



Packaging and Labeling Guidance

The Division of Cannabis Control (DCC or Division) has issued the following guidance to all licensees regarding packaging and labeling requirements for cannabis intended for direct customer sale, pursuant to Ohio Administrative Code (OAC) [1301:18-4-19](#), [1301:18-4-20](#), [1301:18-4-21](#), and [1301:18-4-23](#).

Beginning June 1, 2027, all cannabis transferred to a dispensary for direct customer sale must be compliant with these rules for packaging and labeling. While the new rules will be effective sooner, licensees have until June 1, 2027, to ensure all products transferred to a dispensary are compliant.

Pursuant to OAC [1301:18-4-19](#), each cultivator and processor must request and receive approval from the Division before utilizing packaging or labeling intended for direct customer sale. All packaging and labeling must be submitted for Division review utilizing the Packaging & Labeling Application within the [DCC eLicense](#) portal.

It is the responsibility of each cultivator and processor to establish, maintain, and comply with written policies and procedures to ensure all cannabis intended for direct customer sale complies with the packaging and labeling requirements. Failure to comply with these rules may result in product alerts or recalls and/or penalties including fines, license suspension, or any other enforcement action deemed necessary to ensure compliance.

I. PACKAGING REQUIREMENTS

Each package intended for direct customer sale must:

- Be compliant with the limitations outlined in OAC [1301:18-4-21](#).
- Be **child-resistant** pursuant to [16 C.F.R. 1700.15\(b\)](#) requirements. Please review the [Child-Resistance Guidance](#) for further information.
- Be **tamper evident**.
- **Maintain the integrity and stability** of the cannabis contained within it.
- **Prominently, conspicuously, clearly, and plainly display**, in an unobstructed manner when viewing the package, all of the following information in **legible English**:
 - The **name of the product** as approved by the Division on the associated eLicense Product Registration Application.
 - Licensees must register all brands and their associated products pursuant to the [Product Registration Guidance](#) within DCC eLicense. The guidance provides that the Product Registration Application is to contain the name that the licensee intends to use on all associated packaging and advertising to identify the product. The product identification on packaging may or may not include the Brand Name.
 - This is **not** the full naming convention required on Product Item IDs in Metrc.
 - For example, if the package for my gummies identifies them as “DCC OG Gummies,” then that name must be reflected within the eLicense Brand Registration Application and/or Product Registration Application for the product.
 - I may also supplement the product name on the packaging with additional information that has been approved by the DCC and is compliant. For example: I make multiple flavors of the DCC OG Gummies, which have all been registered and included in the product description and ingredient information. Therefore, I am permitted to include those flavors on my packaging too.
 - Another example, my flower package is identified as “DCC Premium Flower.” “DCC Premium Flower” must be reflected within the eLicense Brand Registration Application and/or Product Registration Application for the product.
 - I may also supplement the product name on the packaging with additional information that has been approved by the DCC and is compliant. For example, I cultivate several different strains under my DCC brand. I have included these strain names in my eLicense Product Registration Application (either name or description field); therefore, I am permitted to include those strains on my packaging as well.

- The **universal THC symbol** affixed such that it clearly and immediately indicates to a reasonable person that the package contains cannabis. Pursuant to OAC [1301:18-4-04](#):
 - The THC symbol must be permanently affixed and in a contrasting color, or molded in a manner that cannot be removed, to the surface upon which it is printed or stamped.
 - The symbol must be at least 1/4 inch by 1/4 inch in size.
 - Each package and container must be clearly marked with the THC symbol. Therefore, if the cannabis is in a container that is then placed in outer packaging, both the container and the packaging must be clearly marked with the THC symbol.
 - For these purposes, a vaporization *cartridge* is not considered a container and therefore is not required to be affixed with the THC symbol. However, pursuant to OAC [1301:18-4-04\(D\)\(2\)](#), if a portable, hand-held cannabis device used to administer cannabis would cause a reasonable person to believe the device does not contain cannabis, it must be permanently affixed with the THC symbol.



- The **DCC seal**, which can be found within the CSC Licensee Portal, including color specifications.
 - The seal must be permanently affixed, or molded in a manner that it cannot be removed, to the surface upon which it is printed or stamped.
 - The seal must be at least 1/4 inch by 1/4 inch in size.

Below is a visual of the DCC seal. This is for visual purposes only; the seal, including its specifications, can be found in the CSC licensee portal.



- For edible and beverage products, the phrase **“cannabis-infused”** or **“marijuana-infused.”** Similar phrases such as “contains marijuana,” “contains cannabis,” “THC-infused” or “contains THC” are also acceptable.

Prominently, conspicuously, clearly, and plainly display, in an unobstructed manner when viewing the package refers to how the package is typically displayed and may be achieved in different ways and is dependent upon the package. However, this standard cannot be met by placing the required information on the back or bottom of the package. For example:

- For a jar that is typically displayed either with the top of the lid facing the customer or the branded side of the facing the customer, these elements could be prominently, conspicuously, clearly, and plainly displayed on the top of the lid or the branded side of the jar.
 - These elements could not be displayed on the bottom of the jar or on the label.
- For a mylar bag that is typically displayed standing, these elements will most likely need to be placed on the front of the bag.
 - The required elements cannot be placed on the label or in a gusset.

Please see *Appendix B* for mock renderings of packaging.

II. LABELING REQUIREMENTS

Each package of cannabis intended for direct customer sale must be permanently affixed with a label with all of the required information provided in legible English.

Below are tables summarizing the information that must be provided on the label.

- If an element is **highlighted**, that indicates inclusion of the required field on a Quick Response (QR) code satisfies the rule requirement if the QR code is affixed to the label.
- While the tables below outline the information that must be provided, it is the licensee's responsibility to present the information in a manner that is clear and not misleading to the customer. Please review the [Standardized Label Templates](#) provided by the Division for examples.

The requirements in the table below do not apply to Seeds, Clones, and Live Plants, and do not address required warnings and disclosures. See *Sections III Seeds, Clones, and Live Plants and IV Required Warnings & Disclosures* for more information.

FLOWER/BUD and SHAKE/TRIM	
Required Field	Notes and Exceptions
Harvesting Cultivator Name & License Number	
Packaging Licensee Name & License Number	The name and license number of the licensee that packaged the product is only required if different than the licensee that harvested the product.
Date Harvested	
Date Packaged	
Metric Product ID	Example: Flower-Sativa-22.2-Durban
Metric Unique Identifier	Example: M123456786
Strain Name	
Net Weight	Net weight is presented in both grams and ounces. The net weight must reflect the net weight of cannabis contents within the package, not of a single unit/serving.
Date Submitted for Final State-Required Testing	The date reflected is the most recent date submitted to state required final compliance testing.
Testing Laboratory Name & License Number	The testing laboratory reflected is that which conducted the most recent state required final compliance testing.
Metric Test Batch Number	

THC Range	The THC range is reported in percentage and is the 10% variance provided on the target THC content listed on the Metrc Product ID, as provided for in OAC 1301:18-4-06(D)(1). For example, if the target THC content listed on the Metrc Product ID is 25%, the THC range to be labeled is 22.5%-27.5%.
CBD	Reported in percentage.
CBDA	Reported in percentage.
THCV	Reported in percentage.
Top 3 Terpenes	Reported in percentage. At a minimum, the top three terpenes (as evidenced by state-required final testing) are required to be listed for products for smoking/combustion/vaporization only.
Form of Product	Include the form for the product. Example: Flower/Bud Example: Shake/Trim

RAW SINGLE SERVING UNITS	
Required Field	Notes and Exceptions
Manufacturing Processor Name & License Number	
Packaging Licensee Name & License Number	The name and license number of the licensee that packaged the product is only required if different than the licensee that manufactured the product.
Date Harvested	If more than one batch is used in the final product, the harvest date listed must be the date that the oldest batch of cannabis plant material utilized to create the lot of final form products was harvested.
Date Manufactured	
Date Packaged	
Metrc Product ID	Example: Raw SSU-Hybrid-20.2-3-Multi-Strain
Metrc Unique Identifier	Example: M123456785
Strain Name	
Net Weight	Net weight is presented in both grams and ounces.

	The net weight must reflect the net weight of cannabis contents within the package, not of a single unit/serving.
Date Submitted for Final State-Required Testing	The date reflected is the most recent date submitted to state required final compliance testing.
Testing Laboratory Name & License Number	The testing laboratory reflected is that which conducted the most recent state required final compliance testing.
Metric Test Batch Number	
THC Range	The THC range is reported in percentage and is the 10% variance provided on the target THC content listed on the Metric Product ID, as provided for in OAC 1301:18-4-06(D)(1). For example, if the target THC content listed on the Metric Product ID is 25%, the THC range to be labeled is 22.5%-27.5%.
CBD	Reported in percentage.
CBDA	Reported in percentage.
THCV	Reported in percentage.
Top 3 Terpenes	Reported in percentage. At a minimum, the top three terpenes (as evidenced by state-required final testing) are required to be listed for products for smoking/combustion/vaporization only.
Expiration Date	The expiration date shall not exceed one calendar year from the date the associated lot of final form cannabis product was manufactured.
Form of Product	Include the form for the product. Example: Raw Single Serving Unit
Number of SSUs per Package	For raw single serving units, indicate the number of individual SSUs within the package. Example: Quantity per package: 3

INFUSED SINGLE SERVING UNITS	
Required Field	Notes and Exceptions
Manufacturing Processor Name & License Number	

Packaging Licensee Name & License Number	The name and license number of the licensee that packaged the product is only required if different than the licensee that manufactured the product.
Date Manufactured	
Date Packaged	
Metric Product ID	Example: Inf SSU-498.1-3
Metric Unique Identifier	Example: M123456787
Net Weight	Net weight is presented in both grams and ounces. The net weight must reflect the net weight of cannabis contents within the package, not of a single unit/serving.
Date Submitted for Final State-Required Testing	The date reflected is the most recent date submitted to state required final compliance testing.
Testing Laboratory Name & License Number	The testing laboratory reflected is that which conducted the most recent state required final compliance testing.
Metric Test Batch Number	
Total THC Content per Package	Reported in milligrams.
Delta-8 THC per Package	Reported in milligrams.
Delta-9 THC per Package	Reported in milligrams.
Delta-9 THCA per Package	Reported in milligrams.
CBD per Package	Reported in milligrams.
CBDA per Package	Reported in milligrams.
THCV per Package	Reported in milligrams.
Top 3 Terpenes per Package	Reported in milligrams. At a minimum, the top three terpenes (as evidenced by state-required final testing) are required to be listed for products for smoking/combustion/vaporization only.
Expiration Date	The expiration date shall not exceed one calendar year from the date the associated lot of final form cannabis product was manufactured.
Form of Product	Include the form for the product. Example: Infused Single Serving Unit
Number of SSUs per Package	For infused single serving units, indicate the number of individual SSUs within the package.

ALL OTHER PROCESSED PRODUCTS	
Required Field	Notes and Exceptions
Manufacturing Processor Name & License Number	
Packaging Licensee Name & License Number	The name and license number of the licensee that packaged the product is only required if different than the licensee that manufactured the product.
Date Manufactured	
Date Packaged	
Metrc Product ID	Example: Edb Oral-10-10-Chocolate Bar-Almond
Metrc Unique Identifier	Example: M123456789
Net Weight	The net weight or volume must be provided. If the product is measured by volume, the volume must be listed on the label in both fluid ounces and milliliters. Otherwise, the net weight of the contents contained within must be listed on the label in both grams and ounces. The net weight/volume must reflect the net weight/volume of cannabis contents within the package, not of a single unit/serving.
Date Submitted for Final State-Required Testing	The date reflected is the most recent date submitted to state required final compliance testing.
Testing Laboratory Name & License Number	The testing laboratory reflected is that which conducted the most recent state required final compliance testing.
Metrc Test Batch Number	
Total THC Content per Package	Reported in milligrams.
Delta-8 THC per Package	Reported in milligrams.
Delta-9 THC per Package	Reported in milligrams.
Delta-9 THCA per Package	Reported in milligrams.
CBD per Package	Reported in milligrams.
CBDA per Package	Reported in milligrams.
THCV per Package	Reported in milligrams.
Top 3 Terpenes per Package	Reported in milligrams.

	At a minimum, the top three terpenes (as evidenced by state-required final testing) are required to be listed for products for smoking/combustion/vaporization only.
Expiration Date	The expiration date shall not exceed one calendar year from the date the associated lot of final form cannabis product was manufactured.
Form & Method of Administration	Include both the form and method of administration for the product. Please note, products that can be consumed by vaporization, smoking, or combustion are not required to re-state the method of administration. If the licensee does state the method of administration for such products, all three methods must be provided: “vaporization, smoking, or combustion.” Example: Edible Gummy for Oral Administration Example: Tincture for Sublingual Administration Example: Solventless Concentrate Example: Vaporization Cartridge
Serving Size	Example: 1 gummy Example: 1 inhalation lasting 2 seconds Example: 1 pill
Number of Servings per Package	Please provide the number of servings per package. Example: 10 gummies Example: 20 pills Note: products for vaporization, smoking, or combustion are not required to provide the number of servings per package.
Number of Units per Package	If the product is a multi-pack, meaning there are multiple units/containers within one package, provide the number of individual units (e.g., 2 vape carts, 3 concentrate jars).

III. SEEDS, CLONES, AND LIVE PLANTS

A. Each **package** of seeds, clones, and live plants intended for direct customer sale must:

- Be compliant with the limitations outlined in OAC [1301:18-4-21](#).
- Be **tamper evident**.
- **Maintain the integrity and stability** of the cannabis contained within it.
- Prominently, conspicuously, clearly, and plainly display, in an unobstructed manner when viewing the package, all of the following information in legible English:
 - The **name of the product** as approved by the Division on the associated Product Registration Application.
 - The **universal THC symbol** affixed such that it clearly and immediately indicates to a reasonable person that the package contains cannabis. Pursuant to OAC [1301:18-4-04](#):
 - The THC symbol must be permanently affixed and in a contrasting color, or molded in a manner that cannot be removed, to the surface upon which it is printed or stamped.
 - The symbol must be at least 1/4 inch by 1/4 inch in size.
 - The **DCC seal**, which can be found within the CSC Licensee Portal, including color specifications.
 - The seal must be permanently affixed, or molded in a manner that it cannot be removed, to the surface upon which it is printed or stamped.
 - The seal must be at least 1/4 inch by 1/4 inch in size.

B. Label:

Each package of cannabis intended for direct customer sale must be permanently affixed with a label. The label for seeds, clones, and live plants must include all of the following:

- The name and license number of the cultivator that cultivated the seeds, clones, or live plants;
- If different than the cultivator that cultivated the seeds, clones, or live plants, the name and license number of the licensee that packaged the materials for direct customer sale;
- The date the material was packaged for direct customer sale;
- The Metrc Product ID Name;
- The Metrc product unique identifying product registration number;

- The strain name, as reflected in and consistent with the cannabis strain name submitted by the licensee into Metrc; and
- The following warning: "WARNING: Keep out of reach of children. This product was NOT subjected to state-required consumer health and safety testing as outlined by 1301:18 of the Administrative Code. This product may be unlawful outside the state of Ohio."
- For seeds:
 - The date the seeds were harvested by the originating cultivator (if the seeds are from multiple harvests, the oldest harvest date must be listed);
 - The net weight in grams and ounces of the seeds in each package; and
 - The total number of seeds contained within the package.
- For clones and live plants:
 - The date planted by the originating cultivator;
 - The height in inches of the clone or live plant when packaged; and
 - The total number of clones or live plants contained within the package.

Only seeds, clones, and live plants harvested by a cultivator licensed by the DCC are permitted to be sold in a dispensary.

As a reminder, watering or tending to clones and live plants is a cultivation activity and not an activity that is permitted by a dispensary.

IV. REQUIRED WARNING LANGUAGE & DISCLOSURES

The following warning labels are required to be provided in legible English and permanently affixed either:

1. On the product facts label; OR
2. Printed directly onto the package in a conspicuous and unobstructed location . . . is clearly visible upon normal inspection of the package.

Warning labels and disclosures are *not* permitted to be included solely on a QR code, unless explicitly permitted below.

1. All Products

- WARNING: Keep out of reach of children. There is limited information on the side effects and medication interactions and there may be health risks associated with the use of this product. This product may cause impairment and may be habit-forming. THC degrades over time. There may be additional health risks associated with the use of this product for women who are pregnant, breastfeeding, or planning on becoming pregnant. Consult your physician prior to use of this product. It is against the law to drive or operate machinery when under the influence of this product. This product may be unlawful outside the state of Ohio.
- The use of adult-use cannabis by individuals under 21 years of age is both harmful and illegal.

2. Edibles and Beverages

- Caution: When eaten or swallowed, effects and impairment may be delayed.

3. Transdermals

- This product may enter the bloodstream and cause impairment.

4. Inhalers

- Not approved by the FDA.

5. All Products Intended for Smoking, Combustion, or Vaporization

- Smoking and vaporization is hazardous to your health.

6. Seeds, Clones, and Live Plants

"WARNING: Keep out of reach of children. This product was NOT subjected to state required consumer health and safety testing as outlined by 1301:18 of the Administrative Code. This product may be unlawful outside the state of Ohio."

7. Solvent-Based Products

- If a solvent-based cannabis extract was used in the manufacture of the product, the following must be disclosed on the label:

- The type of extraction process.
- Any solvent, gas, or other chemical used in the extraction and manufacturing process.
- Any other compound added to the extract.

8. Hemp-Derived Ingredients

- If the product was manufactured using a hemp-derived ingredient, the package or label must include this statement regardless of the type of product: “This product contains hemp-derived ingredients.”
- Additionally, the information below must be disclosed in the manner indicated:
 - The **type of ingredient** that is hemp-derived *must be included on the package or label in the ingredient list*. If the product has an ingredient list, the ingredient must be included within that list. For example, “hemp-derived CBD distillate” or “hemp-derived terpenes (myrcene).”
 - The **type of extraction process and any solvent, gas, or other chemical** used by the originating source in the extraction and manufacturing process or other compound added to the hemp-derived ingredient *must be included on the package or label*.
 - The **business name of the source** must be provided on the package, label, or within a QR code that is affixed to the label.

9. Other Non-Marijuana Ingredients

For the following product types, all ingredients, sub-ingredients, and allergens **must be reported directly on the package or label**. This information is **not** permitted to be included solely on a QR code.

- **Edibles and beverages:** A list of all ingredients and sub-ingredients must be provided on the label in accordance with [21 CFR 101](#). A list of all major food allergens must be provided in accordance with [21 USC 343](#).
- Below are some highlights of those CFR and USC requirements. **This is not an exhaustive list**. It is each licensee’s responsibility to read, understand, and implement these requirements.
 - Ingredients and sub-ingredients must be listed by common or usual name in descending order of predominance by weight.
 - Collective naming is permitted for leavening agents, yeast nutrients, and dough conditioners.
 - This should be presented as the collective name followed with the specific ingredient name in parenthesis.
 - For example, “leavening (baking soda, monocalcium phosphate, and calcium carbonate).”

- If the processor is unable to adhere to a constant pattern of these ingredients, words indicating that they may not be present should be used. Words/phrases such as “or”, “and/or”, and “contains one or more of the following” may be used.
 - For example: “dough conditioners (L-cysteine and/or ammonium sulfate).”
- Spices, flavorings, colorings, and chemical preservatives must be declared on the label in accordance with [21 CFR 101.22](#).
 - Spices, natural flavor, and artificial flavor may be declared as “spice,” “natural flavor,” or “artificial flavor.”
 - Spices which are also colors, such as paprika, turmeric, and saffron, must be declared as “spice and coloring” unless listed by their common or usual name.
 - If an artificial color is used, the specific artificial color must be listed in the ingredients. For example: “Blue 1 Lake.”
 - Substances obtained by cutting, grinding, drying, pulping, or similar processing of fruits, vegetables, etc. are commonly understood to be food rather than flavor and must be declared by their common or usual name. This includes things like onion powder, garlic powder, celery powder, etc.
- Exemptions are specified in [21 CFR 101.100](#).
 - Incidental additives are exempt from ingredient listings generally. These include substances that have no technical or functional effect but are present in a product by having been incorporated into the product as an ingredient of another product, in which the substance did have a functional or technical effect.
 - Incidental additives include processing aids, which are:
 - Added to a product during the processing but are removed in some manner before the product is packaged in final form.
 - Added to a product during processing, are converted to constituents normally present in the product, and do not significantly increase the amount of the constituents naturally found in the product.
 - Added to a product for their technical or functional effect in the processing but are present in the finished product at insignificant levels and do not have any technical or functional effect in the product.
 - **If an additive contains a food allergen it is not considered an incidental additive and not exempt. Therefore, the**

allergen must be listed on the label. Other non-allergenic ingredients in the additive are not required to be listed.

- **Allergens.** There are nine major allergens established under 21 USC 343 currently, including: tree nuts, peanuts, wheat, sesame, soybeans, milk, eggs, fish, and crustacean shellfish.
 - Allergens must be listed either 1) immediately after or next to the ingredient list in a “contains” statement, or 2) in parentheses following the name of the ingredient.
 - For example, the ingredients in a pecan brownie could be labeled in either of the following manners:
 - Cannabis Distillate, Enriched Flour (Wheat Flour, Niacin, Reduced Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Milk, Chocolate, Butter (Milk, Salt), Sugar, Eggs, Cocoa Powder, Pecan Pieces, Salt, Vanilla Extract
 - OR
 - Cannabis Distillate, Enriched Flour (Wheat Flour, Niacin, Reduced Iron, Thiamine Mononitrate, Riboflavin, Folic Acid), Milk, Chocolate, Butter (Milk, Salt), Sugar, Eggs, Cocoa Powder, Pecan Pieces, Salt, Vanilla Extract
 - Contains: Wheat, Milk, Eggs, Pecans
- **Products for smoking, combustion, or vaporization:** a list of all ingredients, sub-ingredients, and additives in the product. This does not apply to Flower/Bud or Shake/Trim.

V. OPTIONAL DISCLOSURES

A. Third-Party Certification

A licensee may seek Division approval through a Product Registration application, and subsequent Packaging & Labeling application, to include a third-party certified claim on their packaging, labeling, or marketing. This may include claims such as vegan, gluten-free, non-GMO, and similar requests.

To obtain such approval, as it appears on the package, label, or advertisement, the claim being made must be:

1. Compliant with any definitions established by the United States Food and Drug Administration for the claim being made, if any such definitions or requirements have been established.
 - a. For example, “gluten-free” is defined and regulated under [21 CFR 101.91](#).
2. Certified by a third-party that has publicly established protocols for the review, analysis, and documentation to certify the particular claim.
3. Accompanied by the name of the third-party certifier on the packaging, labeling, or advertising.
 - a. For example, the packaging, labeling, or advertisement must say “Certified Gluten-Free by ABC Org.”
 - b. The packaging, labeling, or advertisement cannot simply say “Certified Gluten-Free.”

Pursuant to OAC [1301:18-4-21](#), a licensee may not utilize any third-party certification for which the third-party certifier has a direct or indirect financial interest in, or compensation arrangement with, any cannabis entity licensed in the state of Ohio.

It is not permissible for a licensee to state or imply that the Division has reviewed the accuracy of these claims. Approval by the Division for the use of the third-party certification does not constitute an endorsement of the claim itself.

B. Technology Solutions

If the final form cannabis plant material or the cannabis plant material utilized to create the final form cannabis product was not subjected to any technology solutions, including remediation by irradiation, gas treatment such as ozone, radiofrequency, and UV light, the licensee may indicate as such on the package intended for direct customer sale using the DCC-created “technology solution free” seal.

Below is a visual of the “technology solution free” seal. This is for visual purposes only; the seal, including its specifications, can be found in the CSC licensee portal.



Prior to receiving approval on packaging that includes this seal, the licensee will be required to attest that any product that will be packaged within packaging containing the seal has not or will not be submitted to technology solutions.

VI. PROHIBITED ITEMS

No licensee may utilize any packaging or labeling that contains any of the prohibited items in OAC [1301:18-4-21\(B\)](#).

Additionally, the following items are prohibited on packaging, labeling, and advertising, by product type.

- **Flower/Bud, Shake/Trim, and Raw Single Serving Units:** No packaging, labeling, or advertising may include any of the following:
 - The THC content other than the approved range;
 - Any sum total of terpenes or cannabinoids;
 - Delta-9 tetrahydrocannabinol;
 - Delta-8 tetrahydrocannabinol; or
 - Delta-9-tetrahydrocannabinolic acid (THCA).
- **Processed Products:** For other products, no packaging, labeling, or advertising may include any sum total of terpenes or cannabinoids.
- **Seeds, Clones, and Live Plants:** Because these products are not required to be tested, no packaging, labeling, or advertising may include:
 - Any purported THC content, whether total or listed by cannabinoid;
 - Any purported amount of terpenes or cannabinoids, whether individually listed or sum total.

VII. QR CODE

Licensees may also utilize QR codes to offer additional, optional information, such as company history, expanded product details, or educational materials.

Licensees are permitted to provide the Certificate of Analysis (COA) for the final state-required testing of the product, or information directly from the COA, on a QR code.

However, QR codes may not replace information required on the label unless explicitly permitted by this guidance.

All optional language, imagery, or other information – including URLs provided within the QR code – must be compliant with OAC [1301:18-4-21](#) and OAC [1301:18-4-22](#), and be approved by the Division prior to use.

VIII. DISPENSARY LABELS

This section focuses on the information that is required on medical and non-medical dispensary labels and receipts, pursuant to Ohio Revised Code [3796.20](#) and OAC [1301:18-8-08](#) and [1301:18-8-09](#).

Dispensaries are responsible for ensuring that all information required under ORC 3796 and OAC 1301:18 appears on the following, as outlined below:

- The dispensary label;
- The cultivator or processor compliance label; or
- The customer receipt.

To prevent unnecessary duplication, dispensaries do not need to repeat information already printed on the cultivator or processor compliance label, and information appearing on the customer receipt does not need to be restated on the dispensary label.

Below are the elements that a dispensary must ensure are provided. This list does not include items required to be on the cultivator or processor compliance label, as those are outlined throughout this guidance.

A. Receipt

A dispensary **receipt** must include, at a minimum:

- The dispensary's:
 - Business name or registered trade name
 - License number
 - Address
 - Telephone Number
- Time and date of sale
- A complete description of all items purchased

- A complete description of any discounts applied
- Sales tax
- Excise tax (only applicable to non-medical sales)
- If applicable, the dispensary's return policy
 - The policy must either be printed on every receipt *or* clearly posted at each point of sale.
 - Regardless of if the dispensary chooses to print it on every receipt or post it at point of sale, the return policy **must also** be displayed on the dispensary's website.

B. Medical Dispensary Label

Each dispensary must ensure that with each medical cannabis purchase a **label** is provided including all of the following:

- Patient's legal name
- Patient's designated registry number
- If applicable, caregiver's name and designated registry number
- Name of the recommending physician
- Any directions for use provided by the physician

The Division has determined that the other requirements under Ohio Revised Code [3796.20\(B\)\(3\)](#) and [1301:18-8-09](#) are satisfied by their inclusion on the cultivator/processor compliance label or dispensary receipt, and are **not required to be printed again** on the dispensary label for medical patients or caregivers:

- The dispensary's:
 - Business name or registered trade name
 - License number
 - Address
- Date the product was dispensed
- Quantity, strength, kind, or form of cannabis contained within the package

C. Non-Medical Dispensary Label

The Division has determined that all of the requirements under Ohio Revised Code [3796.20\(C\)\(3\)](#) and [1301:18-8-08](#) are satisfied by their inclusion on the cultivator/processor compliance label or dispensary receipt, and are not required to be printed again on the dispensary label for non-medical consumers. ***A non-medical dispensary label is no longer required.***

IX. DISPENSARY PACKAGING

Pursuant to ORC [3796.19](#) and [1301:18-4-19](#), cultivators and processors must ensure all cannabis packaging that they send to a dispensary is child resistant.

However, upon a **medical cannabis patient or caregiver's** written request only, a dispensary *may* provide the patient or caregiver with a container that is “easy open” and not child resistant.

In order to do so compliantly, the standards and procedure below must be followed.

- A registered medical cannabis patient or caregiver must make a request, in writing, to the dispensary, which is documented and includes all of the following:
 - The patient's name and registry number
 - The caregiver's name, if applicable
 - The following disclaimers:
 - “I am a registered medical cannabis patient or caregiver and I am requesting my cannabis product be placed into a container that is not child resistant. I understand that it is my responsibility to ensure that the cannabis is not accessed by children, and will take all necessary precautions to ensure that the non-child resistant container is safely stored to prevent access to children as well as prevent administration to anyone other than the patient identified in this document.”
 - “I will maintain the original packaging provided to me until the cannabis product has been completely consumed or disposed of.”
 - “I understand the marijuana will considered to be ‘previously opened’ and needs to be stored in the trunk of the motor vehicle or, if the motor vehicle does not have a trunk, behind the last upright seat of the motor vehicle or in an area not normally occupied by the driver or passengers and not easily accessible by the driver.”
 - Date of the request
 - Signature of the patient or caregiver
 - Name and registered badge number of the dispensary employee processing the request
 - All of the following information regarding each product dispensed into “easy open” packaging:
 - Product Name (MetrC Product ID)
 - Unique Product Identifier (MetrC “M” Number)
 - Form and Method of Administration
 - Total THC Content per Package
- A written request must be documented each time the dispensary provides a patient or caregiver with an “easy open” container, even if the patient or caregiver has previously completed the request.

- The dispensary must maintain a copy of each request pursuant to OAC [1301:18-3-14](#).
- Upon receiving a valid request, a dispensary employee may open the original child-resistant package and place the product into an easy open container that:
 - Is affixed with the THC symbol and DCC seal; and
 - Maintains the integrity and stability of the cannabis contained within it.
- The transfer of the product between containers must be done:
 - In the presence of the patient or caregiver purchasing the product;
 - Under full surveillance camera coverage; and
 - By a badged dispensary employee who has washed their hands at a hand-washing sink properly equipped pursuant to OAC [1301:18-8-04](#).
- The original child-resistant packaging, along with the original label provided by the cultivator or processor, must be provided to the patient or caregiver. The dispensary employee must advise the patient or caregiver that they are required to maintain the original child resistant packaging as acknowledged in the signed patient/caregiver disclaimer.
- The dispensary label and receipt required pursuant to OAC [1301:18-8-09](#) and outlined pursuant to this guidance must be provided.

X. EXISTING PRODUCTS

A. Product Registration Fees

If you need to update the packaging or labeling for an existing product that already has an associated Item in Metrc, you will still need to complete the Brand and Product Registration Applications within [DCC eLicense](#) first. However, if nothing about the product has changed, you may make a request to the Division to have the \$100 product registration fee(s) discounted on your next license renewal (since you have already paid for the product). Please follow these steps to make such request:

- **Maintain your own records** including the Metrc Item M number for at least one existing Item and the corresponding eLicense Product Registration Application number.
- **Prior to paying** for your next license renewal fee (which must happen at least 30 days prior to your license expiration), do all of the following:
 - Send an email to DCCLicensing@com.ohio.gov.
 - Subject line “[License Number] – Product Fee Deduction Request”
 - Include the list of the eLicense Product Registration Application(s) for which you are requesting be deducted from your fee owed, along with the corresponding Metrc Item M number for at least one existing Item.
- **Refunds will not be provided.** You must request your renewal fee be reduced prior to paying the fee.

B. Packaging & Labeling Submissions & Attestation

The Division understands that packaging and labeling updates take time to design, submit for approval, and work into licensees’ operations. Therefore, in addition to the nine months the Division is providing to obtain compliance with the new rules, DCC is also providing opportunities for licensees to move forward with packaging and labeling updates without prior written approval from the Division if certain conditions are met.

Licensees must submit all Packaging & Labeling via DCC eLicense.

- If your Packaging & Labeling **does** meet all of the conditions outlined below, you **do not have to wait for approval** prior to use. However, you must submit a complete Packaging & Labeling Application within [DCC eLicense](#) and upload this [Packaging & Labeling Attestation](#) with your application before you can use the packaging and labeling.
 - Upload the completed attestation via the “Additional Information” file upload field on the “Package Information” screen of the application. IMPORTANT: Do *not* change the name of the file from “Packaging and Labeling Attestation August 2026,” but you may add information at the end to differentiate your documents.
 - **It is each licensee’s responsibility to ensure their packaging and**

labeling is compliant with all Division rules and this [Packaging & Labeling Guidance](#).

- A licensee may not use this process to circumvent rule requirements. A licensee may not continue to use packaging and labeling that was previously approved if it is not compliant with these rules and guidance.
- Any non-compliant packaging and labeling may be subject to a product recall and is subject to enforcement action.

Conditions that must be met to utilize the [Packaging & Labeling Attestation](#) form to update existing, previously approved packaging and labeling:

- 1) **The product has been reviewed and approved by the Division**, including the product name displayed on the packaging.
- 2) **All** of the packaging and labeling is compliant with the new, updated Division rules and guidance.
 - a) Please note that some packaging and labeling was approved prior to rule updates or guidance, and this requirement is that the packaging and labeling is compliant with all updated Division rules and guidance.
 - b) If a licensee must make changes beyond what is permitted in the [attestation](#) in order to ensure their packaging or labeling is compliant with the new rules, the licensee may not use [this attestation](#) and must receive approval prior to utilizing the updated packaging and labeling.
- 3) **No design elements are changing**, with the exception of the information that must be prominently, conspicuously, clearly, and plainly displayed, in an unobstructed manner when viewing the package, as detailed in the [attestation](#). New designs or additional information added to the package must be approved prior to use.
- 4) **Any label updates are made solely to comply** with the updated rules, as detailed in the [attestation](#). Additional information added to the label must be approved prior to use.
- 5) **Tamper-evidence has been previously approved** or is one of the mechanisms identified on [this list](#), dependent upon package type.
- 6) **Packaging (bag, jar, etc.) meets one of the following:**
 - a) Has been previously approved for the licensee.

OR

 - b) Is the same container type, model type, size, material, and closure as a package previously approved for the licensee, but the manufacturer is different, and the new package – including the same manufacturer, container type, model type, size, material, and closure – is found on [this list](#).

OR

- c) Is a different package than previously approved for the licensee (e.g., licensee was previously using a bag but is switch to a jar), and the new package – including the manufacturer, container type, model type, size, material, and closure – is found on [this list](#).

This list includes all packaging which was reviewed and approved for child-resistant standards after April 17, 2026, and will be updated regularly.

- If your packaging and labeling **does not** meet all of the conditions outlined above, your application **must be approved by the Division prior to use** of the updated packaging and/or labeling.
 - As a reminder, once you have a Packaging & Labeling application approved within [DCC eLicense](#), you can use the “Copy” feature to streamline submission of another similar package. Utilizing the [Copy](#) feature allows you to limit updates to only the sections that are different, and in turn limits the Division’s review to only those sections of information that have not been approved yet.

APPENDIX A

Relevant laws and rules can be found here:

- Ohio Administrative Code:
 - [1301:18-4-04](#)
 - [1301:18-4-19](#)
 - [1301:18-4-20](#)
 - [1301:18-4-21](#)
 - [1301:18-4-22](#)
 - [1301:18-4-23](#)
- Ohio Revised Code:
 - [3796.18](#)
 - [3796.19](#)
 - [3796.20](#)
 - [3796.32](#)

Related packaging and labeling resources for licensees can be found below:

- [Standardized Label Template](#)
- [Child-Resistance Certification Guidance](#)
- [Characterizing Flavors Guidance](#)
- [Metrc Categories & Patient Purchase Limits Guidance](#)
- [Metrc Categories & Packaging Limitations Spreadsheet](#)
- [Product Registration Process Guidance](#)

APPENDIX B



Product Facts	
Edible - Other Infused for Oral Administration	Product ID: M123456789: Edb Oral-10-10 Chocolate Bar-Almond
Ingredients: Cannabis distillate, chocolate, almonds, cocoa butter, cocoa powder processed with alkali, sugar, lecithin (soy), vanilla beans.	Test Batch #: 1A400000001251102512019
Contains tree nuts and soy.	Manufacturer: Processor LLC (CCP000432-00)
Extracted with carbon dioxide and ethanol.	Testing Lab: Testing Lab LLC (CCL000123-00)
	Packaged by: Processor 2 LLC (CCP000442-00)
	Manufacture date: 7/7/2026
	Packaged date: 7/21/2026
	Expiration date: 7/7/2027
	Final testing date: 7/11/2026
Net weight: 100g (3.5oz)	WARNING: Keep out of reach of children. There is limited information on the side effects and medication interactions and there may be health risks associated with the use of this product. This product may cause impairment and may be habit-forming. THC degrades over time. There may be additional health risks associated with the use of this product for women who are pregnant, breastfeeding, or planning on becoming pregnant. Consult your physician prior to use of this product. It is against the law to drive or operate machinery when under the influence of this product. This product may be unlawful outside the state of Ohio.
Serving size: 1 piece	
Serving per package: 10 pieces	
Cannabinoids Per Package (mg)	
Total THC: 100	The use of adult-use cannabis by individuals under 21 years of age is both harmful and illegal.
Delta-9 THC: 100	
Delta-9 THCA: 0	
Delta-8 THC: 0	
CBD: 0	
CBDA: 0	
THCV: 0	Caution: When eaten or swallowed, effects and impairment may be delayed.



Product Facts	
Vaporization Cartridge	Product ID: M123456790: Vape Cart-2-450
Ingredients: Cannabis oil, hemp-derived CBD distillate.	Test Batch #: 1A400000001251102512019
	Manufacturer: Processor LLC (CCP000432-00)
	Testing Lab: Testing Lab LLC (CCL000123-00)
	Packaged by: Processor 2 LLC (CCP000442-00)
Extracted with butane	Manufacture date: 7/7/2026
Net weight: 1g (0.035oz)	Packaged date: 7/21/2026
Serving size: One inhalation lasting two seconds	Expiration date: 7/7/2027
Units per package: 2 cartridges	Final testing date: 7/11/2026
Cannabinoids Per Package (mg)	
Total THC	902
Delta-9 THC	893
Delta-9 THCA	9
Delta-8 THC	0
CBD	50
CBDA	0
THCV	0
Terpenes per Package (mg)	
Terpinolene	45.0
Ocimene	25.0
Myrcene	20.0
WARNING: Keep out of reach of children. There is limited information on the side effects and medication interactions and there may be health risks associated with the use of this product. This product may cause impairment and may be habit-forming. THC degrades over time. There may be additional health risks associated with the use of this product for women who are pregnant, breastfeeding, or planning on becoming pregnant. Consult your physician prior to use of this product. It is against the law to drive or operate machinery when under the influence of this product. This product may be unlawful outside the state of Ohio. The use of adult-use cannabis by individuals under 21 years of age is both harmful and illegal. This product contains hemp-derived ingredients sourced from Hemp Processor LLC. Hemp ingredient extracted with carbon dioxide and ethanol. Smoking and vaporization is hazardous to your health.	



