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Division of Cannabis Regulation
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INFORMATIONAL BULLETIN FEBRUARY 2026

PRODUCT LABEL REQUIREMENTS

BULLETIN SUBJECT/PURPOSE

This bulletin clarifies Product Label requirements and best practices for Cultivation Centers, Craft Growers, and Infusers.

DISPENSARY NAME

Section 15-70(b) of the Cannabis Regulation and Tax Act (410 ILCS 705/15-15(b)) requires dispensing organizations to place the legal name of the dispensing organization on the packaging of any cannabis product it sells.

Sec. 15-70. Operational requirements; prohibitions.
(b) A dispensing organization must include the legal name of the dispensary on the packaging of any cannabis product it sells.

This is a requirement imposed on Dispensaries. Cultivation Centers, Craft Growers, and Infusers are not subject to this provision. While Cultivation Centers, Craft Growers and Infusers may include the name of the Dispensary on the product label prior to shipment to a Dispensary, there is no requirement that they do so.

Dispensaries are responsible for applying the Dispensary name to Product Labels.

Cultivation Centers, Craft Growers, and Infusers are responsible for ensuring compliance with all other packaging and labeling requirements.

"USE BY" DATES

"Use by" dates must be displayed on all packaging. Once established, these dates cannot be altered without approval. (8 IAC 1300.930 (b)(5) and 8 IAC 1300.930 (e))

The CRTA and Administrative Rules do not specify a timeframe for "Use by" dates. However, the Department's recommended best practice is that the "Use by" date not exceed one year from the date of compliance testing. Cultivation Centers, Craft Growers, and Infusers are encouraged to utilize ongoing "stability testing" for all of their products—but especially for products with a "Use by" date of greater than one year.

Purpose of "Use by" Date

"Use by/sell by/best by" are traditional terms used in the manufactured food industry and can differ on the physical matrix of a product, the chemistry of that product and proprietary processing. A "Use by" date is generally considered to be a product quality standard. Therefore, the "Use by" date is the timeframe within which the manufacturer considers the product to be safe to consume or the timeframe in which the product maintains the manufacturer's desired quality.

"Use by" Date in METRC

The State's cannabis plant monitoring system includes a field for Licensees to enter the "Use by" date for a cannabis product. Licensees must ensure that if a "Use by" date is entered into METRC, the date matches the date on the Product Label. The date on the Product Label is considered the accurate "Use by" date of the product.

Stability Testing and Retention Samples

"Stability Testing" is testing that occurs on a regular basis after the initial test of a marketed product. Stability testing is conducted by maintaining "retention samples" at the production site in the original form, which can be sold to the public. Ongoing testing (at 3-month intervals) verifies physical product quality, safety and potency. Stability testing is

performed in addition to required compliance testing outlined in 8 IAC 1300.900, is the "early warning" system for quality issues, and aligns with good manufacturing practices. Stability testing simulates real-world scenarios to help predict how the product will behave throughout its shelf life.

Effective stability testing will examine the growth of microbes within the samples, in addition to changes in potency and water activity/pH. This ongoing testing verifies product safety and potency. Licensees may conduct in-house validations of physical quality, with attention to the following factors:

- Appearance
- Odor
- Clarity
- Phase separation (for infused liquids)

Stability testing is a cannabis industry regulatory standard in Colorado, Maryland, Connecticut, Minnesota, Iowa, North Dakota and Pennsylvania. While stability testing is not mandatory, much of the industry does conduct stability testing, and the Department encourages the practice to ensure safe, quality products.

Storage and Sampling Strategies for Stability Testing

Licensees can use several different forms and strategies for stability testing.

The Department recognizes the following as Stability Testing resources:

- ASTM Standard Guide D8309-21 for Stability Testing of Cannabis-Based Products
  - D8309 Standard Guide for Stability Testing of Cannabis-Based Products
- FDA Guidance Document 2003: Q1A(R2) Stability Testing of New Drug Substances and Products
  - Q1A(R2) Stability Testing of New Drug Substances and Products | FDA
- 2022 FDA Food Code pH and Water Activity standards
  - Food Code 2022 | FDA

The testing guidelines referenced in these resources are not the same as the initial testing requirements specified in the CRTA. Additional solvent testing and heavy metals testing will not be required, unless (e.g. heavy metals) the cannabis product has been stored in a metal container or a cart/pod with metal components directly in contact with the cannabis product. There could be added requirements for testing water activity and pH for shelf stable products to ensure their safety. There could also be additional microbial standards, like botulism, depending on the product.
Retention samples of the product(s) should be stored in conditions that inhibit any visible light exposure to minimize any degradation and maintain an average temperature/relative humidity.

Testing Accommodations for Contaminant Analysis vs. Potency Analysis

Unlike initial testing requirements within the CRTA, Stability Testing offers a different testing strategy. Two strategies that can be altered are described below:

1. Composite Sampling
   a. For all parameters other than potency, lots may have their delineated sample size per time point combined into a "composite sample" for the following parameters.
   b. If any parameter fails, a retest of an individual sample from each of the lots must be completed to identify the contaminated lot.

2. Single Unit Sampling:
   a. All potency must be verified, per individual unit, every test point.
   b. Test point zero will still require relabeling to match the current potency % if ranges 15% +/- from the original unit Mg labeling
      I. Example: If packaged at 100mg, "time zero" test must still fall between 86-114% or be properly relabeled.

Additional testing considerations can be offered for a product sold in single pack/unit vs. a multipack unit with more product volume per container. This would be reducing the total # of samples needed from batch/lot of a multipack compared to a single pack/unit.

1. Example: A production batch of < 50 – 500 enhanced edibles:
   a. Individual packaged units: 5 samples from packaged final form.
   b. Multi pack units: 2 samples from packaged final form.

GUIDANCE

The Department has published this Informational Bulletin to clarify Product Label requirements for Cultivation Centers, Craft Growers, and Infusers.

QUESTIONS

For questions and feedback related to this Information Bulletin, please contact the Illinois Department of Agriculture, Division of Cannabis Regulation by emailing AGR.AdultUse@Illinois.gov.