

UK Premium Cannabis Industry: The Next Scotch Whisky

	Issue	Analysis	Recommendation	Action
1	Cannabis seed selection restricted to an EU list	<ul style="list-style-type: none"> Currently the variety of cannabis that can be grown under license in the UK must come from an approved EU certified seed¹. Post Brexit opportunity for a British Isles accredited list of seeds developed, bio-banked and regulated by an official British Isles body. 	New list of British-grown seeds policed by official body	Creation of British Isles seed centre and accreditation & policing body
2	Controlled cannabinoid limit in the field	<ul style="list-style-type: none"> Examples of accepted range that allow inward investment - Switzerland 1% since 2011². World Health Organization (WHO) 1%³. Australia 1%⁴. Currently UK allows 0.2% THC (dry weight) for cannabis. This figure is an outlier to global competition, makes the British Isles uncompetitive and discourages investment into the industry. All ten Scottish farms growing cannabis [Finola seed variety] often test over 0.2% limit. 	Cannabinoid limit set within accepted global range	Update limit within commercially acceptable range in order to make industry investable
3	Novel Foods (NF) dossier	<ul style="list-style-type: none"> NF a step in right direction in providing legislative framework the industry requires Next steps need to include decreasing the cost and shortening the time. 	Consider NF in light of more consumer-focused Certificate of Analysis (COA)	COA available with each product (see appendix i)
4	Whole-plant extraction of CBD in the UK is not allowed	<ul style="list-style-type: none"> Currently a UK farmer may process cannabis for seed and fibre/stalk only. Flowering tops must be destroyed, while they could be used productively and profitably elsewhere (construction, animal feed etc.). Adapted licenses would enable UK cannabis farmers to engage with economic uses for the whole plant, creating a viable cannabis industry for the British Isles Using Scottish Whisky industry as a conservative equivalent: UK market value £5.5bn, employs 42k people, 7k of which in deprived rural areas⁵. 	Allow UK cannabis farmers to identify economic uses for the whole plant	Extend license process to match
5	'Controlled cannabinoid limit in final product'	<ul style="list-style-type: none"> The 'Controlled cannabinoid limit in final product' does not set a confident benchmark that is easy for industry and consumers to understand. Current controls simple to manipulate to increase amounts of THC. 	Clearly communicated, industry-accepted dose	Initiate labelling process of accepted dose (see appendix ii)

¹ <https://www.gov.uk/government/publications/industrial-hemp-licensing-guidance/industrial-hemp-licensing-factsheet>

² <https://hemptoday.net/switzerland-moves-to-allow-production-marketing-of-planting-seeds/>

³ <https://www.who.int/medicines/access/controlled-substances/Cannabis-and-cannabis-resin.pdf>

⁴ <https://www.parliament.wa.gov.au/parliament/bills.nsf/BillProgressPopup?openForm&ParentUNID=765A8A8EEADCCBEF4825826C001824A7>

⁵ <https://www.scotch-whisky.org.uk/insights/facts-figures/>

Appendix

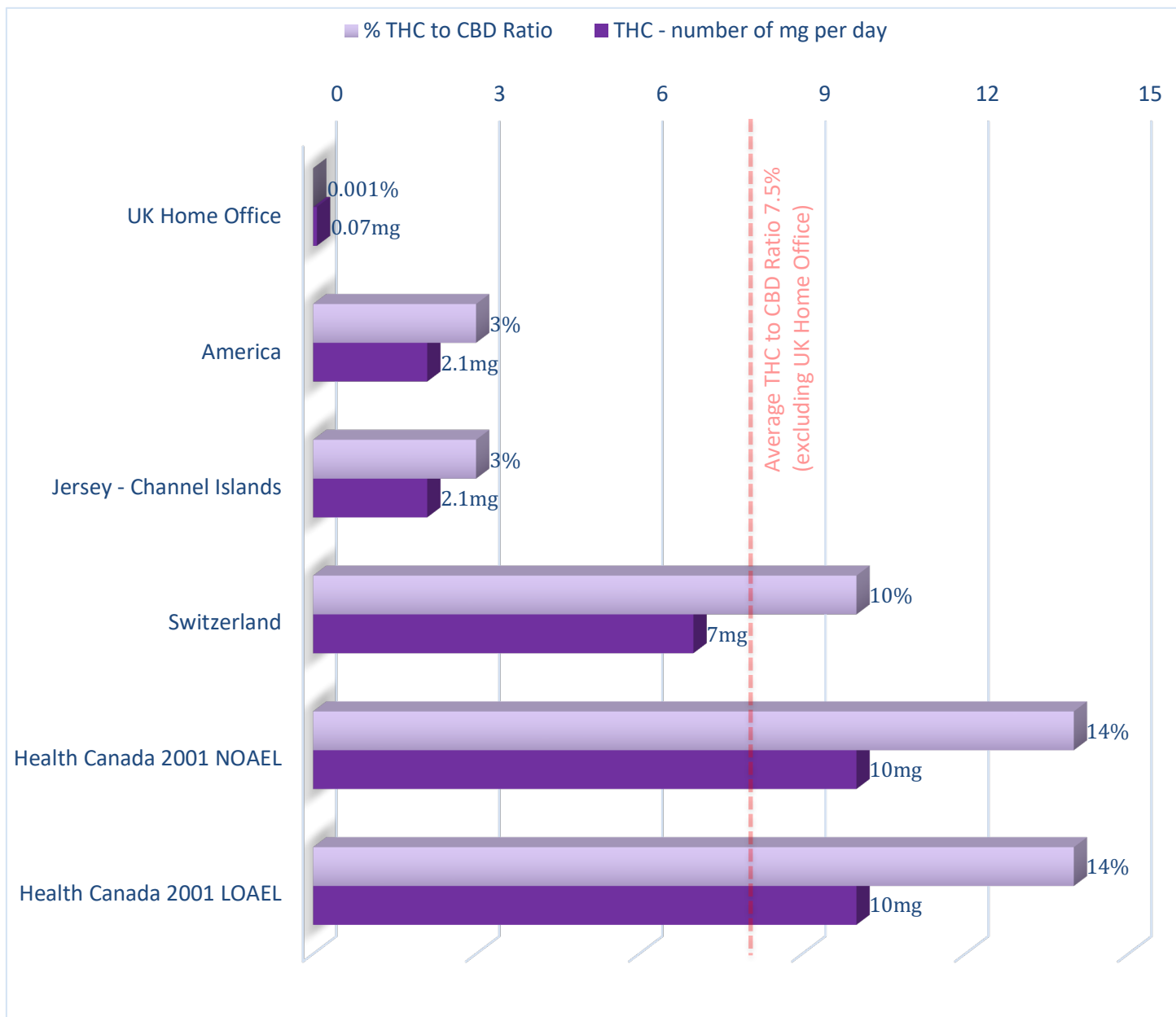
(i) Likely lessons of Certificate of Analysis (COA) in working on next version of Novel Foods (NF)

- Certificate of Analysis (COA) offers familiarity and significant cost- and time-efficiency. Currently British Isles based farmers unable to grow cannabis for production of CBD products unless have spent circa £20-30 million and 2-5 years building secure production facility with correct Home Office licenses to produce a 'sample' which can be tested and then included in an NF dossier application that could then take 12-24 months to be assessed. Even a quote from a third-party consultant-produced dossier = £50-£80k per product
- COA promotes industry competition. With cost efficient COA, small cannabis farmers and plant-based CBD producers will no longer be excluded, stimulating creation of UK plant-based CBD product industry; i.e. artisan bakers, chocolate producers, wine producers etc. and local jobs in agriculture, tourism, and food & beverage.
- COA is transparent, directly benefitting consumers. COA is a public, publishable report by independent lab on finished product.
- COA promotes decarbonisation. With majority of current CBD products imported as laboratory-made isolate, there is no benefit to CO2 emissions. With COAs, regulated cannabis growth in UK could significantly support Government's decarbonisation plan (cannabis absorbs more CO2 than any other plant, > 13 tonnes per hectare⁶).

⁶ <https://eiha.org/hemp-a-real-green-deal/>

(ii) As an example of an excepted dose measurement, 'Ratio of THC to CBD' (see table above) sets a straightforward 'no more than' THC level in all consumer CBD products. It protects consumers and prevents manipulation of a low milligram level of CBD to a 'regulated' % of THC in a container/product. Widely available worldwide evidence of 'No Observed Adverse Effect Level' (NOAEL) and 'Lowest Observed Adverse Effect Level' (LOAEL) could simply be used to establish a straightforward THC to CBD ratio. See table below.

Table: Commercial Range of % THC to CBD ratios based on THC: regulated limits, NOAEL and LOAEL evidence
 NB Current UK regulated limits are an outlier to global commercial range



References

FSA recommendation "no more than 70mg CBD per day"

LOAEL: Lowest Observed Adverse Effect Level

NOAEL: No Observed Adverse Effect Level

Health Canada 2001: Table 2.8:

<https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.630.1743&rep=rep1&type=pdf>