

**House Bill 14-1366 Work Group
Legislative Report Recommendation Form**

1. Work Group Sponsor (s): **Children's Hospital Colorado**

2. Describe the Recommendation:
 1. Individual imprinting of pills, hard candy, and soft candy with approved symbol
 2. Labeling of edibles that cannot feasibly be individually imprinted should have packaging that clearly displays the agreed upon symbol. In addition, should have clear language that states: "Keep out of reach of children"; "Harmful if ingested by children", "Adult only use", "Do not operate motor vehicles, or heavy equipment if taken", or "Please do not remove from original package and transfer to unlabeled packaging".

3. Which portion or portions of House Bill 14-1366 does this recommendation address (underline all those that apply)?
 - a. Protect people from the unintentional ingestion of edible retail marijuana products.
 - b. Ensure that edible retail marijuana products are readily identifiable by the general public.
 - c. Makes it clear that the product is not for consumption by children.
 - d. Makes it clear that the product is safe for consumers.
 - e. Utilize a universal symbol.

4. Please summarize the rationale for the recommendation – why is it important?

The rationale for these recommendations:

1. Experience with unintentional ingestions in children has shown that the ability to rapidly identify the suspected agent often from the labeling on pills, and/or other medicines, can be very helpful in avoiding unnecessary tests, and providing the appropriate care for the ingestion
2. In addition, the use of labeling of "harmful to children", and "keep out of reach" comes from the toxic chemical industry and has been shown to be effective in helping parents know to place certain chemicals in areas hard to reach by children.

5. Describe how your recommendation addresses the rulemaking guiding principles of being transparent, operable, defensible and systematic for the licensees as well as the Marijuana Enforcement Division.

The recommendations take into consideration that individually labeling of fluids, granolas, fresh baked items is not operable in many circumstances.

6. What stakeholders, other than licensees and the Marijuana Enforcement Division, would be positively or negatively impacted by this recommendation? Please explain the impact.

There will be a positive impact to children and families. They will be able to identify candies that contain THC, and the labeling will allow for a more educated consumer.

7. What issue or issues does your recommendation resolve? (Please identify the issues)

The recommendations are intended to address the issue that THC infused products are difficult to distinguish from non-THC infused products that look otherwise identical.

8. Is there a dissenting voice on the working group concerning this recommendation? If yes, please provide a summary of the minority opinion about this recommendation.

N/A

9. Are you aware of any statutory authority or regulation that supports the basis of this recommendation? If yes, please include it here.

Yes, authority for labeling of marijuana products is contained in the Colorado Constitution at Article XVIII, Subsection 16(5)(a)(VI). Further statutory authority for warning labels on marijuana products can be found in C.R.S. 12-43.4-202(3)(a)(VII). Additionally, 1 CCR 212-2, Series R 1000 – Labeling, Packaging, and Product Safety, includes requirements related to warning labels for retail marijuana product containers and other labeling rules which align with the suggestions contained in this form to promote public health and safety.

10. Is the implementation of your recommendation dependent on another decision or action?

NO

- a. If yes, specifically what actions or decisions are required before this recommendation can be implemented?

11. Will the recommendation have a cost to implement? If yes, please explain the reason for the cost and provide an estimate.

Yes, but I am not sure of how much.

12. Provide an estimate of how long it would take to implement the recommendation.

I am not sure.