



Labeling and Safety Protocols for Medicinal Cannabis and Hemp Products Industry Leaders Advocate for Best Practice Guidelines

Submitted by: Americans for Safe Access (ASA), the Cannabis Committee of the American Herbal Products Association (AHPA), and the Hemp Industries Association (HIA)

The AHPA Cannabis Committee, in coordination ASA and HIA and numerous industry experts, have created the following recommendations for the regulation of consumable, topical, and inhalant cannabis- and hemp-derived products to ensure quality and consumer safety.¹ Common language and defined terms are being established for the transparent and accurate labeling of these products that supports responsible commerce and informed use of this important plant.

Most participants in today's hemp food and body care industries and marketers of medical cannabis practice good manufacturing processes and adhere to established standards for labeling. In the best interest of consumers, it's vitally important for leading industry associations and manufacturers to work together to establish clear guidelines for all hemp and cannabis products.

Regulatory recommendations

The regulatory recommendations developed to date are in the form of best practice rules developed by the AHPA Cannabis Committee to address four operational stages of cannabis production and distribution: cultivation and processing; manufacturing and related operations; laboratory practice; and dispensing². These recommendations are applicable to any operation producing and/or distributing lawful cannabis or industrial hemp consumable, topical, or inhalant products that are not already governed by federal regulations. For the complete recommendations, see the AHPA document "Recommendations for Regulators – Cannabis Operations" (August 1, 2014).

To summarize, all cannabis growers, product manufacturers, and dispensaries should implement the following for all cannabis products:

- Safe production processes for products developed for human consumption
- Disclosure of any testing for pesticides, contaminants, and adulterants
- Labeling that includes disclosure of cannabis content and nutrient information (if applicable)
- Disclosures that inform consumers about product potency and/or dosage information (if applicable)

¹ "Hemp" means industrial hemp as defined by Congress as "the plant *Cannabis sativa* L. and any part of such plant, whether growing or not, with a delta-9 tetrahydrocannabinol concentration of not more than 0.3 percent on a dry weight basis." Sec. 7606 (b)(2)

² http://www.ahpa.org/Portals/0/pdfs/AHPA_Recommendations_for_Regulators_Cannabis_Operations.pdf

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Recommendations for plant part identification

The AHPA Cannabis Committee recommends that lawfully-marketed products that consist of or include *Cannabis* spp. ingredients that are intended for oral ingestion, topical application, or inhalation be labeled to identify the part of the *Cannabis* plant from which the ingredient is derived (e.g., seed oil, flower extract, or extract of aerial parts). This policy does not apply to parts of the *Cannabis* plant in unprocessed and recognizable forms.

Regulators and relevant companies seeking to enhance cannabis product quality can adopt and implement these recommendations, as well as the product quality guidelines found in the American Herbal Pharmacopeia (AHP) Cannabis Monograph. Cannabis companies are encouraged to participate in ASA's Patient Focused Certification program as a way to independently demonstrate to consumers that these guidelines have been integrated into their production processes.

Conclusion

ASA, the AHPA Cannabis Committee, and the HIA support the regulatory trends toward mandatory product testing and adoption of other product safety regulations in states currently implementing medical marijuana programs. These organizations recommend all medical cannabis states update their laws and regulations accordingly and appreciate companies that are volunteering to adjust to these market demands. This is an exciting time for the industry; tremendous progress has been made in the past few years and the industry will continue to offer these products in a safe and transparent way that is imperative to its future.

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