



Child-Resistance Certification Forms & Requirements

Pursuant to Ohio Revised Code 3796.19 and Ohio Administrative Code 3796:2-2-02, 3796:3-2-02, and 3796:8-2-03, all cannabis must be packaged in child-resistant packaging. The packaging must meet the standards for child-resistance as evidenced by testing required under 16 CFR 1700.15 and 16 CFR 1700.20.

Currently, cultivators and processors are required to submit evidence of child-resistance along with each packaging and labeling application. The Division of Cannabis Control (DCC or Division) is issuing two new certification forms that must be submitted, along with evidence of testing conducted pursuant to 16 CFR 1700, with each new packaging application. Separate forms must be submitted for each packaging size, material, or closure.

1. [Licensee Form – Certification of Packaging Child Resistance](#): this form must be completed by the licensee. The form includes information about the item being submitted to DCC with your packaging and labeling application (package size, material, closure etc.), as well as information about the packaging manufacturer.
2. [Manufacturer Form – Certification of Packaging Child Resistance](#): this form must be provided by the licensee to the manufacturer to complete. Please note, “manufacturer” may be considered the distributor or importer; for these purposes, the manufacturer is (typically) the US-based entity selling the packaging. This entity is also responsible for certifying that the packaging meets the child-resistant standards pursuant to 16 CFR 1700.15 and 16 CFR 1700.20 based on the testing data provided and, to properly do so, must have access to the testing data underlying the certification.

Child-resistant testing documentation for the packaging subject to the application must also be provided by the manufacturer.

The Division’s review of these forms and accompanying testing documentation will include the following:

Licensee Form

- The packaging specifications (i.e., size, material, closure) must be consistent with the specifications provided on the Manufacturer Form.
- Within the Packaging Manufacturer Information section, in the fields for Use Date, Products, and Dosage or Unit Counts, the Division is looking for information about the types of products that are intended to be placed into the submitted packaging. This includes:
 - Use Date: The licensee must describe when they intend to begin using the packaging for the specific product(s).
 - Proposed Products: The licensee must describe the type(s) of product(s) intended to be placed into the packaging.
 - Proposed Dosage or Unit Counts: The licensee must indicate the dosage or unit count intended for the product placed into the packaging.



Manufacturer Form and Testing Documentation

- The packaging specifications (i.e., size, material, closure) must be consistent with the specifications provided on the Licensee Form.
- The manufacturer's contact information is provided.
- The testing results provided clearly state that testing was conducted pursuant to 16 CFR 1700.15 and 16 CFR 1700.20. The name of the testing laboratory, an image of the packaging, source information, and a signature of the tester must be readily accessible within the testing documentation.
- The Manufacturer Form asks "Does the tested closure, package size, and materials match the package size and materials being certified herein?" If the manufacturer answers no, they must provide a detailed explanation and rationale for certifying the packaging, referencing what objective criteria was relied upon to make the certification.
 - The Division will review this explanation and the testing documentation for objective criteria, based upon the testing data, which demonstrates that the packaging would meet the child-resistant certification standards if it had been directly tested. A proper submission will include references to the testing data in the explanation and comparisons using that data between the tested packaging and the proposed packaging.
- All testing and compliance documentation provided must be unaltered and unredacted. The Division will not approve a packaging application if testing documentation is redacted.
 - If you choose to submit these forms as trade secret, you must include a cover page with the submission outlining that you are asserting trade secret protection and clearly indicate which forms or portions of the forms are protected.

Effective immediately, both the Licensee and Manufacturer forms, along with the testing documentation, must be uploaded under the Child-Resistance section for all new Packaging & Labeling Applications in [DCC eLicense](#). Multiple files may be uploaded.

All questions must be directed to the Cannabis Service Center (CSC). You can open a CSC case within the [CSC Licensee Portal](#) or by emailing DCC Licensing@com.ohio.gov.

UPDATED – Production Batch Checkbox Guidance

The Division has issued updated [Metrc Production Batch Checkbox Guidance](#) to provide for changes required in the recent [Testing Required Prior to Use of Technology Solution Guidance](#). Specifically, cultivators and processors are required to use the Metrc Production Batch checkbox after using a technology solution to treat cannabis plant material and during processing when a package changes form.

For cultivators, selecting the Production Batch checkbox resets the Lab Test Status in Metrc for a new package. When a technology solution has been used to treat a batch of cannabis plant material, a production batch will help ensure that all required testing is completed before a batch is distributed to a processor or dispensary.

For processors, selecting the Production Batch checkbox resets the Lab Test Status in Metrc after a package has changed form, e.g. plant material is extracted, or a product is created from a



cannabis-derived ingredient. A production batch will help ensure that all testing that is required at a given stage of processing is completed before a lot is distributed to dispensaries.

Use of the Production Batch checkbox is only permitted in the scenarios stated above; any other use is prohibited. Please review the [full guidance](#) for more information and Metrc examples.

All questions about use of the Production Batch checkbox or technology solutions must be directed to the CSC. You can open a CSC case within the [CSC Licensee Portal](#) or by emailing DCCCompliance@com.ohio.gov.

Active Employee Roster

DCC eLicense portal users searching their licensed employees now have a more user-friendly view. On the Manage Employees page, you will see a new tab called "Active Employees by Facility" next to the "Inactivated Employees" tab.

This tab has a Search Licenses lookup/dropdown field that displays active licenses the portal user is associated with. When the user selects a license, then a list of all active employees for the selected license are displayed with the following sortable columns:

- Actions
- First Name
- Last Name
- Employee License
- Employee Type
- License Type
- Expiration Date

Any questions must be directed to the [CSC Licensee Portal](#) licensee portal or by emailing DCCLicensing@com.ohio.gov.