



From: [REDACTED] (GROW)
To: [REDACTED] (GROW)
Subject: FW: Cannabis interpretation clarification
Date: mardi 11 décembre 2018 09:46:01
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.png](#)

A enregistrer dans ARES. Merci

From: [REDACTED] [REDACTED]@natrue.eu>
Sent: Monday, December 10, 2018 5:08 PM
To: [REDACTED] (GROW) [REDACTED]@ec.europa.eu>
Subject: Cannabis interpretation clarification

Dear [REDACTED],

Firstly, I am sorry to hear that you will be leaving the cosmetics unit. It has been a pleasure to interact with you during meetings we have both been a part of, and I wish you every success in your new ventures into the world of finance!

From a practical stand point, when will you be leaving in order to know who I may contact regarding borderlines or certain case files? Will this be your colleague [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)?

Secondly, and as the topic of this email, I would like to request if the interpretation of cannabis mentioned in today's meeting is one that is available or will be made available?

For time purposes I had not provided further comment during today's meeting but this is a topic that we see growing in the natural and organic cosmetics sector. We note raw materials certified to private standards and used in products; we also receive enquires from certification bodies as well as manufacturers and consumers on this topic. We know that cannabis can be grown according to the provisions of the EU organic legislation as an agricultural product and can also be organic under certain other judication's legislation like USDA organic, and it is becoming of interest to consumers for a number of reasons too.

I am aware that cannabis is listed in Table I of the Single Convention on Narcotic Drugs and, according to the definition, refers to the flowering or fruiting tops of the cannabis plant (excluding the seeds and leaves when not accompanied by the tops) from which the resin has not been extracted, by whatever name they may be designated. This was covered during today's meeting.

However, seeds and leaves that are not accompanied by the tops are excluded from this prohibition.

To this end, the principle issue of non-compliance is related to the narcotic component of these substances i.e. THC / non-psychoactives. Therefore, the quality of these raw materials (i.e. % THC values).

Unlike THC (tetrahydrocannabinol), it was my understand that products containing cannabidiol (CBD) are not subject to the Narcotics Act because it

does not produce a comparable psychoactive effect cf. exempt from narcotics legislation if the total THC content [THC and THC-A] is less than 1 % but it can often be 10-fold lower as well. It is my understand that there are methods for detection of THC in the literature.

However, this does not mean that CBD can simply be added to random preparations at will or advertised arbitrarily. Products can only be marketed legally if they comply with the legislation of the country where it is placed on the market cf. the EU.

My question is: Are you able to elaborate/confirm what the criteria for compliance with EU legislation is regarding cannabis and derivatives thereof?

Please note that in some cases for natural products the cold-pressed oil may be chemically modified – as could any natural substance (oil) – and so found in products as a natural or derived natural (natural origin) substance.

Thank you in advance for your help in this matter.

Kind regards,



Dr.

NATRUE

The International Natural and Organic Cosmetic Association

40 Rue Washington - 2nd Floor

1050 Brussels

Tel:

Fax:

www.natrue.org



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