MINNESOTA
OFFICE OF
CANNABIS MANAGEMENT

Packaging and Labeling Guide

for Cannabis and Lower-Potency Hemp Edible Products

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Introduction

A business that is licensed or endorsed by the office to manufacture or produce regulated cannabis or hemp-derived products must comply with all applicable packaging and labeling requirements under state statute and rule. Business owners should become familiar with the following sections of law and rule that directly apply to the packaging and labeling requirements outlined in this document, including:

- Minnesota Statutes, sections 342.62, 342.63
- Minnesota Rules, parts 9810.1400, 9810.1401, 9810.1402, 9810.1403

Throughout this document, statutory requirements are followed by an abbreviated citation referring you to the specific chapter, section (§), and subdivision (subd.) of Minnesota Statutes (M.S.) and/or part (P.), and subpart (subp.) of Minnesota Administrative Rules (M.R.). Use the links above to access Minnesota Statutes, chapter 342, and Minnesota Rules, chapter 9810.

This document is meant to provide guidance to businesses licensed with the Office of Cannabis Management to help navigate the packaging and labeling rules adopted by the state of Minnesota. These guidelines are an important part of ensuring that Minnesota's cannabis industry prioritizes public health and safety, consumer confidence and market integrity. The information contained in this document is not legal advice nor is it intended to replace your obligation to thoroughly read all applicable law and rules. It is the responsibility of each license holder to maintain compliance with all applicable laws and rules.

Product transition period for existing regulated product supply chains

Launching a new retail market for cannabis and hemp-derived products that is governed by one statute (chapter 342), while transitioning existing markets authorized under other statutes (section 151.72 and chapter 152) is complex. Prospective hemp-derived, adult-use cannabis, and medical cannabis businesses have understandably had questions about how to manage the transition between regulatory frameworks, particularly as it pertains to statutory requirements for products and packaging/labeling.

To support the launch of the adult-use cannabis market and provide continuity for existing hemp-derived businesses and medical cannabis patients, OCM has authorized a product transition period. During this transition period, OCM will authorize license holders conducting retail sales under Minnesota Statutes, chapter 342 to sell products compliant under the existing regulated supply chains in section 151.72 and sections 152.22-152.37, including hemp-derived cannabinoid products and medical cannabis.

At the end of this document, we outline how this product transition period impacts hemp-derived product retailers, manufacturers, and Minnesota's medical cannabis program.

General Information and Definitions

Packaging is the physical container or wrapping that holds a product. It protects the product, keeps it fresh or safe, and makes it easier to store, ship, and sell. Example: A plastic jar, a foil pouch, or a sealed bottle used to hold a cannabis product.

Labeling is the information printed on or affixed to the packaging. It tells people what the product is, how to use it, what's in it, and includes any required warnings. Example: A label that shows THC content, ingredients, expiration date, and safety warnings.

Important: The “marketing layer” of a label specifically refers to the outermost layer of a retail sale container, such as a bag or box that the package containing the product is placed in, that is predominantly apparent and visible. If the container consists of only a single layer, then the outer surface of the container is the marketing layer. Information required to be displayed on this layer must not be obscured in any way, including under a peel away panel. [M.R. P. 9810.0200, subp. 38]

Universal Packaging and Labeling Requirements

Universal package requirements

All packaging for a regulated product must comply with the following requirements:

- Child-resistant, tamper-evident, and opaque. [M.S. § 342.62, subd. 2(a)(1)]
    - Can be placed in a compliant container at point of sale.
    - Child-resistant requirement does not apply to beverages. [M.S. § 342.62, subd. 2(b)]
- Packaging for edible products containing multiple servings must be resealable or placed in a resealable container at point of sale. [M.S. § 342.62, subd. 2(d)]
- If package contains multiple servings, each serving must be indicated by scoring, wrapping, or other indicators designating the individual serving size. [M.S. § 342.62, subd. 2(c)]
- For lower-potency hemp edibles intended to be combined with food or beverage products prior to consumption, a calibrated dropper, measuring spoon, or similar device for measuring a single serving may be used to designate servings (Note: this applies to products sold at retail, not intended for on-site consumption). [M.S. § 342.46, subd. 6(b)]
- Packaging must be designed to maximize the shelf life of a product. [M.R. P. 9810.1400, subp. 2D]

Universal label requirements

International Intoxicating Cannabinoid Product Symbol (IICPS)

The IICPS must [M.R. P. 9810.1400, subp. 3A]:

- Include the American Society for Testing and Materials (ASTM) D8441 with the letters THC underneath
- Be affixed to marketing layer of product
- Use “Warning Signal Yellow” (ISO 3864-4/ANSI Z535.1, Pantone 109 C, Hex #FFD100) and a black border
    - When displayed on a dark background, a yellow border is added around the initial black border of the IICPS
- Be no smaller than 0.5 inches by 0.5 inches

For light backgrounds

For dark backgrounds

Warning Signal Yellow

ISO:	3864-4
ANSI:	Z535.1
Pantone:	109 C
CMYK:	0, 18, 100, 0
RGB:	255, 209, 0
Hex:	#FFD100

This symbol is available for download on the OCM website.

21+ warning symbol

The 21+ warning symbol must [M.R. P. 9810.1400, subp. 3B]:

- Be affixed to marketing layer
- Be no smaller than 0.75 inches tall by 0.6 inches wide
- Use “Warning Signal Yellow” (ISO 3864-4/ANSI Z535.1, Pantone 109 C, Hex #FFD100) and a black border
    - When displayed on a dark background, a yellow border is added around the initial black border
- Include within the rectangle, a red (Pantone 187 C, Hex #A6192E) octagon containing the words “21+ NOT FOR CHILDREN” in white with the words “POISON CONTROL 800-222-1222” beneath the octagon in black

Red (octagon)

Pantone:	187 C
CMYK:	7, 100, 82, 26
RGB:	166, 25, 46
Hex:	#A6192E

For light backgrounds

For dark backgrounds

Warning statement

The warning statement must [M.S. § 342.63, subd. 2(8); M.R. P. 9810.1400, subp.1D, M.R. P. 9810.1400, subp. 3C]:

- Be on each label and placed on the marketing layer
- Include in no less than size 6 pt font: "Keep this product out of reach of children. This product may be unlawful outside the state of Minnesota."

Content of Label: Cannabis

Included product categories: *Dried cannabis flower and hemp-derived consumer products (consisting of plant parts)*

Required information

- Name and license number of the cultivator [M.S. § 342.63, subd. 2(1)]
- Net weight [M.S. § 342.63, subd. 2(2)]
- Batch number [M.S. § 342.63, subd. 2(3)]
- Cannabinoid profile [M.S. § 342.63, subd. 2(4); M.R. P. 9810.1401, subp. 2A]
- Strain or cultivar name [M.R. P. 9810.1401, subp. 2B]
- Best by date [M.R. P. 9810.1401, subp. 2C]
- Testing verification [M.S. § 342.63, subd. 2(6)]
- Directions for use [M.S. § 342.63, subd. 2(7)]
- All universally required symbols and statements [M.S. § 342.63, subd. 2(5) and 2(8-9); M.R. P. 9810.1400, subp. 3]

Additional requirements for cannabis flower infused with cannabis concentrate

- Name of business that produced product [M.R. P. 9810.1401, subp. 4A]
- Date product was made [M.R. P. 9810.1401, subp. 4B]
- Amount of cannabis concentrate per package, measured in grams [M.R. P. 9810.1401, subp. 4D]
- Method used to create cannabis concentrate [M.R. P. 9810.1401, subp. 4E]
    - Examples include butane extraction, CO2 extraction, solventless, etc."
- Ingredients list [M.R. P. 9810.1401, subp. 4F]
- Major allergens [M.R. P. 9810.1401, subp. 4G]
- Expiration date [M.R. P. 9810.1401, subp. 4H]
- Warning statement: "Do not eat" [M.R. P. 9810.1401, subp 4I]

Additional requirements for imported hemp-derived consumer products (consisting of plant parts)

- State of the product's origin [M.R. P. 9810.1401, subp. 7A]
- Name and business address of manufacturer [M.R. P. 9810.1401, subp. 7B]

Label example (cannabis)

Note: This is not a real product label and is intended as an example only.

Content of Label: Cannabinoid Products

Included product categories: *Ingestible cannabis products and lower-potency hemp edibles*

Required information

- Name and license number of the cultivator(s) [M.S. § 342.63, subd. 3(a)(1)]
- Name and license number of manufacturer(s) [M.S. § 342.63, subd. 3(a)(2)]
- Net weight [M.S. § 342.63, subd. 3(a)(3); M.R. P. 9810.1401, subp. 3C]
- Type of product [M.S. § 342.63, subd. 3(a)(4)]
- Batch number [M.S. § 342.63, subd. 3(a)(5)]
- Expiration date [M.R. P. 9810.1401, subp. 3G]
- Serving size and number of servings [M.S. § 342.63, subd. 3(a)(6); M.R. P. 9810.1401, subp. 3D]
- Cannabinoid profile (must specify amount of THC and CBD) per serving and in total (milligrams) [M.S. § 342.63, subd. 3(a)(7)]
- Ingredients list (in descending order of predominance by weight) [M.R. P. 9810.1401, subp. 3B]
- Major allergens [M.R. P. 9810.1401, subp. 3H]
- All universally required symbols and statements [M.S. § 342.63, subd. 3(a)(9-10) and 3(a)(13-14); M.R. P. 9810.1400, subp. 3]
- Testing verification [M.S. § 342.63, subd. 3(a)(11)]
- Directions for use [M.S. § 342.63, subd. 3(a)(12)]

Additional requirements for lower-potency hemp edibles containing artificially derived cannabinoids

- Warning statement: “Contains artificially derived cannabinoids. Not all safety hazards have been evaluated." [M.R. P. 9810.1401, subp. 8]

Additional requirements for imported lower-potency hemp edibles

- State of the product’s origin [M.R. P. 9810.1401, subp. 7A]
- Name and business address of manufacturer [M.R. P. 9810.1401, subp. 7B]

Additional requirements for lower-potency hemp (edible products)

- Packaging for beverages sold in multipack units (such as cases) must describe the number of individual units contained inside the packaging, the potency and number of servings per unit, and must comply with all universal packaging and labeling requirements including the display of universal symbols. [M.R. P. 9810.1400, subp. 2 and 3; M.R. P. 9810.2503, subp. 1(B)]

Label examples (cannabinoid products)

Note: These are not real product labels and are intended as examples only.

On-site consumption

Cannabis microbusinesses

Edible cannabinoid products sold for on-site consumption must be served in the required packaging but may be removed from the products' packaging by customers and consumed on site. [M.S. § 342.28, subd. 10(d)]

Lower-potency hemp edible retailers

Lower-potency hemp edibles that are intended to be consumed as a beverage may be served outside of the edibles' packaging, such as via bulk dispensing, if the information that is required to be contained on the label of a lower-potency hemp edible is posted or otherwise displayed by the lower-potency hemp edible retailer. [M.S. § 342.46, subd. 8(e)]

Content of Label: Concentrates

Included product categories: *Cannabis concentrate products and hemp-derived consumer products (excluding hemp plant parts)*

Required information

- Name and license number of the cultivator of the plants used to create the concentrates [M.S. § 342.63, subd. 3(a)(1)]
- Name and license number of producer [M.S. § 342.63, subd. 3(a)(2)]
- Net weight or volume [M.S. § 342.63, subd. 3(a)(3)]
- Type of product [M.S. § 342.63, subd. 3(a)(4)]
- Batch number [M.S. § 342.63, subd. 3(a)(5)]
- Serving size [M.S. § 342.63, subd. 3(a)(6)]
- Cannabinoid profile [M.S. § 342.63, subd. 3(a)(7)]
- Directions for use [M.S. § 342.63, subd. 3(a)(12)]
- Expiration date [M.R. P. 9810.1401, subp. 4H]
- Date product was made [M.R. P. 9810.1401, subp. 4B]
- Amount of cannabis concentrate per serving, measured in grams [M.R. P. 9810.1401, subp. 4C]
- Amount of cannabis concentrate per package, measured in grams [M.R. P. 9810.1401, subp. 4D]
- Method used to create cannabis concentrate [M.R. P. 9810.1401, subp. 4E]
- Ingredients list [M.R. P. 9810.1401, subp. 4F]
- Major allergens [M.R. P. 9810.1401, subp. 4G]
- Testing verification [M.S. § 342.63, subd. 3(a)(11)]
- Warning statement: “Do not eat” [M.R. P. 9810.1401, subp. 4I]
- All universally required symbols and statements [M.S. § 342.63, subd. 3(a)(9-10) and 3(a)(13-14); M.R. P. 9810.1400, subp. 3]

Additional requirements for hemp concentrates containing artificially derived cannabinoids

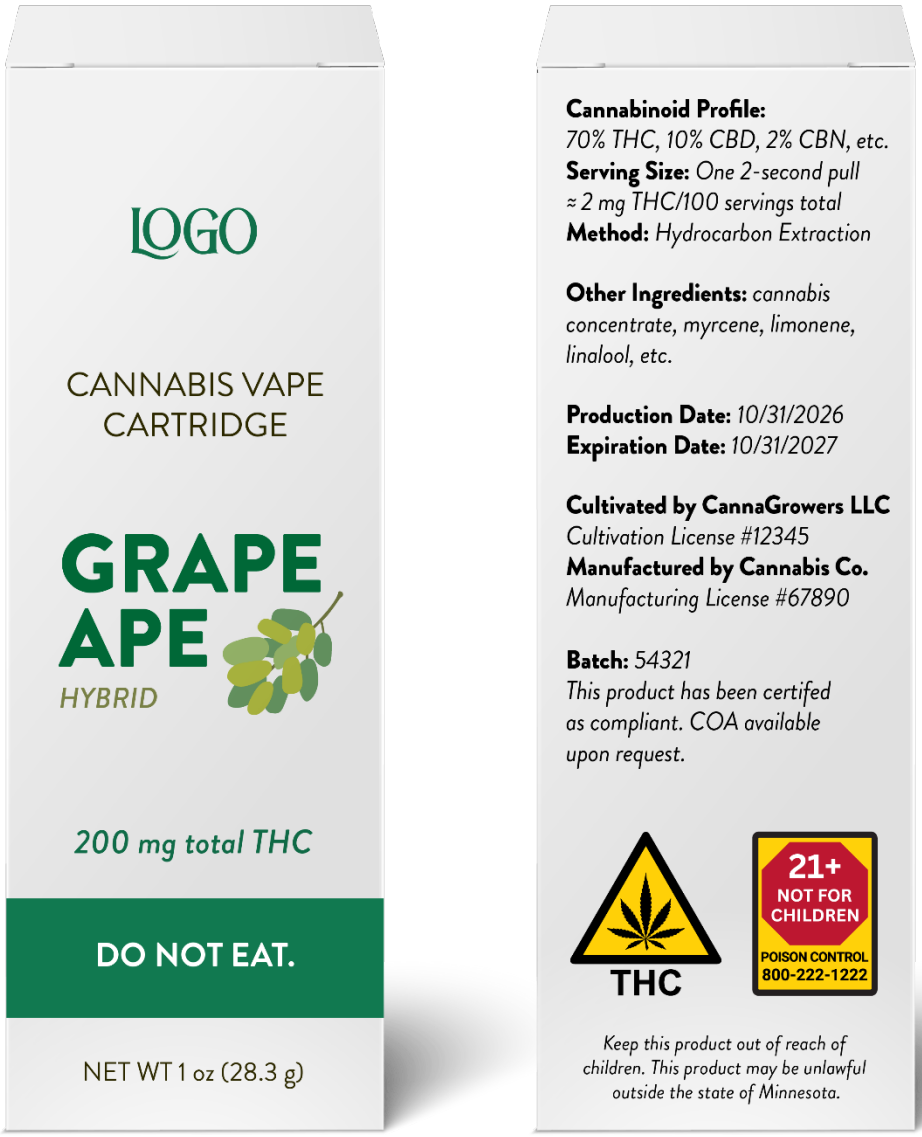
- Warning statement: “Contains artificially derived cannabinoids. Not all safety hazards have been evaluated." [M.R. P. 9810.1401, subp. 8]

Additional requirements for imported hemp-derived consumer products

- State of the product's origin [M.R. P. 9810.1401, subp. 7A]
- Name and business address of manufacturer [M.R. P. 9810.1401, subp. 7B]

Label example (concentrates)

Note: This is not a real product label and is intended as an example only.



Content of Label: Immature Cannabis Plants and Cannabis Seedlings

Included product categories:
Immature cannabis plants and seedlings

Required information

- Name and license number of the cultivator [M.R. P. 9810.1401, subp. 1A]
- Weight of the plant or seedlings [M.R. P. 9810.1401, subp. 1B]
- Average or projected cannabinoid profile based on the variety [M.R. P. 9810.1401, subp. 1C]
- The statement: "This plant or seedling is not required to be and has not been tested for safety compliance under Minnesota Statutes, section 342.61." [M.R. P. 9810.1401, subp. 1D]

Label example (immature cannabis plants and cannabis seedlings)

Note: This is not a real product label and is intended as an example only.

Content of Label: Cannabis Topical Products

Included product categories: *Cannabis topicals or transdermals*

Required information

- Name and license number of the cultivator(s) [M.S. § 342.63, subd. 3(a)(1)]
- Manufacturer name(s), license number(s), location, and website [M.S. § 342.63, subd. 3(a)(2); M.R. P. 9810.1401, subp. 5A]
- Name of laboratory used to test the product and testing verification [M.S. § 342.63, subd. 3(a)(11); M.R. P. 9810.1401, subp. 5B]
- Net weight or volume [M.S. § 342.63, subd. 3(a)(3); M.R. P. 9810.1401, subp. 5C]
- Type of product [M.S. § 342.63, subd. 3(a)(4)]
- Batch number [M.S. § 342.63, subd. 3(a)(5)]
- Potency statement describing the cannabinoid profile [M.R. P. 9810.1401, subp. 5D]
- Ingredients list in descending order of predominance by weight or volume [M.S. § 342.63, subd. 3(a)(8); M.R. P. 9810.1401, subp. 5E]
- Recommended amount for use at any one time [M.S. § 342.63, subd. 3(a)(6); M.R. P. 9810.1401, subp. 5F]
- Directions for use [M.S. § 342.63, subd. 3(a)(12)]
- Warning statement: "For topical application – do not eat or smoke" [M.R. P. 9810.1401, subp. 5G]
- All universally required symbols and statements [M.S. § 342.63, subd. 3(a)(9-10) and 3(a)(13-14); M.R. P. 9810.1400, subp. 3]

Label example (cannabis topical products)

Note: This is not a real product label and is intended as an example only.

Content of Label: Hemp-Derived Topical Products

Included product categories: *Hemp-derived topicals*

Required information

- Manufacturer name, location, phone number, and website [M.S. § 342.63, subd. 5(a)(1); M.R. P. 9810.1401, subp. 5A]
- Name and address of laboratory used to test the product [M.S. § 342.63, subd. 5(a)(2); M.R. P. 9810.1401, subp. 5B]
- Net weight or volume [M.S. § 342.63, subd. 5(a)(3); M.R. P. 9810.1401, subp. 5C]
- Type of topical product [M.S. § 342.63, subd. 5(a)(4)]
- Potency statement describing the cannabinoid profile including the amount or percentage of CBD, CBG, or any other cannabinoid, derivative, or extract of hemp, per serving and in total [M.S. § 342.63, subd. 5(a)(5); M.R. P. 9810.1401, subp. 5D]
- Ingredients list in descending order of predominance by weight or volume [M.S. § 342.63, subd. 5(a)(6); M.R. P. 9810.1401, subp. 5E]
- A statement that the product does not claim to diagnose, treat, cure, or prevent any disease and that the product has not been evaluated or approved by the US Food and Drug Administration, unless the product has been so approved [M.S. § 342.63, subd. 5(a)(7)]
- Recommended amount for use at any one time [M.R. P. 9810.1401, subp. 5F]
- Warning statement: "For topical application – do not eat or smoke" [M.R. P. 9810.1401, subp. 5G]
- All universally required symbols and statements [M.S. § 342.63, subd. 5(a)(8); M.R. P. 9810.1400, subp. 3]

Label example (hemp-derived topical products)

Note: This is not a real product label and is intended as an example only.

Content of Label: Medical Products

Included product categories: *All*

Required information

In addition to the labeling requirements for each product type, including universal requirements, medical product labels must include the following:

Medical symbol [M.R. P. 9810.1402, subp. 1]

The medical symbol must:

- Be no smaller than 0.5 inches wide by 0.35 inches tall
- Use “Warning Signal Yellow” (ISO 3864-4/ANSI Z535.1, Pantone 109 C, Hex #FFD100) and a black border
    - When displayed on a dark background, a yellow border is added around the initial black border

For light backgrounds

For dark backgrounds

This symbol is available for download on the OCM website.

Patient specific label

- Patient's name and date of birth
- Name and date of birth of patient's registered designated caregiver, parent, legal guardian or spouse [M.S. § 342.63, subd. 4(1); 342.63, subd. 4(2)]
- Patient's registry ID number [M.S. § 342.63, subd. 4(3)]
- Name, address and license number of manufacturer [M.R. P. 9810.1402, subp. 2A]
- Chemical composition of the medical cannabis flower or medical cannabinoid product [M.R. P. 9810.1402, subp. 2B]
- Recommended dosage [M.R. P. 9810.1402, subp. 2C]
- Directions for use [M.R. P. 9810.1402, subp. 2D]
- The statement: "This medical cannabis is for therapeutic use only. Diversion of this product is unlawful and may result in revocation of the patient's registration." [M.R. P. 9810.1402, subp. 2E]

Example of patient specific label

Patient: John Doe
DOB: 4/16/1990

Caregiver/ Legal Guardian: Jane Watson
DOB: 2/15/1964

Registry ID: 554433

Manufactured by Cannabis Co.,
License #: 44885
1934 Raymond Rd, Eagan, MN, 55113

Recommended Dosage: XXXX
Directions: XXXX

This medical cannabis is for therapeutic use only. Diversion of this product is unlawful and may result in revocation of the patient's registration.

Packaging and Labeling Prohibitions

- Packaging and labeling must not bear a reasonable resemblance to any commercially available product that does not contain cannabinoids. [M.S. § 342.62, subd. 3(a)(1)]
    - Noncompliant examples include:

- Packaging and labeling must not be designed to appeal to individuals under 21 years of age. [M.S. § 342.62, subd. 3(a)(2)] Defined as the use of: [M.S. § 342.62, subd. 1a]
    - Images depicting toys or robots
    - Images depicting fruits or vegetables, except when used to accurately describe ingredients or flavors contained in a product
    - Images bearing a likeness to characters or phrases popularly used to advertise to children
        - Noncompliant examples include:

    - Brand names or close imitations of brand names of candies, cereals, sweets, chips, or other food products typically marketed to children
        - Noncompliant examples include:

- Packaging must not contain or be coated with any perfluoroalkyl (PFAS) substance. [M.S. § 342.62, subd. 3(b); M.R. P. 9810.1400, subp. 2A]

- Packaging must not expose a product to any toxic or harmful substances. [M.R. P. 9810.1400, subp. 2B]
- Packaging must not be contained in a container composed, in whole or in part of any poisonous or deleterious substance that may render the contents injurious to an individual's health or safety. [M.R. P. 9810.1400, subp. 2C]
- Edible cannabis products and lower-potency hemp edibles must be packaged in a material that is approved by the United States Food and Drug Administration for use in packaging food. [M.S. § 342.62, subd. 3(c)]
- Packaging and labeling must not obscure identifying information on the label or use a false or deceptive label. A QR code cannot be used for information that is required to be on the packaging label [M.R. P. 9810.1403 A]
    - Placing a sticker on top of the label that obscures important info such as THC content or expiration date including peel-away panels
        - Noncompliant examples include:

    - Placing required labeling on tear-away portion of packaging
        - Noncompliant examples include:

    - Using font size or colors that render the information unreadable
    - Making unapproved health, disease cure or prevention claims
- Label must not represent the product as organic unless the cannabis plants and all ingredients used in the product are produced, processed, and certified in a manner that is consistent with the national organic standards established by the United States Department of Agriculture in accordance with the Organic Foods Production Act of 1990, United States Code, title 7, section 6501 et seq. [M.R. P. 9810.1403 B]
- Empty packaging that violates any of the above prohibitions if used, may not be sold. [M.S § 342.62, subd. 4]

Additional Required Information

All licensed retailers must provide the below information to customers through any of the following means: included on the product label, posted on-premises at the retail location, or through a separate brochure/pamphlet provided with product purchases.

- Factual information about impairment effects and the expected timing of impairment effects, side effects, adverse effects, and health risks of cannabis flower, cannabis products, lower-potency hemp edibles, and hemp-derived consumer products. [M.S. § 342.63, subd. 6(a)(1)]
- A statement that customers and patients must not operate a motor vehicle or heavy machinery while under the influence of cannabis flower, cannabis products, lower-potency hemp edibles, and hemp-derived consumer products. [M.S. § 342.63, subd. 6(a)(2)]
- Resources customers and patients may consult to answer questions about cannabis flower, cannabis products, lower-potency hemp edibles, and hemp-derived consumer products, and any side effects and adverse effects. [M.S. § 342.63, subd. 6(a)(3)]
- Contact information for the poison control center and a safety hotline or website for customers to report and obtain advice about side effects and adverse effects of cannabis flower, cannabis products, lower-potency hemp edibles, and hemp-derived consumer products.
  [M.S. § 342.63, subd. 6(a)(4)]
- Substance use disorder treatment options. [M.S. § 342.63, subd. 6(a)(5)]

Approved Product Categories and Potency Limits

Product Type	Product	Potency Limit	Per Serving Limit	Total Package Limit
Cannabis flower	**Cannabis flower** *Fresh, dried raw, shake, trim, pre-rolls*	None	None	None
Ingestible cannabis products	**Ingestible (non-beverage)** *Edibles, cannabis-derived tinctures*	Not applicable	10 mg THC	200 mg THC
Ingestible cannabis products	**Ingestible (beverage)**	Not applicable	10 mg THC	20 mg THC
Adult-use cannabis concentrates (designed for vaporization)	**Liquid Concentrate** *Hash oils or distillate designed for vaporization*	80% THC	None	None
Medical cannabis concentrates (designed for vaporization)	**Liquid Concentrate** *Hash oils or distillate designed for vaporization*	None	None	None
Cannabis concentrates (***not*** designed for vaporization)	**Solid concentrate** *Cured or live resin or rosin, hash (hashish), kief, full extract cannabis oil*	None	None	None
Cannabis combination products	**Infused cannabis flower**	50% THC	None	None
Transdermal or topical cannabis products	**Cannabis topical/transdermal**	Not applicable	None	1,000 mg THC
Lower-potency hemp edible (LPHE) products	**LPHE (non-beverage)** *Edible products, hemp-derived tinctures*	0.3% THC	5 mg THC	50 mg THC
Lower-potency hemp edible (LPHE) products	**LPHE (beverage)** *Beverage products*	0.3% THC	10 mg THC	10 mg THC
Hemp-derived consumer products (HDCP)	**HDCP** *Hemp flower and hemp-derived oils (including vapes)*	0.3% THC	None	None

Product Transition Period for Existing Regulated Product Supply Chains

Launching a new retail market for cannabis and hemp-derived products that is governed by one statute (chapter 342), while transitioning existing markets authorized under other statutes (section 151.72 and chapter 152) is complex. Prospective hemp-derived, adult-use cannabis, and medical cannabis businesses have understandably had questions about how to manage the transition between regulatory frameworks, particularly as it pertains to statutory requirements for products and packaging/labeling.

To support the launch of the adult-use cannabis market and provide continuity for existing hemp-derived businesses and medical cannabis patients, **OCM has authorized a product transition period**. During this transition period, license holders conducting retail sales under Minnesota Statutes, chapter 342 may be authorized to sell products compliant under the existing regulated supply chains in section 151.72 and sections 152.22-152.37, including hemp-derived cannabinoid products and medical cannabis, subject to the following conditions.

Below we outline how this product transition period impacts hemp-derived product retailers, manufacturers, and Minnesota's medical cannabis program.

What the transition period means for hemp-derived retailers

Through December 31, 2025, cannabis and hemp license holders authorized to sell lower-potency hemp edible products at retail are now able to:

- Purchase hemp-derived products that are compliant with section 151.72 from hemp-derived product manufacturers that are not yet licensed as hemp businesses under chapter 342.
- Sell hemp-derived products that are compliant with section 151.72 to customers.

The hemp-derived products purchased and sold by cannabis and hemp license holders **during the transition period** must be compliant with all packaging, labeling, and testing requirements as outlined in **either** section 151.72 or chapter 342.

Before and pending licensure, registered hemp-derived businesses may continue selling hemp-derived products compliant with section 151.72. Once licensed, both cannabis retail businesses and lower-potency hemp edible (LPHE) retailer license holders will now be able to continue sales of hemp-derived products compliant under section 151.72 through **December 31, 2025**.

After December 31, 2025, all hemp and cannabis business license holders authorized to retail must follow all applicable product requirements for their license types under chapter 342, including packaging, labeling, and testing. To prepare for the LPHE licensing window and the regulatory transition from section 151.72 to chapter 342, including how requirements will shift after December 31, 2025, read the Hemp Registrant to License Holder Conversion Guide and Hemp Business Guide.

What the transition period means for hemp-derived product manufacturers

Once a hemp-derived manufacturer currently manufacturing products under section 151.72 receives a hemp or cannabis business license, they must only produce and sell products that are compliant with their license types under chapter 342. The product transition period authorizes the *purchase and retail sale* of hemp-derived products compliant with section 151.72; it does not authorize the manufacture of products compliant with section 151.72 that are not compliant with 342.

Hemp-derived manufacturing businesses should prepare for the transition to licensure and assess stock and sell any remaining product that is not compliant with chapter 342 before licensure. To prepare for the LPHE licensing window, opening October 1, and the regulatory transition from section 151.72 to chapter 342, including how requirements will shift after December 31, 2025, read the Hemp Registrant to License Holder Conversion Guide and Hemp Business Guide.

What the transition period means for the medical cannabis program and medical cannabis patients

Chapter 342 created a new licensing framework for the medical cannabis program. To prevent disruption in medical cannabis patients' access to medical cannabis during the operational transition from sections 152.22-152.37 to chapter 342, the office will authorize medical cannabis combination business license holders that previously held a registration agreement with the state's medical cannabis program to sell medical cannabis products manufactured and tested prior to licensure and compliant under Minnesota Statutes, sections 152.22-152.37 and Minnesota Rules, chapter 4770 to medical cannabis registry patients. This authorization also applies to limited product designated for sale to adult-use consumers subject to registration agreements.

All products sold by a medical cannabis combination business under this authorization must comply with the packaging and labeling requirements in chapter 342 and Minnesota Rules, chapter 9810. A new marketing layer, as that term is defined in part 9810.0200, subpart 38, may be utilized.

Once a medical cannabis combination business is licensed, all new products cultivated and manufactured by the license holder must be tested according to and otherwise compliant with all of chapter 342, chapter 9810, and the office's Cannabis Technical Authority.