



**COLORADO**

**Department of Revenue**

Enforcement Division - Marijuana  
1697 Cole Boulevard, Suite 200  
Lakewood, CO 80401

October 19, 2016

**INDUSTRY-WIDE BULLETIN: 16-14**

**RE: CLARIFICATION ON ALLOWED SALES AS PERTAINING TO PACKAGING, LABELING, AND UNIVERSAL SYMBOL REQUIREMENTS**

Dear Marijuana Industry Stakeholders:

This industry bulletin is intended to clarify allowable sales until November 30, 2016 as they pertain to packaging, labeling, and universal symbol requirements, and then the allowable sales starting December 1, 2016. While the rules explicitly provided for a two-month period, October 1 – November 30, 2016, for selling through existing Medical Marijuana-Infused Products and Retail Marijuana Products, this same window was not explicit in rule for marijuana and concentrate. The Division is applying the two-month sell-through window to marijuana and concentrate. Please refer to the information below for additional information by type of marijuana consumable.

**October 1 – November 30, 2016:**

**Medical Marijuana-Infused Products and Retail Marijuana Products:**

Medical Marijuana-Infused Products and Retail Marijuana Products that were produced prior to the implementation of the new rules on October 1, 2016 are allowed to be transferred and/or sold until November 30, 2016. This includes Medical Marijuana-Infused Products that are not marked directly on the product with the Universal Symbol per M 604(C.5) and/or that are not packaged and labeled according to M 1004.5 and M 1006, as well as Retail Marijuana Products that are not marked directly on the product with the Universal Symbol per R 604(C.5) and/or that are not packaged and labeled according to R 1004 and R 1006.

**Medical Marijuana and Retail Marijuana:**

Medical Marijuana and Retail Marijuana that was produced prior to the implementation of the new rules on October 1, 2016 is allowed to be transferred and/or sold under the former packaging and labeling requirements until November 30, 2016.

**Medical Marijuana Concentrate and Retail Marijuana Concentrate:**

Medical Marijuana Concentrate and Retail Marijuana Concentrate that was produced prior to the implementation of the new rules on October 1, 2016 is



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allowed to be transferred and/or sold under the former packaging and labeling requirements until November 30, 2016.

#### **Starting December 1, 2016:**

##### **Medical Marijuana-Infused Products and Retail Marijuana Products:**

- All Medical Marijuana-Infused Products transferred and/or sold must comply with product manufacturing rule M 604(C.5), and packaging and labeling rules M 1001.5, M 1004.5, and M 1006.
- All Retail Marijuana Products transferred and/or sold must comply with product manufacturing rule R 604(C.5), and packaging and labeling rules R 1001, R 1004, and R 1006.

##### **Medical Marijuana and Retail Marijuana:**

- All Medical Marijuana transferred and/or sold must comply with the packaging and labeling requirements of rules M 1001.5, M 1002.5, and M 1005.
- All Retail Marijuana transferred and/or sold must comply with the packaging and labeling requirements of rules R 1001, R 1002.5, and R 1005.5.

##### **Medical Marijuana Concentrate and Retail Marijuana Concentrate:**

- All Medical Marijuana Concentrate transferred and/or sold must comply with the packaging and labeling requirements of rules M 1001.5, M 1003.5, and M 1007.
- All Retail Marijuana Concentrate transferred and/or sold must comply with the packaging and labeling requirements of rules R 1001, R 1003.5, and R 1007.5.

Regards,

Jim Burack  
Director  
Marijuana Enforcement Division