

## NACB PACKAGING & LABELING CHECKLIST

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### CHILD RESISTANT

- Is your packaging opaque and designed to be difficult for children under 5 to open?
- OR
- Is your packaging plastic at least 4 mils thick and heat-sealed without easy-to-open tabs (liquid also sealed with a metal crown cork-style bottle cap)?
- OR
- Is your packaging otherwise certified as “special packaging” pursuant to 16 C.F.R. Part 1700 (Poison Prevention Packaging Act)?
- OR
- Does your state provide an exception to child-resistant packaging (to accommodate elderly/handicap)?

### CERTIFICATION

- If child-resistant packaging is required, did you obtain certification from manufacturer that containers or exit packages conform to child-resistant standards and identifies batch and lot numbers?
- OR
- If child-resistant packaging not required, did you obtain certification from manufacturer that containers or exit packages protect cannabis, are made of materials the FDA generally considers safe (21 C.F.R. Parts 170-186) and identifies batch and lot numbers?

### PACKAGING CANNABIS

- Are your cannabis products placed in a container prior to sale?
- Are your containers or exit packages child-resistant?
- Are your solid edible products packaged in a single child-resistant container and demarcated into separate servings or an external child-resistant container with internal containers with warning labels?
- Are your solid edible products marked with a distinguishable identification that the product has THC, marijuana or cannabis?
- Does your liquid edible cannabis product include a measuring component allowing increments of one standard serving?

### EXIT PACKAGES

- Does your exit package refrain from any appeal to minors?

### PACKAGING LAYERS

- Does your outmost packaging layer comply with our warning and advertising standards?

### PRODUCT IDENTIFICATION

- Does your product contain a label with the batch identification number for units containing the same strain or concentrate type, method, chemical and batch of origin?
- Does your product contain the cultivators license number for units containing the same strain or concentrate type, method, chemical and batch of origin?

### WARNING SYMBOL

- Does your label contain a standardized symbol indicating that the product contains THC or marijuana or cannabis that either complies with your state law for the “Universal Symbol” from the Colorado Department of Revenue?
- Is your label prominently displayed and clear and legible?

## **WARNING STATEMENTS**

- Does your label contain a statement warning that:
  - The product contains THC or marijuana or cannabis
  - The product is for use only by adults age 21 or older or for use by only authorized patients
  - There may be health risks, including those for pregnant or breast-feeding women
  - The product may impair driving or operating heavy machinery
  - The product must be kept out of childrens reach
  - If claiming a psychological or physiological effect, a warning not approved by FDA
  - The product effect may be delayed by two or more hours

## **PROHIBITIONS**

- Does your label or product container refrain from making any false or misleading statements?
- Does your label or product container refrain from targeting consumers under 21 yrs?
- Cannot contain cartoon characters, toys, action figures, animals, balloons, minors, the word "candy," graphics similar to candy, celebrities.

## **INGREDIENTS**

- Does your product label include all ingredients listed in descending order of weight?

## **ALLERGEN WARNINGS**

- Does your label for edibles contain a statement that the product contains milk, eggs, fish, shellfish, tree nuts, peanuts, wheat or soybeans?

## **HEALTH, MEDICAL & DISEASE CLAIMS**

- Does your label or marketing or advertising refrain from claiming that your product:
  - Diagnoses, mitigates, treats, cures or prevents disease
  - Describes the relationship between your product and any health condition
  - Mimics a brand or otc or prescription drug
  - Uses any words, symbols or images commonly used in medical or pharmaceutical professions like "RX" or "prescription"

## **TAMPER-EVIDENT PACKAGING**

- Does your product container have one or more indicators or barriers to entry which provide reasonably visible evidence or tampering if breached?
- Does your package comprised of materials the FDA deems "generally recognized as safe?"

## **SERVING SIZE**

- Does your product label state the total amount of THC in the container?
- Does your product label state the amount of servings and total amount of THC per serving?