



CBD Sector Advice regarding the FSA Consumer Advisory of 10mg CBD

Dear CBD Sector Colleagues,

For clarity: The CTA is issuing this notice to the CBD trade sector in parallel with any further future regulatory changes that might arise as an outcome of the FSA consumer advisory announcement on Thursday 12th October 2023.

Companies submitted their CBD Novel Food (NF) applications to the Food Standards Agency (FSA) based on the FSA guidance in 2020, of a daily consumption of 70mg of CBD as an acceptable safe daily intake for healthy adults of an average weight.

On Thursday 12th October 2023 the Food Standards Agency (FSA) announced a change in their previous position and released a new **precautionary consumer advisory of 10mg per healthy adult per day as the consumption of CBD, based on chronic lifetime exposure to foods containing CBD.**

<https://www.food.gov.uk/news-alerts/news/food-standards-agency-and-food-standards-scotland-update-consumer-advice-for-cbd>

As you will see from last Thursday's announcement, the recommendation is that **"healthy adults should limit their consumption of CBD from food to 10mg per day, which is about 4-5 drops of 5% CBD oil."**

This change has been brought about by new evidence which has been assessed by two government science safety committees. The advisory is based on the possible issues with the liver, somnolence and possible drug-drug interactions.

This announcement is '**Consumer Advice**' It is an advisory and not legally enforceable by Trading Standards or any other regulatory body. The FSA are highlighting a possible safety issue if consumers decide to ingest more than 10mg of CBD per day over their lifetime.

This consumer advice regarding CBD encourages consumers to monitor their daily intake and make an informed decision on how much CBD they are willing to ingest when considering possible long-term side effects.

Should a consumer choose to ingest higher levels of CBD over a shorter period of time (ie not every day throughout their lifetime), the FSA has determined that there is NO acute safety risk.

This advisory is similar to the consumer advice issued for Alcohol, where 2-3 units of alcohol for women and 3-4 units of alcohol for men per day has been advised.

We have been informed by the FSA that even though this new precautionary advice has been published, which greatly reduces the daily consumption advice for CBD, each CBD Novel Food application will be considered on its' own merit.

As long as a company, and its CBD products, are listed on the CBD Public List (on the FSA's website), these products can remain on the market until the product is either legally authorised or denied.

The FSA has confirmed that they have briefed retailers to reassure them that they can continue to sell CBD products which have a higher content of CBD than 10mg, as long as those products are still remain listed on the FSA CBD Public List.

It is the opinion of the Cannabis Trades Association that companies are not required to take any immediate action since:

1. Current products (on the FSA CBD Public List) are still permitted to be sold onto the UK market.
2. Retailers have assurance by the FSA that they can continue to sell CBD Products whilst Novel Food applications are ongoing, and products remain on the FSA CBD Public List.
3. The FSA will be providing further advice including the scope of reformulating products and switching supplier protocols in line with precautionary advice of 10mg per day. We strongly recommend that you do not look to reformulate any products (this would render them a new product) until that advice is received.

CBD Labelling & Consumer Notices:

It is noted that the FSA advice issued on the 12th October 2023, includes an additional 'vulnerable group' i.e. **"parents trying to conceive"**. The CTA recommendation is that on your next packaging print run, we advise that you update your labelling to state:

"Not suitable for under 18s, pregnant or breastfeeding women or parents trying to conceive. Those who have a chronic medical condition or who are taking medication, should consult their doctor before taking."

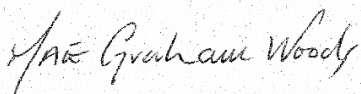
For products that have daily consumer intake above 10mg per (healthy) adult per day then the CTA suggests label or leaflet changes along the lines of:

"Existing data supports a daily consumption of more than 10mg of CBD only when taken over a short period of time. When consuming CBD on a daily basis, and for consumed from any source."

Simply put, if a consumer ingests CBD chronically (over a lifetime) at high dosages, they should be advised to 'take a break' from CBD periodically to allow the CBD to be excreted from their body.

Should you have any questions, then please do not hesitate to contact the CTA.

On behalf of the CTA, our Directors and Members.



Marika Graham-Woods, Executive Director
Cannabis Trades Association and Hemp Trades Association

