that includes at a minimum all the information in the "Tiny Container" checklist below.

Important: If the package or container is a jar and is 1.75 inches or less in height and has a lid with a width of two inches or less, then the principal display panel must be on the top of the lid. This requirement applies to all label types. See OAR 845-025-7030.

All other required label information not listed in the tables below must be contained on an outer container or package, inside a peel-back or accordion label, or on a leaflet or hangtag that accompanies the marijuana item. If an outer container is used, all labeling information, including the information listed in the table below, must be on the outer container.

SMALL CONTAINER LABEL EXAMPLE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Net weight or volume; ☐ Product identity; ☐ Universal symbol; (Principal Display Panel) ☐ Business or trade name and OLCC license number; ☐ The UID number; ☐ Concentration of THC and CBD; and ☐ A warning that reads: "For use only by adults 21 and older. Keep out of reach of children."	 UID1A4018297310677118742955 Growing Green, LLC, 1000026J04D For use only by adults 21 and older. Keep out of reach of children. Container: THC 800 mg Container: CBD 100 mg

TINY CONTAINER LABEL EXAMPLE

REQUIRED INFORMATION	GENERIC LABEL EXAMPLE
☐ Product identity; ☐ Universal symbol; ☐ Business or trade name and OLCC license number; ☐ The UID number; ☐ Concentration of THC and CBD; and ☐ A warning that reads: “Keep out of reach of children.”	 UID1A4018297310677118742955 Growing Green, LLC, 1000026J04D Keep out of reach of children. Container: THC 800 mg / CBD 100

Principal Display Panel