

# PACKAGING REQUIREMENTS

## CANNABIS AND CANNABIS PRODUCTS



The Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) includes basic requirements for how cannabis and cannabis products must be packaged before sale. These guidelines apply to all cannabis flower, pre-rolls and manufactured cannabis products sold within California.

### PACKAGING CHECKLIST

- Tamper Evident** – A consumer knows if the package has been opened.  
*Example: a plastic seal, a sticker across the lid that is ripped when opened, a jar with a lid that pops up after opening, etc.*
- Child Resistant** – The package is designed to be difficult for children under five years of age to open. See below for more information about what qualifies as child resistant.
- Resealable** (for products with multiple uses) – The package can be closed after each use.  
*Example: a lid, adhesive closure, box top closure, etc.*
- Opaque** (for edibles only)\* – The package is not transparent; consumers cannot see the product through the packaging.  
*\*Amber-colored bottles are considered opaque.*  
*\*Opaque bottles used for beverages may use a single, vertical, clear strip less than 0.25" wide to indicate serving sizes.*

### DOs

- Cannabis flower may be packaged by a cultivator, manufacturer or distributor. Manufactured cannabis products must be packaged and labeled by the manufacturer prior to transfer to a distributor as finished products.
- Protect products from contamination and exposure to any toxic or harmful substances
- If a product has multiple layers of packaging, the packaging requirements can be fulfilled using any one of those layers.

### DON'Ts

- Cannot imitate packaging used for products typically marketed to children
- Cannot imitate packaging used for non-cannabis food products

### CHILD-RESISTANT PACKAGING (CRP)

State law requires all cannabis and cannabis products to be in child-resistant packaging. Until December 31, 2019, a child-resistant exit package, used by a retailer at the time of sale, may be used to fulfill the CRP requirement. Beginning January 1, 2020, every individual product must be in a child-resistant package.

#### What qualifies as child-resistant packaging?

- Packages that have been certified as child-resistant, in accordance with the federal Poison Prevention Packaging Act (PPPA, 16 CFR §1700.1)
- A bottle sealed with a pry-off metal crown bottle cap
- Plastic packaging that is at least 4 mils. thick and heat-sealed without an easy-open tab, dimple, corner or flap

#### Types of CRP:

- **Single Use** (“Initial CRP”) – the package is initially child-resistant, but once opened, it is no longer child-resistant. If used, the package’s label must say “This package is not child-resistant after opening.”
- **Multiple Use** (“Lifetime CRP”) – the package maintains its child-resistance throughout the life of the package. It can be opened and closed, but still remains child-resistant.

#### WHAT REQUIRES INITIAL CRP?

- Flower and flower-only pre-rolls
- Inhaled concentrates (infused pre-rolls, vape cartridges, shatter, wax, etc.)
- Topicals
- Single-serving cannabis products

#### WHAT REQUIRES LIFETIME CRP?

- Edibles
- Orally-consumed concentrates (tinctures, capsules, etc.)
- Suppositories

*NOTE: A package containing multiple servings is not required to be in lifetime CRP if each individual serving is in child-resistant packaging.*