Suggestions for Standardizing Medicinal Cannabis Labeling

Product labels communicate vital information to consumers. For products that have a direct impact on health, there is significant precedent for regulating packaging and labeling elements. Pharmaceuticals, food, dietary supplements, tobacco and alcohol all have labeling regulations to help protect consumers. Medicinal cannabis labels are regulated at the state level, since the drug remains illegal at the federal level. Unsurprisingly, each state regulates medicinal cannabis labels slightly differently; however, if cannabis becomes federally legal, federal labeling requirements will likely accompany the decision.

Although research on labeling standards for recreational and medicinal cannabis products is sparse, the existing research offers some suggestions on important labeling elements for legalized cannabis products. Although comparisons to other products, such as tobacco and alcohol, can offer suggestions for labeling standards, the differences in use, distribution and consumption of medicinal cannabis mean direct comparisons are often incomplete.

The following suggestions are purposefully general, as additional research is needed to determine specific best practices for medicinal cannabis labeling. It is also important to note that while labeling serves a vital public health role, it is not a replacement for public education about appropriate use, dosing across product types and potential health impacts.
### Health Information

- **Justifications and Considerations**
  - Ensure that health warnings are **accurate** based on available scientific evidence.
  - Test warning language with different populations to ensure proper understanding and prevent confusion.
  - Keep warning language concise.
  - Ensure regulatory approval of **therapeutic or medical claims** before they appear on packaging.

- **Public Health Benefits**
  - Alerts people to potentially detrimental consequences of using medicinal cannabis.
  - Informs or reinforces public understanding of the most common or more severe risks associated with use.
  - Prevents unsubstantiated claims of therapeutic or medical benefit from misleading the public.

### Dose Information

- **Justifications and Considerations**
  - There is no scientific consensus on the definition of a **standard cannabis dose**. However, experts say that lower doses are safer, with some suggesting no more than 5mg THC as a standard dose.
  - Many states have set the **maximum allowable serving size** at 5 or 10 mg of THC for recreational edibles. These doses are widely used by manufacturers as “standard serving sizes.”
  - Doses should be **clearly portioned**. Individually wrapping doses most effectively communicates dosage and helps ensure accuracy.

- **Public Health Benefits**
  - Helps consumers slowly increase the amount of THC to allow for consumption of the **lowest effective dose**.
  - Helps prevent accidental overconsumption when doses are individually wrapped.

### THC†/CBD Content

- **Justifications and Considerations**
  - CBD and THC have **different effects** on the body, and medicinal cannabis patients may desire different ratios of these compounds to best manage their symptoms.
  - **CBD content** can **alter the effects** of THC.
  - Because many factors contribute to the experienced effects of consuming cannabis, **more research** is necessary to determine the most accurate and effective method of communicating potency and effect across product categories.
  - To help people with low numerical literacy or little experience using cannabis, different graphic or **non numerical methods** of communicating THC content and potency should be developed.

- **Public Health Benefits**
  - Informs consumers about the amounts of two of the **most abundant cannabinoids** in the product.
  - Helps consumers determine their ideal dose.
  - Assists consumers in understanding numerical THC content information in the **context** of intoxication potential.

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* Examples of concentrates include products known as shatter, hash, wax and other names.
‡ Examples of edibles include baked goods, candies and lozenges, oils and tinctures, and drinks.
† THC is the primary intoxicating cannabinoid in cannabis.
### Manufacturer and Batch Information

**Packaging Element 4**

**Justifications and Considerations**
- Provides a contact point for consumers if products are spoiled, defective or otherwise unsafe.
- Provides a point of contact for consumers if adverse events occur from consuming the product.

**Public Health Benefits**
- Aids health departments and agencies in tracking, investigating and identifying potentially harmful products in the event of an outbreak of illness associated with cannabis products.

### Ingredients and Nutrition

**Packaging Element 5**

**Justifications and Considerations**
- Informs consumers of potential allergens.
- Allows consumers to evaluate a product’s nutritional profile and make informed decisions about consumption.

**Public Health Benefits**
- Enables those who consume cannabis medicinally to eliminate and manage certain ingredients or nutrients that help manage their conditions.
- Provides information about potential contaminants from processing or cultivation.

### Tamper-Evident and Childproof Containers

**Packaging Element 6**

**Justifications and Considerations**
- One study found that childproof packaging can be difficult for some medicinal cannabis patients to open due to physical limitations or disabilities. This should be considered in packaging design.

**Public Health Benefits**
- Helps prevent accidental ingestion of cannabis products by children.
- Ensures that consumers can identify when the contents of a product may be compromised.

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