



Ref. Ares(2022)6555362 - 22/03/2022  
European Industrial Hemp Association

# EIHA presentation on Hemp Extracts

*12 March 2019, WG PAFF Committee*

## 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 completed with functional food, non-allergic ingredients and food supplements → Healthy life-style model
- To keep the “**homeostasis**” in adverse modern conditions consumers take 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 psycotropic, 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 (infructescense) 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 20<sup>th</sup> 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 demonstrated in October 2018 already

- Food Business Operators in EU have been acting in GOOD FAITH based on guidance given by 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 practices** are used for processing hemp infructescense
- Such practices 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



### Inscripts on the Tower of the Escape, Bologna

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

*"Panis Vita / Cannabis Protectio / Vinum Laetitia"* -

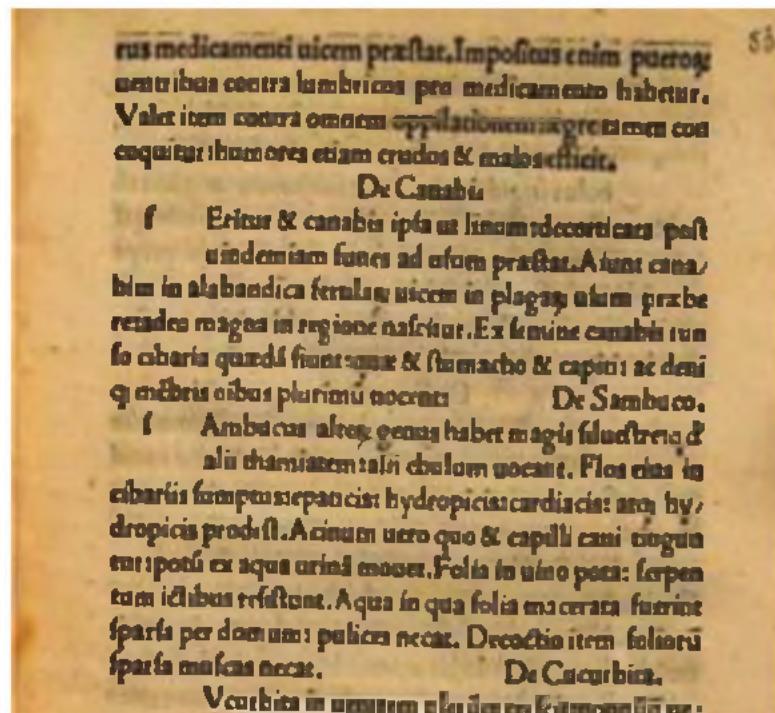
*"Bread is Life / Cannabis is Protection\* / Wine is Joy"*

\*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 Cannabis.

*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

740

BRUNO LAURIOUX

fiant tenues; et tunc fac illa bulire<sup>100</sup>. Post hoc tempora illa cum zapharano, [Fol. 9v] et aliis speciebus dulcibus, et mitte intus cepas ad modum taxillis<sup>101</sup>, cum oleo olive<sup>102</sup>, et maiorana<sup>103</sup>; et fac rostire panem album, ei fac parvas partes, et funde hoc totum superius. Et erit bonum pro rusti-  
cis<sup>104</sup>.

59 – Sic fac ministrum de canapo. Recipe eum, et munda cum in  
aqua callida, et mitte eum lente bulire, ita quod coagulatur superius; ei  
tunc remove partem superiorem, et mitte per straminiam, ut aqua exeat;  
et tunc mitte eum ad ignem cum pane gratitato, et cepis rostillis in oleo  
olive; et tunc tempora illum cum lacte eius, zapharano, et aliis speciebus;  
ei sparge uva passa ad scutellam. Et erit bonum pro infirmis.

60 – Sic fac ministrum de farris. Recipe eas, et munda bene in aqua,  
et fac ea bulire cum lacte amigdalarum, et inmille zapharanum, cum aliis  
speciebus dulcibus. Aut si est tempus, potes inmille ova<sup>105</sup>. Et est pro debi-  
libus<sup>106</sup>.

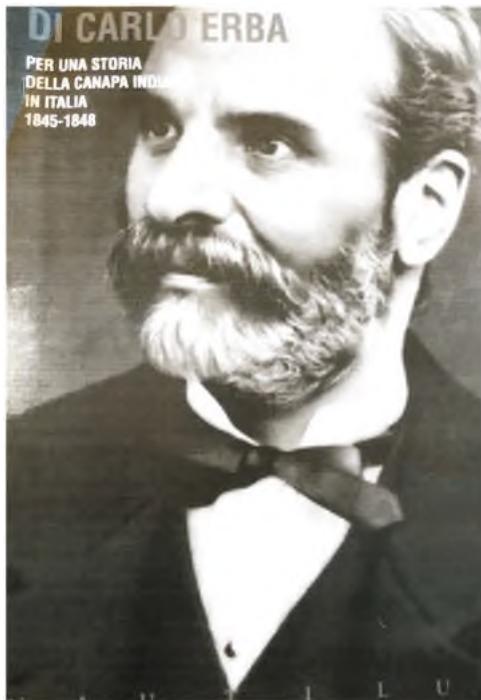
59 - On Ministrum de canapo

Jean de Bockenheim, Registre de cuisine, p.740  
n° 59, Reference to Bruno Lauroux, 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 [redacted]

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.<sup>88</sup> Hemp soup for forty monks required six pounds of hemp, three quarts of wine, one white bread, mashed apples, vinegar, and spices.<sup>89</sup> 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:

# Hampfroeextract: Extrakt-Cannabis och Maltos Cannabis

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



# 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*

Classe 49 50-52	Salle Norvège — 792	N° 26—38	Classe 54-56	Salle Norvège — 793	N° 34—48
<b>XIII. — INDUSTRIES CHIMIQUES</b>					
CLASSE 48 Industrie du papier.					
25. Eberz Traediberi, Yessofasen. Pape de bois. Métiers d'acajou-papier de Liverpool 1886, Amsterdam 1888, Anvers 1889, Christiania 1890, Toulouse 1891, etc.	26. Lands Traediberi, Drammen. Galan de bois et assortiments de carton de bois. Métiers d'or, Paris 1878, Chex Gaste 1883, Bruxelles 1888, Hambourg 1888.	28. Lunde Traediberi, Drammen. Galan de bois et assortiments de carton de bois. Métiers d'or, Paris 1878, Chex Gaste 1883, Bruxelles 1888, Hambourg 1888.	34. Haug Thir, C. (firme Sonnenstein-Natzen et Tunc), Stavanger. Commerce de papier et de viande. Réservoirs, Drammen 1873, London 1875, Vienne 1877, Berlin 1889 et 1894, Anvers 1889, Liverpool 1890, Malmö 1890, Paris 1890, Copenhagen 1890, Skien 1891, Christiania 1892, Christiania 1892, Christiania 1892.	36. Lund Carl, Christiania. Ansdal. Réservoirs, Philadelphie 1876, Porto 1881, Christiania 1882, Christiania 1882, Fredericia 1882.	38. Sundberg, G.-J., direct. Mäntys Hamra, vice-présid. Lysicki L. Ansdal et métiers de boissons alcoolisées et de sucre, ainsi qu'autre matière première destinée à la fabrication d'alcool pour les autres industries de boissons diverses, sucre et sucre blanc. 16 dépôts et 16 médailles.
27. Hanssen, H.-C., Solvkinna près Skien. Édouillard de pain de bois. Économiseur à pain de bois, Christiania 1894, Anvers 1895, Christiania 1895, Skien 1895.	28. Niss Cellulosefabrik, Moss. Types de bois déchiqueté et plus finement ou non broyé et autres produits. Réservoirs, Christiania, Esthoniens, Anvers; métiers d'or à Paris 1891.	30. Oslo Bryggeri, Christiania. Lait condensé au sucre. Mikkels, Christiania 1892, København 1892, Copenhagen 1892.	40. Lust, Th., Fabricie d'huile de foie de morue et d'huile de foie de poisson, Ålesund.	41. Moss preservier, C., fabrication de conserves, Moss. Molasses, Christiania 1885; Copenhagen, London 1893, Christiania 1893, Copenhagen 1893.	42. Øvre Ringveien-Gard, Christiania. Conserves de pommes de terre.
29. Kalvild Traediberi, Tillestrand. Pape de bois.	31. Ørje Brug, représenté par Hayman, et C., Christiania. Fils de bois en feuille.	32. Kamika Fabrik Norden, H., Fredrikshald., Christiania. Produits en cuivre, 12 sortes à 5% et 12% et 20% et 32% et 33% et 35%.	33. Aktilolaget Stora Bryggeriet, Stockholm. Pilsner beer à 10% par hectolitre. Lager beer à 8% par hectolitre.	43. Aktilolaget Stora Bryggeriet, Stockholm. Pilsner beer à 10% par hectolitre. Lager beer à 8% par hectolitre.	45. Hamar Bryggeri, Christiania. Bière de Norvège.
33. Leinser, Adelina, Christiania. Ansdal.	34. Bremnes, Christiania 1888, Copenhagen 1889, Paris 1890, Skien 1891.	35. Fortuna Bryggeri (Brasserie Fortune), 11, rue du Théâtre et 31 et 33, rue Pilstadstræet, Christiania. Bière.	44. Fortuna Bryggeri (Brasserie Fortune), 11, rue du Théâtre et 31 et 33, rue Pilstadstræet, Christiania. Bière.	46. Narvik Bryggeri, Christiania. Bière de Norvège.	47. Narvik Bryggeri, Christiania. Bière de Norvège.
<b>XIV. — INDUSTRIES ALIMENTAIRES</b>					
CLASSE 52 Soutterie, boulangerie, pâtisserie, etc.					
33. Leinser, Adelina, Christiania. Ansdal.	Bremnes, Christiania 1888, Copenhagen 1889, Paris 1890, Skien 1891.	48. Bratt, J.-W., Göteborgs. Fond-Söder.	49. Cederlands Bier, J., Stockholm. Fond-Söder.		
CLASSE 56 Viols et boissons fermentées.					
Les plus hautes distinctions à nos époques les expositions.					

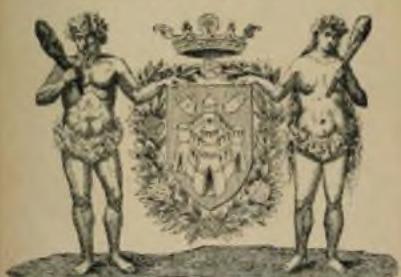
**Exposition Universelle d'Anvers 1894**

**CATALOGUE OFFICIEL GÉNÉRAL**

**Sections Étrangères,**

**PREMIÈRE ÉDITION**

**Prix : 4 francs les deux volumes**



**BRUXELLES**  
Typographie et Lithographie Adolphe MERTENS  
14 — Huie d'or — 14

# Traditional cannabinoid-rich products

## Evidence #8: POLAND

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

Ananiewa N. 2012. Nazwy potraw w polskich gwarach na Litwie, Białorusi i Syberii wobec przemian cywilizacyjnych. Rozprawy Komisji Językowej EJN, t. XIV, 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 zebrane i opracował

Dr. Med. JÓZEF PESZKE.

Konopie w „Rachunkach” wymieniane były częstokroć, jako siemień konopne (*semen canopi*), w dni postne. Wiemy już, że wybijano z nich olej, do kraszenia potraw służący w poście, ale bardzo być może, iż ziemiańca owożnego używano już wtedy do przyrządzania polewek, jadanych i dziś jeszcze tu i ówdzie u nas, szczególnie na wieczernę w wigilje Bożego Narodzenia, ale tego nie mówią nam „Rachunki” \*\*). Konopie uprawiano w dobrach królewskich, atoli kupowano też siemien na targu.

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 warzyw i ogrodów (warzyw). Wśród nich najpopularniejsze były: buraki czerwone, cebula, chrzan, czosnek, giersz, później już nieużywany, kucmerka (kucmorka) jedana w poście wielkim, groch, kapusta, konopie, kminek, koper, mak, marchew, ogórek, pietruszka, rzepa, rzodkiew, rzezucha, soczewica. Powyższy zestaw wskazuje, że polska kuchnia średniowieczna była wyjątkowo dobrze zaopatrzona w warzywa, a ich stosowanie było dość powszechnie (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.

Chmiele 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 A. 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 bei Ende November eine Umfrage unter 40 Unternehmen aus Deutschland, Österreich, den Niederlanden und England durchgeführt, die die Verwendung von Hanfprodukten im Lebensmittelbereich erfassen sollte. Insbesondere gingen es um die Frage, welche Mengen Hanfprodukte vor dem 19. Mai 1997 in der EU als Lebensmittel vermarktet wurden. Diese Mengen werden einen wichtigen Einfluss auf die Entscheidung haben, ob Hanfseife, Hanföl oder auch Hanfblütenölhäuser unter die novel-food-Verordnung fallen.

Ris zum 01. Dezember 1997 haben auf die Umfrage 27 Unternehmen geantwortet. (3 Unternehmen aus Deutschland, 4 aus Österreich, 4 aus Eng und 2 aus den Niederlanden. Das Ergebnis der Erhebung lautet:

Vor dem 19. Mai 1997 in der EU verkauftes hanfhaltige Lebensmittel nach Umfrage der Hanfgesellschaft vom 19.11.97:

Hanfzucker	ca. 200 Tonnen
Hanföl	ca. 33.000 Liter
Hanflebensmittelprodukte (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 Umlätze nicht weitergeben wollten, auch nicht vertraulich. Dies betrifft insbesondere den Hanfölsektor.

Hürth, den 01.12.97

Für Rückfragen: Telefon -

March 12, 2019 9/22/2022 WG PAFF  
Committee

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

**Snacks with Hemp flowers** ca 2 tonnes

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



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.**"

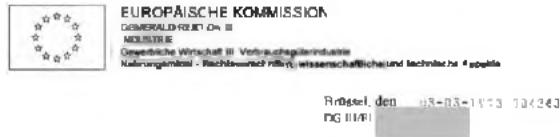
Important, paragraph 2:

**"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



Betreff: Ihre Anfrage bezüglich Pflanzenzüchtung von Cannabis sativa  
Bereit: Ihre Telefonaufnahme vom 16. Februar 1998

Sehr geehrter Herr [REDACTED]

Zweiglich Ihrer Anfrage kann ich Ihnen mitteilen daß der Ständige Lebensmittelausschuss sich am 18. Dezember mit der Frage der Verwendung von Rauschstoffen in Lebensmitteln beschäftigt hat. Es wurde über ein Konsens 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

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."**

Hauptstr. 41  
D - 63920 Rödermark

Das ist in 2000, S-04999999999999999999999999999999  
Telefon: Durchwahl 13222523176, Fax 069/11111111, Telefax: 2596261  
Fernschreiber: COM4U 811873, Telefax annehmen: COM4U Berlin  
March 12, 2019 9/22/2022 WG PAFF  
Committee

# 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 the consumers safety EIHA proposes a **maximum daily intake of 160 mg** (for 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

# What's happen if MSs enforce 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. CO<sup>2</sup> absorption) will be **outside of Europe** (not in line with CAP orientations)

# Benefits for MSs

- CBD help 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 **equal level play field** for all actors in the hemp sector (SMEs vs big companies)



European Industrial Hemp Association

**Thank you for your  
attention!**

For further information:

