



# Ohio Department of Commerce Medical Marijuana Control Program

## Product Packaging and Labeling Guidance

The Ohio Department of Commerce developed the following guidance and examples to aid medical marijuana processors in correctly labeling medical marijuana products.

### Product Labeling Requirements

- Cannabinoid content is required to be listed on the label for every medical marijuana product sold in MMCP-licensed dispensaries.
- Each product must conform to the daily unit requirements listed in O.A.C. 3796:8-2-04 for the appropriate product category, with the actual Total THC concentration derived from lab testing falling within 95-105% of the units listed therein.

### Product Net Weight Determination

Ohio Administrative Code 3796:3-2-02 requires the inclusion of THC, THCA, CBD, and CBDA on each medical marijuana product label. Values for each of these cannabinoids are reported into METRC by testing laboratories in units of milligrams per gram of product (mg/g). When listing these values on the label, a processor must factor in the net weight of the product (g) in each package. The resulting value will be the total cannabinoid content in milligrams per package.

***EXAMPLE:** A laboratory report shows that an edible product has a THC content of 3.4mg/g. The THC amount to be placed on the label will be 3.4mg/g multiplied by the net weight in grams of product in the package. The result will be the THC content of the package in mg. The same applies to other required cannabinoids.*

In determining the net weight of a medical marijuana product to be placed in a package, it is important to note that unit requirement in OAC 3796:8-2-04 refers to the product's **Total THC** content as defined in OAC 3796:1-1-01(A).

- Total THC is calculated as follows:  $(\text{THCA} \times 0.877) + \text{THC}$

Total THC and Total CBD are also reported into METRC by testing laboratories. When determining the net weight of a given product to be packaged after receiving lab results on a bulk production batch, the **Total THC** value must fall within 95-105% of the value listed in OAC 3796:8-2-04 for that product's category.

***EXAMPLE:** The lab report for the edible product in the example above also shows a THCA content of 0.3mg/g. Factoring in the THC results, this means that the Total THC is  $(0.3 \times 0.877) + 3.4 = 3.66\text{mg/g}$ . The Total THC increment required for edible products by OAC 3796:8-2-04 is 110mg +/-5% (104.5mg to 115.5mg). Therefore, the net weight of product per package for this edible product must be 30.05g +/-5% (28.55g to 31.55g).*

### Product Labeling

In addition to listing THC, THCA, CBD, and CBDA on a product label as required by rule, the Department strongly recommends that cultivators and processors also list Total THC and Total CBD on product labels. (*NOTE: Total CBD is calculated in the same manner as Total THC, i.e.  $(\text{CBDA} \times 0.877) + \text{CBD}$ .*)

Processors are also required by rule to provide a list of all ingredients contained in a medical marijuana product on the product label. Because of the requirement that a lot or batch of manufactured medical marijuana product contain the exact same ingredients, each individual flavor of the same type of product must be batched separately, lab tested



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separately, and assigned a unique product ID. Ingredient lists that include items like “natural flavoring” must include sufficient detail to differentiate multiple varieties of the same type of product. For example, if a processor manufactures orange flavored gummies and cherry flavored gummies, batches of each may not be combined together for lab testing, each flavor must have its own product ID, and the ingredient lists should include “orange flavoring” and “cherry flavoring.”

***EXAMPLE:*** The lab report for the product in the previous examples also shows a CBD concentration of 3.4mg/g and a CBDA concentration of 0.3mg/g. Therefore, the product label should look like this:

Medical Marijuana Processing Company, INC. License # MMCPP12345 Product ID M012345678 Edb Oral Admin 10 – 10 – 11 Milk chocolate squares, edible, 10mg THC each Lot # 1A000321654987654 Manufactured on 1/1/19 Tested on 1/2/19 at Testing Lab Inc, MMCPL12345 Packaged on 1/5/19 Expiration 1/1/20	Net wt. 30.05g THC 102.17mg THCA 9.02 Total THC 109.98 Ingredients: Milk, sugar, cocoa, THC, CBD Allergens: Contains milk This product is for medical use and not for resale or transfer to another person. This product may cause impairment and may be habit-forming. This product may be unlawful outside the State of Ohio. Caution: When eaten or swallowed, the effects and impairment caused by this drug may be delayed.
	CBD 102.17 CBDA 9.02 Total CBD 109.98

### **Total THC Per Daily Unit**

Each portion or dose of medical marijuana must contain no less than 95% or no more 105% of the concentration of Total THC required by rule. (Please refer to O.A.C. 3796:8-2-06(D)) For the purpose of clarification, the following table indicates the acceptable **Total THC** per daily unit for each medical marijuana product category:

Category	Daily unit (mg THC)	Lower limit (mg THC)	Upper limit (mg THC)
<b>Patch</b>	295	280.25	309.75
<b>Lotion, cream, ointment</b>	295	280.25	309.75
<b>Oil for oral administration</b>	110	104.5	115.5
<b>Edible or capsule</b>	110	104.5	115.5
<b>Tincture</b>	110	104.5	115.5
<b>Oil or solid preparation for vaporization</b>	590	560.5	619.5

Medical marijuana products must be packaged in multiples of the daily units listed in rule. Utilize the table above in conjunction with your laboratory report to determine the unit net weight of product to be packaged. If a package contains more than one daily unit, multiply the figures above accordingly and ensure that the Total THC concentration of the package falls within range for the number of daily units in the package.