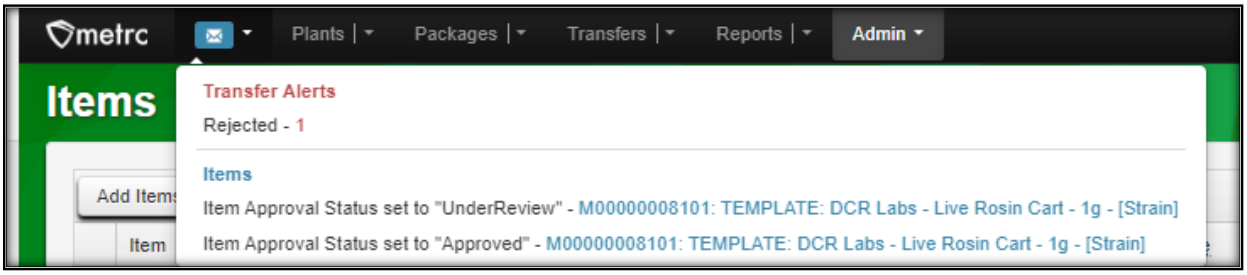
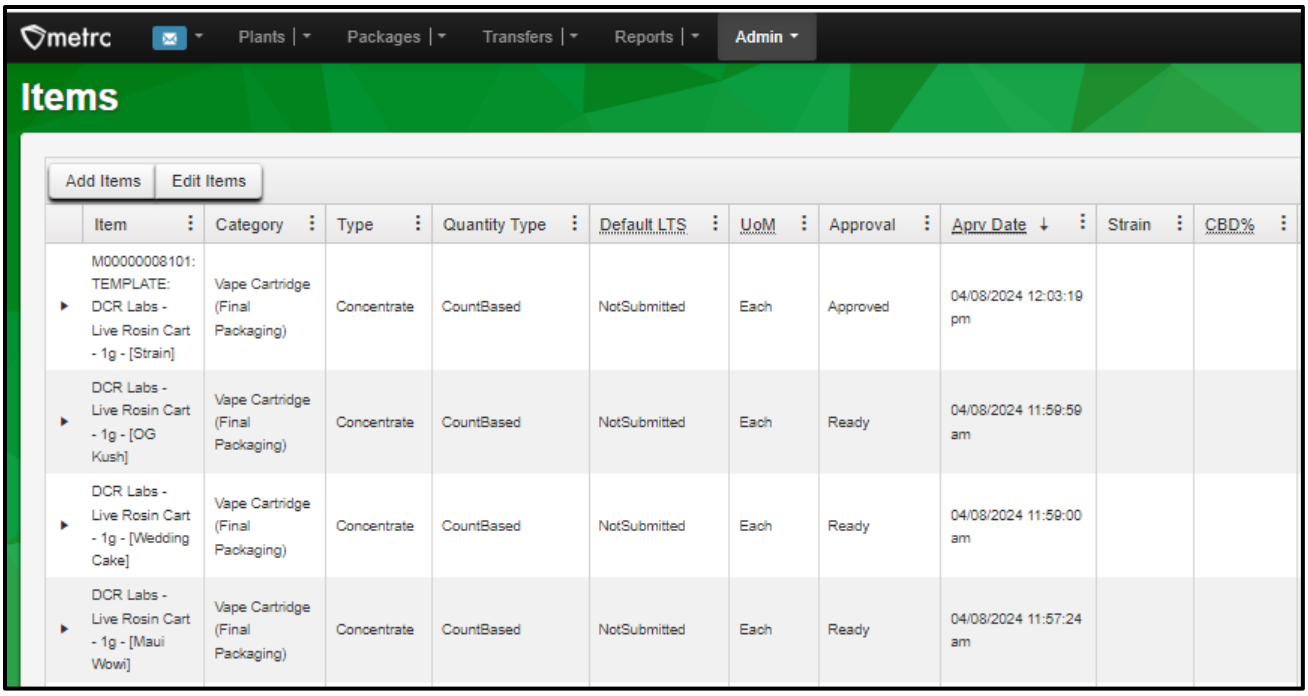
Division of Cannabis Regulation
Guidance Document – 05.20.24
Topic: Item Approval Process Efficiencies – Submitting Template-Based Items

On September 1, 2023, the Division of Cannabis Regulation (DCR) implemented the Item Approval process per 19 CSR 100-1.120(2). This process requires licensees to submit all marijuana product designs, packaging designs, and label designs to DCR for a compliance review with 19 CSR 100-1.120(1), prior to use. The Item Approval process is in place to ensure products and packaging are designed in a manner that protects public health. In working through the Item Approval process and considering feedback from licensees, DCR continues to identify areas that will improve the process and allow DCR and licensees to gain efficiencies. For all final marijuana product, below are the efficiencies DCR is implementing effective immediately regarding submission of items based on approved template items.

After a licensee has received Department approval through the statewide track and trace system (Metrc) for a new template item, the licensee may begin submitting items based on that approved template. Items may only differ in flavor or strain. Certain areas of the approved-template are expected to change based on a different flavor or strain, and the licensee is required to demonstrate the areas that will differ through a placeholder on the template-item submission. For example, a gummy product should have the same ingredients, but would list "natural [flavor (e.g. lime)] flavoring," inputting the flavor for each template-based submission. See the Creating Template Items guidance for additional information to assist with submission of an approved template-based item. Below is an example that includes three types of notifications provided by Metrc when the Department takes an action pertaining to an item, including approval. Additionally, an item that has been approved by the Department will receive an approval number, which may be found at the beginning of the item name as show below.



Licensees may submit all templated-based items associated with an approved template item at one time, which may allow for a reduced review time for each item. See example submission below. This process is reserved specifically for template-based items. Any items not using an approved template should follow the submittal instructions from the Item Approval Process Efficiencies.

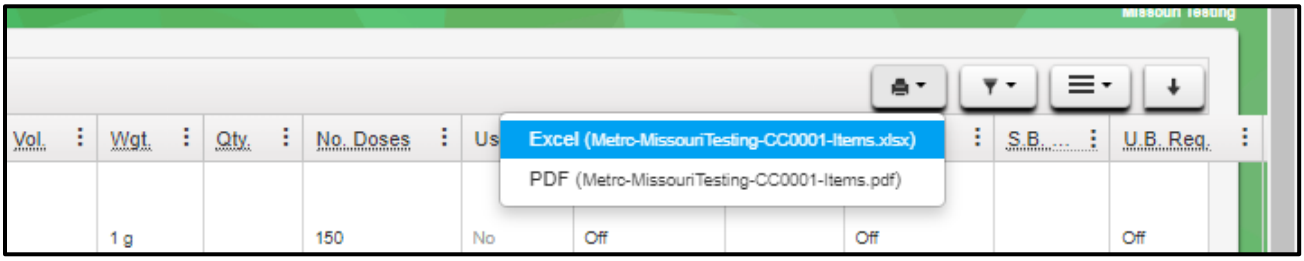


Item	Category	Type	Quantity Type	Default LTS	UoM	Approval	Aprv Date	Strain	CBD%
M00000008101: TEMPLATE: DCR Labs - Live Rosin Cart - 1g - [Strain]	Vape Cartridge (Final Packaging)	Concentrate	CountBased	NotSubmitted	Each	Approved	04/08/2024 12:03:19 pm		
DCR Labs - Live Rosin Cart - 1g - [OG Kush]	Vape Cartridge (Final Packaging)	Concentrate	CountBased	NotSubmitted	Each	Ready	04/08/2024 11:59:59 am		
DCR Labs - Live Rosin Cart - 1g - [Wedding Cake]	Vape Cartridge (Final Packaging)	Concentrate	CountBased	NotSubmitted	Each	Ready	04/08/2024 11:59:00 am		
DCR Labs - Live Rosin Cart - 1g - [Maui Wowi]	Vape Cartridge (Final Packaging)	Concentrate	CountBased	NotSubmitted	Each	Ready	04/08/2024 11:57:24 am		

After a licensee enters all the approved template-based items for an approved template, the licensee should submit the data in a CSV (Microsoft Excel) file format to CannabisProductCompliance@health.mo.gov, along with a completed Item Approval Application. Licensees should submit the CSV file and Item Approval application with the following subject line: Licensee # - Approved Template Number Item Name as shown below.

MAN0000## – M00000008101 TEMPLATE: DCR Labs - Live Rosin Cart – 1g – [Strain].

Licensees can use the Metrc submission to export the data to a CSV file by clicking “export data to file” button as shown below.



Label submission for template-based items:

Licensees are not required to submit unique labels when creating template-based items. Licensees may submit the same label file that was submitted with the original approved template with each subsequent template-based item. Additionally, licensees must attest that the template-based items will match the approved template item that is referenced on the application. If an approved template item has received approval for alternate placement of a label required by rule, the template-based item would automatically be approved for the same alternate placement.

For template-based items, a licensee is not required to complete sections 4-6 of the Item Approval application identifying the logos or symbols, side or behavioral effects, and a QR code as these elements are required to be the same as the approved template item. The Item Approval Application and other packaging and labeling resources can be found at the DCR Facility Communications and Guidance Page.