

Division of Cannabis Regulation
Guidance Document – [5.29.2024] (Revised)
Topic: Packaging and Labeling FAQs

How should licensees report cannabinoid content on the final marijuana product label?

19 CSR 100-1.120(1)(C)2.H requires the **exact** milligrams per serving/dose (mg/serving-dose) of the following cannabinoids:

- Delta-9-tetrahydrocannabinol (Δ 9-THC),
- Delta-9-tetrahydrocannabinolic acid (Δ 9-THCA),
- Cannabidiol (CBD),
- Cannabidiolic acid (CBDA),
- Cannabinol (CBN),
- Tetrahydrocannabivarin (THCV),
- Cannabidivarin (CBDV), and
- Delta-8-tetrahydrocannabinol (Δ 8-THC)

Licensees must list values in terms of mg/serving-dose, and **not** milligrams per gram (mg/g).

It is the responsibility of the licensee providing the final marijuana product for sale to determine the final marijuana product's serving or dosage size. It is the testing licensee's responsibility to capture serving size at the time of sampling final marijuana product for mandatory testing to ensure cannabinoid mg/serving-dose values can be calculated.

Can final marijuana products have cannabinoid percentages, including Total Δ 9-THC and Total CBD, on the product label?

Yes. Licensees may also include the cannabinoid percent per package (%), including Total Δ 9-THC and Total CBD, on the final marijuana product label if:

- The reported percent and total calculations were made for the representative sample collected by the testing licensee for mandatory testing. Licensees may request this calculation by selecting ***“Additional – Mandatory Cannabinoid % and Totals”*** in addition to the product's appropriate “Mandatory” testing category.
- Cannabinoid % results are placed directly after the milligrams per serving/dose (mg/serving-dose) on the final marijuana product label. Cannabinoid % results must be listed for each required cannabinoid in 19 CSR 100-1.120(1)(C)2.H.
 - For example:
 - Δ 9-THC: [##] mg/serving-dose; ([##] %)
 - Δ 9-THCA: [##] mg/serving-dose; ([##] %)
 - CBD: [##] mg/serving-dose; ([##] %)
 - CBDA: [##] mg/serving-dose; ([##] %)
 - CBN: [##] mg/serving-dose; ([##] %)

- THCV: [##] mg/serving-dose; ([##] %)
 - CBDV: [##] mg/serving-dose; ([##] %)
 - Δ8-THC: [##] mg/serving-dose; ([##] %)
 - Total CBD: [##] mg/serving-dose; ([##] %)
 - Total Δ9-THC: [##] mg/serving-dose; ([##] %)
- Include the following total cannabinoid reporting areas directly below the cannabinoid profile required by 19 CSR 100-1.120(1)(C)2.H:
 - Total Δ9-THC [##] mg/serving-dose; ([##] %)
 - Total CBD [##] mg/serving-dose; ([##] %)

For any final marijuana items that have been previously approved by the Division of Cannabis Regulation (DCR), licensees may send requests to edit these items to cannabisproductcompliance@health.mo.gov with the subject line: *[License number] - Reset items to add cannabinoid percentage.*

How should testing licensees report cannabinoid percentages in Metrc?

Testing licensees shall enter the cannabinoid percentages per package in Metrc, the statewide track and trace system.

Licensees requesting mandatory testing must select **“Additional – Mandatory Cannabinoid % and Totals”** in addition to the product’s appropriate “Mandatory” testing category, to list cannabinoid percentages, including Total Δ9-THC and Total CBD, on product labels.

How may a licensee include a barcode on final marijuana product?

Upon submitting a final marijuana product and label for approval required by 19 CSR 100-1.120(2), licensees may include a standard barcode on the label required by 19 CSR 100-1.120(1)(C)2. The barcode must be linked to the package tag number. Licensees can include this barcode directly after or under the required statewide track and trace system (Metrc) tag number associated with the mandatory testing results for the final marijuana product as required by 19 CSR 100-1.120(1)(C)2.F; or directly next to, or under the final marijuana product source package tag number allowed through the August 18, 2023 variance, if a licensee chooses to include this information.

For any final marijuana items that have been previously approved by the Division of Cannabis Regulation (DCR), licensees may send requests to edit these items to cannabisproductcompliance@health.mo.gov with the subject line: *[License number] - Reset items to add barcode.*

For additional information, please see variance issued on May 29, 2024. This FAQ and variance supersede the FAQ and variance posted on March 8, 2024.