



## Wholesale Labeling and Packaging Guide:

The Cannabis Control Division (CCD) at the Montana Department of Revenue is providing this guide to explain the labeling, packaging, and exit packaging rules for wholesale marijuana and marijuana products. However, this guide should **not** be construed as a replacement for thoroughly reading the rules.

**This guide is specific to submitting wholesale packaging and labeling submissions. For a guide on standard packaging and labeling submissions, click this [link](#).**

The administrative rules for labeling and packaging can be found here: [ARM 42.39.314 to 42.39.322](#). Licensees are required to follow the labeling and packaging rules, and it is their responsibility to know, understand, and operate with respect to the rules.

The labeling and packaging rules apply to marijuana and marijuana products that are for ultimate sale to a consumer, registered cardholder, or their designated purchaser(s).

**These rules do not apply to items undergoing lab sampling or testing or bulk transfers of marijuana and marijuana products from one licensee to another.**

There are general labeling requirements for all marijuana and marijuana products (adult- use and medical) under [ARM 42.39.314](#).

In addition to general labeling requirements for all marijuana and marijuana products, there are additional labeling requirements for:

- seeds and marijuana plants, [ARM 42.39.322](#)
- marijuana flower, [ARM 42.39.315](#)
- ingestible marijuana-infused products, [ARM 42.39.316](#)
- non-ingestible marijuana-infused products, [ARM 42.39.317](#)
- marijuana concentrates and extracts, [ARM 42.39.318](#)

The packaging requirements for marijuana and marijuana products are found under [ARM 42.39.319](#).

Wholesale package and label application requirements are found in [ARM 42.39.321](#).

## Who is required to get pre-approval for wholesale labeling and packaging?

Before transferring marijuana or marijuana products that are for **ultimate sale** to a consumer, registered cardholder, or the cardholder's designated purchaser(s), wholesale marijuana and marijuana products must be submitted and approved for packaging and labeling by the wholesaler.

## How to apply for wholesale labels and packages?

Within the TAP Packaging and Labeling application, there is a "Package Use Type" and "Label Use Type" option to select "Wholesale" or "Standard." The applicant must choose the wholesale option when submitting a wholesale package or label. If a package or label submission is submitted under the wrong "use type," it will be changed.

**Wholesale submissions must only be submitted by the wholesaler that manufactures the product. Customers who purchase from wholesalers do not need to resubmit for package and label approval.**

**Important: Licensees purchasing from wholesales are responsible for confirming that the packages and labels of wholesale products have been approved. If the wholesaler provides an approval letter, retain that letter for future inspections.**

## What is the difference between labels and packages for marijuana and marijuana products?

- The **label** is the **text (typed information)** printed on or affixed to the product package. It provides information about the marijuana or marijuana product. Required statements must be verbatim on the label, but the specific product information may change from product to product. If the template of the label changes, a new application is required.
- The **package or packaging** is the **physical structure** that holds and protects the product. As well as any logos, graphics, or design elements printed on or adhered to the physical structure. Changes in graphics or design elements require a new package application. Color, shape, and size changes **do not** require a new application submission.

## When may applications be submitted to CCD?

Wholesale marijuana and marijuana products that have been approved previously must be resubmitted with the wholesale “use type” on the application. Previously approved packages and labels **will not** be charged an additional fee for wholesale approval. CCD will remove the fee prior to approving the application.

The licensee producing the wholesale product must submit their label and package applications to CCD for review and approval prior to offering to wholesale customers. Applications and required attachments (such as photographs or accurate renderings of proposed labels and packages) shall be submitted electronically to the department via the [TransAction Portal](#).

**Wholesale package and label submissions may be subject to name changes by the CCD.** If the name provided by the licensee does not accurately describe the product, CCD will rename it and provide a note in the invoice and approval letter.

### The application fees and payment deadlines:

- **Wholesale Generic labels:**

No fee is associated with the use of generic labels (all fees are assessed as a final step in the approval process), and attachments (photos or accurate renderings) of the proposed labels are not required. **Applicants must use the labels on [CCD’s website](#) (label templates).**

- **Wholesale Custom labels:**

If the applicant elects to use a custom label, the fee is \$25 per label, and attachments of photos or accurate renderings are required. All fees are assessed as a final step in the approval process.

- **Wholesale Generic packages:**

No fee is associated with the use of generic packages (all fees are assessed as a final step in the approval process), and attachments (photos or accurate renderings) of the proposed packaging are not required.

- **Wholesale Custom packages:**

If the applicant chooses to use a custom package, the fee is \$10 per distinct package design, and attachments of photos or accurate renderings are required. All fees are assessed as a final step in the approval process.

An applicant will receive an invoice for all application fees after the department has reviewed the application. The application is not approved until the invoice fee is paid.

**The applicant shall pay all invoiced application fees to the department within ten (10) days of receipt of its invoice. An applicant's failure to pay all invoiced application fees will result in a denial of the application.**

**Questions?**

Contact CCD Education at: [DORCCDEducation@mt.gov](mailto:DORCCDEducation@mt.gov)