



# CDPH REGULATIONS FOR CANNABIS

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Manufactured Cannabis Safety Branch



# California Department of Public Health (CDPH)

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Role: Protect public health by promoting product and workplace safety

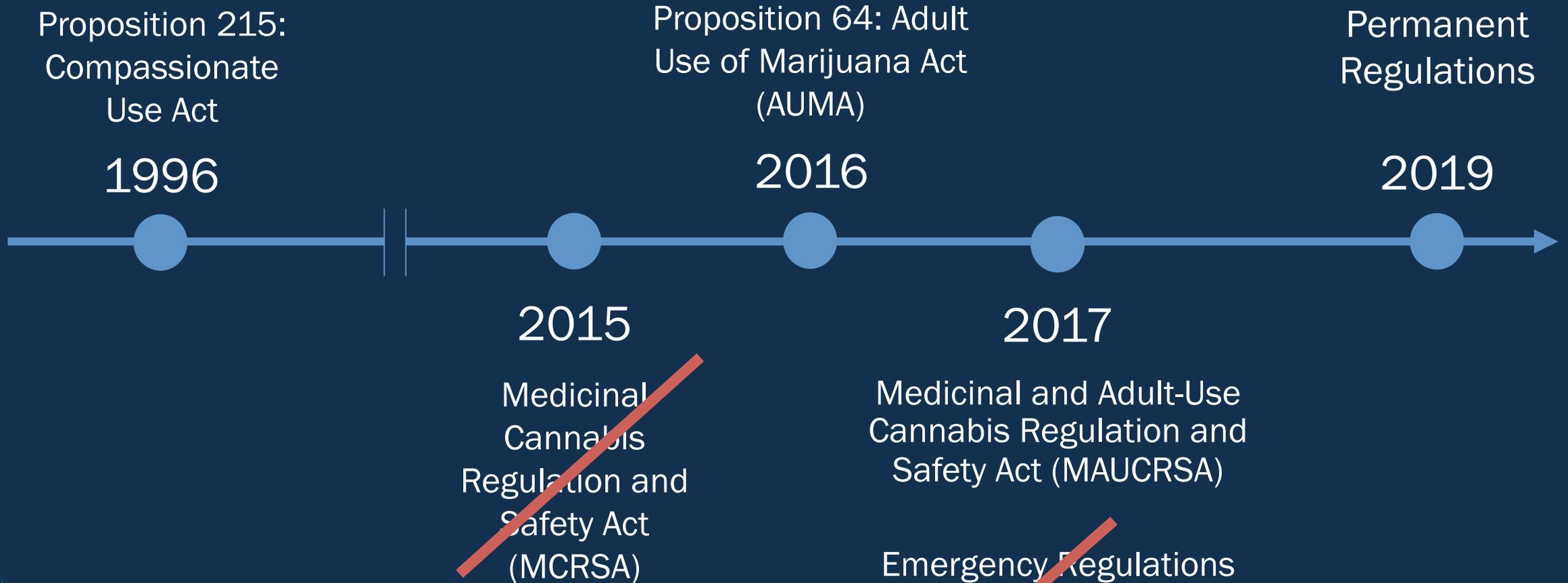
## Manufactured Cannabis Safety Branch

- Oversight of cannabis manufacturers
- Packaging and labeling standards for all cannabis and cannabis products



# LAWS AND REGULATIONS

# History of Cannabis Law



# Laws for Cannabis Manufacturers

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Medicinal and Adult-Use Cannabis Regulation and Safety Act (MAUCRSA) – Business & Professions Code, Division 10

CDPH Regulations for Cannabis

Other applicable state laws

Applicable local ordinances



# PACKAGING AND LABELING

# Packaging Requirements

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- Tamper evident
- Child-resistant
  - *During 2019: Can be fulfilled using product package or exit packaging*
  - *Beginning Jan 1, 2020: Product package must be child resistant*
- Resealable *(If it has multiple uses)*
- Opaque packaging *(Edibles only)*

# Labeling Requirements

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## PARTS OF A LABEL:

### Primary Panel

The part of the label most likely to be displayed to the consumer at retail. Typically the front or top of the package

### Informational Panel

Any other part of the label that is not the primary panel

# Labeling Requirements: Cannabis

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## Primary Panel:

- Product Identity
- Universal Symbol
- Net weight (*Metric and US Customary Units*)

## Primary OR Informational Panel:

- Cannabinoid Content (*in %*)

## Informational Panel:

- UID Number
- Licensee name & phone number or website (cultivator or packager)
- Date of packaging for retail sale
- Government warning statement

# Labeling Requirements: Cannabis Products

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## Primary Panel:

- Product Identity
- Universal Symbol
- Net weight or volume (*Metric and US Customary Units*)
- “Cannabis-Infused”

## Primary OR Informational Panel:

- Cannabinoid Content (*in mg*)

## Informational Panel:

- Manufacturer name & website or phone
- Date of manufacture/packaging
- Government warning statement
- UID number
- Batch or lot number
- Instructions for use/any prep needed
- List of ingredients
- Allergens (*if applicable*)
- Artificial food colorings (*if applicable*)
- Expiration, use by or best by date (*if applicable*)
- “KEEP REFRIGERATED” or “REFRIGERATE AFTER OPENING” (*if perishable after opening*)
- “FOR MEDICAL USE ONLY” (*if applicable*)
- Sodium, sugar, carbohydrates, total fat

# Labeling Requirements: Cannabis Products

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## Inner Container Labeling Requirements

*\*If the product container is separable from the outer-most packaging*

### For Edibles

- Product identity, universal symbol, net weight or volume, “Cannabis-Infused”

### For Topicals, Suppositories, Orally-Consumed Concentrates

- Product identity, universal symbol, net weight or volume

### For Inhaled Products

- Universal symbol

# CANNABIS PRODUCTS

# Product Classifications

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Edibles

Concentrates

Topicals

Orally-consumed  
concentrates

# THC Limits

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## Edibles:

- 10 mg per serving
- 100 mg per package

## Orally-dissolving edibles:

*Ex: Lozenges, mouth strips*

- 10 mg per serving
- 500 mg per package  
*(“FOR MEDICAL USE ONLY”)*

## Concentrates, Topicals:

- 1000 mg per package
- 2000 mg per package  
*(“FOR MEDICAL USE ONLY”)*

# OPERATIONAL REQUIREMENTS

# Good Manufacturing Practices (GMPs)

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## Quality Control Program:

- Grounds, building, premises
- Equipment and utensils
- Personnel
- Cannabis product components
- Manufacturing processes and procedures

# GMP Documentation

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**Product Quality Plan** (*for each product type*) – assessment of potential hazards and preventative measures to mitigate risks

**Master Manufacturing Protocol** (*for each formula*) – step-by-step instructions that will be used to make the product; “recipe”

**Batch Production Records** (*every time a batch is produced*) – documentation of performance

# Record Keeping Requirements

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## Standard Operating Procedures (SOPs):

- Security plan
- Emergency response (safety data sheets)
- Track-and-Trace compliance
- Inventory control
- Cannabis waste management
- Personnel training
- Product complaints
- Recalls
- Copies of licenses: CDPH, other state cannabis office, local
- Premises diagram
- Personnel records
- Contracts with other licensees
- Financial records
- Shipping manifests
- Sales invoices/receipts

# Tracking of Cannabis

- Sales invoices and receipts
- Track-and-Trace

**SALES INVOICE/ SHIPPING MANIFEST**  
PLEASE USE PERMANENT INK FOR ALL ITEMS

INVOICE/MANIFEST NUMBER:				ACTUAL DATE AND TIME OF DEPARTURE:	<input type="checkbox"/> AM <input type="checkbox"/> PM
ATTACHED PAGE(S)?	<input type="checkbox"/> YES <input type="checkbox"/> NO	# OF ATTACHED PAGES:		ESTIMATED DATE AND TIME OF ARRIVAL:	<input type="checkbox"/> AM <input type="checkbox"/> PM

SHIPPER INFORMATION		RECEIVER INFORMATION	
STATE LICENSE #		STATE LICENSE #	
TYPE OF LICENSE		TYPE OF LICENSE	
BUSINESS NAME		BUSINESS NAME	
BUSINESS ADDRESS		DELIVERY ADDRESS	
CITY, STATE, ZIP CODE		CITY, STATE, ZIP CODE	
PHONE NUMBER		PHONE NUMBER	
CONTACT NAME		CONTACT NAME	

DISTRIBUTOR INFORMATION			
STATE LICENSE #		DRIVER'S NAME	
BUSINESS NAME		CA DRIVER'S LICENSE#	
STREET ADDRESS		VEHICLE MAKE	
CITY, STATE, ZIP		VEHICLE MODEL	
PHONE NUMBER		VEHICLE LIC. PLATE #	
CONTACT NAME		ACTUAL DATE AND TIME OF ARRIVAL	<input type="checkbox"/> AM <input type="checkbox"/> PM

PRODUCT SHIPPED DETAILS							
SHIPPER COMPLETES ALL THE UNSHADED COLUMNS BELOW. RECEIVER COMPLETES ONLY THE SHADED COLUMNS BELOW							
(Please attach additional pages, if needed)							
UID TAG NUMBER (IF APPLICABLE)	ITEM NAME AND PRODUCT DESCRIPTION (INCLUDE WEIGHT OR COUNT)	QTY ORDERED	QTY REC'D	UNIT COST	TOTAL COST	RETAIL ONLY	
						UNIT RETAIL VALUE	TOTAL RETAIL VALUE



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# LICENSING OF MANUFACTURERS

# License Types

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Type 7 – volatile solvent extraction

Type 6 – non-volatile solvent/mechanical extraction

Type N – infusion

Type P – packaging and labeling

Shared-use facility registration (with Type 7, 6 or N)

Type S – manufacturers using a shared-use facility

# Application Process

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Online application: Manufactured Cannabis Licensing System (MCLS)



\*All "Owners" —

Business Applicant —————

# License Application Requirements

## Individual Information

Contact information  
Live Scan background check  
Disclosure of criminal convictions and evidence of rehabilitation

## Business Information

Legal business name  
FEIN, seller's permit number, mailing address, primary contact  
Disclosure of owners and financial interest holders  
Business formation documents

## Premises Information

Premises address  
Manufacturing activities  
Gross annual revenue  
Product types

## License Information

Manufacturing procedures  
Premises diagram  
Surety bond  
Property owner's authorization  
Closed-loop certification and fire official approval



# Common Application Questions & Mistakes

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**Premises Diagrams** – Missing details: outline of the premises, boundaries, security camera locations,

**SOPs/Descriptions** – Incomplete descriptions, purchased SOPs

**Closed-Loop System Certifications** - Certified as installed, fire official review

**Provisional Licenses** - Eligibility is assessed during annual license review

# Tips for Applicants

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Don't wait until the last minute to submit your application –  
annuals take time to process

Submit a complete application – incomplete applications  
cannot be processed

If our team contacts you with requests for information, respond  
in a timely manner

# Thank you

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