

Division of Cannabis Regulation
Guidance Document – 03.22.24
Topic: Packaging and Labeling Compliance Extension

After receiving feedback from licensees regarding potential delays in global shipping and in manufacturing lead times impacting ability to receive packaging compliant with 19 CSR 100-1.120, the Division of Cannabis Regulation (DCR) is extending the date for compliance from May 1, 2024, to September 1, 2024. Additionally, DCR is allowing dispensary licensees until November 1, 2024, to sell the existing marijuana product that is currently on the market.

Important Dates and Actions

September 1, 2024: All product produced at licensed facilities must be packaged in compliant packaging prior to transfer to a dispensary facility for sale to patients and consumers. Cultivation, manufacturing, and dispensary licensees that package marijuana product for retail sale shall no longer use any packaging that is not in compliance with 19 CSR 100-1.120.

Existing items at a cultivation or manufacturing facility or items that are packaged for retail sale by the dispensary licensee must be destroyed or repackaged into compliant packaging. DCR will discontinue any products in the statewide track and trace system (Metrc) that have not been submitted and approved in accordance with 19 CSR 100-1.120 on August 31, 2024.

November 1, 2024: Dispensary licensees may not sell any marijuana product that does not have an approved Item Approval number on the label required by 19 CSR 100-1.120(1)(C)2.L. Existing items at a dispensary facility must be either destroyed or repackaged into compliant packaging by the licensee that created the final marijuana product.

As a reminder, any newly created product line or SKU that the licensee produces on or after September 1, 2023, must go through the preapproval process to verify compliance with 19 CSR 100-1.120 prior to being made available for sale to patients and consumers. Marijuana product transferred for retail sale to a dispensary licensee are required to be in a “final packaging” item category in Metrc. Licensees that are not using the “final packaging” item category to circumvent that preapproval process are in violation of 19 CSR 100-1 and subject to notices of violation, fines, or other penalties.

Additionally, licensees should discontinue any marijuana product items in Metrc no longer produced by the licensee.

For questions or feedback regarding packaging, labeling, and product design compliance or the Item Approval process, please contact the Product Compliance Team by email at CannabisProductCompliance@health.mo.gov. Licensees may find additional information on our website: <https://health.mo.gov/safety/cannabis/facility-comms-guidance.php>