

Growing & Manufacturing of Products Containing Cannabis FAQs

Product Eligibility and Certification

- 1. What types of products are eligible for certification?
 - Products eligible for certification include cannabis infused edibles (gummies, cookies, candy, chocolate, etc.), tinctures, capsules, lozenges, troches, oral sprays, concentrates for ingestion, drinks, unprocessed cannabis plant (wet and dried) as a food ingredient or to be used as feed.
- 2. What products are not eligible for certification?
 - Products for inhalation (smoking, vaporization, etc.) and other not categorized as food (e.g., medical) per SQF guidelines.
- 3. What are the options for companies that grow, process, hold, and/or distribute products that are both eligible and not eligible for certification?
 - Companies that process, hold, and/or distribute products that are both eligible and not eligible for certification may obtain certification for eligible items if there is clear procedural distinction for handing both items and physical separation of processes. (Example, cannabis material destined for eligible products shall be physically separated and labeled at the time which it was deemed for such use).
- 4. Is my raw material supplier of cannabis raw material, which is incorporated into a food product, required to be certified for me to use its raw material?
 No, suppliers are not required to be certified for sites that manufacture edibles

however, they must be risk assessed and monitored for performance as per the Supplier Approval Program in Part B of the SQF Code.

- 5. What Food Sector Category does cannabis food products fall under?

 Cannabis products fall under several different Food Sector Categories. Refer to the SQF Cannabis FSC Guide.
- 6. If a site is currently certified to products not containing cannabis, but will start producing products containing Cannabis does is need a new or separate certification?

The site must provide their certification body (CB) with information such as process changes, new ingredients, different regulations etc. and the CB will inform them if they are required to have an additional audit to expand or change the scope of certification. In most instances scope expansion on a recertification audit or an additional audit before the certificate expiry would be required given the risks and different regulations involved.



SQF Auditors

7. Are there additional qualifications and/or training that registered SQF auditors will be required to conduct SQF certification audits at sites growing or manufacturing cannabis products or edibles?

Yes, there will be additional training for auditors that must be completed prior to conducting any audits at sites growing or manufacturing with cannabis products. The training will follow publication of the additional tools and guidance for industry.

8. Is specialized clearance required from auditors prior to visiting sites manufacturing products containing THC?

Clearance would be dependent on regulatory requirements and the types of products being grown or manufactured. If you are producing products for the medical prescription market the regulations and visitor requirements are usually different than for food, beverage, and dietary supplements.

Regulatory and Legislation

9. Can hulled hemp seed, hemp seed protein powder, and hemp seed oil be used in human food?

The <u>U.S Farm Bill of December 2018</u> provided assurances that these products, which are considered to be GRAS (Generally Recognized as Safe) can be produced and sold as separate products or as ingredients into food. Manufacturers must meet all applicable food regulations.

10. Is it legal, in interstate commerce, to sell a food (including any animal food or feed) to which THC or CBD has been added?

Sites certified to grow or manufacture products containing THC or CBD cannot ship across state boundaries. Certified sites must be located in states where regulation permits the growing and manufacturing of products for use in edibles.

11. Can THC or CBD products be sold as dietary supplements or natural health products?

Where products contain cannabis and/or levels of THC or CBD they cannot be marketed as a dietary supplement or natural health product. As such they cannot claim to prevent or reduce various illnesses. Where allowed by regulations they can be sold as is (e.g., CBD oil) provided they meet the labeling and claims levels stated by regulation. Products considered GRAS can be sold as a dietary supplement or natural health product.