

## CROO Packaging and Labeling FAQ

*Summary of labeling impacts with Metrc seed-to-sale transition*



*Packaging and Labeling rules are not changing.*

- 1) *During transition, Entire Packages will need a new Metrc Tag number, but individual units will not need new labels. Pre-labeled products with BioTrack ID numbers do not need to be relabeled.*
- 2) *Dispensary names do not need to be added before shipping to dispensaries. However, dispensary names are required on the units before selling, and can be added by manufacturers.*

This document answers frequent questions about the packaging and labeling rules for Illinois. At the bottom of the document there are resources and links for further explanation. During the seed-to-sale tracking transition from BioTrack to Metrc, packaging and labeling rules **are not changing**.

### Definitions:

- ⇒ **Package:** a box, case, tote, etc. that contains identical units inside.
- ⇒ **Individual Product or Units:** the products inside a Package that are labeled and prepared for individual sale to end consumers.

BioTrack Identifier	Metrc Package Tag	Individual Product Label
<i>Varies, barcode with the unique number that links to the BioTrack item (case).</i>		<div> Cherry Pie 3.5 Hybrid Indica - Cherry Pie  1A4FF030000001000001087   420420710  Tested by : GreenLeaf Labs  04/28/2025, Rating: Pass  Prod on by 05/08/2025:  Hvst: 05/08/2025    Use By: 04/28/2026  Δ9-THC: 1.18%    THCa: 22.78%  CBD: 0.24%    CBDa: 0.26%  Net Weight: 3.5 (g) </div> 
Both BioTrack and Metrc Package Tags are placed on cases, totes, or boxes with multiple, identical units inside. These electronic inventory data and ID numbers must match the ID numbers on the physical Packages.		Final products within Packages (or cases, totes, etc.) must be labeled in compliance with Illinois law/rules.

**During the transition:**

- ⇒ During the transition, a Package of finished products may get a new Metrc Package Tag number during transition from BioTrack to Metrc:
- ⇒ **What:** Packages with final lab test results in BioTrack and transferred into Metrc with the *External Incoming Transfer* process will not need a relabeling of individual units within each Package.
  - The Metrc Package Tag number is a different number than the BioTrack ID number. The BioTrack number would be on all the individual units loaded inside the BioTrack-tested Package.
  - During the transition:
    - A) The individual units do not need to be relabeled.
    - B) The individual units should still have compliant labels (with the BioTrack ID number).
    - C) The Package should have a COA available.
    - D) The *External Incoming Transfer* process should link the BioTrack ID number with the Metrc Package Tag.
- ⇒ **Who:**
  - A) **IDOA Licensees** – Cultivation center, craft grower, infuser: use *External Incoming Transfer* and Virtual Test Sample process to migrate inventory tracking of a Package from BioTrack to Metrc.
    - Test results must be requested/entered for the Package before selling to another licensee.
    - Individual final products inside the Package do not need to be relabeled.
  - B) **IDFPR Licensees** – dispensaries: (i) receive Packages that IDOA have brought in from BioTrack using their process or (ii) use *External Incoming Transfer* process to migrate your own inventory tracking of Packages.
    - Test results do not need to be re-entered.
    - Individual final products inside the Package do not need to be relabeled.
- ⇒ **Why:** The BioTrack ID number should already be on each unit, and the BioTrack ID must be included as the External ID field during the *External Incoming Transfer*, thus ensuring traceability.

**During and after the transition:**

- ⇒ Throughout this process, Packages will need to be tagged, identified, and labeled in compliance with State laws and regulations. Please see [410 ILCS 705/55-21](#) and [8 Ill. Admin. Code 1300.930](#).
- ⇒ **What:** Throughout this process, individual units need to have (A) compliant labels and (B) the dispensary name.
- ⇒ **Who:**
  - (A) **IDOA Licensees** – Cultivation center, craft grower, infuser licenses must continue to comply with label requirements in 8 Ill. Admin. Code 1300.930 with legible English meaning the requirements must appear on the label. QR Codes are permitted to be added to product labels but do not satisfy label requirements.



- (B) **IDFPR Licensees** – dispensaries must ensure each individual unit for retail sale to consumers must have the dispensary name.
- The dispensary name can be part of the product label, affixed by the cultivation center, craft grower, or infuser, or by the dispensary. Cultivation centers, craft growers, and infusers may attach the dispensary name to the product but are not required to. If the cultivation center, craft grower, or infuser did not place the dispensary name on the product, the dispensary will need to add it.
  - The dispensary name must be the legal name of the business. For example, XYZ Cannabis Company, LLC d/b/a ABC Dispensary would need to have ABC Dispensary displayed on the product prior to sale.
- ⇒ **Why:** Each individual unit will need the Package Tag number listed but the label does not require a Metrc Package Tag on each unit. Individual units just need an individual product label with the associated Package Tag number from the case/Package (see the pictures above in the definitions section).

## Metrc Resources

- ✦ Note: the State has reviewed and provided feedback to Metrc for Retail ID but has not vetted all possible labels produced by Metrc. The responsibility is on the licensee to ensure compliance.
- ✦ Retail ID can assist in creating Illinois-compliant labels.
  - Metrc Retail ID is not required.
  - The QR code produced by Retail ID does not replace the need for printing test results on the individual unit labels.
  - Retail ID can be printed directly from Metrc interface.
- ✦ Licensees can export QR codes linked to Package Tag numbers in CSV for custom printing/use.
  - Licensee can use third-party printing services to use QR code or the ID numbers to create custom, Illinois-compliant product labels.
- ✦ Additional questions can be sent to [Metrc Support](#).
- ✦ Guidance on Product Labels is available [here](#) (the Retail ID bulletin is coming soon).

## State Resources:

- ✦ [410 ILCS 705/55-21](#) [Cannabis Regulation and Tax Act Labeling Section]
- ✦ [8 Ill. Admin. Code 1300.10](#) [Adult Use Production Definitions]
- ✦ [8 Ill. Admin. Code 1300.930](#) [Adult Use Labeling Rules]
- ✦ [8 Ill. Admin. Code 1000.420](#) [Medical Labeling Rules]
- ✦ [410 ILCS 705/15-70\(b\)](#) [“A dispensing organization must include the legal name of the dispensary on the packaging of any cannabis product it sells.”] For example, XYZ Cannabis Company, LLC d/b/a ABC Dispensary would need to have ABC Dispensary displayed on the product prior to sale.

