



**COLORADO**  
Department of Revenue  
Enforcement Division - Marijuana  
455 Sherman Street, Suite 390  
Denver, CO 80203

October 30, 2015

**INDUSTRY-WIDE BULLETIN: 15-09**

**RE: REVISED UNIVERSAL SYMBOL PACKAGING, LABELING, AND ON-PRODUCT MARKING REQUIREMENTS BEGINNING OCTOBER 1, 2016**

Dear Marijuana Industry Stakeholders:

As part of its permanent rulemaking process, the State Licensing Authority adopted a revised Universal Symbol for Medical Marijuana and Retail Marijuana packaging and labeling. The Universal Symbol is also required to be marked, stamped or otherwise imprinted on Edible Medical Marijuana-Infused Products per rule M 604(C.5), and on Edible Retail Marijuana Products per rule R 604(C.5). Licensees must comply with the revised Universal Symbol packaging, labeling, and on-product marking requirements starting on October 1, 2016. However, Licensees may begin using the revised Universal Symbol prior to October 1, 2016.

Images of the revised Universal Symbol and how it must appear on-product (edible products only) versus on packaging and labeling (for all types of Medical and Retail Marijuana) are included in this bulletin. Downloadable files for the revised Universal Symbol are located on the Division's website at: <https://www.colorado.gov/pacific/enforcement/licensees-marijuana-enforcement-division>

A number of stakeholders have submitted questions for clarification regarding the revised Universal Symbol requirements. The Division has combined and included these questions in a Frequently Asked Question format below.

**1) Q:** Previously, only Retail Marijuana and Retail Marijuana Product packaging and labeling required the Universal Symbol. Is it required for Medical Marijuana and Medical Marijuana-Infused Product now?

**A:** Yes, beginning on October 1, 2016, the revised Universal Symbol must appear on all Medical Marijuana and Medical Marijuana-Infused Product packaging and labeling (review the rules in the M 1000 series), and also on the product itself for all Edible Medical Marijuana Infused-Products (review rule M 604(C.5)).

**2) Q:** What are the on-product versus packaging and labeling requirements for the revised Universal Symbol?



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A: Reference Attachments A and B, which are included with this Bulletin, for examples. Only Edible Retail Marijuana Product and Edible Medical Marijuana-Infused Product have on-product marking requirements. For on-product marking of Edible Retail Marijuana Product and Edible Medical Marijuana-Infused Product, the revised Universal Symbol must be distinguishable and easily recognizable, see rules R 604(C.5)(4) and M 604(C.5)(4)(a) respectively. Examples of how a manufacturer may accomplish marking, stamping, or otherwise imprinting the Universal Symbol on the product are: (1) the revised Universal Symbol could be imprinted like a “blind stamp” where it is pressed or formed down into the product; or (2) the revised Universal Symbol could be marked like an “embossed stamp” where the symbol is raised on the surface of the product; or (3) the Universal Symbol also could be set flat on the surface of the product. For on-product marking, coloring is not required for the Universal Symbol. However, for packaging and labeling, the Universal Symbol must appear as a red-outlined diamond that is white inside, and the internal text must appear red as well.

- 3) Q:** Can an Edible Retail Marijuana Product or Edible Medical Marijuana-Infused Product be shaped as a diamond and then simply have the text of the revised Universal Symbol added onto the diamond-shaped product?

A: No. The revised Universal Symbol must appear in its entirety on Edible Retail Marijuana Products and Edible Medical Marijuana-Infused Products.

- 4) Q:** Since the new Edible Medical Marijuana-Infused Product and Edible Retail Marijuana Product marking, packaging and labeling requirements begin on October 1, 2016, how long does a Licensee have to sell through non-compliant Edible Medical Marijuana-Infused Product and Edible Retail Marijuana Product?

A: Until November 30, 2016. Beginning December 1, 2016, a Medical Marijuana Center shall not purchase, take possession of, or sell non-compliant Edible Medical Marijuana-Infused Product per rule M 1006(A)(1). Beginning December 1, 2016, a Retail Marijuana Store shall not purchase, take possession of, or sell non-compliant Edible Retail Marijuana Product per rule R 1006(A)(1).

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Director

Marijuana Enforcement Division

# Retail Marijuana revised Universal Symbol Examples

On Packaging/Labeling  
for all types of Retail  
Marijuana:



Contains Marijuana. Keep  
out of the reach of children.

- The Universal Symbol must be labeled on the front of the packaging 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 out of the reach of children."

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

On Edible 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 rule R 604(C.5) for all Edible Retail Marijuana Product marking requirements.*

# Medical Marijuana revised Universal Symbol Examples

On Packaging/Labeling  
for all types of Medical  
Marijuana:



Contains Marijuana. For Medical Use  
Only. Keep out of the reach of children.

- The Universal Symbol must be labeled on the front of the packaging 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. For Medical Use Only. Keep out of the reach of children."

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

On Medical Marijuana-  
Infused Product:



- The Universal Symbol must be marked on at least one side of the product.
- 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 rule M 604(C.5) for all Edible Medical Marijuana-Infused Product marking requirements.*