

## 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"> <li>Currently the variety of cannabis that can be grown under license in the UK must come from an approved EU certified seed<sup>1</sup>.</li> <li>Post Brexit opportunity for a British Isles accredited list of seeds developed, bio-banked and regulated by an official British Isles body.</li> </ul>	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"> <li>Examples of accepted range that allow inward investment - Switzerland 1% since 2011<sup>2</sup>. World Health Organization (WHO) 1%<sup>3</sup>. Australia 1%<sup>4</sup>.</li> <li>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.</li> <li>All ten Scottish farms growing cannabis [Finola seed variety] often test over 0.2% limit.</li> </ul>	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"> <li>NF a step in right direction in providing legislative framework the industry requires</li> <li>Next steps need to include decreasing the cost and shortening the time.</li> </ul>	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"> <li>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.).</li> <li>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</li> <li>Using Scottish Whisky industry as a conservative equivalent: UK market value £5.5bn, employs 42k people, 7k of which in deprived rural areas<sup>5</sup>.</li> </ul>	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"> <li>The 'Controlled cannabinoid limit in final product' does not set a confident benchmark that is easy for industry and consumers to understand.</li> <li>Current controls simple to manipulate to increase amounts of THC.</li> </ul>	Clearly communicated, industry-accepted dose	Initiate labelling process of accepted dose (see appendix ii)

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

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

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

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

<sup>5</sup> <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)

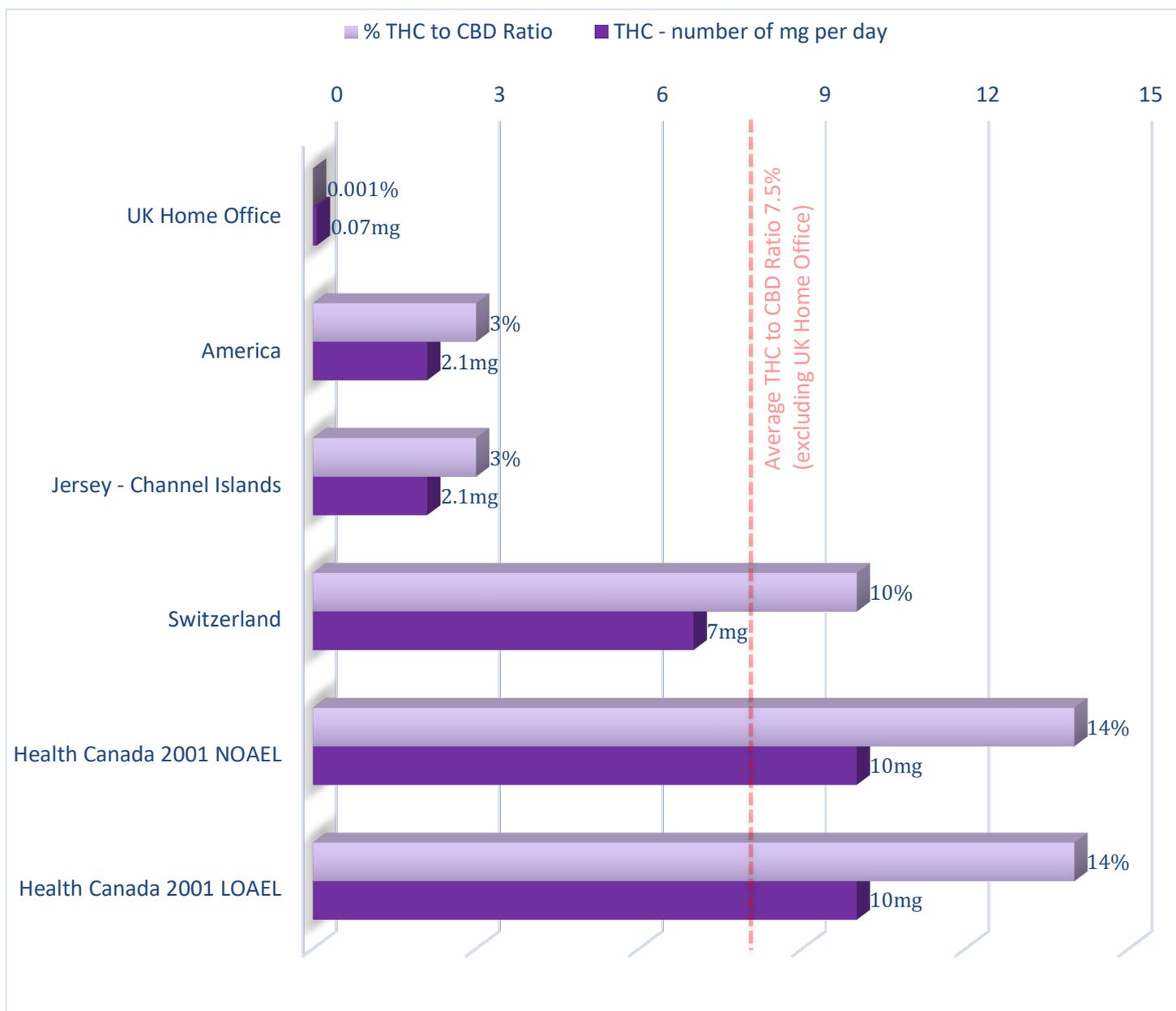
- Certificate of Analysis (COA) offers familiarity and significant cost- and time-efficiency. Currently British Isles based farmers unable to grow cannabis for production of CBD products unless have spent circa £20-30 million and 2-5 years building secure production facility with correct Home Office 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 hectare<sup>6</sup>).

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<sup>6</sup> <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>