Missouri Division of Cannabis Regulation Guidance Document – 6/06/2023 Topics: Packaging Color and Variance Extension

Final rules regarding cannabis packaging were filed May 15. If you have not already done so, now is the time to begin the process of bringing your license's product, packaging and labeling into compliance with the new rules.

To facilitate this process, we want to highlight some key differences between the original proposed rules for packaging and the final rules.

First, clarifications were made to 19 CSR 100-1.120(1)(B)5 to address a misunderstanding that the original language required "monochromatic" packaging. The new language clarifies that the packaging rule allows for several colors, specifically: 1) a primary packaging color, and 2) up to two logos or symbols that can be a different color or even different colors.

Additionally, the previous version allowed for, "text indicating whether the product is sativa, indica, or a hybrid." The final rule replaces this with, "text indicating side effects and behavioral effects of usage."

To illustrate the requirements of 19 CSR 100-1.120(1)(B)5, we are including an example of a package that complies with this rule. It does not reflect other packaging rule requirements and should not be taken as an example of how to comply with the entire rule section.

We hope many of you have already begun redesigning your packaging to meet the requirements in Article XIV and the proposed rules. However, in light of these recent changes to the proposed rules, the Department will be issuing a variance for 19 CSR 100-1.120 with a schedule that will allow licensees additional time to bring the license's product, packaging and labeling into compliance with the new rules.

CANNABIS BRAND

Product Name

[Text indicating side effects and behavioral effects of usage]

MARIJUANA



5. All marijuana product packaging design, including that for exit packaging, may only utilize—

A. limited colors, including a primary color as well as up to two (2) logos or symbols of a different color or colors, whether images or text, including brand, licensee, or company logos, provided that the widest part of a logo or symbol is no wider than the length or height, whichever is greater, of the word "Marijuana" on the packaging;

Packaging – Primary color, purple (R:204, G:153, B:255)



Logo 1 (Text) – Brand; Multiple colors; 4" x 1.5" (L x H) text box Logo 2 (Symbol/Image) – Company logo; Multiple colors; 3" x 3" grouping box

MARIJUANA

"Marijuana"- Required; Black or White font; 5" x 1.25" text box

5. All marijuana product packaging design, including that for exit packaging, may only utilize—

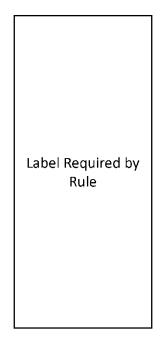
B. a product name; *Black or White font;* 4" x 1" text box

Product Name

C. text indicating side effects and behavioral effects of usage; *Black or White font;* $4'' \times 1''$ text box; not an opportunity to make health claims

[Text indicating side effects and behavioral effects of usage]

D. A label required by this rule; Black and White label;



E. A QR code linking to a website where a purchaser can learn more about the product; *Black and White only; not an opportunity for another logo or image*

