

Safer Packaging Related to Medical Marijuana

History

Federal standards require products intended for human consumption must pass a Food Safety Good Manufacturing Practices with inspections performed by an accredited certifying body. This includes labeling requirements.

Currently edibles in FL containing more than 0.03% THC are required to be put in a white opaque primary package with only the universal MMJ symbol printed on it, no other printing is allowed. This primary package is then placed in a secondary child resistant receptacle which is used to identify the brand, product, patient info, etc.

Given this requirement, cannabis packaging loses the traceability and chain-of-custody standards required for food, by disallowing details like the MMTC's logo on the primary packaging, as well as important dietary information like the nutrition facts, allergens and ingredients. If a patient discards the outer child resistant package, they are left with THC edibles in a non-branded, non-child resistant package.

Please support this consumer safety proposal.

Florida Statute 381.986 currently reads:

15. Each edible shall be individually sealed in plain, opaque wrapping marked only with the marijuana universal symbol. Where practical, each edible shall be marked with the marijuana universal symbol. In addition to the packaging and labeling requirements in subparagraphs 11. and 12., edible receptacles must be plain, opaque, and white without depictions of the product or images other than the medical marijuana treatment center's department-approved logo and the marijuana universal symbol. The receptacle must also include a list of all the edible's ingredients, storage instructions, an expiration date, a legible and prominent warning to keep away from children and pets, and a warning that the edible has not been produced or inspected pursuant to federal food safety laws.

Amended language in red print

15. ~~Each edible must be individually sealed in plain, opaque wrapping marked only with the marijuana universal symbol.~~ Where practical, each Edibles must be marked with the marijuana universal symbol. In addition to the packaging and labeling requirements in subparagraphs 11. and 12., edible receptacles must be plain, opaque, and white without depictions of the product or images, **and must include** other than the medical marijuana treatment center's department-approved logo, **and** the marijuana universal symbol, **and the edible's statement of identity per 21 CFR 101.3 and the net quantity of contents per 21 CFR 101.105(a)(b)(c).** The receptacle must also include a list of **all** the edible's **nutrition facts, allergens,** ingredients, storage instructions, an expiration date, a legible and prominent warning to keep away from children and pets, and a warning that the edible has not been produced or inspected pursuant to federal food safety laws.

This proposal is supported by the Florida Cannabis Action Network.

Reach FLCAN by contacting:
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