

NACB PACKAGING AND LABELING CHECKLIST

Child Resistant

- Is your packaging Opaque and designed to be Difficult for Children under 5 to open?;
- OR
- Is your packaging plastic at least 4 mils thick and heat-sealed without easy- to-open tabs (liquid also sealed with a metal crown cork-style bottle cap)?
- OR
- Is your packaging otherwise certified as “special packaging” pursuant to 16 C.F.R. Part 1700 (Poison Prevention Packaging Act)?
- OR
- Does your state provide an exception to child-resistant packaging (to accommodate elderly/handicap)?

CERTIFICATION

- If child-resistant packaging is required, did you obtain certification from manufacturer that containers or exit packages conform to child-resistant standards and identifies batch and lot numbers?
- OR
- If child-resistant packaging not required, did you obtain certification from manufacturer that containers or exit packages protect cannabis, are made of materials the FDA generally considers safe (21 C.F.R. Parts 170-186) and identifies batch and lot numbers?

PACKAGING CANNABIS

- Are your cannabis products placed in a container prior to sale?
- Are your containers or exit packages child-resistant?
- Are your solid edible products packaged in a single child-resistant container and demarcated into separate servings or an external child-resistant container with internal containers with warning labels?
- Are your solid edible products marked with a distinguishable identification that the product has THC, marijuana or cannabis?
- Does your liquid edible cannabis product include a measuring component allowing increments of one standard serving?

Exit Packages

- Does your exit package refrain from any appeal to minors?

Packaging Layers

- Does your outmost packaging layer comply with our warning and advertising standards?

Product Identification

- Does your product contain a label with the batch identification number for units containing the same strain or concentrate type, method, chemical and batch of origin?
- Does your product contain the cultivators license number for units containing the same strain or concentrate type, method, chemical and batch of origin?

Warning Symbol

- Does your label contain a standardized symbol indicating that the product contains THC or marijuana or cannabis that either complies with your state law for the “Universal Symbol” from the Colorado Department of Revenue?
- Is your label prominently displayed and clear and legible?

Warning Statements

- Does your label contain a statement warning that:
 - The product contains THC or marijuana or cannabis?
 - The product is for use only by adults age 21 or older or for use by only authorized patients?
 - There may be health risks, including those for pregnant or breast-feeding women
 - The product may impair driving or operating heavy machinery
 - The product must be kept out of childrens reach
 - If claiming a psychological or physiological effect, a warning that not approved by FDA
 - The product effect may be delayed by two or more hours

Prohibitions

- Does your label or product container refrain from making any false or misleading statements?
- Does your label or product container refrain from targeting consumers under 21 yrs?
- Cannot contain cartoon characters, toys, action figures, animals, balloons, minors, the word “candy,” graphics similar to candy, celebrities.

Ingredients

- Does your product label include all ingredients listed in descending order of weight?

Allergen Warnings

- Does your label for edibles contain a statement that the product contains milk, eggs, fish, shellfish, tree nuts, peanuts, wheat or soybeans?

Health, Medical & Disease Claims

- Does your label or marketing or advertising refrain from claiming that your product:
 - Diagnoses, mitigates, treats, cures or prevents disease
 - Describes the relationship between your product and any health condition
 - Mimics a brand or otc or prescription drug
 - uses any words, symbols or images commonly used in medical or pharmaceutical professions like "RX" or "prescription."

Tamper-Evident Packaging

- Does your product container have one or more indicators or barriers to entry which provide reasonably visible evidence or tampering if breached?
- Does your package comprised of materials the FDA deems "generally recognized as safe"

Serving Size

- Does your product label state the total amount of THC in the container?
- Does your product label state the amount of servings and total amount of THC per serving?

NACB ADVERTISING CHECKLIST

Required Statements

- Does your advertising legibly identify the responsible licensee?
- Does your advertising state that:
 - No one underage can use (retail)
 - Product use is only for authorized patients (medical)
- There are health risks associated with consumption of cannabis
- There are additional health risks for pregnant and breast-feeding women

Prohibited Statements

- Does your product label refrain from:
 - making false or misleading statements
 - making health, medical or disease claims
 - promoting of excessive consumption
 - promoting safety because of state licensing regulation
 - promoting non-medical use in only medical use state
- encouraging underage consumption
- disparaging or degrading any race, gender, sexual orientation, minority or other group.
- using cartoon characters, toys, mascots, brand sponsorship, logo, animal or celebrity endorsement that targets underage persons.
- encourages driving while impaired
- encourages driving across state lines

Audience Composition

- Do you refrain from publishing or advertising to an audience of underage people more than 15% ?
- Does your advertising utilize a method of age affirmation to verify the recipient is not underage?
- Does your advertising refrain from targeting people out of state?
- Do you refrain from advertising on public transit or shelters?
- Do you refrain from offering gifts in exchange for proofs of purchase?

Digital Advertising

- Does your web page employ a neutral age-screening mechanism before allowing access to website?
- Do you refrain from advertising through pop-up ads?
- Do you refrain from directing ads to location-based devices like cell phones unless confirm not underage and an opt-out feature.

Event Sponsorship

- Do you refrain from sponsoring events targeting under age persons?

NACB LAB TESTING AND PRODUCT INTEGRITY CHECKLIST

Potency

- Does your label for potency have less than a 15% variance from the lab test?

Lab Independence

- Do you refrain from contracting with labs to perform testing if you have a percentage ownership in the lab?

Lab Accreditation

- Has your testing lab received ISO/IEC 17025 accreditation if required by state law?

Testing Claims

- Do you refrain from making any statement regarding contaminant levels unless you have verified such claims by lab tests?

Thank you!