



EIHA presentation on Hemp Extracts

12 March 2019, WG PAFF Committee

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Who is EIHA and who we represent

- Originally formed almost 19 years ago; **officially founded in 2005.**
Based in Brussels and Cologne
- The **only pan-European consortium** in the industrial hemp sector
- Membership encompasses **25 EU states** and 12 additional countries including members in North America and APAC; total membership 200, primarily farmers, processors and manufacturers.
- **Policies:** CAP reform, Hemp extracts/NF regulation, THC limits in feed and food, Life Cycle Assessment of hemp materials, CO2 impacts, environment concerns, cosmetics

Evolution of consumers life-style

- Before using so called medicines as we know it, humans balanced their health with **natural foods** (vegetables):
 - plants (leaves and flowers), seeds, fruits, grains and nuts
- After so many decades of highly **processed food**, consumers are increasingly attracted by what is “**natural**”
- **Consumers trends:** physical activity, balanced and healthy diet enhanced with functional food, non-allergic ingredients and food supplements → Healthy life-style model
- To maintain “**homeostasis**” in challenging modern conditions consumers seek out food supplements of botanical origin

EU Institution approach to this shift in consumers' behavior

- 2008 Council of Europe: one of our society's main characteristic is people's growing desire to **improve** one's health condition, **reduce** the risk of disease and try to find the best possible **quality of life**
→ education's improvement/increased general knowledge and awareness
- **Homeostasis**: status of a person whose physiological parameters function within the limits considered normal – optimal balance
- **Food supplements' aim**: support, maintain or optimize the normal physiological condition = balance (homeostasis)
- **Medicines' aim**: bring back physiological functions from critical condition into normality (homeostasis)

What are hemp extracts? (focus on Cannabidiol)

- **Definition** of hemp extracts: from latin “*extrahere*” = draw out, remove) means any method that uses a (solid, liquid or gaseous) extraction agent to remove one or several components from a substance mixture (of solid, liquid or gaseous substances)
- Coffee → Coffee extract / tea → tea extract
- Cannabidiol (CBD) is the **most abundant cannabinoid naturally presents** in the industrial hemp plant and their extracts
 - Non psychotropic, non-intoxicating, not addictive, very well tolerated by humans even in large doses
- Hemp extracts are used in food/supplements for their health maintaining properties

How hemp extracts are made from hemp plant?

1. **Cold pressing:** the most simple extract from hemp fruiting tops is hempseed oil
 2. **Ethanol extraction:** using alcohol to whole fruiting tops (infructescence) and leaves
 3. **CO2 extraction:** using Carbon Dioxide to whole fruiting tops (infructescences) and leaves
 4. **Fat extraction:** can easily be used for home-made preparations
- Moreover...
 - Extract can be left raw or decarboxylated and added to consumer products without further processing
 - Extracts are usually winterized in order to remove plant waxes
 - Extract can be further distilled/rectified in order to remove unwanted elements such as chlorophyll

NF Catalogue last change

- On the 20th of January, 2019 MSs and COM agreed on a **new wording** for the NF catalogue.
- In item Cannabis sativa L:
 - hemp seeds and their derivatives are not assessed as NF
 - leaves and infructescence are left in a grey zone
- Moreover, a new item “Cannabinoids” was introduced into NF catalogue → **hemp extracts are considered NF**
- Conclusion: major confusion regarding interpretations and negative impact on the hemp sector (regarding investments, level playing field)

EIHA already demonstrated in October 2018

- Food Business Operators in EU have been acting in GOOD FAITH based on guidance represented by the information provided in Novel Food Catalogue
→ investments
- Use of hemp leaves and infructescence have NOT BEEN discriminated in listing for item Cannabis sativa
- Catalogue item Cannabidiol has provide a clear guidance: products with “natural” levels of CBD have been considered “traditional”
- **Only traditional propagating practicies** are used for processing hemp infructescense
- Such practicies include pressing or solvent extraction
- Presence of cannabinoids in human diet is also well documented across middle ages to the modern age. We will demonstrate it on 14 examples.

Traditional cannabinoid-rich products

Evidence #1: ITALY



Inscriptions on the Tower of the Escape, Bologna

Constructed from 1220, the vault of the Canton de 'Fiori carries the following Latin inscription:

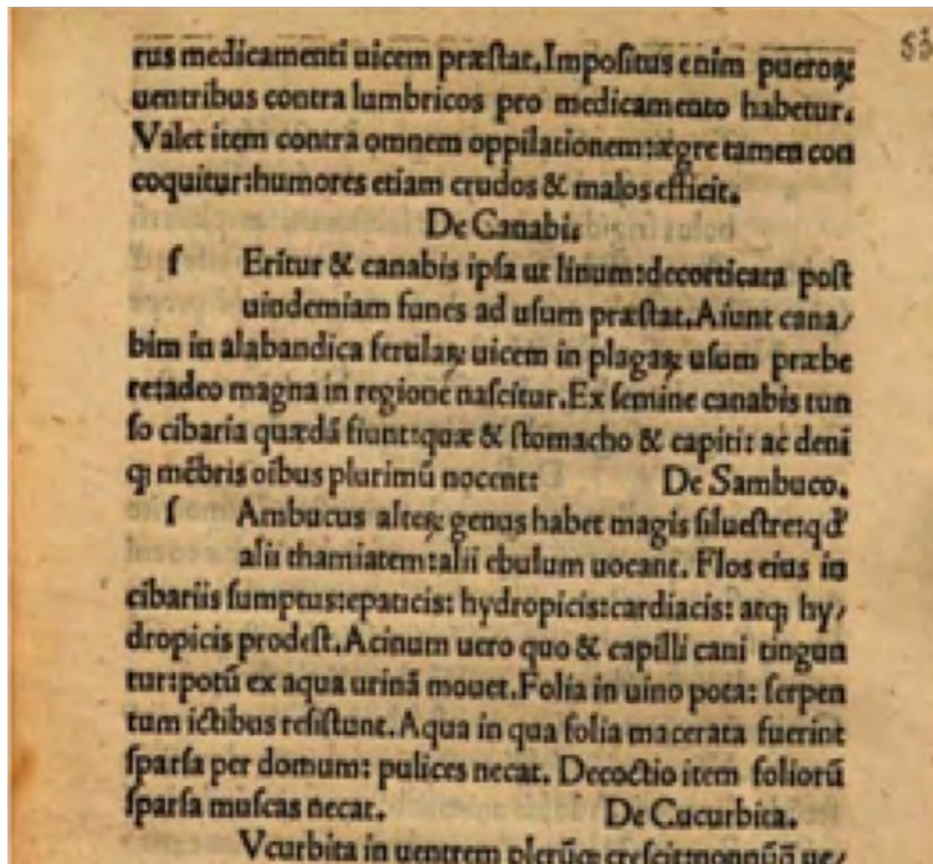
"Panis Vita / Canabis Protectio / Vinum Laetitia" -
"Bread is Life / Cannabis is Protection / Wine is Joy"*

**Protection = homeostasis*

Traditional cannabinoid-rich products

Evidence #2: ITALY

Use of aerial parts of the hemp plant within European perspective is CLEARLY demonstrated by two citations from [one of the oldest] cookbooks **De Honesta Voluptate Et Valetudine**, published in 1475 AD by Bartolommeo de Sacchi Platina



On Canabis.

To make cannabis yourself known as flax for thread.

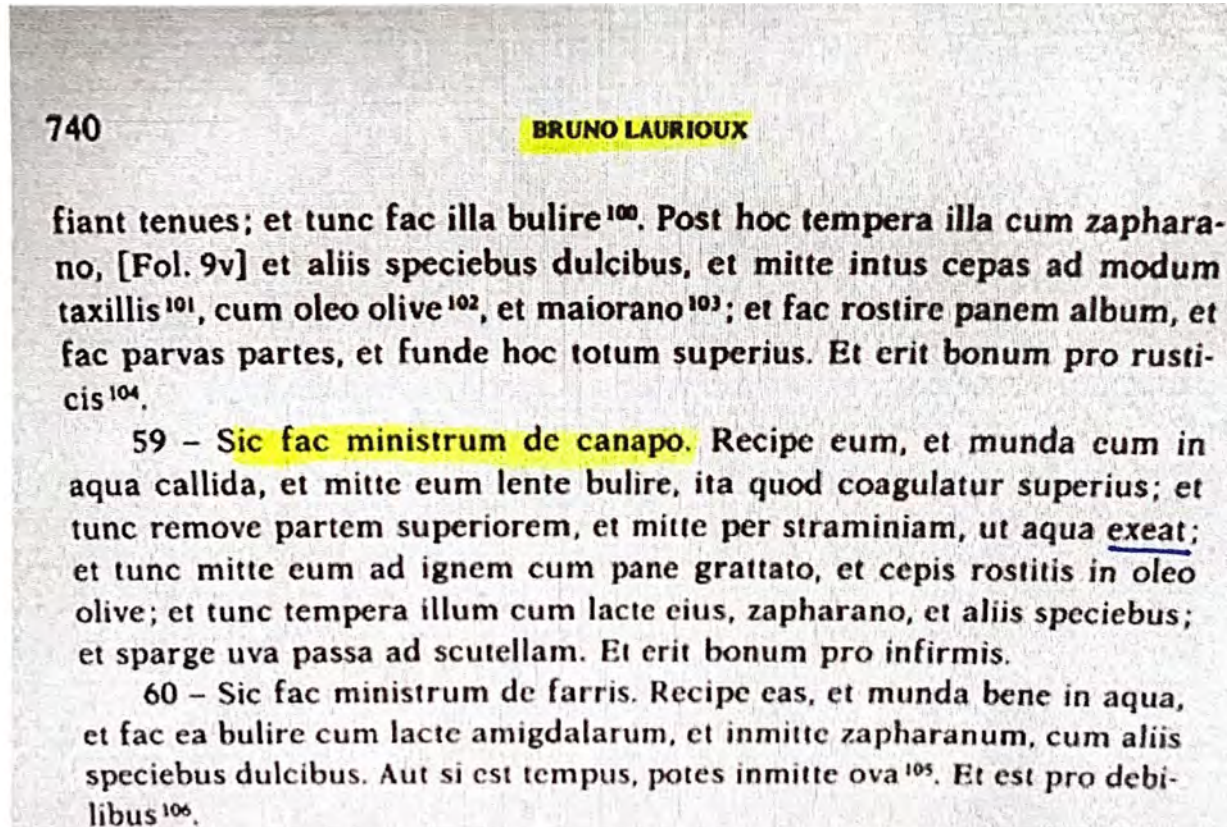
*Use a mallet to **crush clods** collect after good harvest
 Taken as food in wine or cake.*

*Add cannabis to nard oil an iron pot. **Crush together over
 some heat until juice.***

*A **health drink** of cannabis nectar. Carefully treat food and
 divide for the stomach and the head. Finally remember
 everything in excess may be harmful or criminal.*

Traditional cannabinoid-rich products

Evidence #3: VATICAN

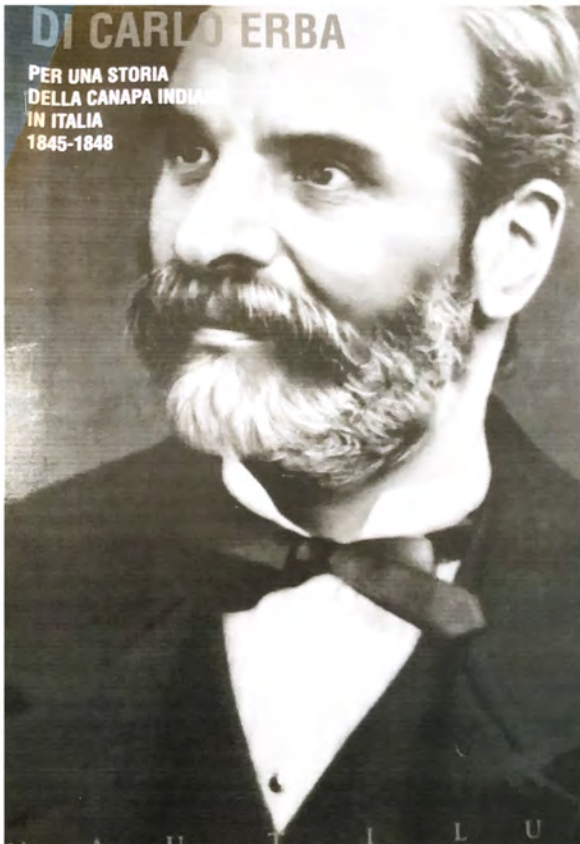


59 - On Ministrum de canapo
 Jean de Bockenheim, Registre de cuisine, p.740
 n° 59. Reference to Bruno Laurioux, chef of
 Pope Martin V

Boil flowers and leaves (canapo) in water. Once ready press them to **extract** water. Add the mixture with bread crumbs and cooked onion. Slowly add the water in which canapo was boiled to the mixture and add saffron and spices.

Traditional cannabinoid-rich products

Evidence #4: ITALY



Carlo Erba focused his studies between 1945 and 1958 on hemp extracts.

Doctor Erba quoted two methods of “cannabina” extracts commonly used at that time:

- British chemist, Smith
- French chemist, Decourtive

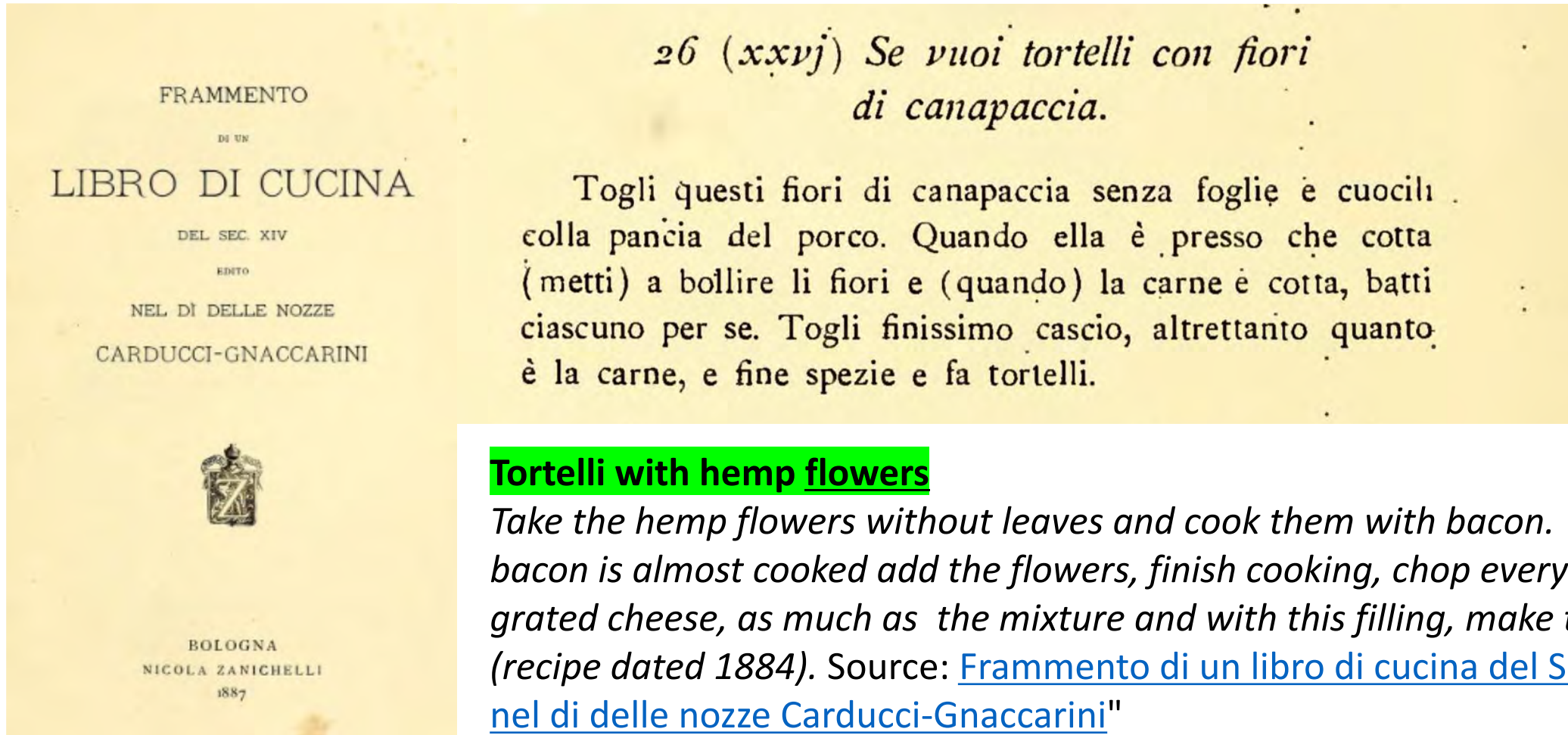
Erba after having analyzed these two method he proposed the **ether extraction** as with ether there is no need to heating, no need to use metals and acids elements that could alterate the hemp properties.

Moreover in his book, Doctor Erba mentioned the studies of Doctor Valerzi (from university of Naples) that studied **hemp extracts with fat and honey** (1887).

It is written that in July 1887, Valerzi went to Veneto region in Italy and harvested Sativa hemp. From the harvest Valerzi **extracted** distilled water, essential oil, tinctures alcohol, syrup, liquors, decortications and instilled.

Traditional cannabinoid-rich products

Evidence #5: ITALY



Traditional cannabinoid-rich products

Evidence #6: GERMANY

Germany – Monk Recipe for **Hemp Soup**

Regional Cuisines of Medieval Europe: A Book of Essays

edited by Melitta Weiss Adamson

nineteenth-century editor calls the dishes Lenten fare. However, a closer look at the material reveals that the Tegernsee monks marked feast days by indulging in little pleasures, among them eggs, milk, and dairy products, as well as the occasional luxury such as almonds, figs, rice, and saffron. At the time the meal plans were written, the monastery must have housed approximately forty monks, because the quantities mentioned in the cookbook section are usually for forty people.⁸⁸ **Hemp** soup for forty monks required six pounds of **hemp**, three quarts of wine, one white bread, mashed apples, vinegar, and spices.⁸⁹ By medieval standards, these recipes are quite unusual in that they provide the quantities for ingredients but no cooking instructions. Normally, medieval culinary recipes contain information on ingredients and their processing but no quantities, as the following analysis of the oldest German cookbooks will show.

Six pounds = 2.7 kgs hemp. / 40

monks = 67g per person

RDI is 30g hemp seeds for western
modern diet

Monks lived subsistence life. This
indicates that 67g/pp included green
parts

Traditional cannabinoid-rich products

Evidence #7.1: SWEDEN

The add specifically states:

Hampfroextract: Extrakt-Cannabis och Maltos Cannabis

This ad confirms that hemp extract was used in the preparation of Maltos Cannabis nourishing food remedy.

Mot Lungrot, Bröst- och Magkatharr, Blåskatharr m. m. enl. intyg.



Sedan vi nu anlagt en fabrik för tillverkning uti stor skala och under offentlig kontroll af

Hampfröextrakt: Extrakt-Cannabis och Maltos Cannabis,
kunna vi erbjuda dessa artiklar, som gynna i stor främjd, förpackade på snygga bleckburkar (vanl. Cacaoburkar) innehållande ca 3 ränger mer än tidigare förpackningar. Pris pr burk 1 kr. för Extrakt-Cannabis och 1: 25 för Maltos-Cannabis.

Äf vanliga paketer finnas några tusen kvar till nedsatt pris 75 öre.

Maltos-Cannabis

är en lyckligt funnen sammansättning af Hampfröets värdefulla beståndsdel med Maltospreparat.

Uti Hampfröextrakt måste, för att absorbera Hampfröfettet, användas en del mjöl, som i sig sjelf ej eger större värde. Här undvikas detta genom att Hampfröfettet absorberas af Maltossocker etc., som äro af större värde än sjelfva Hampfröextraktet. Dessa hvar för sig så värdefulla, närande och holsobrinande beståndsdelar suppleras härigenom hvarandra, och utgör således detta Maltos-Cannabis ett starkt koncentreradt medel mot sjukdomar i

Lungor, Luftrör, Bröst och Mage
samt mot Kraftlöshet och Afmörning af mängdthelt större värde än sjelfva Hampfröextraktet. Detta preparat, hvarä patent sökt i flera lnder, torde af alla, som förtäga det, komma att föredragas framför Extrakt-Cannabis.

Cacao Maltos-Cannabis

är en närande, sund och välsmakande frukostdryck, som kan rekommenderas åt alla. Smakar precis som vanlig lrmu Cacao.

Maltos uppfanns 1887 af Läsaretsläkaren K. Mc Dillon och har sen dess vunnit spridning öfver nästan hela Europa som ett utmärkt medel för bröst- och maglidande samt erhållit 3 guldmedaljer. Den svenske Professorn Mikael Steen yttrar derom i ett längre intyg, att »det borde icke saknas ut något hemt. långtidande och af dålig matsmältning hemsäktat till halsans förfriskande och återställande».

Sättet att tillverka Maltos med Hampfrö och Cacao m. fl. är för Sverige vår uteslutande rätt, som vi skola biträffa mot eventuella intrång.

»Ej blott för lungsjuktiga, utan i många andra fall, då det är önskvärdt, att patienten skall öka i hult har jag ordinerat Maltos-Cannabis, såsom åt personer med bröstkatarr, skrofler, liten mage; åt blodfattiga, nervsaga och konvalescenter och i ej få fall redan under den ännu ej långa tid, jag observerat näringsmedlets verkan, funnit goda resultat däraf, såsom ökade krafter och bättre hult. Preparatets smak är ren, kraftig och enligt min uppfattning behaglig.»

Citatet är ur en längre sympatisk artikel i Hålsövännen för 1 Mars och af den kände läkaren i Stockholm

Doktor Henrik Berg.

Tekniska Fabriken Röda Korset, Stockholm.

Traditional cannabinoid-rich products

Evidence #7.2: SWEDEN

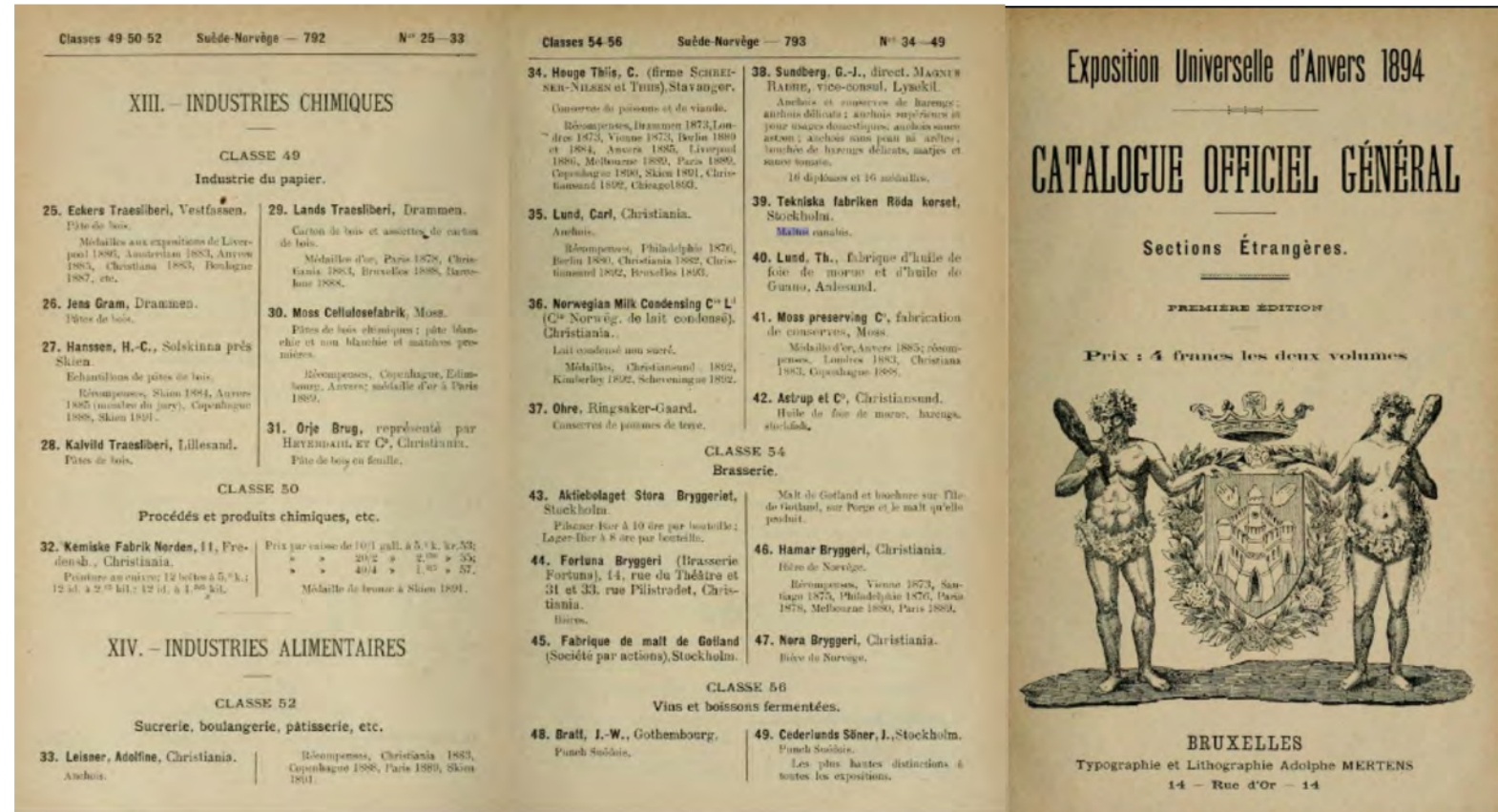
World Exhibition in Antwerp 1894 – official catalogue

Exhibition was held from 5 May to 5 November 1894 attracting 3 million visitors.

In category XIV – **Industries Alimentaires (Food Industries)**, point 39:

Tekniska fabriken Roeda korset, Stockholm

Maltos Cannabis



Traditional cannabinoid-rich products

Evidence #8: POLAND

Podczas głodu, którego doznali zarówno mieszkańcy polskich wiosek syberyjskich, jak i użytkownicy północno-wschodniej polszczyzny kresowej, jadło się różne trawy. Z tych „jadalnych” traw mieszkańcy Widz wymieniają *osotę*, lituanizm *v'iksvę* ‘turzyca’, *pokšyvę* ‘pokrzywa’, *konop'i* ‘konopie’, *šn'itkę* (por. *сні'тка*, *сны'тка*: *Снітка* – лапшатая трава, свіням, каровам і *самы снітку варылі...* (kursywa tu i dalej – N.A.); *калісь і снітку варылі і елі* [SBH 4, 1984, s. 514]; *шні'тка*: *Шнітку елі ў вайну. Даўней шнітку варылі*: *Шнітка* –

Ananiewa N. 2017. Nazwy potraw w polskich gwarach na Litwie, Białorusi i Syberii wobec przemian cywilizacyjnych. Rozprawy Komisji Językowej ŁTN, t. LXIV, 8.

During the famine suffered by both the inhabitants of Polish Siberian villages, as well as users of the north-eastern Polish borderland, ate different grasses. From these "edible" grasses, the inhabitants of the Widzew exchange *osyt*, and lituanizm *v'iksva* 'sedge', *pokšyva* 'nettle', **hemp 'hemp'**, *šn'itka*

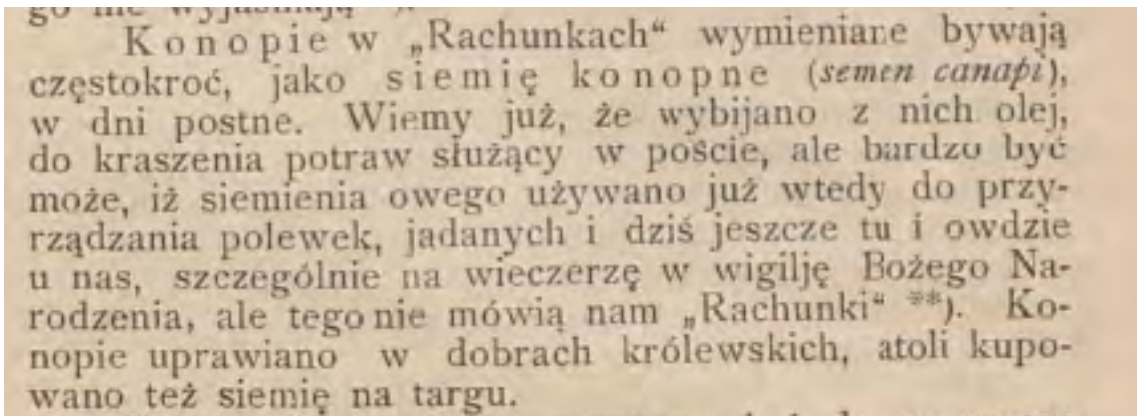
Traditional cannabinoid-rich products

Evidence #9: POLAND

Kuchnia polska dawna

Urywki z jej dziejów od czasów najdawniejszych do końca wieku XVII.

ze źródeł zebrał i opracował
Dr. Med. JÓZEF PESZKE.



Peszke J.1904. *Kuchnia polska dawna: urywki z jej dziejów od czasów najdawniejszych do końca wieku XVII*. Gazeta Domowa nr 9, 133.

Jednak największy podziw musi budzić liczba i różnorodność używanych jarzyn i ogrodowin (warzyw). Wśród nich najpopularniejsze były: buraki czerwone, cebula, chrzan, czosnek, giersz, później już nieużywany, kucmerka (kucmorka) jadana w poście wielkim, groch, kapusta, konopie, kminek, koper, mak, marchew, ogórki, pietruszka, rzepa, rzodkiew, rzeżucha, soczewica. Powyższy zestaw wskazuje, że polska kuchnia średniowieczna była wyjątkowo dobrze zaopatrzona w jarzyny i warzywa, a ich stosowanie było dość powszechne (Peszke 1904, nr 9, s. 133-134). Na uwagę zasługują też owoce, wśród których spotykamy: czereśnie, gruszki, jabłka, orzechy, śliwki, poziomki oraz równie często spożywane figi i migdały.

Chmiel A.2015. *Kuchnia I Rzeczypospolitej*. ZNUV, 45(7):11.

Translation:

However, the greatest admiration must be aroused by the number and variety of used **vegetables and garden plants (Vegetables)**. Among them the most popular were: red beets, onions, horseradish, garlic, grys, later unused, kucmorek (kucmorka) eaten in a great post, peas, cabbage, **hemp**, cumin, dill, poppy, carrot, cucumbers, parsley, turnip, radish, cress, lentils. The above set indicates that Polish medieval cuisine was exceptionally well stocked with vegetables and vegetables, and their use was quite common (Peszke 1904, No. 9, pp. 133-134).

Traditional cannabinoid-rich products

Evidence #10: POLAND



<https://alchetron.com/Siemieniotka>, 6.03.2019

HEMPSEED SOUP, SILESIAN (*siemieniotka, siemianka*): Rinse 1½ c hempseeds in cold water and drain. Scald with boiling water, bring to boil and drain again. In pot combine hempseeds with 5 c warm water, bring to gentle boil, reduce heat and simmer until seeds begin to burst. Drain, reserving liquid. **Transfer hempseeds to sieve and with wooden spoon squeeze out their contents (hempseed milk).** Scald seeds in sieve with a little boiling water and continue squeezing out their milk. Transfer partially crushed seeds from sieve to another bowl add a little boiling water, mix well, drain and squeeze them some more. When no more juice can be extracted, discard seed husks left in sieve. Combine hempseed milk (squeezings) with 3 c milk and the reserved stock (in which the hempseeds were cooked). Thicken with 3 T flour dissolved in a little water, add 2 t salt, and 1–2 T sugar. Mix, bring to boil and simmer several min, stirring so it doesn't burn. Remove from heat, add 1 T butter and serve. This is a traditional Christmas Eve soup in Silesia (Śląsk).

Stryber R. 2007. Polish Holiday Cookery. Hippocrene Books. INC, Nowy Jork: 44.

Traditional cannabinoid-rich products

Evidence #11: GERMANY

Hanfgesellschaft informiert

Das nova-Institut Hürth hat im Auftrag der Hanfgesellschaft Berlin Ende November eine Umfrage unter 40 Unternehmen aus Deutschland, Österreich, den Niederlanden und England durchgeführt, die die Verwendung von Hanfrohstoffen im Lebensmittelbereich erfassen sollte. Insbesondere ging es um die Frage, in welchen Mengen Hanfrohstoffe vor dem 15. Mai 1997 in der EU als Lebensmittel vermarktet wurden. Diese Mengen werden einen wichtigen Einfluß auf die Entscheidung haben, ob Hanfsamen, Hanföl oder auch Hanfblüten/-blätter unter die novel-food-Verordnung fallen.

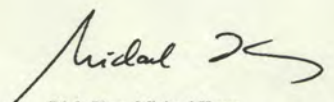
Bis zum 01. Dezember 1997 haben auf die Umfrage 23 Unternehmen geantwortet, 13 Unternehmen aus Deutschland, 4 aus Österreich, 4 aus England und 2 aus den Niederlanden. Das Ergebnis der Erhebung lautet:

Vor dem 15. Mai 1997 in der EU verkaufte hanfhaltige Lebensmittel nach Umfrage der Hanfgesellschaft vom 19.11.97:

Hanfsamen	ca. 200 Tonnen
Hanföl	ca. 33.000 Liter
Hanffertigprodukte (Müsli, Snacks, Brot-, Back- und Teigwaren)	ca. 55 Tonnen
Getränke mit Hanfblüten/-blätter	ca. 115.000 Liter
Snack mit Hanfblüten	ca. 2 Tonnen

Leider haben sich einige große Hersteller nicht an der Umfrage beteiligt, weil sie ihre individuellen Umsätze nicht weitergeben wollten, auch nicht vertraulich. Dies betrifft insbesondere den Hanfgetränkereich.

Hürth, den 01.12.97



Dipl.-Phys. Michael Karus
2. Vorsitzender der Hanfgesellschaft

Für Rückfragen: Telefon +49 - 2233 - 97 83 70, Fax +49 - 2233 - 97 83 69

The Nova Institute was commissioned by the Hanfgesellschaft to undertake a survey on the request of EU Commission to obtain data on volume of hemp products sold prior to May 1997.

Out of 40 companies contacted, **23 companies from Europe**, including Germany, Austria, the Netherlands and the UK responded:

Hempseeds	ca 200 tonnes
Hempseed oil	ca 33,000 litres
Hemp ready made products (snacks, flour, muesli, bread, bakery & pasta)	ca 55 tonnes

Drinks with hemp flowers/leaves	ca 115,000 litres
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Snacks with hemp flowers	ca 2 tonnes
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The letter also states “unfortunately several large hemp companies did not participate in the survey because they did not want to share their data, especially from the drinks sector.”

Traditional cannabinoid-rich products

Evidence #12: GERMANY



Subject: Your request for information about the opinion of the Standing Committee for Foodstuffs concerning hemp products.

Dear Mr Kreutner,

According to your request of 26 January 1998, we can inform you that the Standing Committee for Foodstuffs agreed on 18 December 1997 that hemp flowers used for the production of beer-like beverages are considered to be food ingredients and not additives since they are used in the same manner as hop flowers.

Secondly, it was decided that foods containing parts of the hemp plant do not fall under the scope of the Regulation (EC) 258/97.

Yours sincerely,


 E. GAERNER

SonnenHaus
 OKO-Handels GmbH
 Mr Andreas Kreutner
 Hermine-Berghofer-Straße 48
 A-6130 Schwaz

Rue de la Loi 200, B-1049 Brussels/Wetstraat 200, B-1049 Brussels - Belgium - Office: RP 11 - 3/26
 Telephone: direct line (+32 2) 2955540, exchange 298.11.11, Fax: 2960951
 Telex: COMEUB 21577, Telegraphic address: COMEUBR Brussels
 X.400: GmGeorg: S=Schreiber; I=GS Internet: georg.schreiber@dg3.ec.be

The letter of European Commission, dated 03.02.1998, to Mr Kreutner (Öko-Handels GmbH, Austria) stated "that **hemp flowers used for the production of beer-like beverages are considered to be food ingredients** and not additives since they are **used in the same manner as hop flowers.**"

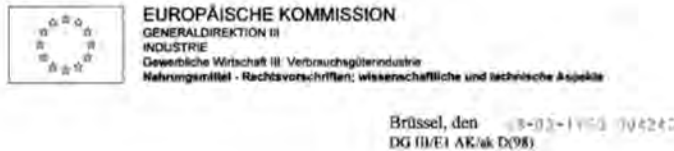
Important, paragraph 2:

“Secondly it was decided that foods containing parts of the hemp plant do not fall under the scope of the Regulation (EC) 258/97.”

NOTA BENE: Hemp flowers (EU) are not Cannabis in the meaning of the UN SC, otherwise contradiction to definition of food in Reg. (EC) 178/2002, Art. 2 (g).

Traditional cannabinoid-rich products

Evidence #13: GERMANY



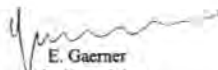
Betrifft: Ihre Anfrage bezüglich Pflanzenteile von *Cannabis sativa*

Bezug: Ihre Telefaxnachricht vom 16. Februar 1998

Sehr geehrter Herr Dupetit,

bezüglich Ihrer o.a. Anfrage kann ich Ihnen mitteilen, daß der Ständige Lebensmittelausschuß sich am 18. Dezember mit der Frage der Verwendung von Hanf in Lebensmitteln befaßt hat. Es wurde Übereinkunft erzielt, daß Lebensmittel, die Teile der Hanfpflanze enthalten, nicht unter die Verordnung (EG) Nr. 258/97 des Europäischen Parlaments und des Rates über neuartige Lebensmittel und neuartige Lebensmittelzutaten fallen.

Mit freundlichen Grüßen


 E. Gaerner
 Abteilungsleiter

Alfredo Dupetit
 dupetit Natural Products
 Hauptstr. 41
 D - 63930 Richelbach

Rue de la Loi 200, B-1049 Bruxelles/Waterlostraat 200, B-1049 Brussel - Belgien - Büro: RP11 3157.
 Telefon: Durchwahl: (+32-2)2953125, Zentrale 209 11 11, Telefax: 2957951
 Fernschreiber: COMEUB 21577, Telegrammadresse: COMEUR Brüssel

Letter of the European Commission to Mr Dupetit, dated 03.03.1998, saying the Standing Committee on Food agreed on 18.12.1997 that

**foods which contain parts of the
 hemp plant do not fall under
 Regulation (EC) No. 258/97 on
 Novel Food and Novel Food
 Ingredients."**

Traditional cannabinoid-rich products

Evidence #14: SLOVAKIA

Official use of hemp leaves for making teas can also be demonstrated on a case of Slovak Republic:

SLOVAKIA - DECREE 09/2015 Z.z. of Ministry of Agriculture and Rural Development of Slovak Republic, of December 4, 2015, on spices, table salt, dehydrated food, soup preparations and on aromas contains item konopa siata - *Cannabis sativa* L. - leaf, seed in Annex III, Table 1:

LIST OF PLANTS AND THEIR PARTS SUITABLE FOR PRODUCTION OF TEAS
without recommending any restrictions on the amount [of herb] used.

EIHA position on hemp extracts

- **Leaves** and **flowers** of industrial hemp plants **are non NF** → regulated like food and food supplements (rules and labelling)
- Extracts, with **traditional extraction technologies**, from hemp plants legally growing in EU are **not NF**
- **Naturally occurred cannabinoids** in the whole plant extracts are **not NF**
- For consumer safety EIHA proposes a **maximum daily intake of 160 mg** (for an average adult) for food or\and food supplements
- **Genetic modified plants** and synthetic material are **NF**

Further reflections

- Hemp flower products such as hempseed and its extract - hempseed oil - are traditional food exempt from authorization as Novel foods due to demonstrated consumption in Member States prior to May 1997.
- Naturally incidental to the long history of consumption of the hempseed is a sticky resin, on the outside of the seed shell → cannabinoids are found inside this resin
- Cannabinoids are found on seeds and other part of the plants (which are not NF) as residues and are therefore consumed without authorisation.
 - In the process of pressing, the hempseed oil can get contaminated with other elements of infructescence of the plant that contain cannabinoids, resulting in cannabinoids presence in hempseed oil
 - In the past, up until the beginning of the 20th century, when the mechanical threshers were introduced, any seeds - be it wheat grain or hemp seed - were obtained in the process of manual threshing with flails. The inevitable presence of such combination from which the oil was pressed results in inflated levels of cannabinoids in the hempseed oil.
- In the pre-industrial era hempseed oil obtained in this way was the primary source of plant oil in human diet, hence cannabinoids have been consumed in larger amounts than today and have a long history of consumption prior to 1997
- The parts making up the whole are inseparable from the whole; if the whole is exempt then so are the parts.

Further reflections

- It must also be considered that hemp and hops are the same plant family of **Cannabaceae**, which includes about 170 species grouped in about 11 genera, including Cannabis (hemp, marijuana), Humulus (hops) and Celtis (hackberries). (<https://en.wikipedia.org/wiki/Cannabaceae>)

One will surely not question that hops, its flowers, leaves and whole tops are used as food, ingredients and extracts.

- As long as the product
 - has no added Cannabidiol isolate or synthetics, and
 - is less than 2.000 ppm THC and recommended intake to fulfill the guidance values re THC, and
 - is from an approved Hemp cultivar or non-Cannabis source...

...then it must be considered a traditional product, not Novel Food needing pre-marketing authorization

Implications if MSs enforce the NF Catalogue

- **End of the internal market** creating a vacuum which will be filled by the '**grey market**' (54% of consumers are willing to buy CBDs it even if they are illegal)
- **Loss of jobs** in production, processing and sales
- **Loss of market control** represents significant potential consumer risk as they access products which do not comply with any safety, labeling or compliance standards.
- **Loss of competitiveness** for EU enterprises (vs Canada, the US, China and Switzerland) → no equal level playing field for all actors
- **Discrepancy on the labelling** → impossible for consumers to compare products
- All the **environmental benefits** of cultivating hemp (e.g. CO² absorption) will be **outside of Europe** (not in line with CAP orientations)

Benefits for MS

- CBD helps maintain homeostasis; which in turn supports better health for all = improved productivity and **reduced public health service costs**
- Facilitating the growth of the CBD industry will create **new jobs** at a range of skill levels and deliver **increasing tax revenues** (VAT and income tax)
- Hemp extracts represent an **additional income for farmers**
 - Enabling farmers to utilise the entire hemp plant including the leaves will encourage **much more cultivation of this key crop** with numerous additional benefits including carbon sequestration, enhanced biodiversity, land reclamation and phytoremediation.
- Safe and clear framework which will guarantee an **even playing field** for all actors in the hemp sector (SMEs vs big companies)



Thank you for your attention!

For further information:

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