



COLORADO

Department of Revenue

Enforcement Division - Marijuana
1707 Cole Blvd., Suite 300
Lakewood, CO 80401

March 12, 2018

INDUSTRY-WIDE BULLETIN: 18-04

RE: ADOPTION OF A SINGLE UNIVERSAL SYMBOL FOR MEDICAL AND RETAIL MARIJUANA

Dear Marijuana Industry Stakeholders:

Effective immediately, the State Licensing Authority adopts a single Universal Symbol (“Single Universal Symbol”) for packaging, labeling, and on-product marking of medical and retail marijuana, concentrate, and product (“Inventory”) pursuant to the Medical Marijuana Rules and Retail Marijuana Rules, 1 CCR 212-1 and 1 CCR 212-2.

From extensive stakeholder engagement through prior focus group and rulemaking meetings that facilitated a comprehensive review and discussion of our labeling framework, the State Licensing Authority committed to evaluating the application of one Universal Symbol to both medical and retail Inventory. The State Licensing Authority’s adoption of a Single Universal Symbol is intended to further protect public health and safety by enhancing consumers’ ability to identify products containing marijuana. Further, by eliminating distinctions between Universal Symbols for medical and retail marijuana, the Single Universal Symbol works to simplify and improve compliance regarding packaging, labeling, and product marking requirements.

An image of the Single Universal Symbol is included in this bulletin (Attachment A) and located on the Division’s [website](#).

**Medical Marijuana Businesses and Retail Marijuana Establishments
(Other than Medical Marijuana Centers and Retail Marijuana Stores)**

- **Optional Use Period – Until December 31, 2018**, Medical Marijuana Businesses and Retail Marijuana Establishments may either:
 - a) Transfer medical and retail Inventory that is packaged, labeled, and marked using the Single Universal Symbol; or
 - b) Transfer medical Inventory that is packaged, labeled, and marked using the prior established Medical Universal Symbol and retail Inventory that is packaged, labeled, and marked using the prior established Retail Universal Symbol.

- **Mandatory Use Effective Date - Beginning January 1, 2019**, Medical Marijuana Businesses and Retail Marijuana Establishments shall only Transfer medical and retail Inventory that is packaged, labeled, and marked using the Single Universal Symbol.

Medical Marijuana Centers and Retail Marijuana Stores

- **Optional Use Period – Until December 31, 2018**, Medical Marijuana Centers and Retail Marijuana Stores may either:
 - a) Accept Transfers of medical and retail Inventory that is packaged, labeled, and marked using the Single Universal Symbol; or
 - b) Accept Transfers of medical Inventory that is packaged, labeled, and marked using the prior established Medical Universal Symbol and retail Inventory that is packaged, labeled, and marked using the prior established Retail Universal Symbol.
- **Mandatory Use Effective Date – Beginning January 1, 2019**, Medical Marijuana Centers and Retail Marijuana Stores shall only accept Transfers of medical and retail Inventory that is packaged, labeled, and marked with the Single Universal Symbol.
- **Limited Medical Center Sales Period - Until July 1, 2019**, Medical Marijuana Centers may sell medical Inventory that is packaged, labeled, and marked with the prior established Medical Universal Symbol **only if** the Inventory was Transferred to the Medical Marijuana Center prior to January 1, 2019 (this limited duration of permissible sales are hereinafter referred to as the “Limited Center Sales Period”).¹

The Limited Center Sales Period is offered to further facilitate industry transition to compliance with the Single Universal Symbol requirement. The Limited Center Sales Period is also intended to maintain collective efforts to protect public safety and reduce risks of public harm by identifying a date certain by which all packaging, labeling, and on-product marking is required to display consistent information.

After July 1, 2019, under no circumstances may a Medical Marijuana Center or Retail Marijuana Store sell Inventory packaged, labeled, or marked without the Single Universal Symbol. Any Medical Marijuana Business or Retail Marijuana Establishment in possession of non-compliant Inventory shall follow waste disposal procedures pursuant to Rules M and R 307, 1 CCR 212-1 and 1 CCR 212-2.

A complete copy of the Medical Marijuana Rules and Retail Marijuana Rules are accessible at the Division’s [website](#). Please be aware that the information contained in this Industry Bulletin does not represent legal advice or replace a licensee’s responsibility to read, understand, and maintain full compliance with all relevant statutes and rules.

Sincerely,



James Burack
Director
Marijuana Enforcement Division

¹ The Limited Center Sales Period applies to Inventory that complies with all other relevant statutes and rules. For example, the Limited Center Sales Period shall not apply to Medical Marijuana-Infused Product that has exceeded its expiration date such that it is no longer fit for consumption.

Medical and Retail Marijuana

Single Universal Symbol Examples

On Packaging/Labeling for all types of Medical and Retail Marijuana:



Contains Marijuana. Keep away from children.

- The Universal Symbol must be labeled on the front of the Container in red and white as it appears above.
- The Universal Symbol must be at least ½" x ½" on the packaging/labeling.
- Directly under the Universal Symbol, the licensee must place the warning label "Contains Marijuana. Keep away from children."

This is a non-exhaustive list of requirements - Review the M and R 1000-1 series rules for all packaging/labeling requirements.

On Edible Medical Marijuana-Infused Product and Retail Marijuana Product:



- Medical Marijuana-Infused Product: The Universal Symbol must be marked on at least one side of the product.
- Retail Marijuana Product: The Universal Symbol must be marked on at least one side of each Standardized Serving Of Marijuana.
- Coloring is not required for the on-product Universal Symbol marking.
- The Universal Symbol must be at least ¼" x ¼" on the product.

This is a non-exhaustive list of requirements - Review rules M and R 604 for all Edible Medical and Retail Marijuana Product marking requirements.