



INTERNATIONAL NARCOTICS CONTROL BOARD

SPECIAL NOTICE

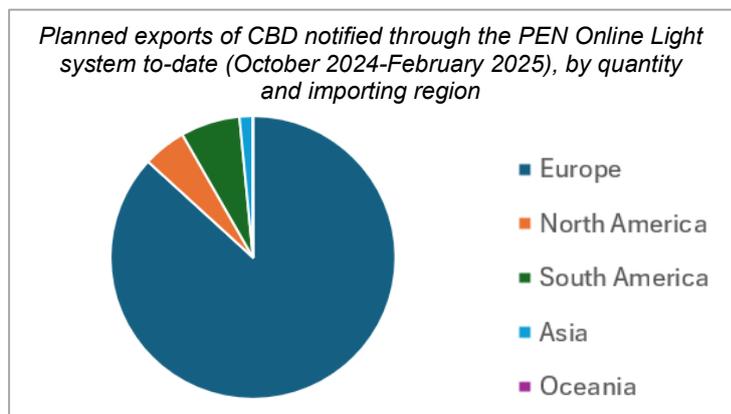
Observations concerning cannabidiol (CBD)¹

Further to PP-PC Notice 1/2024 of 13 August 2024, which informed Precursors Focal Points about the designation of CBD as a drug precursor in China in September 2024, INCB wishes to share the following observations and encourages feedback to a few questions attached to this notice.

Trade pre-notified through INCB's PEN Online Light system

Since October 2024, China has used the [INCB Pre-Export Notification Online Light \(PEN Online Light\) system](#) to inform importing countries, on a voluntary basis, of planned exports of CBD. As of 16 February 2026, 211 CBD-related PENs had been submitted to 25 importing countries worldwide, including 15 countries in Europe. Individual proposed shipments involve quantities from less than 1 kg to 30,000 litres; the majority involve CBD in solid form. The total quantity of CBD which has been proposed for export by China to-date amounts to almost 450 tons and 33,660 litres.²

Planned exports of CBD notified through the PEN Online Light system to-date (October 2024-February 2025), by quantity and importing region



¹ CBD is a non-psychoactive cannabinoid found in the cannabis plant but can also be manufactured synthetically. Pure CBD is not controlled under the international drugs control conventions. It is authorized for treatment of seizures and some other medical conditions. In many countries, there are various products that contain CBD being manufactured and distributed without regulatory oversight. CBD can also be used as a starting material for the illicit manufacture of semi-synthetic cannabinoids.

² See also INCB Report on Precursors for 2025, paras.158-161.

The Board commends China for its initiative of voluntarily notifying importing countries of planned CBD exports, thus bringing to light the extent of trade in the substance. The Board encourages other countries that produce and/or trade in CBD to also share, to the extent possible, information about planned exports through the PEN Online Light system, with a view to collectively enhancing knowledge of CBD supply chains characteristics, legitimate markets and the operators involved.

While the Board acknowledges that CBD is not controlled as a drug precursor in most countries, and the authorities of importing countries therefore may not be able to approve or reject a PEN on the basis of national drug precursor legislation, importing countries are encouraged to make use of the information communicated through PEN Online Light to safeguard CBD supply chains.

Uses of CBD and Importing companies

Information on the actual uses of CBD in importing countries remains limited. To the Board's knowledge, CBD is currently used in products sold as (list non exhaustive):³

- Therapeutic products
- Foodstuffs, food products and food supplements
- Cosmetic products
- Herbal smoking products
- Non-smoked tobacco substitutes (substitute products for snus)
- Vaping products related to e-cigarettes

With regard to vaping products, publicly available information suggests that between 5 to 15 tons of pure CBD are sold annually in France just for e-liquids for electronic cigarettes.⁴

From the information available through the PEN Online Light system and cross-checked with some of the importing countries concerned, INCB understands that importing companies represent a range of different categories, including companies that are:

- (i) Licensed for controlled drugs and medications, including for THC production
- (ii) Licensed for cultivation of medical cannabis
- (iii) Not licensed / unknown to the competent national authorities responsible for drug precursors and/or narcotic drugs and psychotropic substances

Use of CBD for the synthesis of semi-synthetic cannabinoids (SSC)

While some countries have raised concerns with INCB about the use of CBD as a precursor in the manufacture of THC and SSC (such as HHC, THCP, HHC-O), evidence of use of CBD as the actual starting material is limited. Forensic analysis of some HHC products, which were not controlled internationally until 6 December 2025, suggested that the synthesis pathway began with CBD. INCB is also aware of a criminal network that operated in Romania between October 2022 and September 2023 which manufactured and distributed electronic vaping devices containing HHC and other SSC. However, the actual starting material there appeared to have been industrial hemp/low-THC cannabis from which CBD was obtained on-site.⁵

³ <https://www.swissmedic.ch/swissmedic/en/home/news/mitteilungen/products-containing-cannabidiol--cbd---overview.html> and <https://echa.europa.eu/documents/10162/29b872cd-a603-4911-7c7e-e6e4836e700a> (both accessed 17 February 2026)

⁴ <https://echa.europa.eu/documents/10162/29b872cd-a603-4911-7c7e-e6e4836e700a>

⁵ https://www.euda.europa.eu/publications/eu-drug-markets/new-psychoactive-substances/distribution-and-supply/semi-synthetic-cannabinoids_en#box_edmrnps_ssc_dream-factory (accessed 16 February 2026)

Focal point action

Precursor Focal Points are kindly requested to disseminate this alert to all relevant national regulatory and law enforcement authorities. Considering the enormous amounts of CBD being pre-notified for export by China alone, Precursor Focal Points and other law enforcement and regulatory officials are encouraged to:

- Cooperate with each other and the Board to enhance knowledge of the legitimate market for CBD, supply chains and operators involved, including by completing the attached form as soon as possible and no later than 3 April 2026.
- Register other relevant agencies as users of PEN Online Light, which may be better positioned to assess the legitimacy of a proposed CBD shipment.
- Review the profiles of the importing companies and determine whether their portfolio is consistent with CBD imports and the quantities involved.

Precursor Focal Points are further encouraged to be vigilant and communicate to INCB any evidence of use of CBD as a starting material for the illicit manufacture of SSC, suspicious shipments, smuggling attempts or seizures of CBD, preferably using the Precursors Incident Communication System (PICS).⁶ The information provided may be used to facilitate investigations and to identify trafficking routes and modus operandi for use in confidence with Precursor Focal Points under Projects Prism and Cohesion.

Any comments or suggestions related to this notice may be forwarded to the following address:

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⁶ <https://pics.incb.org>