



**COLORADO**

Department of Revenue

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

December 3, 2018

**INDUSTRY-WIDE BULLETIN: 18-11**

**RE: LABELING OF UNIVERSAL SYMBOL ON SEALED VAPORIZER CARTRIDGE, DISPOSABLE VAPORIZER PEN, OR SYRINGE-TYPE DEVICE WITH AN INTENDED USE THAT IS LISTED IN MED RULE M & R 1003-1**

Dear Marijuana Industry Stakeholders:

This Industry-Wide Bulletin is intended to inform Licensees about upcoming changes regarding labeling requirements, **and does not replace each licensee's responsibility to read and comply with all applicable laws and rules.**

The State Licensing Authority has adopted permanent rules which become effective January 1, 2019. The full set of these newly adopted rules can be found on the Division [MED Rules](#) webpage. Included in these adopted rules is a new provision, which clarifies and makes express that while sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices for which all intended uses are listed in Rules M & R 1003-1(B) are not required to be in a Child-Resistant package, they must be labeled with at least the Universal Symbol pursuant to Rules M & R 1002-1. The exact rule language in MED Rules M & R 1002-1 (C)(2) and MED Rules M & R 1002-1 (D)(1)(a) states:

*...A sealed vaporizer cartridge, disposable vaporizer pen or syringe-type device that is within an intended use that is listed in Rule M[R] 1003-1(B) and that is not an Alternative Use Product must be labeled with at least the Universal Symbol, but is not required to include "Contains Marijuana. Keep away from children.", prior to Transfer to a patient[consumer]. The Universal Symbol shall be legible no smaller than ¼ of an inch by ¼ of an inch. Nothing in this Rule authorizes the use of a syringe for any type of injection involving a needle piercing the skin.*

The State Licensing Authority's adoption of this language is intended to further protect public health and safety by enhancing patients', consumers' and other stakeholders' ability to identify products containing marijuana.

**Medical Marijuana Businesses and Retail Marijuana Establishments:**

- **Optional labeling of the Universal Symbol on sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices with an intended use that is listed in Rule M 1003-1(B) – Until September 30, 2019**, Medical Marijuana Businesses and Retail Marijuana Establishments have the option to apply the Universal Symbol to all medical and retail sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices for which all intended uses are listed in Rules M & R 1003-1(B) prior to Transfer to a patient or consumer.
- **Mandatory labeling of the Universal Symbol on sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices with an intended use that is listed in Rules M & R 1003-1(B) – Beginning October 1, 2019**, Medical Marijuana Businesses and Retail Marijuana Establishments shall apply the Universal Symbol to all sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices



for which all intended uses are listed in Rules M & R 1003-1(B) prior to Transfer to a patient or consumer, unless the exception below applies.

- **\*Exception – Limited Medical Marijuana Center and Retail Marijuana Store Sales Period** – Until **July 1, 2020**, Medical Marijuana Centers and Retail Marijuana Stores may sell sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices within an intended use that is listed in Rules M & R 1003-1(B) that is not labeled with the Universal Symbol **only if** the sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices within an intended use that is listed in Rules M & R 1003-1(B) was Transferred to, and accepted by, the Medical Marijuana Center or Retail Marijuana Store **prior** to October 1, 2019 (this limited duration of permissible sales are hereinafter referred to as the “Limited Sales Period”).<sup>1</sup>

The Limited Sales Period is offered to facilitate industry compliance with the required and consistent labeling of the Universal Symbol on sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices within an intended use that is listed in Rules M & R 1003-1(B) requirement.

After July 1, 2020, under no circumstances may a Medical Marijuana Center or Retail Marijuana Store Transfer sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices within an intended use that is listed in Rule M 1003-1(B) that are not labeled with the Universal Symbol.

Any Medical Marijuana Business or Retail Marijuana Establishment in possession of sealed vaporizer cartridges, disposable vaporizer pens or syringe-type devices that do not display labeling compliant with the rules and this industry bulletin shall follow waste disposal procedures pursuant to Rules M & R 307, 1 CCR 212-1 and 1 CCR 212-2.

A complete copy of the adopted Medical Marijuana Rules, 1 CCR 212-1, and Retail Marijuana Rules, 1 CCR 212-2 are accessible at the Division’s website at the following link:

<https://www.colorado.gov/pacific/enforcement/med-rules>

Please be aware that the information contained in this Industry Bulletin and associated attachments do not represent legal advice or replace Licensees’ responsibility to read, understand, and maintain full compliance with all relevant statutes and rules.

Sincerely,

James Burack  
Director,  
Marijuana Enforcement Division

---

<sup>1</sup> The Limited Sales Period applies to Inventory that complies with all other relevant statutes and rules. For example, the Limited 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.