Toolkit · Operate Checklist Updated November 22, 2026

Packaging and Labeling Compliance Checklist

The packaging, labeling and product registration requirements in the Cannabis Control Act and the CCA draft rules, each cited: required label content, the universal symbol, warnings, the QR code to the certificate of analysis, potency and serving information, expiration dates, child-resistant and light-resistant packaging, edible limits, banned shapes and imitations, wholesale and point-of-sale labels, and product registration.

Who needs it: Cultivation facilities, processing facilities and microbusinesses (product labels and registration); Retail stores (point-of-sale labels and final packaging); Dual-use medical operators (dispensing labels).

Rule basis: Code of Virginia §§ 4.1-600, 4.1-604 4 and 32, 4.1-606 B 6 and 7, 4.1-1405, 4.1-1406, 4.1-1407; draft rules 3VAC10-20, 3VAC10-40-20 A, -160, 3VAC10-50-20, -50, -70, 3VAC10-70-10 to -55 (proposed); CCA draft provisions for CPHAC review (Nov. 2026).

Citations starting **3VAC10** are the Cannabis Control Authority's draft proposed adult-use regulations dated September 9, 2026: **proposed, not final, may change**. Citations starting **§ 4.1** are the Code of Virginia as amended by HB 30, Chapter 1 (2026). The section "What other states required or scored" is reference only and is not Virginia law.

We report what the law says. Not legal advice; see the disclaimer.

The Cannabis Control Act lists what a marijuana label must show, how the package must be built, what packaging and labels may not do, the THC limits for edibles, and the product registration process. The CCA's draft rules (Chapter 70 and parts of Chapter 50) add label fields, type size, the universal symbol, packaging standards and wholesale and point-of-sale labels. Citations to 3VAC10 are to the CCA's draft regulations dated Sept. 9, 2026 (proposed, not final; they may change before adoption).

A November 2026 CCA document listing revised provisions for Cannabis Public Health Advisory Council (CPHAC) review is cited separately where its wording differs.

Labels for regulated hemp products are listed in the Hemp retail compliance checklist.

What Virginia requires

Consumer label content (statute)

Marijuana and marijuana products sold or offered to a consumer are labeled with (Code of Virginia § 4.1-1405 A):

- Identification of the type of marijuana or product (§ 4.1-1405 A 1).
- Identification of the cultivation facility and processing facility where it was cultivated and processed, as applicable (§ 4.1-1405 A 2).
- A statement of net weight (§ 4.1-1405 A 3).
- In English and in a font no less than 1/16 of an inch: all ingredients; THC, CBD and other cannabinoid content; any allergens required by the Board; the number of servings in the package; and total and per-serving milligrams of THC and CBD for edible and topical products, or total percentage of THC and CBD for inhalable products (§ 4.1-1405 A 4).
- Usage instructions, including the amount that constitutes a single serving and the product's purpose, as applicable (§ 4.1-1405 A 5).
- An expiration date (§ 4.1-1405 A 6).
- A warning statement adopted by the Board, prominently displayed in bold print and in a clear and legible fashion (§ 4.1-1405 A 7).
- A universal symbol stamped or embossed on the packaging (§ 4.1-1405 A 8).
- A QR code or other Board-prescribed means linking to the certificate of analysis, produced by a licensed testing facility, stating the total THC concentration of the product or its batch (§ 4.1-1405 A 9).
- Any other information required by Board regulations (§ 4.1-1405 A 10).

- The Board requires the web address of its resource on responsible consumption and health risks to be included on the label of all marijuana and marijuana products as provided in § 4.1-1405 (§ 4.1-604 32).

Packaging (statute)

- Prepackaged in child-resistant, tamper-evident and resealable packaging that is opaque, or placed in such packaging at the final point of sale (§ 4.1-1405 B 1).
- Packaging for multiserving liquid products includes an integral measurement component (§ 4.1-1405 B 2).
- Packaging complies with any other Board requirements (§ 4.1-1405 B 3).
- “Child-resistant” means significantly difficult for a typical child under five to open and not significantly difficult for a typical adult to open and reseal, and resealable for any multi-use or multi-serving product (§ 4.1-600).

What packaging and labels may not do (statute)

- Bear, without authorization, another manufacturer’s trademark, trade name, famous mark or identifying mark, or otherwise violate federal trademark law (§ 4.1-1405 C 1).
- Appeal particularly to persons younger than 21 (§ 4.1-1405 C 2).
- Obscure identifying information on the label (§ 4.1-1405 C 3).
- Use a false or misleading label (§ 4.1-1405 C 4).
- “Depict, model the shape of, or use a label or package that depicts or models the shape of a human, animal, vehicle, or fruit” (§ 4.1-1405 C 5).
- Violate other Board labeling or packaging requirements (§ 4.1-1405 C 6).

Edible products (statute)

Edible marijuana products, and other products the Authority deems applicable (§ 4.1-1406 A):

- Are processed by a processing facility under VDACS inspection as a food manufacturer and in compliance with food manufacturing law (§ 4.1-1406 A 1), and comply with Chapter 51 of Title 3.2; such products are considered food (§ 4.1-1406 A 2).
- Have cannabinoid content and marijuana concentrate homogeneous throughout the product or each element of it (§ 4.1-1406 A 3 and 4).
- Have a universal symbol stamped or embossed on the packaging of each product (§ 4.1-1406 A 5).
- Contain no more than 10 mg of THC per serving and no more than 100 mg of THC per package (§ 4.1-1406 A 6). The Board's maximum THC level may not exceed those amounts (§ 4.1-606 B 7).
- Contain no additives that are toxic or harmful, designed to make the product more addictive, contain alcohol or nicotine, are misleading, or are designed to appeal particularly to persons under 21 (§ 4.1-1406 A 7).
- Do not add marijuana to a trademarked food or drink product, except as a component or ingredient where the product is not advertised or described as containing the trademarked product (§ 4.1-1406 A 8).
- The CPHAC review version of the draft would have the Board refuse to register "any edible marijuana product that exceeds five milligrams of THC per serving or one hundred milligrams of THC per package" (CCA draft provisions for CPHAC review, Nov. 2026: 3VAC10-50-70(D)).

Board authority (statute)

- The Board determines the nature, form and capacity of containers and prescribes the form and content of labels and seals (§ 4.1-604 4).
- The Board establishes health and safety warning labels (§ 4.1-606 B 6) and may adopt additional labeling, packaging and health and safety regulations, including limits on display of products at retail stores and microbusinesses (§ 4.1-1406 B).

Product registration (statute and draft)

- Cultivation facilities, processing facilities and microbusinesses register with the Board all marijuana and products they cultivate or process, on a Board form (§ 4.1-1407 A).
- The application includes total THC and total CBD based on laboratory testing of the formulation; a product name; a proposed package; and a proposed label, which need not show an expiration date at application (§ 4.1-1407 B).
- The Board registers products that meet labeling and packaging standards after receiving the application and fee, or notifies the applicant of the specific reasons for failure (§ 4.1-1407 C).
- No new registration is needed for a THC or CBD deviation of up to 15% (within 0.5 mg for products with 5 mg or less per dose), substantially similar packaging, minor label text, font or design changes, or other insignificant changes (§ 4.1-1407 D); other deviations may be submitted as a modification request (§ 4.1-1407 E).
- Each registered product name is associated with a specific laboratory test including total CBD and total THC, a terpenes profile, and THC, THC-A, CBD and CBDA (3VAC10-50-70 A, draft).
- Two products may share a registered name only within the 15% or 0.5 mg tolerance (3VAC10-50-70 B, draft).
- The Board will not register a product name that is identical or confusingly similar to an existing commercially available product, an unlawful product, or a previously registered product; is obscene or indecent; may promote overconsumption or use by persons under 21; may encourage use for a condition other than the one the practitioner intended to treat; is customarily associated with persons under 18; or relates to benefits, safety or efficacy unless supported by substantial evidence or clinical data (3VAC10-50-70 C, draft).
- The draft lists a $50 fee to register each product for cultivation and processing facilities and $25 for microbusinesses (3VAC10-20-60 E, 3VAC10-20-70 E, 3VAC10-20-90 E, draft).

Product content (draft)

- No marijuana product may contain any other regulated drug or controlled substance, or non-cannabinoid additives that are psychotropic or increase potency, toxicity or addictive properties, including alcohol, caffeine and nicotine; sugar and naturally occurring caffeine (such as in chocolate) are excepted (3VAC10-50-20 A, draft).
- No inhalable product may contain vitamin E acetate (3VAC10-50-20 C, draft).
- The CPHAC review version requires adequate precautions so that production does not contribute to allergen cross-contact or contamination by microorganisms or foreign substances (CCA draft provisions for CPHAC review, Nov. 2026: 3VAC10-50-50(G)).

Retail product label (draft)

- Each container and layer of packaging prominently displays the universal symbol (3VAC10-70-20 A, draft). The CPHAC review version adds that any illustration, sign, mark, symbol or design that resembles and may be mistaken for the universal symbol may not appear on any packaging or label (CCA draft provisions for CPHAC review, Nov. 2026: 3VAC10-70-20(A)).
- Products are unadulterated and processed, packaged and labeled under the FDA dietary supplement current good manufacturing practice rule, 21 CFR Part 111 (3VAC10-70-20 B 1 and 2, draft); the CPHAC review version also allows 21 CFR Part 117 (CCA draft provisions for CPHAC review, Nov. 2026: 3VAC10-70-20(B)(2)).

- Labels show: (a) the establishment's name and address; (b) the registered product name; (c) a description of the product's purpose and instructions for use; (d) child and safety warnings approved by the CCA in a conspicuous font; (e) a unique serial number matching the product with the batch number, including the cultivator and processor if obtained through distribution; (f) the date of testing and packaging; (g) the name and address of the testing laboratory; (h) an expiration date 12 months or less from testing unless supported by stability testing; (i) quantity or weight in each container; (j) a terpenes profile and all active and inactive ingredients, including THC, THC-A, CBD and CBDA; (k) for inhalable products, total percentage of CBD and THC; (l) for edible and topical products, total milligrams of CBD and THC per package and per serving; and (m) a pass or fail rating on required tests or a readable QR code to the certificate of analysis (3VAC10-70-20 B 3, draft).
- The CPHAC review version requires this information "in regular weight and width standard sans serif black font, without italics and a type size no smaller than 6 point," adds storage instructions to item (c), words item (d) as "any necessary cautionary warning statement, as required by the authority," and limits item (m) to a pass rating or a QR code linking to the certificate of analysis and relevant health and safety warnings that "may not link to any other information, unless approved by the authority" (CCA draft provisions for CPHAC review, Nov. 2026: 3VAC10-70-20(B)(3)).
- If the immediate container is too small, an outer layer carries the full label and the immediate container shows: establishment name, phone, and email or website; registered product name; production serial number; a prominently printed expiration date; quantity by weight, volume, or count and weight; active ingredients (THC, THC-A, CBD, CBDA); and a pass or fail rating or QR code (3VAC10-70-20 C, draft).
- Labels may be accordion, expandable, extendable or layered (3VAC10-70-20 D, draft).

- Vaporizer cartridges bear a universal symbol no smaller than 1/4 inch by 1/4 inch, engraved, printed or affixed with a sticker (3VAC10-70-20 E, draft). The CPHAC review version adds that all products intended for human consumption be stamped or imprinted with the universal symbol directly on each single serving (CCA draft provisions for CPHAC review, Nov. 2026: 3VAC10-70-20(E)).
- No product may be labeled "organic" unless grown and produced in compliance with organic standards under 7 CFR Part 205 (3VAC10-70-20 F, draft).

Point-of-sale label (draft)

- The label is unobstructed and conspicuous; all required information is on the outside container or wrapper or legible through it; a separable immediate container is labeled under 3VAC10-70-20 (3VAC10-70-35 A and B, draft).
- In type no smaller than 6 point: (1) a serial number assigned to the sale; (2) the product name on the certificate of analysis; (3) the certificate of analysis product identification number; (4) a terpenes profile and all active and inactive ingredients, including THC, THC-A, CBD and CBDA; (5) a pass rating on microbiological, mycotoxin, heavy metal, residual solvent and pesticide analysis (and water activity and moisture for botanical marijuana) or a readable QR code to the certificate of analysis; (6) any necessary cautionary statement required by the CCA; (7) a prominently printed expiration date; and (8) directions for use and storage understandable by the ordinary individual (3VAC10-70-35 C, draft).

Wholesale label (draft)

- Product for wholesale distribution is not adulterated, is processed, packaged and labeled under 21 CFR Part 111 except as exempted, and is packaged in a tamper-evident container (3VAC10-70-30 A and B 1 and 2, draft).
- Labeled with: names and addresses of the distributing and receiving establishments; quantity or weight; contents, including type or form and strain name as appropriate; the prominent statement "Not Packaged for Final Sale"; a unique serial number matching the product with the cultivator, manufacturer and batch number; and the dates of packaging and testing and, for botanical cannabis, harvest (3VAC10-70-30 B 3, draft).

- Wholesale product complies with all testing and labeling requirements before dispensing (3VAC10-70-30 C, draft).

Packaging standards (draft)

- Products containing THC are sold only in a child-resistant, secure and light-resistant container (3VAC10-40-20 A, draft).
- Child-resistant means meeting the “special packaging” standard in 16 CFR 1700.1(b)(4); the establishment keeps a copy of the certificate showing packaging is child-resistant and complies with 16 CFR 1700.15 and 1700.25 (3VAC10-70-55 A 1, draft).
- Tamper-resistant means one or more indicators or barriers to entry that would show a reasonable person the package was breached (3VAC10-70-55 A 2, draft).
- Light-resistant means entirely and uniformly opaque, protecting the whole contents from light (3VAC10-70-55 A 3, draft).
- Packaging may not bear any reasonable resemblance to trademarked or product-specialized packaging of any commercially available candy, snack, baked good or beverage, or be designed to be especially appealing to persons under 21 (3VAC10-70-55 B, draft).
- Labeling, packaging and marketing may not appeal to minors through cartoons or mascots, bubble-type or cartoon-like font, imitation of food, candy, soda, drinks, cookies or cereal (cultivar names excepted), the terms “candy” or “candies” and variants such as “kandy” or “kandeez,” symbols, images, characters, public figures, phrases, toys or games commonly used to market to persons under 21, or audio attractive to them (3VAC10-40-160 4, draft).

Dispensing label for medical cannabis products (draft, dual-use)

- The pharmacist or a pharmacy technician under direct supervision affixes a label with: a dispensing serial number; the registered product name; the production serial number; the dispensing date; the quantity dispensed; a terpenes profile and all active and inactive ingredients; a pass rating or QR code; the patient's name; the certifying practitioner's name; the amount recommended and directions for use; the dispensing pharmacist's name or initials; the processor's or dispensing facility's name, address and phone; any necessary cautionary statement; a prominently printed expiration date; and recommended conditions of use and storage (3VAC10-70-45 A, draft).
- Items A 6, A 7 and A 14 may be omitted if they appear on the batch label and are clearly visible to the patient (3VAC10-70-45 B, draft). Only a pharmacist or supervised pharmacy technician may alter, deface or remove the label (3VAC10-70-45 C, draft).

Records and forms the rules name

Consumer label check (each row is a field in § 4.1-1405 A or 3VAC10-70-20 B 3, draft)

Field	Source	On label
Product type	§ 4.1-1405 A 1	
Cultivation and processing facility	§ 4.1-1405 A 2	
Establishment name and address	3VAC10-70-20 B 3 a	
Registered product name	3VAC10-70-20 B 3 b	
Net weight; quantity or weight per container	§ 4.1-1405 A 3; 3VAC10-70-20 B 3 i	
Ingredients, cannabinoid content, allergens, servings (1/16 inch, English)	§ 4.1-1405 A 4	

Field	Source	On label
Terpenes profile; THC, THC-A, CBD, CBDA	3VAC10-70-20 B 3 j	
THC and CBD percentage (inhalable) or mg per package and serving (edible, topical)	§ 4.1-1405 A 4; 3VAC10-70-20 B 3 k and l	
Purpose and instructions for use; serving size	§ 4.1-1405 A 5; 3VAC10-70-20 B 3 c	
Board warning in bold; CCA child and safety warnings	§ 4.1-1405 A 7; 3VAC10-70-20 B 3 d	
Universal symbol on each container and layer	§ 4.1-1405 A 8; 3VAC10-70-20 A	
Serial number matching batch (and cultivator, processor)	3VAC10-70-20 B 3 e	
Date of testing and packaging	3VAC10-70-20 B 3 f	
Testing laboratory name and address	3VAC10-70-20 B 3 g	
Expiration date	§ 4.1-1405 A 6; 3VAC10-70-20 B 3 h	
QR code to certificate of analysis (or pass/fail rating)	§ 4.1-1405 A 9; 3VAC10-70-20 B 3 m	
Web address of the Board's consumption and health-risk resource	§ 4.1-604 32	

Package check (§ 4.1-1405 B and C; 3VAC10-70-55, draft)

Requirement	Source	Met
Child-resistant, with 16 CFR 1700 certificate on file	§ 4.1-1405 B 1; 3VAC10-70-55 A 1	

Requirement	Source	Met
Tamper-evident	§ 4.1-1405 B 1; 3VAC10-70-55 A 2	
Resealable	§ 4.1-1405 B 1	
Opaque (entirely and uniformly)	§ 4.1-1405 B 1; 3VAC10-70-55 A 3	
Integral measuring component (multiserving liquids)	§ 4.1-1405 B 2	
No human, animal, vehicle or fruit shape or depiction	§ 4.1-1405 C 5	
No unauthorized trademark; no resemblance to candy, snack, baked good or beverage packaging	§ 4.1-1405 C 1; 3VAC10-70-55 B	

What the law does not say

- Neither the statute nor the draft rules include the text of the Board's warning statement or the design of the universal symbol; the draft defines the symbol as the image "established by the authority and made available on the authority's website" (3VAC10-70-10, draft).
- The draft rules do not list the allergens that § 4.1-1405 A 4 says the Board may require on labels.

What other states required or scored

Not required in Virginia. Shown so applicants can see what other regulators asked for.

Massachusetts (935 CMR 500)

- Massachusetts requires products sold to consumers to be in child-resistant packaging that is opaque and plain, avoids bright colors and cartoon characters, is resealable for multi-use products, and is certified by a qualified testing firm as meeting 16 CFR 1700 (935 CMR 500.105(6)(a)1.).
- Where child-resistant packaging is "Unreasonably Impracticable," the product goes in a resealable child-resistant exit package (935 CMR 500.105(6)(a)2.).
- Flower labels use wording no smaller than 1/16 inch and show the producer's name, registration number and contacts, packaging date, batch number, net weight in U.S. and metric units, and full cannabinoid profile (935 CMR 500.105(5)(a)1.-5.).
- Labels carry a statement and seal certifying contaminant testing with no adverse findings and the test date (935 CMR 500.105(5)(a)6.).
- The required warning begins "This product has not been analyzed or approved by the FDA" and includes "KEEP THIS PRODUCT AWAY FROM CHILDREN," followed by Commission symbols showing the package contains marijuana and is harmful to children (935 CMR 500.105(5)(a)7.-9.).

New York (9 NYCRR Part 128)

- New York requires retail packaging that is child-resistant for the product's useful life, tamper-evident without obscuring labels after opening, resealable for multiple servings, and fully enclosing (9 NYCRR 128.2(a)).
- Licensees keep documentation that each package meets 16 CFR 1700.15 and 1700.20 (9 NYCRR 128.2(b)).
- Plastic packaging must contain at least 25% post-consumer recycled content, with exceptions for child-resistance mechanisms and items with no recycled-content option; new licensees have twelve months to comply (9 NYCRR 128.3(a)(2)).
- The principal display panel shows THC and CBD per serving and per package (calculated as THC + THCA x 0.877), servings per package, serving size, net quantity and brand name (9 NYCRR 128.5(a)).

- The package also lists ingredients with major allergens, solvents, expiration date, storage conditions, the processor's name, location, license number and contact, a lot number, and a QR or bar code linked to the certificate of analysis (9 NYCRR 128.5(b)).
- The universal symbol appears at a minimum 1.25 inches tall for the square version, and required text is at least 6-point font in English (9 NYCRR 128.5(b)(6), (c)).

New Jersey (N.J.A.C. 17:30-16)

- New Jersey requires packaging that is fully enclosed, opaque, "of a single color," light resistant, child-resistant under 16 CFR Part 1700, and resealable unless single-serving (N.J.A.C. 17:30-16.2(f)).
- Containers meet United States Pharmacopeia container standards, and packaging is done on food-grade stainless steel tables in a secure area (N.J.A.C. 17:30-16.2(a)-(b)).
- Usable cannabis packaged for retailers may be in any increment up to one ounce (28.35 grams) (N.J.A.C. 17:30-16.2(d)).
- Once the seal on a retail-ready item is broken, the item is deemed unusable (N.J.A.C. 17:30-16.2(g)).
- Businesses "shall make a good faith effort" to use biodegradable packaging (N.J.A.C. 17:30-16.2(h)).

Maryland (COMAR 14.17.18)

- Maryland requires retail packaging that is tamper evident, child resistant and opaque; soft-sided packages are at least 4 mil thick (COMAR 14.17.18.02B).
- Four warning statements are required, including "This package contains cannabis. Keep out of reach of children and animals," plus the Maryland Poison Center number (COMAR 14.17.18.03C).
- Label text is no smaller than 6-point font or 1/12 inch (COMAR 14.17.18.03B(2)).
- Cannabinoid concentrations under 1 percent are printed with a leading zero, and the label names the manufacturer and phone number for adverse event reports (COMAR 14.17.18.03D(1)).

- Prohibited elements include resemblance to commercial candy or snack packaging, images of food or fruit, cartoons, animals, neon colors, mascots, anthropomorphic graphics, depictions of consumption, and medical claims (COMAR 14.17.18.07A).

Ohio (OAC 1301:18-4-20)

- Ohio requires Division approval before a licensee uses any packaging or label intended for direct customer sale (OAC 1301:18-4-20(A)(1)).
- Each package displays net weight, the registered product name, the universal THC symbol, the Division of Cannabis Control seal, and for edibles "cannabis-infused" or "marijuana-infused" (OAC 1301:18-4-20(B)).
- Plant material labels add harvest and packaging dates, product registration number, strain name matching the tracking system, weight in grams and ounces, THC range, and the testing laboratory's name and license number (OAC 1301:18-4-20(C)(1)).

Sources checked 2026-11-22.

- Cannabis Control Commission, 935 CMR 500.000 (effective 09-11-26)
- Office of Cannabis Management, 9 NYCRR Parts 128 and 129 (adopted packaging, labeling, marketing and advertising rules)
- NJ Cannabis Regulatory Commission, N.J.A.C. 17:30 Personal Use Cannabis Rules
- COMAR 14.17.18.02, General Packaging Requirements
- COMAR 14.17.18.03, General Labeling Requirements
- COMAR 14.17.18.07, Prohibited Packaging and Labeling
- OAC 1301:18-4-20, Packaging and labeling requirements for cannabis intended for direct customer sale

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Sources

- Code of Virginia § 4.1-600 (Definitions)
- Code of Virginia § 4.1-604 (Powers and duties of the Board)
- Code of Virginia § 4.1-606 (Regulations of the Board)

- Code of Virginia § 4.1-1405 (Labeling and packaging requirements; prohibitions)
- Code of Virginia § 4.1-1406 (Other health and safety requirements for edible marijuana products)
- Code of Virginia § 4.1-1407 (Product registration requirements)
- CCA draft adult-use regulations, Sept. 9, 2026 (proposed, not final): 3VAC10-20, 3VAC10-40, 3VAC10-50, 3VAC10-70
- CCA, Draft Regulation Provisions for CPHAC Review (Nov. 2026)

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