BRCGS085: Position Statement
Guidance for Sites Manufacturing CBD products

Document Scope

To enable certification bodies to decide whether a site engaged in the extraction of cannabidiol (CBD), the manufacturing and contract packing cannabidiol products can be certificated under the BRCGS scheme and to which Standard.

Change log

Version no.	Date	Description
	31/072020	Draft position statement
	10/08/2020	Revision after I consultation
1	12/08/2020	Final
1.2	24/08/2020	Footer changed slightly to reflect the relevant Standards.

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1. Introduction

CBD is found in cannabis plant families, Indica, sativa, and ruderalis. It is mainly derived from hemp and marijuana varieties of the cannabis sativa plant. The Cannabis sativa plant contains naturally occurring active compounds called **Cannabinoids.** Of the almost 500 different compounds present in the plant, only approximately 66 are termed **cannabinoids**.

There are seven subclasses of cannabinoids

Cannabigerols (CBG)

Cannabichromenes (CBC)

Cannabidiol (CBD)

Tetrahydrocannabinol (THC)

Cannabinol (CBN)

Cannabinodiol (CBDL)

Other cannabinoids including cannabicyclol (CBL), cannabielsoin (CBE) and cannabitriol (CBT).

The most abundant of the cannabinoids is CBD, which makes up about 40% of the plant resin extract. The main way in which the cannabinoids are differentiated is based on their degree of psychoactivity. For instance, CBG, CBC and CBD are not known to be psychoactive active agents whereas THC, CBN and CBDL along with some other cannabinoids are known to have varying degrees of psychoactivity.

The most well-known among these compounds is the delta-9-tetrahydrocannabinol (Δ9-THC), which is the main psychoactive ingredient in cannabis

2. Extraction and Uses

2.1 Extraction

The most common extracts used in food and consumer products are **hemp seed oil** and **CBD.**

Hemp is one of the oldest cultivated plants and is grown for its seeds or fibre and often used in dietary supplements, hair and skin products, and clothing. The seeds, which contain about 30 percent oil, are edible and a good source of fibre, protein,

vitamin E, potassium, and magnesium. The oil from hemp seeds can be used to make edible oils in addition to paints, soaps, and varnish.

Hemp seed oil is produced by cold pressing the seed of a hemp plant.

Through the use of a winterization process**, CBD** can be extracted, from the leaves and flowers of either a marijuana plant or a high-CBD hemp plant also known as industrial hemp. Marijuana has high amounts of the controlled compound THC, which is classified as a narcotic in many countries and regions.

Industrial hemp, on the other hand, typically contains permitted trace amounts of THC of 0.3% dry weight and less.

CBD isolate products are those which contain only the CBD molecule, with no accompanying terpenes, THC, or other cannabinoids and is not controlled. During the extraction process, everything including contaminants and heavy metals is removed or filtered out of the hemp plant except for cannabidiol.

CBD distillate products contains an array of cannabinoids, terpenes, vitamins, and fatty acids with negligible amounts of THC.

CBD distillate comes with either a broad spectrum or a full spectrum of cannabinoids. The difference between these terms is the THC. Broad spectrum distillates have all of the same compounds, except that the THC has been removed. **Other cannabinoids** can also be extracted using the same process as above.

2.2 Uses

As consumers learn more about cannabinoids, in particular CBD, demand for these products has increased significantly around the world. Legislation in many countries permits the use of CBD from industrial hemp containing trace amounts or no THC in food and non-food products

Manufacturing of CBD is set to increase. Currently the global market is worth $7.1 billion with significant growth predicted in the next 5 years. Products currently available on the market include:

- Food supplements
- Food and drink products
- Vapes (electronic cigarettes/smokes)
- Prescription -based products
- Topical Cosmetic products- Bath salts/creams/balms
- Household products - candles
- Pet supplements

CBD Vape Juice does not contain nicotine. Instead, the active ingredients are Cannabidiol (CBD) derived from the hemp plant. CBD Vape Juice is very similar to standard e-liquid as they share the same basic ingredients, propylene glycol (PG) and vegetable glycerine (VG). PG and VG are what is known as Base Carriers. They transport the active ingredients and flavours from a liquid state to a vapour state as an e-cigarette heats the e-liquid

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3. Legal Ramifications

The laws continue to change around the world so as a manufacturer, buyer, or seller it is important to know the laws in the countries/regions/states of production and export. Here is a useful link.

https://www.orlandoweekly.com/Blogs/archives/2020/06/02/is-cbd-legal-in-the-us-uk-canada-eu-and-australia

4. BRCGS Position

Currently BRCGS does not certificate sites that produce tobacco and associated products. Cannabis and nicotine- based products classified as controlled narcotics along with medicinal products which also fall out of scope of all the Standards.

4.1 Which sites manufacturing Cannabinoid-based products can be certificated against BRCGS Standards?

The scope of operations, intended use of the product, packaging type and claims may be used to determine whether a site can be certificated under the BRCGS scheme. Please see summary table1 below.

Table 1. Manufacture and certification of Cannabinoid products

Cannabinoid Product Type	Intended Use	Certificated	Standard	Category
Vape Juice	Smoke cessation /combustion products	NO	NO	
Food grade extracts Baked goods Candy/gummies Snacks Beverages	Food consumables/edibles	YES	Food Plant Based	For Food – in accordance with Appendix 6 of the Standard
Capsules/Pills/liquids	Food Supplements	YES	Food	
Non-medicinal oral drops	Various	YES	Food Consumer Products	
Oral drops capsules/sprays/injectables	Medicinal/Pharmaceuticals	NO	NO	
Cosmetic grade extracts Toothpaste/mouthwash Bath salts Topical creams/balms/oils	Cosmetics	YES	Consumer Products	PCH
Candles	Household	YES	Consumer Products	PCH
Candy/gummies/snacks	Pet consumables	YES	Food Plant based	For Food – in accordance with Appendix 6 of the Standard
Topical creams/balms/oils	Pet products	YES	Consumer Products	PCH

5. Conclusion

Certification bodies shall determine the scope of sites manufacturing Cannabinoid products before certification to ensure that they fall into the categories permitted by BRCGS as summarised in table 1. In section 4.2. Where the choice of Standard is still unclear, Certification bodies are advised to contact BRCGS at enquiries@brcgs.com