



BRCGS085: Position Statement for sites manufacturing Cannabinoid products.

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

Change log:

Version no.	Date	Description
0.1	31/072020	Draft position statement.
0.2	10/08/2020	Revision after consultation.
1	12/08/2020	Final.
1.2	24/08/2020	Footer changed slightly to reflect the relevant Standards.
2	01/04/2021	Update section 4.
3	28/04/2022	Scope of the Position updated to include Gluten-Free certification. Update to Section 4.1.



CONTENTS

- 1 Introduction
- 2 Extraction and Uses
- 3 Legal ramifications
- 4 BRCGS Position
- 5 Conclusion



1. Introduction

Cannabinoids are naturally occurring active compounds found in cannabis plant families, Indica, sativa, and ruderalis. They are mainly derived from hemp and marijuana varieties of the cannabis sativa plant. 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 (Δ 9-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

BRCGS085: Position Statement for sites manufacturing CBD products	BRCGS
Version 3: 28/04/2022	Page 3 of 6



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

Vape Juice does not contain nicotine. Instead, the active ingredients are cannabidiol (CBD) derived from the hemp plant. 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.

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 also fall out of scope of all the Standards.

Where a cannabis derived product is permitted to be manufactured as a foodstuff or ingredient, or consumer product, certification to the relevant BRCGS Standard is accepted.

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 table 1 below. Please note that coeliac/ceeliac associations who endorse the Gluten-Free Certification Program reserve the right to refuse the use of their trademark on these products. Permission should be sought from the relevant association prior to gaining certification.

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 Gluten-Free	For Food – in accordance with Appendix 6 of the Standard
Capsules/Pills/liquids	Food Supplements	YES	Food Gluten-Free	
Non-medicinal oral drops	Various	YES	Food Consumer Products Plant-Based Gluten-Free	For Food – in accordance with Appendix 6 of the Standard PCH
Oral drops capsules/sprays/ injectables/lozenges	Medicinal Pharmaceuticals	NO	NO	
Cosmetic grade extracts Toothpaste/mouthwash Bath salts Topical creams/balms/ oils	Cosmetics	YES	Consumer Products Gluten-Free	PCH
Candles	Household	YES	Consumer Products	PCH
Candy/gummies/ snacks	Pet consumables	YES	Food Plant-Based Gluten-Free	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. Where the choice of Standard is still unclear, Certification bodies are advised to contact BRCGS at enquiries@brcgs.com