

# The Poland Cannabis White Paper

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# INTRODUCTION

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**T**his white paper explores the key developments taking place in the burgeoning Polish cannabis market. The cannabis sector is currently experiencing a boom in Poland, with the medicinal cannabis market expected to be worth at least €2.0 billion by 2028. The bulk of commercial activity centres on industrial hemp, which is legal to cultivate, process, market and consume in Poland. It is illegal to cultivate medical cannabis domestically. As a result, the majority of the most lucrative opportunities in the sector are only available to foreign producers of medical cannabis. Recreational cannabis is illegal in Poland. In addition to detailing the latest legislative developments and identifying the activity of key market participants, this white paper provides an overview of the challenges and opportunities facing the cannabis market in Poland today.

# DEFINITIONS

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## Medicinal cannabis

Medicinal cannabis refers to both medical and pharmaceutical cannabis products. These are defined as follows:

### Medical cannabis

Medical cannabis refers to plant-based or plant-derived cannabis products prescribed by a medical practitioner for the treatment of specific conditions or diseases (for example, epilepsy, pain, or multiple sclerosis (MS)). Medical cannabis uses the whole unprocessed plant, the processed plant or the chemicals contained within it. It can include high CBD and low THC products, though CBD products may also appear as consumer goods. Medical cannabis products are currently prepared as plant materials, oils, tinctures, edibles and capsules.

### Pharmaceutical cannabis

For the purposes of this white paper, pharmaceutical cannabis refers to products formulated using pure cannabinoids (either plant extracted or synthetic) that have been through full clinical trials and are licensed as a medicine. Examples of products include Sativex, Epidiolex, Cesamet, Marinol and Syndros.

### Recreational cannabis

Recreational cannabis refers to any cannabis used for non-medical purposes, and includes black market products. It ordinarily has a higher concentration of THC, the psychoactive property present in the cannabis plant. It is illegal in many countries and states, including Poland. People tend to smoke recreational cannabis or use oils or vaporised products (and increasingly, people consume cannabis via edibles or infused drinks).

## CBD

CBD, the abbreviation for cannabidiol, is one of the non-intoxicating ingredients in cannabis. It is present in both agricultural hemp and medical cannabis. It is thought to offer wide-ranging health benefits, with few side effects and low risk of addiction or abuse. The ailments it is used to treat include skin conditions such as dermatitis or psoriasis, PMS, arthritic inflammation, epilepsy and other types of seizure disorders.

## THC

THC, the abbreviation for tetrahydrocannabinol, is the main psychoactive component of the cannabis plant. It is the primary element creating the 'high' associated with recreational cannabis use. Research indicates that THC may be used in treating the side effects of chemotherapy (nausea and vomiting), MS, HIV/AIDS, spinal injury, chronic pain, inflammation and digestive problems.

## Hemp

Hemp, or industrial hemp, is defined as registered strains of the cannabis sativa plant subspecies grown for a number of industrial and commercial uses. Hemp is utilised for extraction of cannabinoids and can be refined into various commercial products that do not contain cannabinoids. Overall THC levels in industrial hemp are usually very low – less than 1%, and typically around 0.2% to 0.3%.

# MARKET OVERVIEW

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In 2018 Poland was home to a population of almost 38 million; gross domestic product (GDP) in the same year was US\$586 billion. Contributing to this is a boom in cannabis-related activity currently under way in Poland. In a landslide poll victory of 440 votes in favour, two opposed and one abstention, Poland became the 12th European country to legalise the use of medical cannabis on 22 June 2017. The country has a centuries-old tradition of industrial hemp cultivation – which, if not for the rising global interest in cannabis and hemp-derived products, was well on its way to extinction.

Over the past few years there has been a flurry of commercial activity related to growing, production, marketing and sale of industrial hemp-based products. It is estimated that on average, just over one industrial hemp-related business opens per day in Poland, with entrepreneurs looking to sell hemp-based products such as CBD oil, cosmetics, soaps, food, drink and building materials. In a landmark event, HemPoland, a Polish manufacturer and marketer of premium organic CBD oils, was acquired by a Canadian cannabis company, The Green Organic Dutchman Holdings Ltd (TGOD), in a multimillion dollar transaction in August 2018.

Nonetheless, there are still many challenges facing the Polish cannabis market. Regulation can be confusing and inconsistent, and there is still much to be done to educate politicians, physicians and citizens about the benefits of cannabis. Although medical cannabis formally became legal to purchase from registered pharmacies on 1 November 2017, it was not until December 2018 that it actually became available in Poland. Since the Polish government did not legalise the domestic cultivation of medical cannabis, it must be imported into the country from foreign producers, which must officially be approved by the government. While this has created opportunities for major global cannabis suppliers, it has severely limited supply and led to exponentially higher costs for patients.

# REGULATORY ENVIRONMENT

- 1 Although there is support from some fringe political parties, recreational cannabis remains illegal.**
- 2 Since 2017 physicians have been able to prescribe medicinal cannabis. They do not need special permits to do so and there is no definitive list of health conditions for which it can be prescribed.**
- 3 Industrial hemp cultivation and the production, sale and consumption of the products that can be derived from it, including CBD, are legal in Poland so long as the THC content does not exceed 0.2%.**

## BACKGROUND AND CONTEXT

Possession or use of recreational cannabis is illegal in Poland.

In the summer of 2017 Poland's lower house of parliament voted overwhelmingly in favour of making medical cannabis legal 'under certain circumstances'.

Current legislation does not provide for domestic cultivation of cannabis for medical purposes. As a result, the ingredients for cannabis-based medicines must be imported, which greatly increases costs for patients in Poland. The Polish Ministry of Health did not grant any foreign producer of medical cannabis permission to export to Poland until October 2018. Although unlikely to result in notable savings, the legalisation of medical cannabis gave qualified patients who could not access cannabis in Poland the right to travel to other EU countries where medical cannabis is legal, to fill their prescription if they could not do so in Poland.

Cultivation of industrial hemp and most of the products that can be derived from it is legal in Poland. By 2014 just 100 hectares were cultivated in Poland. Things have changed dramatically in recent years, however, and the amount of land dedicated to industrial hemp production is once again rising rapidly.

### Hemp growth in Poland, 2016–2018

	2016	2017	2018
<b>LICENCES GRANTED</b>	84	92	124
<b>AREA DECLARED (HA)</b>	678.78	740.25	1,219.22

Source: Official statistics on the Single Payment Scheme in Poland

## CURRENT LAWS AND REGULATIONS

### Medical cannabis

Since 1 November 2017 it has been legal for any physician in Poland to prescribe medical cannabis. No special licences are required. Once a product has been successfully registered with the Office for Registration of Medical Products, patients can fill their prescriptions at any registered pharmacy. However, highly restrictive legislation meant that it was not available in pharmacies until December 2018.

Domestic cultivation and production of medical cannabis products remain illegal in Poland. As a result, all medical cannabis is imported.

### Recreational cannabis

Poland has some of the strictest laws in Europe when it comes to recreational use of cannabis containing anything more than trace levels of THC. It is illegal to grow cannabis plants for personal use, and possession of any amount of illegal cannabis is punishable by a fine and/or a prison sentence. As of December 2011, prosecutors and judges may use their discretion to drop or reduce charges for cases involving very small amounts of illegal cannabis. In addition, sentenced users may, under certain circumstances, receive treatment in lieu of punishment.

### Industrial hemp

Industrial hemp cultivation and the production, sale and consumption of the products that can be derived from it, including CBD, are legal in Poland so long as the THC content does not exceed 0.2%. According to industry sources, the 0.2% THC content threshold is an industry self-imposed standard which was put in place due to a lack of clarity and consistency from regulators about accepted levels.

## MAIN REGULATORY BODIES

### Medical cannabis

**IS REGULATED BY THE POLISH MINISTRY OF HEALTH (MINISTERSTWO ZDROWIA RZECZYPOSPOLITEJ POLSKIEJ) VIA THE CHIEF PHARMACEUTICAL INSPECTORATE.**

### Industrial hemp products

**(INCLUDING CBD) ARE REGULATED BY THE POLISH FOOD AND NUTRITION COMMISSION (GŁÓWNY INSPEKTORAT SANITARNY).**

Poland is a member state of the European Union, and must adhere to EU regulations regarding novel foods. According to the European Commission, certain cannabis sativa hemp seed products, such as seeds, seed oil, hemp seed flour and defatted hemp seeds, have a history of consumption prior to 15 May 1997 and are not considered novel foods. Other hemp-derived products that do not fit this description cannot be introduced on to the market without first following procedures detailed in Regulation (EU) 2015/2283 of the European Parliament and of the Council of 25 November 2015.

## IMPORT STANDARDS

Under current legislation, cannabis from imported plants to be processed at Polish pharmacies is permitted as long as it has been registered with the country's Office for Registration of Medicinal Products. Before being sold through registered pharmacies, the medical cannabis must first be filed with the Office for Registration of Medicinal Products.

### Legislation on the marketing of cannabis products

Products derived from industrial hemp, including CBD, are currently governed by the same laws that control the marketing of products in the respective industries. Industries using hemp include cellulose and paper, food, dietary supplements, cosmetics, building materials and textiles.

Labelling of CBD-based products must be in line with the rules set out in:

- the Polish Act on Food and Nutrition Safety
- Polish Regulation of the Minister of Health on the Composition and Labelling of Dietary Supplements
- Polish Regulation of the Minister of Agriculture and Rural Development on the Labelling of Foodstuffs
- Regulation (EC) No. 1924/2006 of the European Parliament and Council of 20 December 2006 on nutrition and health claims related to food
- Commission Regulation (EU) No. 432/2012 of 16 May 2012.

The labelling and marketing of hemp seed products cannot suggest any therapeutic benefits, nor indicate the presence of therapeutic compounds such as CBD.



# LICENCES AND AVAILABILITY

- 1 **The ban on domestic cultivation forces companies to rely on importing raw cannabis materials.**
- 2 **Canadian giants Canopy Growth and Aurora are both looking to gain a European foothold through opportunities in Poland.**
- 3 **Companies applying to import medical cannabis to Poland must also be in a position to distribute it if they are to qualify for a licence. This has led to a series of recent partnerships between Canadian wholesalers such as Cronos Group and Polish distributors such as Delfarma.**

The first processing licence was granted to Pharmacann Polska (now Pharmacann International) in 2019, paving the way for the first production of medical products from raw imported cannabis. In March 2019 the firm signed a deal to export processed products to a German company, Farmako. Though this deal has since fallen through, it clearly signals the company's intent to produce for markets beyond Polish borders.

## NUMBER OF LICENCES ISSUED

### Cannabis licences issued, 2017–2019

	2017	2018	2019 (TO DATE)
<b>CULTIVATION</b>	Law prohibits cultivation	Law prohibits cultivation	Law prohibits cultivation
<b>PROCESSING</b>	–	–	Pharmacann Polski
<b>IMPORT/EXPORT</b>	Only government bodies	Aurora Cannabis	Aurora Cannabis, Spectrum Cannabis Polska (a subsidiary of Canopy Growth Corp.), Cronos Group and Experion Holdings Ltd
<b>PRESCRIPTION</b>	All doctors have discretion	All doctors have discretion	All doctors have discretion
<b>DISTRIBUTION (TO PHARMACIES, HOSPITALS, ETC.)</b>	–	Spectrum Cannabis	Spectrum Cannabis, Delfarma. Sp. Zo.o (applied for a distribution licence)
<b>RETAIL</b>	All pharmacies and hospitals may distribute	All pharmacies and hospitals may distribute	All pharmacies and hospitals may distribute

Source: Prohibition Partners

## LICENSING CONDITIONS FOR INDUSTRIAL HEMP

### Cultivation of industrial hemp in Poland

In order to grow hemp in Poland, an applicant must meet the following conditions:

- **a clean criminal record for the offences referred to in Articles 63–65 of the Polish Act on Counteracting Drug Addiction**
- **industrial hemp may only be cultivated in designated areas according to the stipulations of the permit for cultivation, using seeds of an elite or certified category**
- **a cultivation contract is in place with an entity authorised by the Regional Marshal to purchase hemp**
- **technical and infrastructure measures must be in place to ensure hemp is not used for unlawful purposes.**

### Sourcing and marketing of wholesale industrial hemp

To source and market wholesale industrial hemp, a purchase agreement must be in place with an authorised industrial hemp cultivator (for the entire harvest or part thereof).

### Processing of industrial hemp for food, beverages, diet supplements and medical products

Processing of industrial hemp is only possible for entities that have secured permission to cultivate or purchase it. Any plans to process industrial hemp must be presented to the relevant regional authority. Any other permissions granted will depend on the type of product being created. In Poland, industrial cannabis can only be processed for textiles, chemicals, cellulose and paper, food, cosmetics, pharmaceuticals, building materials and seed industries.

### Retail sale of industrial hemp products, including CBD

According to the Polish Act on Food and Nutrition Safety, an entity wishing to sell industrial cannabis products in retail outlets must first submit an application to the Polish Register of Establishments. The same entity would be subject to the control of the Polish Food and Nutrition Commission (Główny Inspektorat Sanitarny).

# HEALTHCARE ANALYSIS

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- 1 An estimated 10 million people in Poland are living with chronic pain. If just 1% of chronic pain sufferers in Poland were prescribed medical cannabis by their doctor, it would equate to an additional 100,000 medical cannabis patients and up to 400,000 medical cannabis prescriptions.**
- 2 Prices of medicinal cannabis remain artificially high, since domestic cultivation is not permitted and therefore Poland must rely on imports to meet current demand. If legislation were amended this would create significant opportunities for investors going forward.**
- 3 Of the 15,000 registered pharmacies in Poland, approximately 90% are authorised to distribute medical cannabis.**

When medical cannabis became legal in Poland in 2017, the estimated number of patients who could potentially benefit ranged from 300,000 to 1 million. It is estimated that more than 400,000 patients had registered for medical cannabis treatment by 2019.

## REIMBURSEMENT FROM HEALTH INSURANCE PROVIDERS

It is possible for the cost of medical cannabis to be covered under statutory health insurance. A full refund for pharmaceutical cannabis may be obtained with permission from the Ministry of Health under the 'destined import' scheme.

## MAIN CONDITIONS TREATED

Legislation in Poland does not contain a definitive list of health conditions for which medical cannabis can be prescribed. As a result, doctors in Poland are free to prescribe medicinal cannabis to patients as they see fit. The guidance broadly given to doctors is that it should be prescribed as a last resort.

Spectrum Cannabis has estimated that some 60% of medical cannabis will be prescribed to patients who experience chronic pain (often associated with cancer or migraines), while the remaining 40% will treat diagnosed conditions, such as MS and epilepsy. A large-scale survey conducted in 2006 found that 27% of Polish people surveyed experienced some form of chronic pain. This is the second highest rate in the European Union. It equates to more than 10 million people in the population who are living with chronic pain. This could drive the number of medicinal cannabis patients in Poland up by some 100,000 people (the equivalent of just 1% of chronic pain sufferers). The 2006 survey also identified a higher than average rate of MS sufferers, at 0.115% of the population. This equates to almost 110 people per 100,000 population. The average age-adjusted rate across Europe is 106 sufferers per 100,000 population, thus Poland is a high-risk

area for MS. Similarly, the epilepsy prevalence rate in Poland, at 1% of the population (more than 380,000 citizens), is higher than the global prevalence rate of 0.638%.

## PHARMACEUTICAL PRODUCTS

There are three main cannabis medications approved in Poland: Bediol, Bedrocan and Sativex. Sativex, a cannabis-derived sublingual spray, has marketing authorisation and was available in Poland prior to the legalisation of medical cannabis in 2017, meaning prescriptions were available from doctors. Other cannabinoid-containing medicinal products can be made available to patients on a special named-patient basis.

In October 2018 Spectrum Cannabis Polska received authorisation to start importing Red No. 2, a high-THC dried whole-flower product (see the section on ‘Company activity’).

In early September 2019 Polish authorities halted the registration of any new medical cannabis products. The reasons behind this decision are unclear. However, with a general election tabled for October 2019, this setback may be only temporary. Companies which have already registered their products in Poland are likely to benefit from the freeze on new product registration.

## PRICES/COST OF PRODUCTS

Due to the fact that medical cannabis cannot be produced domestically, the price of cannabis in Poland is high. In 2019 the Polish Pharmaceutical Chamber estimated that a gram of medical cannabis costs in the region of 65zł (US\$17). This is in keeping with 2018 figures from Spectrum Cannabis. However, import costs could see this figure almost triple to 185zł (US\$48) per gram. As a result, a monthly course of treatment with medical cannabis could cost a patient between 2,000zł (around US\$500) per month and 5,700zł (US\$1,500).

Sativex is only available in two pharmacies in Warsaw, and three 10ml containers cost from 2,678zł to 2,693zł (around US\$670). Detailed price information about Bediol and Bedrocan is not available.

If domestic cultivation and production of medical cannabis were legalised, it is likely that the cost of cannabis in Poland would reduce significantly. Based on comparable figures from the US-based RAND Drug Policy Research Center, the cost of producing one gram of legal medical cannabis in Poland is estimated to be as little as 4.5zł (around US\$1.12).

## SUPPLY CHAIN

Domestic cultivation of medical cannabis is illegal in Poland, thus all cannabis used for medicinal purposes must be imported via licensed foreign wholesalers to registered Polish pharmacies for processing and filling prescriptions. Of the 15,000 registered pharmacies in Poland, approximately 90% are authorised to distribute cannabis.

At present, the licensed medical cannabis wholesale suppliers exporting their products to Poland include:

- Aurora Cannabis Inc.
- Spectrum Cannabis Polska (a subsidiary of Canopy Growth Corp.)
- Experion Holdings Ltd
- Cronos Group.

## RETAIL

Medicinal cannabis is distributed via registered pharmacies, while products derived from industrial hemp, including CBD products can be purchased legally from any participating retailer.

# COMMERCIAL OPPORTUNITIES

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- 1 The Polish medicinal cannabis market could be worth €2 billion by 2028.**
- 2 With no domestic cultivation of medicinal cannabis, there have been significant opportunities for international companies to supply demand.**
- 3 EU subsidies, coupled with rising demand for CBD, have underpinned growth in the Polish hemp industry.**

	2028
MEDICINAL CANNABIS	€2.0b

Source: Prohibition Partners

There is currently a boom in cannabis-related business activity in Poland. The bulk of commercial activity centres on industrial hemp, which is legal to cultivate, process, market and consume in Poland. At the moment, recreational cannabis is illegal and medical cannabis cannot be cultivated domestically. As a result, the more lucrative opportunities in the latter segment are only available to foreign producers of medical cannabis. This is a frustrating situation for Polish entrepreneurs.

In recent years there has been an increase in the numbers of foreign and domestic companies investing in the cultivation, production and sale of all types of hemp-based products, such as CBD oil extracts and capsules, hemp seeds, cooking oils, hemp fibres for textiles, building materials and hemp-based cosmetics. Rising demand for industrial cannabis-based products has also opened up opportunities for Polish companies to export cannabis-related technologies. For example, Polish scientists have been developing innovative techniques in the extraction of CBD from hemp, while entrepreneurs are working to develop hempcrete, a fire-resistant building material.

Increased interest in cannabis around the world and the availability of EU subsidies of up to €480 per hectare for organically farmed hemp are creating opportunities for Polish farmers. In recent years there has been a sharp increase in industrial hemp cultivation in Poland; indeed, in 2016 it was reported that the Agriculture Ministry had reserved nearly 5,000 hectares for such cultivation in anticipation of rising demand. According to the most recent figures available, from 2016 to 2018 the cultivation of industrial hemp in Poland rose significantly (see 'Regulatory environment' section). HemPoland (see 'Key players' section below), a Polish cultivator and manufacturer, farmed 81.08% of Poland's hemp in 2017, according to government records. It was sold in 2018 for \$15.5 million to a Canadian company, TGOD Holdings. Some industry stakeholders project that Polish cultivation could increase to 5,000 hectares by 2020, opening the floodgates on future opportunities for investors.

# COMPANY ACTIVITY

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- 1 Canadian giants lead company activity in the country through strategic partnerships and subsidiary advances.**
- 2 Hemp continues to be a key focus for companies operating in the country, with product launches in consumer goods categories and industrial hemp products such as hempcrete and fuel.**
- 3 The political parties all support a legal medical cannabis market, but only a handful support the legalisation of a recreational market.**

On 6 August 2019 Global Cannabis Applications Corp. (GCAC), a leading developer of innovative data and artificial intelligence technologies for the medical cannabis industry, announced the funding of its strategic partner Sequoya Cannabis Ltd by MMJ Group Holdings Ltd, a global cannabis investment company. MMJ invested CA\$2.5 million in Sequoya Cannabis, a privately held Polish/Canadian cannabis extraction company. As part of a licensing agreement announced in May 2019, Sequoya has the exclusive right to market GCAC's Citizen Green Prescription Patient-Care Solution to over 13,700 pharmacies in Poland.

In May 2019 Katowice-based hemp firm Herbs & Hydro launched a range of hemp bar shampoos. In addition to a plain hemp formula, the shampoos come in five varieties: may chang (an Asian evergreen), mango, coconut, raspberry and Palo Santo (a mystical tree that grows on the coast of South America).

On 21 January 2019 it was announced that Canopy Growth's Toruń-based subsidiary, Spectrum Cannabis Polska, had completed the first import of its high-THC whole-flower product Red No. 2, to Poland.

On 25 October 2018 Canadian company Aurora Cannabis announced that it was the first foreign company to be granted an import permit to supply medical cannabis to Poland by the Polish Ministry of Health. Medical cannabis will be imported into the country via its Aurora Deutschland GmbH subsidiary. The first shipments of medical cannabis were delivered to a pain treatment centre and a hospital in Warsaw.

On 8 October 2018 Grupa Lotos, Poland's government-owned petroleum firm, announced that it had agreed to partner with the state-owned Institute of Natural Fibres and Medicinal Plants to produce bioethanol from hemp.

On 21 August 2018 Canadian cannabis company TGOD announced that it had reached an agreement to acquire 100% of the issued and outstanding shares of privately held HemPoland, a Polish manufacturer and marketer of premium organic CBD oils, in an immediately accretive cash and share transaction. The acquisition cost consisted of US\$7.75 million in cash and 1,968,323 restricted TGOD shares, with an additional US\$10.3 million (CA\$13.5 million) cash investment for rapid European expansion.

## KEY PLAYERS

### Aurora Cannabis Inc.

Headquartered in Edmonton, Alberta, Canada, Aurora Cannabis is a leading global cannabis company operating in 25 countries, including Poland, as of October 2019. The company is active in all key segments of the value chain, from facility engineering and design to cannabis breeding and genetics research, cannabis and hemp production, derivatives, high value-added product development, home cultivation and wholesale and retail distribution. Aurora operates a pan-European company, Aurora Europe GmbH, which is headquartered in Berlin, Germany. In August 2019 the Office for Registration of Medicinal Products, Medical Devices and Biocides in Poland released the marketing authorisation for four of Aurora Cannabis's products. The move is expected to expand access to medical cannabis significantly for Polish patients. Shipment of the new Cannabis Flos products is expected to start in late 2019.

### HemPoland (CannabiGold)

HemPoland is a Polish company founded in 2014, and a leading European manufacturer and marketer of premium organic CBD oils under the CannabiGold brand. The company was the first in Poland to secure a state licence to grow hemp and manufacture CBD oil products. In 2017 HemPoland produced over 32,000 kilograms of organic dried flower and 310 kilograms of organic CBD oils. The company has over 506 hectares under cultivation, leveraging third parties and multiple commercial-scale extraction units. It has local distributors in Poland, Austria, the Netherlands, Germany, the United Kingdom, Italy, Switzerland, Portugal, Ireland, the Czech Republic, Slovenia, Lithuania and Estonia, selling its products in over 700 locations.

### Sequoia Cannabis

Sequoia Cannabis Ltd is a privately held Polish/Canadian cannabis extraction company, which is officially headquartered in Toronto but has its main operations in Krakow, Poland.

According to the company, plans are in place to establish an organic hemp farm spanning over 121 hectares in Poland in 2020. It also claims that prime agricultural land options have been identified and are currently being negotiated. The principal goal of this endeavour is to secure total independence from market supply and prices, ensuring the consistency and control of CBD-rich organic biomass and enabling the production of pure 99% isolate and other raw CBD oil extract products. Once this is completed, the company's European hemp extract facilities will be relocated directly to the new farm. Sequoya hopes this will result in a threefold increase in production to close to 500 kilograms of pure 99% pharma-grade isolate or 350 kilograms of isolate and 250 kilograms of raw full-spectrum CBD extract oils.

### Spectrum Cannabis Polska (subsidiary of Canopy Growth Corporation)

Based in Toruń, Poland, Spectrum Cannabis Polska is one of several Spectrum Cannabis branded operations around the world, all of which are owned subsidiaries of Canopy Growth. The subsidiary operations are dedicated to providing medical cannabis for patients and healthcare practitioners. Spectrum Cannabis products are available in a wide range of potencies and formats designed to simplify discourse around strength and dosage by applying a colour-coded spectrum to categorise medical cannabis according to THC and CBD levels. The product line-up includes whole-flower cannabis, oils and softgels.



## POLITICAL PARTIES

- **Law and Justice (Prawo i Sprawiedliwość):** the present ruling party is pro-medical cannabis legalisation and currently opposes legalisation of recreational cannabis.
- **Civic Platform (Platforma Obywatelska):** the main opposition party is pro-medical cannabis legalisation but does not currently support recreational cannabis legalisation.
- The **Confederation Freedom and Independence (Konfederacja Wolność i Niepodległość)**, **Democratic Left Alliance (Sojusz Lewicy Demokratycznej)** and **The Modern (Nowoczesna)** are supporters of medical cannabis.
- **Your Movement (Twój Ruch)** and **Kukiz'15** support the legalisation of both medical and recreational cannabis.

## CANNABIS LOBBY AND ADVOCACY GROUPS

Although Poland has seen some significant changes in cannabis legislation in the past few years, there are not many well-known organised political lobbying groups. There have, however, been many notable cannabis advocates influencing change in the country.

- **Wolne Konopie (Free Cannabis Initiative)** ([wolnekonopie.org](http://wolnekonopie.org)).
- **Koalicji Medycznej Marihuany (Medical Marijuana Coalition)** ([medycznamarihuana.org.pl](http://medycznamarihuana.org.pl)).
- **Polish Institute of Cannabis** ([pimc.pl](http://pimc.pl)).

## INFLUENCERS

- **Andrzej Dolecki:** a former politician who founded Wolne Konopie (Free Cannabis Initiative).
- **Dorota Gudaniec:** the mother of a boy with Downs' syndrome and severe epilepsy, her public struggle to obtain cannabis-based medication for her son attracted widespread attention and sympathy. Her advocacy efforts for the rights of patients in need of treatment was highly influential in the legalisation of medical cannabis in Poland.
- **Maciej Kowalski:** one of Europe's most widely respected CBD experts. He is the founder and CEO of HemPoland, a leading European manufacturer and marketer of premium organic CBD oils, recently acquired by Canadian cannabis company TGOD.
- **Piotr Krzysztof Liroy-Marzec, aka Liroy:** this former rapper turned politician has played a leading role in campaigning for the complete legalisation of cannabis in Poland. Although it was significantly diluted, he was responsible for putting forward the initial bill calling for the legalisation of cannabis in February 2016, which eventually resulted in the legalisation of medical cannabis from 1 November 2017. He also helped to establish the Polish Institute of Cannabis, which provides medical professionals with educational materials on cannabis medicine.
- **Jarosław Sachajko:** MP for the Kukiz'15 movement, and an active leader in attempting to reform cannabis legislation in Poland.
- **Michael Klepacz:** this American entrepreneur is the CEO and founder of Natural Materials Unlimited, and is considered one of the most prominent cannabis experts in Poland.

# BRIEF OVERVIEW OF CANNABIS IN OTHER PARTS OF CENTRAL AND EASTERN EUROPE

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A brief examination of the cannabis market in nearby countries reveals that Poland shares many similarities with Germany, which formally legalised medical cannabis in 2017, the same year as Poland. Poland is something of a laggard compared to countries like Austria and the Czech Republic, which adopted more liberal policies towards both recreational and medical cannabis several years before Poland. However, when compared to neighbouring Slovakia and Ukraine, where all types of cannabis remain illegal, it is evident that Poland's position is more progressive.

## AUSTRIA

In Austria, cannabis cultivation for medical and scientific purposes has been legal since 2008. Recreational cannabis use is illegal, although possession of small amounts was decriminalised in 2016. In December 2018 regulators in Austria moved to ban the sale of food and cosmetics containing CBD, claiming that the quality of products is uncontrolled and sales had got out of hand.

## GERMANY

The situation in Germany has many parallels to Poland. Recreational use of cannabis is illegal, but prosecutors have the option to drop charges for possession of small amounts. Medical cannabis has been legal since 2017, but, as in Poland, patients have very limited access to it.

## CZECH REPUBLIC

Compared to Poland, the Czechs take a more progressive and pragmatic approach to cannabis legislation. Recreational cannabis is illegal, but personal possession has been decriminalised for amounts up to 15 grams since 2010. Medical cannabis has been legal since 1 April 2010.

## SLOVAKIA

Cannabis is illegal in Slovakia, and the country has very strict laws against its use. However, a law which would make CBD legal is due to come into place from 1 January 2020.

## UKRAINE

Cannabis is illegal in Ukraine, but the country is on its way to legalising medical cannabis. In an April 2019 interview with RBC-Ukraine, President Volodymyr Zelenskyy stated he supports the legalisation of medical cannabis. Meanwhile, a petition calling for the legalisation of medical cannabis was registered in the Ukraine parliament on 20 May 2019.

# GLOSSARY

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<b>CBD</b>	cannabidiol
<b>EC</b>	European Commission
<b>EU</b>	European Union
<b>GCAC</b>	Global Cannabis Application Corp.
<b>ha</b>	Hectares
<b>MS</b>	multiple sclerosis
<b>TGOD</b>	The Green Organic Dutchman Holdings
<b>THC</b>	tetrahydrocannabinol

