



The ACI Cannabinoid Quality Charter

1. Legal frameworks

It is essential that all cannabinoid producers and sellers foster an understanding of the laws and regulations in their respective sectors (food supplements, cosmetics and inhalables), moving towards a state of full compliance. Members of the ACI, without exception, will pursue the necessary authorisations to legally distribute cannabinoid products.

- In the first instance, the ACI will engage closely with the FSA to facilitate prompt submissions of quality novel food applications, putting our members on the legal pathway to compliance. The ACI will use scale and knowledge transfer to minimise costs whilst maximising speed and quality. The ACI will ensure that partners who rely on other suppliers' cannabinoid extract in their finished products are able to work with signatories to the charter who are fully engaged in the novel food application process.
- The ACI will pursue clarification on a grace period for those submitting a novel food application.
- The ACI will maintain close relationships with government and senior bodies to ensure that our members maintain ongoing legal compliance as this nascent industry evolves.

2. Testing

Quality and safety are established through robust testing using bespoke analytical quality by design. Test methods need to demonstrate validation, from sample preparation to LOD (Limit of Detection) and LOQ (Limit of Quantification), with inter-lab testing to confirm validation. Each method must be validated to accommodate specific product ranges. Testing methods can be extended to different product ranges via further sub-validation of sample preparation methods. It is important that test methods indicate stability, to ensure that CBD product expiry dates are reliable and that any product degradation is taken into account when setting the expiry date, choosing the packaging material and deciding storage conditions.

Working with accredited laboratories, the ACI will facilitate a programme whereby each submission of raw material or a finished product will be tested at accredited laboratories, with methods evaluated by all stakeholders. The ACI mark will only be granted to companies if they enrol in the testing programme described above.

3. Labelling

Fair, honest and safe sale of cannabinoid products is dependent on a number of labelling regulations which ensure that consumers understand what they are buying and are not misled. The Advertising Standards Authority's guidelines have been used for the following rules.

All member organisations must include the following information on their labelling:

- No medical claims under any circumstances.
- The term 'food supplement' in the case of all food supplements.
- The term 'CBD' or 'cannabidiol'.
 - If any other cannabinoids are present (established by the ACI testing programme), these must be mentioned.
 - 'Cannabis' or 'hemp' can be considered.
- The recommended daily dose.
- A warning not to exceed the stated recommended daily dose.
- A warning that the product should not be used by pregnant or breast-feeding women.
- A warning that CBD may interact with medicines and to consult a doctor or pharmacist.
- A statement to the effect that food supplements should not be used as substitutes for a varied diet.
- A statement to the effect that the product should be stored out of the reach of young children.
- Information about the amounts of any vitamins, minerals or other substances with nutritional or physiological effects that are present in the product.
 - This should also include the percentage of the relevant Recommended Daily Allowance (RDA) as set out in the Annex to Commission Directive 2008/100/EC.
- Nutritional information, if a nutritional or health claim is made on the packaging, or if vitamins or minerals have been added.
- A product name that does not indicate a medical/health claim.
- A list of ingredients, ordered by weight (from most to least).
 - This should include the amount of CBD present in the product in mg and as a percentage; mg of CBD per serving should also be shown. This should not be misleading for the consumer. The maximum dose should be included, based on the product information sheet.
- The amount of cannabis content in mg in the ingredients list only, unless it is a pure extract or isolate.
- A date mark or use-by date
- Any special storage conditions or conditions of use.

- The name and address of the manufacturer, packer or EC seller, including a physical address that can be reached by mail.
- Instructions for use.
- The place of origin of the food (place of manufacture, either region, e.g. EU, or country, e.g. Spain).

Other labelling requirements:

- External packaging should contain the same information as the label requirements.
- Below the ingredients list, it is best practice to state 'Allergens are listed in bold', even if there are no allergens present.
- If the raw materials are organic in origin there must be certification evidence provided to support this. In order to make an 'organic' claim on a label, a food manufacturer must be registered with a recognised organic control body.
- If 'non-GM' is stated, certification of evidence needs to be provided.
- All mandatory information should be printed using a font with a minimum x-height of 1.2 mm, or 0.9 mm if the largest surface area of packaging is less than 80 cm².
- Products imported from outside the EU for resale should meet all of the labelling requirements for the UK/EU. Many products from the USA are not compliant with UK/EU requirements (e.g. 'Dietary Supplement' is non-compliant).

4. Manufacturing

Continuous improvement should be the basis for any food manufacturing organisation. Consistency in product quality through compliance is key for any CBD manufacturer. The supply chain, from raw material to commercial sale, requires adherence to quality management systems.

Under EU food safety laws, food manufacturers, caterers and other businesses in the food chain are responsible for safety and are obliged to:

- Provide safe foods.
- Implement procedures to prevent unsafe foods.
- Be able to trace their food one step back and one step forward.
- Withdraw and recall unsafe foods.
- Cooperate with competent authorities.

The British Retail Consortium (BRC) has already laid down standards, divided into seven sections. However, as we are dealing with CBD, which requires special control over controlled substances, the seven sections below are amended to ensure CBD product safety and quality:



1 – Senior management commitment and continual improvement

Your senior managers must commit to implementing and continually improving your organisation's food safety processes.

2 – The Food Safety Plan – HACCP

Having a Hazard Analysis and Critical Control Point (HACCP) plan in place allows you to identify and manage any biological, chemical or physical hazards that could make the food you produce unsafe to eat.

This section has been further amended by the ACI to stress raw material identification: appropriate controls must be in place to overcome fraud and adulteration of CBD products and raw material. CBD products are derived from plants, so it is important to rule out any PA (Pyrrolizidine Alkaloid) issues using a risk-based approach or by appropriate testing. Growing of raw material should follow GACP (Good Agriculture and Collection Practices) guidelines.

3 – Food safety and quality management systems

You should implement a system that enables you to produce safe products, meet customers' expectations and ensure your staff are well trained.

This section has been further amended by the ACI to stress traceability of all the ingredients used in the supply chain to manufacture the finished product. There should be regular internal audits to ensure the quality of the finished product.

4 – Site standards

Sites on which you manufacture or prepare food must be laid out, maintained, cleaned and secured according to strict standards. Your organisation must also meet requirements relating to the control of pests and foreign bodies.

This section has been further amended by the ACI to stress the importance of keeping the documentation and batch records as per the CGMP (Current Good Manufacturing Practice) guidelines (ICH Q7, Section 6).

5 – Product control

For your products to be considered safe, you need to demonstrate that you properly manage things such as allergens, provenance and product testing.

This section has been further amended by the ACI to stress that product testing methods must indicate stability. Cannabinoids are sensitive to light, air and temperature; therefore, it is important to show the stability of the product using appropriate methods with LOD/LOQ.

It is important that stability testing is carried out using the same containers as used for commercial sale. Stability data should be used to justify appropriate storage conditions, expiry dates and packaging of the finished product.

6 – Process control

You must implement your HACCP plan from day to day, and have effective procedures in place for ensuring you manufacture your products to the correct quality.

This section has been further amended by the ACI to stress that there must be validated analytical methods in place to control the related impurities and controlled drug impurities. Therefore, the equipment used for testing must be fit for purpose as per the CGMP guidelines (ICH Q7, Section 5).

7 – Personnel

This part of the standard covers training, protective clothing, and hygiene.

ACI will be using a risk-based approach to ensure we build bespoke analytical quality through a design specific to the CBD product market.

5. Controlled drugs

Without exception, the ACI's UK members will adhere to the UK's laws on scheduled substances. The ACI will be working with analytical testing houses to establish the LOD and LOQ for controlled substances

Each EU member state will have different rulings on this subject. Working with the regulators, we will aid with market-specific product development.

6. Marketing ethics

All ACI members commit to providing clear, honest and ethical marketing messages. All advertising, whether online, offline or in-store, should not refer through imagery or language to any of the following:

- Medical claims as defined by MHRA.
- Sexuality (e.g. unclothed men or women, suggestive imagery).
- Violence (e.g. weaponry, aggressive behaviour).
- Illegal behaviour (any recognised crime).
- Political affiliation (including extremism as well as moderate politics).
- Religion.

7. Sustainability and social impact

While the cannabinoid industry is in its infancy, there is a clear opportunity to shape business activity to ensure it is future-facing in its commitment to social and environmental good. The following principles are aligned with the UN's Sustainable Development Goals (SDGs), to contribute to a global compact tackling the world's most pressing problems:

- Land and natural resource use (SDG 15: Life on Land):
 - Farming and production should use land responsibly. This includes:
 - No deforestation or other ecosystem destruction to clear land for crops.
 - All wastes and fertilisers must be stored in a manner that minimises the risk of contamination or pollution.
 - The use of Plant Protection Products (PPPs) such as pesticides, herbicides and fungicides should be kept to a minimum.
 - Only appropriate, safe and suitable fertilisers and soil improvement products must be applied to land.
 - Producers must have systems in place that aim to maintain soil structure and control erosion.
 - Excessive water use should be avoided. Crop irrigation must be based on an identified need and irrigation water usage records must be kept.
 - Crop management should meet Red Tractor standards as a minimum. Annually, members – even if they are not aiming for organic status – should be able to show how improvements are being made towards higher standards set out by the Soil Association.
- Responsible waste management (SDG 12: Responsible consumption and production):
 - A commitment to minimal waste generation through prevention, reduction, recycling and reuse.
 - All wastes must be disposed of in a manner that minimises the risk of contamination or pollution.
 - Waste management should meet Red Tractor standards as a minimum. Annually, members – even if they are not aiming for organic status – should be able to show how improvements are being made towards higher standards set out by the Soil Association.
- Fair employment (SDG 8: Decent work and economic growth):
 - Throughout the supply chain, there should be:
 - No use of forced (including bonded or prison) labour.
 - No discrimination in employment (across recruitment, wage policy, admittance to training programmes, employee promotion policy, policies of employment termination, retirement) based on race, colour, sex, religion, political affiliation, union membership, nationality, social origin, deficiencies or handicaps.

- No child labour. Workers should not be younger than the age of completion of compulsory schooling and never younger than 15 years.
 - The right of all workers to form and join trade unions and bargain collectively must be recognised.
 - Wages and benefits paid for a standard working week must meet legal minimum standards and always be sufficient to meet the basic needs of workers and their families, as well as providing some discretionary income. No wage deductions for disciplinary measures, or any deduction that will lead the employee to receive less than the minimum wage. Employees shall be adequately and clearly informed about the specifications of their wages, including wage rates and pay periods.
 - Hours of work must comply with applicable laws. Working hours should not regularly exceed 48 hours per week, and all workers should receive at least one day off every seven-day period. Overtime should be voluntary and not exceed 12 hours per week, and should always be compensated at a premium rate.
- No plastic pollution (SDG 14: Life below water):
 - Plastic to be minimised in the supply chain.
 - Where plastic is used in the supply chain, it should be biodegradable. Where biodegradable alternatives are not available, plastic should be widely recyclable.
 - Plastic to be minimised in consumer packaging. It should only be used where no alternative is available.
 - Where plastic is used in consumer packaging, it should be non-virgin plastic that is also recyclable or compostable.
 - Clear recycling information should be included on consumer packaging, relevant to materials used.

Ensuring High Standards

In cases where a complaint of a breach of the ACI charter is reported, complaints will be considered by the Code of Practice Panel and, where required, by the Code of Practice Appeal Board.

Where a breach of the charter has been ruled, the company concerned must give an undertaking that the practice in question has ceased forthwith and that all possible steps have been taken to avoid a similar breach in the future. An undertaking must be accompanied by details of the action taken to implement the ruling.

Additional sanctions can be imposed in serious cases (all costs will be borne by the offending member). These may include:

- Auditing of a company's procedures to comply with the Code, followed by the possibility of a requirement for the pre-vetting of future material.
- Recovery of non-compliant material from those to whom it has been given.

- The issuing of a corrective statement.
- A public reprimand.
- Suspension or expulsion from the ACI.
- Reporting of the breach to the appropriate UK authority.