

Topical Application Packaging Requirements Guidance

Packaging Must:

- Fully enclose the product;
- Not display fluorescent or neon colors;
- Be tamper evident;
- Be Certified as Child-Resistant in accordance with the Poison Prevention Packaging Act of 1970, 16 C.F.R. Part 1700;
- Be Resealable in a Child-Resistant manner.

Confirm the Packaging:

- Protects the product from contamination;
- Does not impart any toxic or deleterious substance to the product;
- Does not contain any design, image, label or coloring that is prohibited by the Regulation.

Exit Package:

1. Except for retail-ready cannabis-infused products, upon Commission approval, any other retail-ready cannabis product placed into a container that is not child-resistant shall be placed into a child-resistant exit package at the point of sale.
2. The exit package is not required to be labeled pursuant to 560-RICR-10-10-2.7 if the package(s) within the exit package containing the retail-ready cannabis product comply with all packaging and labeling requirements pursuant to 560-RICR-10-10-2.6 and 2.7.



	Single Application Unit THC	Multiple Single Application Units Packaged Together
Adult Use	* A single application unit shall not exceed 10 mg total potential THC * Packaging may or may not be resealable * Packaging must be certified as Child-Resistant	* A multi-application packaged together shall not exceed 100mg total potential THC * Packaging must be resealable * Packaging must be certified as Child-Resistant
Medical Use Only	* A single application unit may exceed 10 mg total potential THC * Packaging may or may not be resealable * Packaging must be certified as Child-Resistant	* May exceed 100mg total potential THC per package; (Refer to: Product Designation List) * Packaging must be resealable * Packaging must be certified as Child-Resistant

Topical Application Package Labeling Requirements

Font Requirements for Required Information:

- No smaller than size 6 font;
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica;
- Legible;
- Clearly written or printed in the English language.

Required Information on the Packaging:

1. The business(es) or tradename(s) and license number(s) of the cannabis establishment(s) who manufactured and/or produced the product; *(the last licensee to process the final cannabis product **or** the last processor in the chain **and** licensee manufacturing/packaging/white labeling)*; Licensees do not have to label the same licensee multiple times to satisfy the requirements.
2. Unique Identifier generated by the cannabis seed-to-sale tracking system;
3. Cannabinoid Profile: **Delta-9-THC, THCa, CBD, CBDA, Delta-8**, and any other advertised cannabinoid;
 - A. Must be stated **per application unit** and **per package in mg**, and in a font larger than size 6, **bolded and underlined** so as to stand from surrounding text to the consumer;
 - B. Per Single Application (**Adult Use shall not exceed 10mg total potential THC**);
 - C. Per Package (**Adult Use shall not exceed 100mg total potential THC**).
4. Universal Symbol;
5. Manufacturing Batch Creation Date;
6. Product Identity Type;
7. American Association of Poison Control Center (800) 222-1222;
8. If not fully homogenized, identification of what portion of the product contains cannabinoids;
9. The serving size;
10. The number of servings per package;
11. All Required Warnings.

Required Information that must be on the Packaging *or on an Insert, stated in a Peel-Back Accordion, Expandable or Extendable Label* style so long as the label can be easily identified by a consumer as containing important information, or *may be contained by a Commission-approved QR-code*:

1. Net weight or volume of the cannabis product prior to its placement in a package;
2. Whether the product has been remediated and the remediation method used, if applicable, **may** be included;
3. If applicable, the processing technique or solvent(s) used to produce the product (i.e. CO₂, ethanol, hydrocarbon, etc.);
4. If applicable, a list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the product or that were added to product;
5. A statement that “the cannabis in the product has been tested by a regulated cannabis testing facility and has passed all required compliance tests” (in accordance with RIDOH Testing Regulations, 216-RICR-60-05-6.)

All required information must be unobstructed and conspicuous.



Universal Symbol

Pursuant to 560-RICR-10-10-2.7.2(E)(5), a Commission-selected universal warning symbol must appear on the front or most prominently displayed area of the package, **no smaller than one (1) inch by one (1) inch**.

Topical Application Container Labeling Requirements

Labeling the Container(s)

Immediate Small Container Requirements:

“Immediate container” means the container or other form of packaging in contact with the cannabis product. If the immediate container holding the cannabis product is too small to fit all the required label information, a licensee may put **at a minimum** the following information on a label that is securely affixed to the small container:

1. Universal Symbol;
2. Cannabinoid Profile: **Delta-9-THC, THCa, CBD, CBDa, Delta-8**, and **any other advertised cannabinoid**;
 - A. Must be stated **per application unit** and **per package in mg**, and in a font larger than size 6, **bolded and underlined** so as to stand from surrounding text to the consumer;
 - B. Per Single Application (*Adult Use shall not exceed 10mg total potential THC*);
 - C. Per Package (*Adult Use shall not exceed 100mg total potential THC*).
3. Tradename of producer of the product;
4. Product Identity (Topical Type: i.e Lotion, Balm, Salve, etc.)
5. “Warning: This product contains cannabis. Store securely locked away from children.”



Secondary Container Requirements:

“Secondary container” or “outer packaging” means the form of packaging in which an immediate container is placed. The immediate small container must be placed into a secondary container that is labeled with the below information:

1. The business(es) or tradename(s) and license number(s) of the cannabis establishment(s) who manufactured and/or produced the product; (*the last licensee to process the final cannabis product or the last processor in the chain and licensee manufacturing/packaging/white labeling*); Licensees do not have to label the same licensee multiple times to satisfy the requirements.
2. The unique identifier generated by the cannabis seed-to-sale tracking system;
3. Cannabinoid Profile: **Delta-9-THC, THCa, CBD, CBDa, Delta-8** and **any other advertised cannabinoid**;
 - A. Must be stated **per application unit** and **per package in mg**, and in a font larger than size 6, **bolded and underlined** so as to stand from surrounding text to the consumer;
 - B. Per Single Application (*Adult Use shall not exceed 10mg total potential THC*);
 - C. Per Package (*Adult Use shall not exceed 100mg total potential THC*).
4. Universal Symbol;
5. Manufacturing Batch Creation Date;
6. Product Identity (Topical Type: i.e. Lotion, Balm, Salve, etc.);
7. American Association of Poison Control Center (800) 222-1222;
8. Net weight of cannabis product prior to placement in packaging;
9. All Required Warnings.



*** Additional Required Information** is still required to be on package, **on an insert, a peel-back, or QR Code**. See page 2—Topical Application Package Labeling Requirements regarding the required additional processing and manufacturing information.

Topical Application Warning Label Requirements

Warnings on Retail-Ready Cannabis Products

Font Requirements for Warning Labels:

- Be in the English language;
- Be in Times New Roman, Calibri, Arial, Helvetica or any other font that can be easily read;
- Be in text no smaller than size 8 font and in bold;
- Not be covered or obscured;
- Be displayed in a bright yellow box as to stand out from other labeling requirements;

Warnings may be stated in a peel-back accordion, expandable, or extendable style so long as the label can be easily identified by a consumer as containing important information as follows:

1. The exposed portion of the peel-back label must clearly indicate that it contains a warning.
2. The exposed portion of the peel-back label must be displayed in the bright yellow box; and
3. The exposed portion of the peel-back label must comply with all other requirements stated above.

Warnings must be displayed on all retail-ready cannabis products, preceded either collectively or individually by the term “Warning.”

These Required Warnings Must Be On the Packaging:

1. “This product contains cannabis. Store securely locked away from children.”
2. “It is unlawful to transport this product outside of Rhode Island.”
3. “Cannabis use may impair your ability to operate a motor vehicle or machinery.”
4. “Consumption while pregnant or breastfeeding may be harmful.”
5. For all cannabis-infused products, it must state in slightly larger or bold font as to stand out from surrounding text, with priority placement:
 - A. “Effects of this product may be delayed.”

Warning: This product contains cannabis. Store securely locked away from children. It is unlawful to transport this product outside of Rhode Island. Cannabis use may impair your ability to operate a motor vehicle or machinery. Consumption while pregnant or breastfeeding may be harmful. Effects of this product may be delayed.

Logo and Graphic Prohibitions Compliance Check List

Ensure Logos and Graphics Do Not:	
Depict animal characters	☐
Depict toys	☐
Use cartoon characters or similar images	☐
Resemble a branded product's logo, such as Reese's or Coca Cola	☐
Include images of children or minors	☐
Include images of or any person using or consuming the product	☐
Include words, a design or brand that resembles a product that is commonly associated with children or minors or marketed to children or minors	☐
Include symbols or celebrities that are commonly used to market products to minors	☐
Include the word or make any reference to "candy" or "candies"	☐
Include any false or misleading statements, including any statements regarding curative or unproven therapeutic effects to the consumer	☐
Include any seal, flag, crest, coat of arms, or other insignia that could reasonably mislead any reasonably prudent person to believe that the product has been endorsed or manufactured by the State of Rhode Island or any agency or municipality thereof	☐
Cause a reasonable consumer confusion as to whether the cannabis product is a trademarked product	☐
Violate any state or federal trademark law or regulation	☐

Examples of prohibitions include, but are not limited to the following:



Animal characters, toys,
cartoon characters , and
images of children



Crest that looks like
product is from a state agency



Curative claims or
unproven therapeutic effects

Brand/symbol
used to market to minors

