

Tuesday, 01 July 2025

# FSA CBD Update Briefing – CTA Members

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### What Happened

Today's discussion explored where we are with the FSA's novel food process for CBD products. We covered the hold-up at the risk-management stage, reviewed the latest safety guidelines and THC limits, and considered what this means for products already on the market and those we plan to launch.

### Key Takeaways

#### Safety limits and labels

The FSA has confirmed that CBD products must contain no more than one milligram of THC per container. Every label must also include:

- An advisory daily intake of ten milligrams for isolated CBD
- A clear statement of whether the product is full-spectrum or an isolate
- A warning that the product is not to be sold to anyone under 18
- A note that the product is not recommended for pregnant or breastfeeding women or those trying to conceive
- Storage instructions such as "Store in a cool, dry place away from direct sunlight"

Although the advisory daily intake is not legally enforceable, clear labelling will help customers use products responsibly.



## Reformulation isn't mandatory yet

The FSA is not forcing an immediate reformulation, but updating formulations now will streamline authorisation by autumn 2026. Consider new SKUs that meet safety requirements while keeping current lines on the public list during the transition.

## New products versus substitutions

There was concern that the FSA might only allow tweaks to existing lines and block entirely new products. The agency has indicated it will review new formulations under the same safety protocol, so innovation remains possible if guidelines are followed.

## Retailer support

To avoid confusion at point of sale, the FSA will provide guidance materials for retailers. These materials will explain the new labels, advise on responsible consumption, and equip staff to answer customer questions.

## Why It Matters

By acting now you can:

1. Keep existing products available while updating labels and formulations.
2. Introduce compliant SKUs that have a better chance of fast-track approval.
3. Position your business for export opportunities once UK rules align with European standards.

## What's Next

1. Audit your CBD range to identify any products over the one-milligram THC limit or missing the required ADI statement – or that your data does not support the product.
2. Draft reformulation plans, including any new SKUs and label updates needed to meet the FSA's safety criteria
3. Monitor for the isolated CBD consultation and submit feedback to shape the final authorisation process
4. FSA to train retailer partners so they understand the new labels and can guide customers effectively

Thank you for your engagement today. We will share updates as soon as the FSA releases consultation papers and retailer toolkits.