Alcohol, Drugs & Impairment Division

Alcohol, Drugs and Impairment Division – NATIONAL SAFETY COUNCIL

Position Statement

Labeling of Adult-Use Cannabis Products

Position

The Alcohol, Drugs and Impairment Division (ADID) of the National Safety Council (NSC) supports policies that substantially reduce or eliminate safety risks from the use of cannabis (marijuana), other products containing delta-9-tetrahydrocannabinol (Δ9-THC), its isomers, derivatives, and other potentially impairing cannabinoids.

Cannabis product labeling practices vary between different legal and regulatory markets. To enhance the safety of cannabis product use, the NSC-ADID recommends the implementation of standardized, comprehensive labeling on both regulated and unregulated, commercially available cannabis products, including cannabidiol (CBD), to include the following components:

1. Pictograms indicating the product contains impairing/intoxicating cannabinoids;
2. Comprehensive product facts;
3. Regulatory compliance statement(s).

Background

Federally mandated *"*Nutrition Facts*"* labeling on food products provides vital information about ingredients, nutritional content, and potential allergens, empowering consumers to make informed choices. Similarly, alcoholic beverage labels play a crucial role in promoting public health and safety by specifying alcohol content by volume and assisting consumers in moderating their alcohol intake. Cannabis product labels should similarly provide detailed information designed to give consumers the power to make informed decisions. Standardized, comprehensive labels support consumer rights, promote healthier lifestyles, and contribute to a more informed, safe, and responsible society.

Current State of Cannabis Product Labeling

Differences in the regulatory and legal status of cannabis, at both the state and federal levels, results in highly variable cannabis product labeling.[1] In states with robust quality assurance regulations, labels may provide ample information, or this information may be included as brochures or package inserts. In contrast, products from states with minimal oversight may lack proper labeling and/or quality assurance.

Unregulated product labels often include minimal information, and sometimes even contradictory or false information. Studies have shown that these products often contain one or more unlisted

pharmacologically-active cannabinoid(s), incorrect concentrations, listed ingredients not present in the product, false certificates of analysis, and suggested serving sizes with no supporting clinical data.[2–5] The use of terms such as “hemp-derived,” “THC free,” or “<0.3% THC” on many of these products creates an illusion of product legality and safety. These products often contain more than 0.3% Δ9-THC by weight and/or other cannabinoids that may mimic the effects of Δ9-THC (e.g., Δ8-THC, Δ10-THC).[6] Use of products with such labeling inaccuracies may lead to adverse health events requiring medical attention.[7,8] Additionally, many unregulated product labels closely resemble those of consumer food items, particularly cereals, candies, cookies, and other popular snacks, which have resulted in accidental ingestion by children.[9]

Recommended Label Components

The NSC-ADID recommends the following components be included in cannabis product labels, at a minimum, to maintain public safety:

Use of Pictograms

Similar to prescription and over-the-counter medications, cannabis products should prominently display a symbol (*pictogram*) indicating that the product contains one or more intoxicating cannabinoids. The ADID recommends using the American Society of Testing and Materials (ASTM) D8441[10] International Intoxicating Cannabinoid Product Symbol (IICPS) to promote labeling consistency (Figure 1).

Figure 1. ASTM IICPS
No less than 0.39 by 0.39 in.[10]

Comprehensive Product Facts

Product facts should be reader-friendly and include, at a minimum**:** serving size, directions for use, active and other ingredients, storage and disposal instructions, safety warnings, manufacturing information, and the responsible party/parties (Figure 2). Product facts should be visible on exterior packaging. Repeat-use products in which exterior packaging is discarded (e.g., electronic cigarettes) should, at a minimum, have the IICPS pictogram. If single-serve products intended for resale are packaged in bulk, the single-serve products should have a label.

Regulatory Compliance Statement

As cannabis regulations differ between states, products should clearly indicate the regulation(s) followed, with the strictest of requirements taking precedence. Many laboratories are unable to test for semi-synthetic and synthetic cannabinoids. A product containing cannabinoids without content or concentration data from an accredited laboratory should include the following statement: “Identification and concentration was not confirmed through validated laboratory testing.” Each intoxicating cannabinoid should be listed as a unique “Active Ingredient.” Although not intoxicating, CBD and cannabidiolic acid (CBDA) should also be listed under active ingredients. CBDA and tetrahydrocannabinolic acid (THCA) should not be included as “total CBD” and “total THC,” respectively. All other ingredients should be listed under “Other Ingredients” and may be listed by class (e.g., terpenes, dyes, stabilizers). The complete “Other Ingredients” list should be available either on the product, manufacturer website, or other route.

Other Packaging Elements

In alignment with ASTM 8449,[11] packaging should not appeal to children, nor mimic popular consumer products. Labels should contain safety warnings, a batch number, manufacturing date, and *“*best by*”* date. The text should be legible (i.e., adequate font size and color contrast) and in English. Labels should not include vague terminology (e.g., “<0.3% THC”) to declare concentrations. Packaging should not include health claims unverified by peer-reviewed,

published scientific data (e.g., relieves depression, lowers anxiety). The use of the term “hemp-derived” should be prohibited. Any products including synthetic or altered cannabinoids should state: “This product contains synthetic or chemically-altered cannabinoids.”

Conclusions

The adoption of these labeling components will increase the information available to consumers, promoting informed and responsible decisions regarding cannabis product use. Similar to both food and alcohol labels already familiar to consumers, accurate cannabis product labels are anticipated to facilitate greater compliance with intended serving size and use, thereby increasing safety and decreasing risk of overdose/hospitalization.

The NSC-ADID urges all state and federal regulators to adopt these evidence-based labeling requirements to protect public safety, reduce accidental ingestion by children, and ensure consumers have accurate product information.

Figure 2. Mock Product Facts Label (created in part from elements included in ASTM recommendations). Contents in brackets should be completed by the Responsible Party.

	Product Facts		
1	**[xx] servings per container** **Serving Size**		**[#] [units]**
2	**Directions for Use:** Take 1 serving by [route of administration]. Wait a minimum of [xx] [timeframe] before taking another serving. Do not take more than [xx] servings within a [xx]-hour interval.		
3	**Active Ingredients:** (listed by decreasing concentration) *[for example:*	Per serving	Per package
	delta-9-tetrahydrocannabinol (Δ9-THC)	*[xx] mg*	*[xx] mg;*
	delta-8-tetrahydrocannabinol (Δ8-THC)		
	delta-10-tetrahydrocannabinol (Δ10-THC)		
	delta-9-tetrahydrocannabinolic acid (Δ9-THCA)		
	cannabidiol (CBD)		
	cannabinol (CBN)		
	delta-8-tetrahydrocannabinol acetate (Δ8-THC-O)		
	delta-9-tetrahydrocannabinol acetate (Δ9-THC-O)		
	tetrahydrocannabiphorol (Δ8-THCP)		
	delta-9-tetrahydrocannabiphorol (Δ9-THCP)		
	Others: (to be listed as product prepared/identified)]		
4	**Other Ingredients:** (listed by decreasing concentration) *[for example: terpenes, natural flavors, artificial flavors, propylene glycol, preservatives]*		
5	**Storage & Disposal:** In accordance with state *regulations, [for example: Store in a [xx] environment. Minimize exposure to [xx]. Safe to dispose of in [xx].]*		
6	**Safety Warnings:** This product is not intended to diagnose, treat, cure, or prevent any disease, and has not been authorized for sale by the Food and Drug Administration. Consult a doctor if you are currently taking other medications, as interactions between multiple substances may impact effects. Use or overuse of this product may lead to adverse effects. Seek medical help or contact a Poison Control Center right away if adverse effects occur. If pregnant or breast-feeding, consult a healthcare professional before use. Keep out of reach of children, minors, and pets. This product may impair the ability to drive a motor vehicle or operate machinery safely. Use of this product in any way other than directed/intended may pose additional health and safety risks. Consumers should report adverse effects to the Poison Help Line at 1-800-222-1222.		
	Manufactured By: [Name], 7 [Permit Number], [Address], [Telephone Number], [Email Address]	8 Manufacture date: [YYYY-MM] Best before: [YYYY-MM] 9 Batch: [XXXXX] 10 This product was manufactured in compliance with the following regulations: [XX, YY, ZZ]	

1. Declaration of Quantity
2. Declaration of Intended Use
3. Declaration of Active Ingredients
4. Declaration of Other Ingredients
5. Storage & Disposal Instructions
6. Warning Statements
7. Declaration of Responsibility
8. Manufacture and Best Before Dates
9. Batch Identification
10. Declaration of Regulatory Compliance

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