

Missouri Division of Cannabis Regulation

Guidance Document – 9/08/2023

Topics: Item Approval – Item Photos Guidance

Beginning September 1, 2023, the Item Approval process became required for all new final marijuana products. Through this process, licensees are required to upload photos for all final marijuana product items created in the statewide track and trace system, Metrc, “Final Packaging” item category. These photos are available to the public through an [online catalog](#) hosted by Metrc. The Division of Cannabis Regulation (DCR) encourages patients, caregivers, and consumers to utilize this catalog to promote product confidence.

DCR will deny item approval applications that do not meet the photo requirements outlined below.

Product Photo: This means a single photo of the physical final marijuana product on a solid neutral color background.

1. *The product photo must provide a clear and detailed image of the entire final marijuana product intended for distribution.*
 - Where there are multiple servings and/or doses of the same flavor/strain within a final marijuana product unit, licensees shall submit a photo of a single serving and/or dose.
 - For example, if a licensee produces a pack of five (5) Golden Goat prerolls or a pack of ten (10) cherry flavor gummies, the licensee must submit a photo of a single preroll or gummy.
 - Where there are multiple servings and/or doses of different flavors within a final marijuana product unit; licensees shall submit a photo that includes a single serving and/or dose of all flavors.
 - For example, a pack of thirty (30) tropical flavored candies includes ten (10) of each of the following flavors: mango, pineapple, and coconut. The licensee must submit a photo that includes a candy of each flavor. Therefore, this photo would have three (3) candies visible in the product photo: one (1) mango, one (1) pineapple, and one (1) coconut.
2. *To enhance product visibility, licensees must take final marijuana product photos on a solid neutral background.*
 - For example, a white preroll may blend in if photographed on a white background.
 - Commonly defined, a neutral color is black, white, brown, or grey.
 - Photos may not include embedded brand or product logos.
 - Photos may not be styled in a way as to include raw ingredients, marijuana leaves, cooking utensils, bowls/bongs/rigs, additional brand/product imagery or logos, etc.

Label Photo: This means a single pdf file of the label information in the order required by rule, colloquially known as the “testing label” or “label required by rule.”

1. *The label must list all required information, in the proper order, from top to bottom and left to right.*
2. *If applicable, provide an area for terpenes, source tag, and flavor/strain if the licensee will list them on the product label.*
3. *Leave variable or unknown content blank.*

- For example, cannabinoid and terpene test results and item approval number should be left blank.
 - Ingredients and their order are not variable information and should be included in the label photo.
4. *Provide an area for upcoming cannabinoid testing requirements*
- For example, Delta 8 THC, THCV, and CBDV

Packaging Photo: This means a single photo of the physical final marijuana packaging, including all printed content, display panels and wrappers, on a solid neutral color background.

1. *The packaging photo must provide a clear and detailed image of the entire final marijuana packaging intended for distribution.*
 - a. For example:
 - i. A resealable pouch has two sides and a bottom, DCR approved the design with printed content on both sides of the packaging, and nothing on the bottom; the licensee should submit a single packaging photo that includes the front and back of the packaging in a single photo.
 1. Note 1: A licensee may accomplish this by placing two packages in a single shot with one package facing forward and the other backward.
 2. Note 2: If DCR approved printed content on the bottom of the package, DCR would expect licensees to include the bottom of the package in the photo.
 - b. Where applicable, the packaging photo must include any wrappers included within the package.
 - i. For example, if the resealable pouch above contained individually wrapped marijuana-infused candies, DCR expects the wrapper for those candies to be included in the packaging photo with both side of packaging.
2. *To enhance product visibility, licensees must take final marijuana product photos on a solid neutral background.*
 - a. For example, black packaging may blend in if photographed on a black background.
 - b. Commonly defined, a neutral color is black, white, brown, or grey.
 - c. Photos may not include embedded brand or product logos.
 - d. Photos may not be styled in a way as to include raw ingredients, marijuana leaves, cooking utensils, bowls/bongs/rigs, additional brand/product imagery or logos, etc.