



## UNPA HEMP EXTRACT/CANNABINOID NEW MEMBER POLICY GUIDELINES October 2019

While efforts at the state and federal level to clarify the legal status of hemp extract and cannabinoid products continue, UNPA believes it is in the interest of consumers, health professionals and relevant industries to establish a framework of practices and compliance standards for hemp extract/cannabinoid products.

The quality and compliance criteria laid out below form the basis of UNPA's membership criteria for both new and current Executive level members, effective October 1, 2019. (Science & Technology Services and Associate level members may join under UNPA's current general membership policies.)

UNPA will accept hemp extract/cannabinoid(s)\* companies as Executive Members, whose principal business is the growing, manufacture, sale and/or distribution of hemp extracts/cannabinoid(s)\* ingredients labeled as dietary supplement, food, beverage, and cosmetic products that meet the following criteria:

Completed as part of the membership application, companies must comply with the UNPA membership-approval process as follows:

- Compliance assessment
- Website review
- Label/labeling (*may include packaging, printed literature, websites, social media, etc.*)
- UNPA staff & Executive Committee review & vetting

### 1. Product Liability Insurance:

At time of membership application: Proof of product liability insurance.

### 2. Hemp Derived Only:

No sale of synthetic (*chemical or synthetic biology*) cannabinoids or other constituents of the hemp plant.

### 3. Adverse Event Reporting System:

Verified, competent Serious Adverse Event Reporting system in place; UNPA to recommend external systems (*i.e., SafetyCall International*).

### 4. Recall Procedures:

Verified recall procedure in place ([click here to view example](#)).

*\*Tetrahydrocannabinol (THC) above 0.3% is excluded*



**5. DSHEA Labeling / Claims Compliance:**

At time of membership application: Labels and labeling (*including packaging, printed literature, websites, social media, etc.*) will be in compliance with DSHEA dietary supplement or food labeling requirement under CFR Part 101-Food Labeling including Supplement Facts or Nutrition Facts panels. If labels are out of compliance, UNPA will advise of required changes.

**6. Federal Trade Commission (FTC) Compliance:**

Advertising must be truthful and not misleading in compliance with FTC requirements. Refer to [FTC's Dietary Supplement: An Advertising Guide for Industry](#).

**7. Current Good Manufacturing Practices (cGMP):**

Companies must demonstrate 21 CFR Part 111-Dietary Supplement GMP compliance under one of the following:

- a. Third-party certification
- b. Current government inspection report (*FDA, U.S recognized or equivalent*)
- c. UNPA assessment

**8. Food Safety Modernization Act (FSMA):**

Companies will comply with applicable food-safety regulations and have appropriately trained staff, including Qualified Individuals, as defined in FSMA. A qualified individual will demonstrate education, background and training or experience to include:

- a. Section 111 GMP for dietary supplements
- b. Section 117 Preventive Controls for Human Foods
- c. Foreign Supplier Verification Programs, if appropriate
- d. Other FSMA training (i.e., Intentional Adulteration, Produce Safety)

**9. UNPA No Sale List:**

At time of membership application: Compliance with current UNPA "no sell" list (*see Appendix I or view at <https://www.unpa.com/policies--endorsements.html>*).

**10. Use of UNPA Logo:**

The use of the UNPA member logo is subject to a Terms of Use Agreement. The UNPA member logo may not be used on product labels.

**11. Not intended for inhalation:**

UNPA members may not sell hemp extracts/cannabinoid(s)\* products intended for inhalation.

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**12. State Registration or License:**

Applicants will submit any current state registration, licenses or other permits relevant to the growing, manufacture or sale of hemp extract/cannabinoid(s)\* materials or finished products.

**13. Executive Management Capabilities:**

Applicants will provide a bio or CV for senior management responsible for purchasing, operations, regulatory, legal and compliance at the time of application.

**14. Compliance Oversight:**

Applicants accepted for membership will advise UNPA's VP, Global Regulatory and Compliance of a state or federal GMP inspection, audit or regulatory action or any new third-party GMP certification or accreditation, with seven (7) days of such event.

**15. Corrective Plan:**

Failure to meet these criteria may result in the hemp extract/cannabinoid(s)\* company developing and implementing a corrective action plan. Failure to satisfy these membership criteria will result in non-acceptance of the membership application.

**16. Membership Dues:**

Annual Executive membership dues for hemp extract/cannabinoid(s)\* companies will be set at the same membership rates for UNPA Executive members, subject to special assessment as may be needed.

***For a UNPA membership application or for questions or assistance with this document,  
please contact Kira Olsen, UNPA Director of Member Services & Events,  
801.474.2572, [kira@unpa.com](mailto:kira@unpa.com).***

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## APPENDIX I

### UNPA POLICY: 'NO SELL LIST'

In its ongoing efforts to support the sale of safe and responsible products, UNPA has enacted the following trade policies as conditions of membership for prospective and all current UNPA members.

“As we have done before with our other no-sale policies, we’re committed to moving quickly to define the boundaries of responsible practices within the industry,” said Loren Israelsen, UNPA president. “UNPA will continue to do so as circumstances warrant.”

- Effective September 19, 2019, no UNPA member will engage in the sale of synthetic (chemical or synthetic biology) cannabinoids or other constituents of the hemp plant.
- Effective May 22, 2018, no UNPA member will engage in the sale of liquid, high-dose caffeine products for retail sales.
- Effective April 9, 2015, no UNPA member will engage in the sale of  $\beta$ -methylphenethylamine (BMPEA).
- Effective Feb. 24, 2015, no UNPA member will engage in the sale of bulk-powdered caffeine for retail sales.
- Effective May 1, 2014, UNPA members will not engage in the sale, distribution or marketing of any products that contain kratom (*Mitragyna speciosa*) for human use or consumption.
- Effective May 1, 2013, no UNPA member will engage in the sale of 1,3-dimethylamylamine, methylhexanamine or geranium extract, commonly known as DMAA or any chemically related substance.
- Effective May 1, 2005, UNPA members will not engage in the sale, distribution or marketing of any products containing ephedra or ma huang (*Ephedra sinica*) at any dose.

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