



Missouri Department of Health and Senior Services

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Sarah Willson
Director

Mike Kehoe
Governor

August 15, 2025

Missouri Facility Licensees

RE: Department-initiated variance to allow variety packs of certain edible marijuana-infused products

Licensees,

Pursuant to 19 CSR 100-1.020(1)(A), the Division of Cannabis Regulation (DCR) is granting a variance to the requirement in 19 CSR 100-1.110(5)(B)4. Manufacturing licensees will be considered in compliance with the rule by complying with an alternative requirement for variety packs¹ of edible marijuana-infused product that include minimal variation, such as variations in flavorings or colors.

19 CSR 100-1.110(5)(B)4 states that:

Marijuana products may be sampled in bulk after all processing of the harvest lot or process lot² is complete.

Licensees may offer edible marijuana-infused products that include minimal variation, such as multiflavored gummies and multicolored chocolate candies, by complying with the following modified requirement:

Marijuana products may be sampled in bulk in the product equivalent to what will be dispensed to patients and consumers.

Variety packs covered through this variance must still meet all requirements of process lots and will be sampled and mandatory tested after the process lots are combined. For example, if a licensee intends to have a variety pack of gummies with blue, red, and yellow gummies, the licensee must produce the gummies using the same ingredients (except for the flavoring or dyes that cause the variation in color), standard operating procedures, and harvest lots. Additionally, the licensee must combine the three process lots of gummies prior to sampling for mandatory testing by a testing licensee.

This variance does not apply to marijuana-infused products that are to be vaporized or smoked (inhaled products).

¹ A variety pack is a package of edible marijuana items, of the same product type, containing a selection of different flavors or colors, with each individual item having the same volume and surface area.

² 19 CSR 100-1.010(81) "Process lot" means, once production is complete, any amount of marijuana concentrate or marijuana extract of the same type and processed using the same extraction methods, standard operating procedures, and harvest lots; or any amount of marijuana-infused product or prerolls of the same type and processed using the same ingredients, standard operating procedures, and harvest lots.

DCR will review variety pack marijuana products through the item approval process to determine if a product is eligible for this variance from rule. If a variety pack is not eligible, it will be denied through the item approval process.

DCR determined the good cause for granting this variance is to provide manufacturing licensees the same ability to produce a variety pack with minimal variation no matter the timing the different flavors and/or colors of candies are introduced prior to sampling for mandatory testing.

Erica Ziegler, Deputy Director
Division of Cannabis Regulation
Department of Health & Senior Services

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