



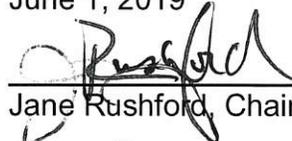
Liquor and Cannabis Board Revised Interim Policy BIP-05-2018

Subject: Implementation of Cannabis Packaging and Labeling Rules Changes

Effective Date: October 31, 2018

Ending Date: June 1, 2019

Approved:



Jane Rushford, Chair



Ollie Garrett, Board Member



Russ Hauge, Board Member

Purpose:

This revised Interim Policy details the requirements and allowances the WSLCB will use to allow licensees to “phase-in” the new packaging and labeling rule requirements to allow flexibility in implementation and reduce impacts and costs on the industry prior to the June 1, 2019, effective date where all new requirements must be followed.

Licensees will have until June 1, 2019, to submit all packaging and labeling with the new requirements for products approved under the old requirements for approval by the board.

The WSLCB is using this approach as we understand that packaging and labeling requirements changes pose impacts to the industry logistically, as well as the understanding that many processors purchase large quantities of packaging and labeling materials at a time to reduce costs (approximately 6 months on average). This approach will allow licensees to “phase-in” packaging and labeling that adheres to the new requirements as they cycle through existing inventory. Additionally, other optional allowances are provided to assist in reducing costs related to processes required for labeling retailer business/trade name and UBI on packages and impacts on label “real estate.”



Policy Statement:

Effective January 1, 2019, licensees **MUST** use new packaging and labeling rule requirements as adopted by the Board on May 2, 2018.

Effective June 7, 2018, licensees may use the following options to “phase-in” the new packaging and labeling requirements. **This is only allowed until January 1, 2019, when the new requirements must be followed.**

Licensees may choose to use current rule requirements or new rule requirements, but must use all the requirements under each scheme (cannot combine elements of both requirements), with the following exceptions:

- Licensees may choose not to include the following optional information under either the current rule requirements or the new rule requirements:
 - Retailer business/trade name and UBI
 - Harvest date (where required in current rules)
 - “Best by” date
 - Manufactured date
- The above items were selected as optional requirements under the new rule requirements because this information can be gathered from data in the traceability system. Additionally, inclusion of unique identifiers in the traceability system and on labels will allow the WSLCB and licensees to trace products back to their source in cases where a recall may be necessary without the above information included on the label.
- Licensees may still choose to include the above information on labels under either the current rule requirements or the new rule requirements.