



European Monitoring Centre
for Drugs and Drug Addiction

CBD and low-THC cannabis in the EU; fad or policy challenge?

Lisbon Addictions 2019

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The recent phenomenon

- (non-intoxicating) Hemp is grown for industrial use
- Early 2017: Switzerland ‘cannabis cigarettes in the supermarket’ – less than 1% THC
- Mid 2017 on: various EU countries then seemed to follow the Swiss example (but less than 0.2% THC - or similar)
- Some EU countries’ domestic legislation is for 0.3%, 0.5%.
- Also: rise in CBD “health / wellness / lifestyle ” products



EMCDDA and policymaker concerns

Working definition:

“products being or containing cannabis herb, resin, extracts or oils that might be consumed like illicit cannabis products but claim or appear to have a very low percentage of THC that would be unlikely to cause intoxication”

INCLUDE - Herb, resin, oil, e-liquids, edibles, crystals

EXCLUDE - shampoo, skin cream... pet food?



TEAS

FRESH MINT
LEMON GRASS
PURE HEMP
CARDAMOMO &
CINNAMON

...

PETS

DOG TREATS
SUPPLEMENTS

...

VAPERS & E-LIQUID

VAPER DRY HERB
VAPER E-LIQUID
E-LIQUID WITH FLAVORS

...



EMCDDA mini-trendspotter exercise

Different shops, products, consumers; but all broadly split into two groups:

- Illicit cannabis users or experimenters; smokers of herb/resin (“taste”)
- Healthy natural lifestyle people; capsules, oils, creams (“quality”)

This split is very approximate - both groups might be found in the same shop



CBD PRODUCTS

PRODUCTS

COLLECTIONS

- ★ WHITE WIDOW
- ★ BLACK MAMBA
- ★ PURPLE HAZE
- ★ NEW ORANGE
- ★ SUPER LEMON HAZE

THC < 0,2%



Disclaimers - contradictions

CANVORY Cannabis burn incense joint with 4% CBD

The plants are organically grown and are free of any pesticides and herbicides. Cultivation according to GMP standard, made in Austria, from our indoor breeding plant in Vienna.

These flowers were hand harvested and trimmed by our professional team. Small to medium size of hemp flowers, with <1% semen content, rich in CBD, very low THC content.

The difference of these buds to others is that our cannabis buds have a high cannabidiol content. On the other hand, we can detect a very low THC content (<0.2%). Their taste is mild, barely distinguishable from a high quality marijuana.

Usage: 2%). Their taste is mild, barely distinguishable from a high quality marijuana.

Under current law we can not give you advices. Therefore, we ask you to take a look at our CANNABIS WIKI or to use your favorite search engine. You will certainly benefit from the many advantages and outstanding features of CBD.

Characteristics:

CBD content: approx. 4 %

THC content: < 0,2 %

Taste: mild

Cultivation: Indoor, Organic, GMP-Standard

Ingredients: Dried CBD-rich EU utility hemp flowers (Cannabis Sativa L.)



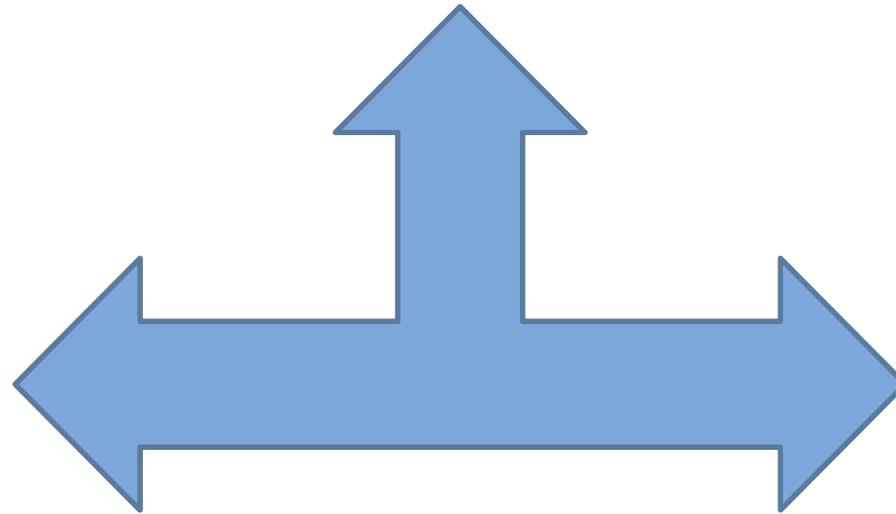
Important note: Keep out of reach of children. The hemp flowers serve as raw material - not intended for consumption.

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Policy response - to what?

The plant
and its
associations

THC



CBD

Unregulated products



Size and nature of the problem?

Are the problems / harms:

- Countable (deaths, poisonings, traffic collisions...)
- Uncountable (encouragement of use of high-THC cannabis by adults or children; long-term effects; public visibility; unlicensed medicine by presentation...)
- Indirect (involvement of organised crime, enforcement complications, abuse of licensed hemp plantations...)
- Detectable (modern techniques can detect microscopic levels of THC)
- ... ?



Possible classes of responses, factors

How to classify the products?

- Narcotics (by origin, strict function)
- Medicines (by function or presentation)
- Foods (novel, supplements, flavouring)
- Cosmetics
- Agriculture
- Tobacco substitute...

What factors?

- Plant source
- Chemical composition
- Pharmaceutical function
- Declared / implied purpose
- Expected purpose
- Viability of conversion to narcotic

Which policy area? Which ministry leads?



THC – where to measure the 0.2%, and why?

Where?	Why?
Plant variety (usual production)	Permit hemp cultivation but not illicit narcotics
Different parts of the plant (roots, fibre, leaves, flowers, seeds...)	Permit certain parts to be used for industrial purposes without risking diversion to illegal market
Cannabis extract	Does it have intoxicating properties? Permit carefully dosed medicines
Final consumer product, eg chocolate bar	Minimise risk of intoxication from consumption of one dose, or minimise longer term effects e.g. liver damage by setting “safe” daily dose
Before or after heating?	THCA converts to THC on heating

Conflating the limits

Industrial regulations (permitted) = percentages

Narcotic controls (prohibited) = gram limits

1kg of herbal cannabis at 0.2% = 2g THC

If you have a large enough quantity by weight, then a small percentage of that will still breach narcotic control gram limits.



Enforcement issues

How is permission to supply given, if at all?

Herbal cannabis (low THC) – how to distinguish in public?

Sales of products – which agencies supervise sales?

If packaging is unmarked, who decides the appropriate regulations?



Some Member States' responses

Finland, Denmark	CBD is medicinal product
France (July 2018)	Hemp only authorised for industrial use
Austria (Dec 2018; Ministry)	If swallowed, novel food (needs licence); if smokable, needs tobacco-style labelling.
Italy (May 2019; Court)	Not exempt from narcotics laws unless it is devoid of narcotic effects.
Sweden (June 2019; Court)	Hemp converted into product containing THC is <u>preparation</u> .
European Commission (2019)	Updates to Novel Food regulations for “cannabinoids”, Cosmetics ingredients labels



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01

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CLASSIC CHOCOLATE

Verdadeiro sabor
a chocolate
The real flavor of
classical chocolate



2,00€

03

CHOCOLATE BRANCO
WHITE CHOCOLATE

A doçura do
chocolate Branco
Sweetness of



13

CHOCOLATE BRANCO
COM COCO
WHITE CHOCOLATE
WITH COCONUT

Para os mais
irreverentes
For the most
irreverent

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CHOCOLATE CANNABIS
CANNABIS

Para os viciados
em chocolate
For those addicted
to chocolate



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CHOCOLATE
COM CAFÉ
COFFEE CHOCOLAT



Any questions?

