

MULTI-PACKS: EDIBLES AND VAPES

In response to requests from licensees, the Cannabis Regulatory Agency (CRA) is pleased to announce it has developed a way for licensees to compliantly create packages containing multiple flavors, colors, and strains of infused-edibles and vape cartridges.

A multi-pack is a package containing two or more varieties of the same item -- either infused edibles or vape cartridges -- packaged together and sold in a single package under one Metrc package tag. Multi-packs will allow licensees to package and sell multiple varieties of an item in one package without the need to attach or scan multiple labels.

CAUTIONS

Before creating a multi-pack, licensees should be aware that creating a multi-pack will co-mingle separate SKUs/products under a single package tag in Metrc, which will also co-mingle the chain of custody and test results. As a result, any concerns that may arise with one product that has been combined into a multi-pack may necessitate action, including administrative holds and recalls, being taken on all of the products that were combined to create the multi-pack.

Licensees should carefully consider all potential risks before creating a multi-pack.

INSTRUCTIONS AND REQUIREMENTS

To learn how to create a multi-pack package in Metrc, please refer to this [bulletin](#).

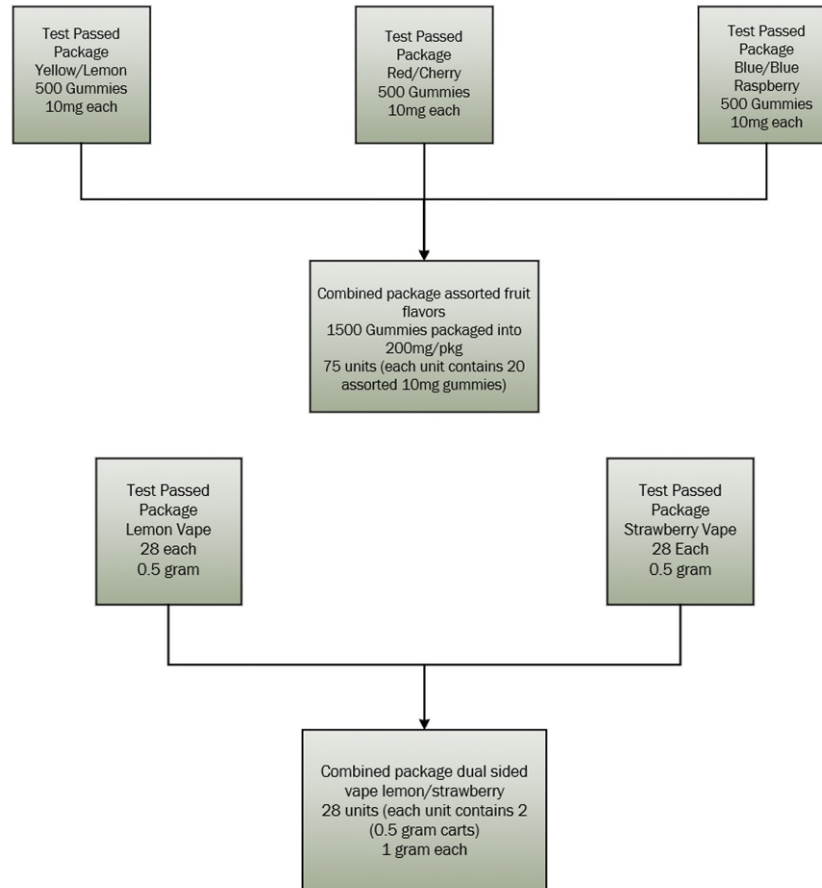
A multi-pack must contain items of the same item category. A licensee cannot create a multi-pack by combining different product types; for example, an infused edible and a vape cartridge may not be combined.

Each product that is combined to create a multi-pack of infused edibles must contain the same target concentration and quantity of THC. For example, a licensee cannot create a multi-pack that includes a 10mg red gummy and 20mg blue gummy.

Multi-packs of infused edibles are required to adhere to the [maximum THC concentrations](#) per serving and per package, subject to the [allowable variance](#).

A licensee may only create a multi-pack using products that have passed full compliance testing in final form. As a reminder, for vape cartridges, final form means the marijuana concentrate in an e-cigarette or a vaping device.

Below are example workflows for creating multi-packs of gummies and multi-packs of vape cartridges.



LABELING

Multi-packs must comply with all labeling requirements in the [administrative rules](#). Labeling requirements that are applicable to all products in the multi-pack may be included on one label or on the packaging.

These requirements include the following:

- Net weight in United States customary or metric units
- Activation time expressed in words or through a pictogram
- The universal symbol for marijuana product published on the CRA's [website](#)
- A warning that includes all the following statements:

"It is illegal to drive a motor vehicle while under the influence of marihuana."

"National Poison Control Center 1-800-222-1222."

For products being sold by a marijuana facility that exceed the maximum THC levels allowed for products sold under MRTMA, "For use by registered qualifying patients only. Keep out of reach of children."

For all other products, "For use by individuals 21 years of age or older or registered qualifying patients only. Keep out of reach of children."

In clearly legible type and surrounded by a continuous heavy line: "WARNING: USE BY PREGNANT OR BREASTFEEDING WOMEN, OR BY WOMEN PLANNING TO BECOME PREGNANT, MAY RESULT IN FETAL INJURY, PRETERM BIRTH, LOW BIRTH WEIGHT, OR DEVELOPMENTAL PROBLEMS FOR THE CHILD."

Labeling requirements that are applicable to only one product in the multi-pack must be included on the label in a way that the consumer knows which product the labeling requirement applies to. For example, "Lemon vape: [required information], Strawberry vape: [required information]." These requirements include the following:

- The name and the state license number of the cultivator or producer, including business or trade name, and package tag as assigned by the statewide monitoring system*
- The name and the marihuana license number of the licensee that packaged the product, including business or trade name, if different from the producer of the marijuana product*
- Concentration of Tetrahydrocannabinol (THC) and cannabidiol (CBD) as reported by the laboratory after potency testing along with a statement that the actual value may vary from the reported value by 10%
- Name of the laboratory that performed any passing compliance testing on the product in final form and any test analysis date

*Some of these items, if applicable to all products in the multi-pack, could also be on a combined label.

Multi-packs of infused edible products must include the following additional labeling requirements:

- The name of the marijuana-infused product that includes a product modifier such as "marijuana product," "THC product," or "cannabis product" using the same or larger font than the product name



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- The ingredients, including excipients and diluents, of the marijuana-infused product, in descending order of predominance by weight
- The net weight or net volume of the product
- For an edible marijuana product, both of the following must be included:
 - (i) Allergen labeling as specified by the Food and Drug Administration (FDA), Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA), 21 USC 343.
 - (ii) If any health or nutritional claim is made, appropriate labeling as specified by the federal regulations regarding Food Labeling, 21 CFR part 101.
- The date the marijuana product was produced.

Questions about these requirements may be directed to the Operations Support Section via email to: CRA-Compliance@michigan.gov.