



European Monitoring Centre  
for Drugs and Drug Addiction

# Low-THC cannabis in the EU

**Lisbon Addictions 2019**

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# EU subsidises low-THC cannabis for decades

UN Single Convention on Narcotics, 1961, Art 28(2):  
shall not apply to the cultivation of cannabis plant  
exclusively for industrial purposes (fibre and seed).

EC Common Agricultural Programme subsidies for flax and  
hemp;

- Limits of THC first set to 0.3% in Council Regulation 2059 of 1984.
- Lowered to 0.2% in Council Regulation 1420 of 1998.





## **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

...

# 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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# Trustworthy labels? THC

Austrian analyses of about 200 samples:

- 49 had THC over legal limit (ie 0.4-1.1%)

Czech analyses of 35 samples (oils):

- 12 declared THC but 28 had THC
- About half had more than maximum limit of carcinogens set in EC Regulations



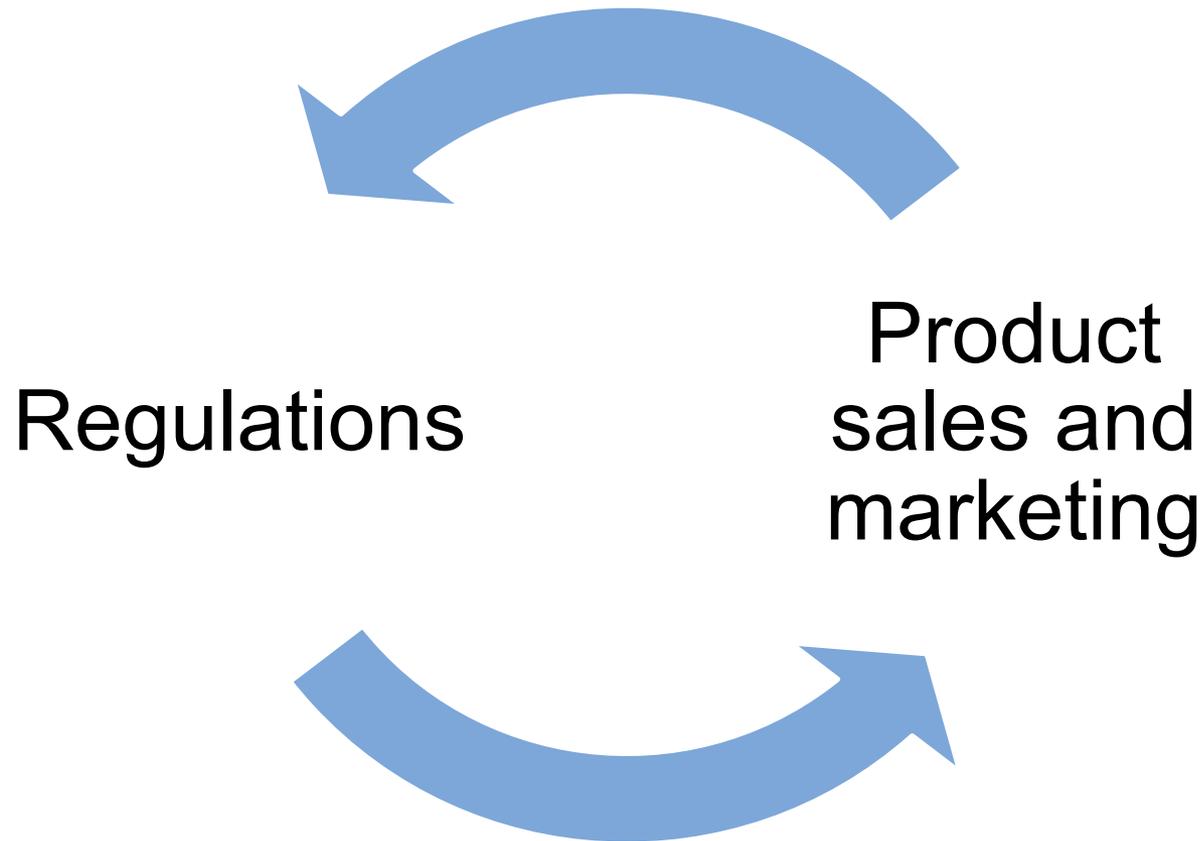
# Trustworthy labels? CBD

Czech analyses of 35 samples of CBD oils:

- 15 in line with declared CBD content
- 15 “somewhat higher”
- 3 had almost no CBD in them



# Regulations - Compliance or loopholes?



# 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?



# WHO-ECDD Critical Review Jan 2019

WHO ECDDA reviewed classifications of cannabis and cannabis extracts in UN Convention on Narcotics:

Jan 2019: Proposed footnote to “cannabis extracts” explaining:  
*“products containing predominantly CBD and not more than 0.2% Delta-9-THC are not under international control”*

[as there is no relevant risk to public health]

Proposals not yet accepted. Implications?



# EU novel food catalogue; new entry Jan 2019

“Cannabinoids”:

“[...] extracts of *Cannabis sativa* L. and derived products containing cannabinoids **are considered novel foods**, as a history of consumption has not been demonstrated.

This applies to both **the extracts themselves and any products to which they are added as an ingredient** (such as hemp seed oil). This also applies to extracts of other plants containing cannabinoids. **Synthetically obtained cannabinoids are considered as novel”**



# EU cosmetics ingredients – changes 2019

Several cannabis extracts or products, including cannabidiol, have been listed in the recent Commission Decision (EU) 2019/701 as common ingredient names for use in the labelling of cosmetic products.

BUT the European Commission has stated in April 2019 that **cannabis extracts are banned in cosmetics**, as they fall under the definition of ‘cannabis’ which is listed in Schedule 1 of the UN Convention of 1961.



# 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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CLASSIC CHOCOLATE

Verdadeiro sabor  
a chocolate  
The real flavor of  
classical chocolate



2,00€

03

CHOCOLATE BRANCO  
WHITE CHOCOLATE

A doceira 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



15

CHOCOLATE  
COM CAFÉ  
COFFEE CHOCOLAT



Thank you  
for listening