

The Lithuanian hemp regulation: new amendments and the risk of commercialization

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Public-health and drug-policy perspective

Europe faces significant security, health and social challenges linked to the trafficking and use of illicit drugs.

This profoundly impacts the safety and security of our towns, cities, and local communities.

Growing, sophisticated and violent drug markets contribute to increased crime, dependency, overdoses, the spread of infectious diseases, and environmental degradation, destabilising communities, and straining public resources.

Illicit drug production, trafficking and distribution is a growing and evolving global criminal business. In the EU, half of the most dangerous criminal networks engage in drug trafficking, and over two thirds use violence.



Brussels, 4.12.2025
COM(2025) 743 final

**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN
PARLIAMENT AND THE COUNCIL**

on the EU Drugs Strategy

The new Strategy and accompanying Action Plan sets out specific actions and measures on **supply reduction**, against **drug trafficking**, to be implemented by EU Member States, the EC and its relevant structures.

The Law on Hemp in Lithuania from 2013 – up to legal THC exports in 2026

2013-2014	Law adopted; main provisions effective from January 2014.
2014-2020	Expansion of hemp growing area; foreign investments in hemp factories;
2021-2022	Amendments allowing wider use of hemp plant parts and no numerical limit concentrated intermediates
2023	Allowed crop THC threshold increased to 0.3%
2024	Introduction of screening before licencing, request and documenting origin information
2025	definitions and controls revised from November, control mechanism with no implementation resources
2026	Amendment allowing explicit destination-based export THC limits in intermediate goods coming into force from July the 1st.

Promises of investment and innovation



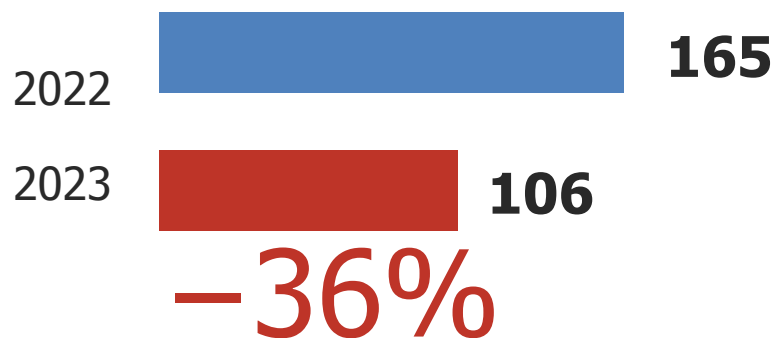
- Investment and new export
- focused products used to justify liberalization
- Current products include cosmetics, food and fodder with CBD content;
- Commercial opportunity requires measurable public health protection.

Hemp area in Lithuania: contraction and recovery

from **283** ha in **2013**

	2017	2018	2019	2020	2021
Ha	2479	3921	9182	5285	4780

Growers



Declared area ▪ hectares



UNCLEAR ECONOMIC INCENTIVE

NTAKK's warning: intermediates and control

- NTAKK raised concerns with the Lithuanian Parliament in 2020.
- In 2021 NTAKK sent a letter of concern to the Commission questioning control measures for the higher THC level intermediates and control.
- The central issue was material between the crop and the finished product, which was not covered by control regulation.

No. SR-20211028-01

To:

Date: 2021-10-28

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Dear Sir/Madam,

Lithuanian Tobacco and Alcohol Control Coalition sends this urgent letter of concern regarding the Law of the Republic of Lithuania amending Law No. XII-336 On Hemp (hereinafter – The Law), which is coming into effect on October 28, 2021. The Law will create a unique situation in the EU by legalizing production of unlimited amount of tetrahydrocannabinol (THC) extracts. The Law poses diverse risks to public health and safety of the citizens of EU.

When it comes into effect on November the 1st, 2021 The Law will create a unique situation in the EU by legalizing production of unlimited amount of tetrahydrocannabinol (THC) extracts. The Law

The Commission's response — 6 April 2022

“not to liberalise the use of cannabis”

- The reply stressed limits on finished products.
- It stated that the notification procedure had closed after the adopted text was communicated on 29 June 2021.



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MIGRATION AND HOME AFFAIRS
Directorate D – Internal Security
D.5 – Organised Crime and Drugs
The Head of Unit

Brussels
HOME.D.5/PM

Ms Nijole Gostautaitė Midtun
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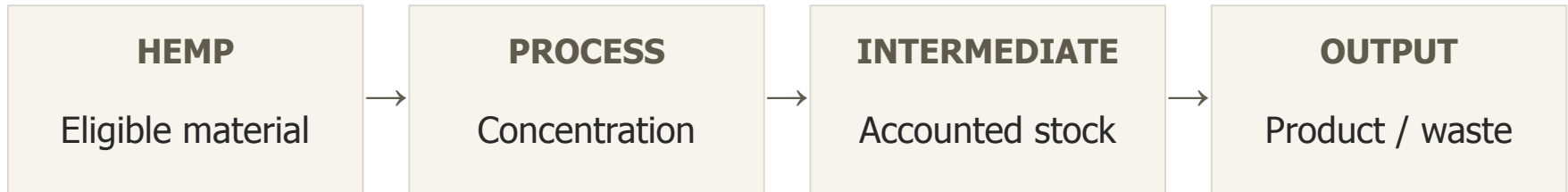
Dear Ms Gostautaitė Midtun,

I refer to your letter dated 28 October 2021 concerning the Law of the Republic of Lithuania amending Law No. XII-336 on fibre hemp. This law has been notified under the scope of Directive (EU) 2015/1535¹. According to the information provided by the national authorities and the draft version of the Law, it lays down requirements for the cultivation and processing of hemp and for the market placement of hemp products and articles.

Response reproduced in the 2022 presentation
Historical correspondence

A reassurance about finished goods did not resolve issues about intermediates. The EC also accepted the final document, without verifying if the raised issues were addressed.

Intermediates: no specified numerical limit



- Above 0.2% THC: the cited manufacturing route requires a permit.
- Intermediates must be accounted for and used for compliant output or managed as waste.
- Domestic products supplied for further manufacture have a separate 0.3% ceiling.
- “No numerical limit” for the export of intermediaries

The new export rule – higher THC content justified by the destination

LITHUANIAN MARKET

0.2%

General finished-goods upper limit 0.3% THC

OUTWARD SUPPLY

Destination country's limit

From 1 July 2026

Czechia

Finished-goods upper limit	Hypothetical hemp extract	Conditional extract threshold
0.2%	0.5%	1%

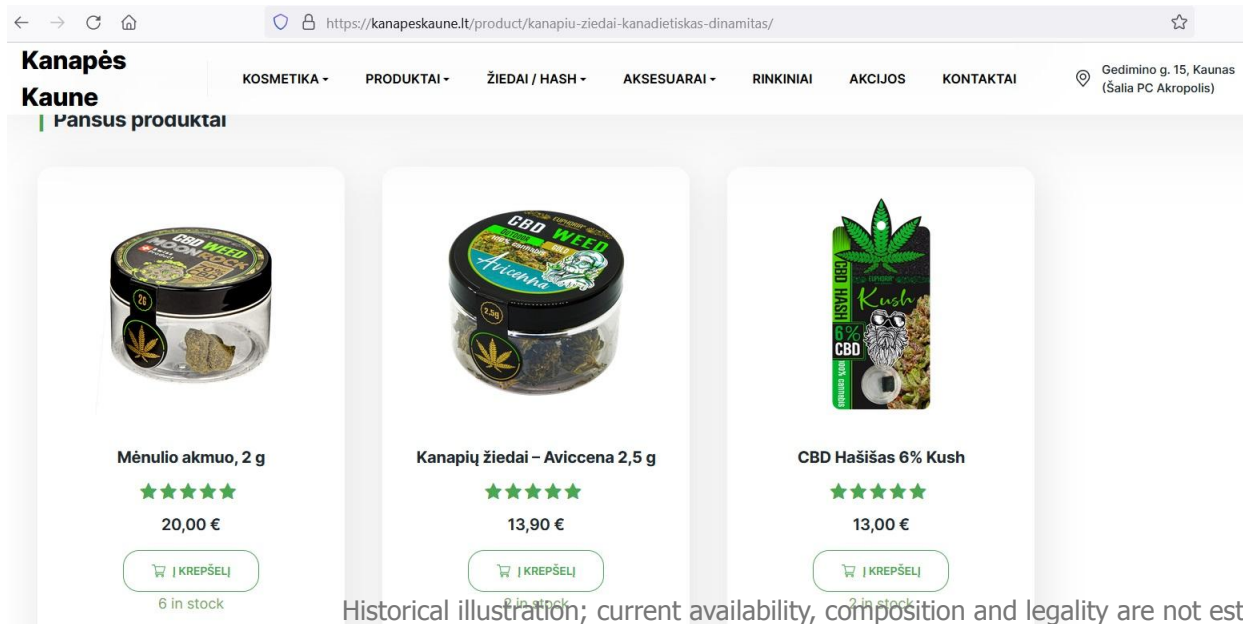
Limited or lack of process for controlling exports destination and purpose.

What Lithuania's hemp industry markets today

Company	Product portfolio	Control
Biosyyd	CBD ingredients, oils, capsules, cosmetics	International business is self-reported
Sanobiotec	Bulk CBD isolates	Self reported
Kanapės galia	Full-spectrum oils / extracts	Batch verification for THC content on paper (relying on self-reporting)
Allive	Seed foods, oil and protein	Batch verification for THC content on paper (relying on self-reporting)
Panevėžio aruodas	Fiber, biomass, oils, protein	Limited batch verification

Lithuania is a major European exporter of **raw materials**—namely industrial hemp stalks, fiber, biomass, and hemp seeds (exporting raw true hemp volumes to regional partners like Poland and Spain) for processing;

“Promised economic innovation”: the retail reality



Historical illustration; current availability, composition and legality are not established



CBD drops 30% concentration

30% Full Spectrum CBD drops are the most potent concentrations available, with no purification of any of the plant material, which makes the cannabinoids interact with each other for excellent results. The pure raw cannabis extract is used.

English

Hemp for smoking—and now cannabinoids in vapes



HISTORICAL MARKETING EXAMPLE
Screenshot from the 2022 deck

- Lithuania specifies zero THC for herbal smoking products, e-cigarettes and refills.
- European monitoring reports vapes containing synthetic and semi-synthetic cannabinoids.
- Appearance and labeling do not establish what is inside.

A familiar device can deliver an unfamiliar substance.

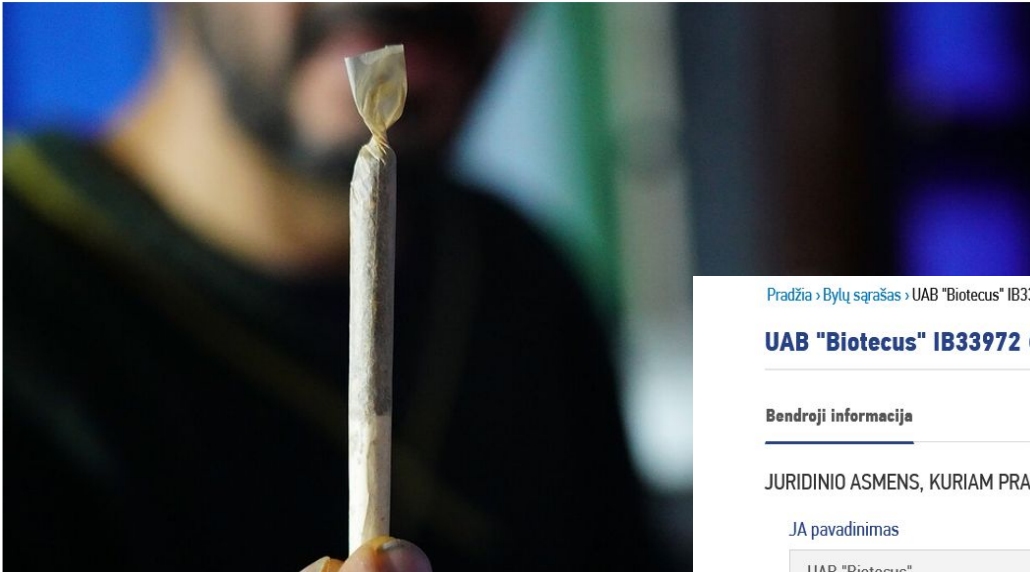
Biotechnological „innovation“ – selling joints under disguise of tea-bags

Verslas 2026.05.24 21:49

Teismas: kanapių suktinėmis prekiaavusi „Biotecus“ nubausta teisėtai



Evelina Paškovskytė, BNS
2026.05.24 21:49



- Legal case since 2023;
- Excess of THC;
- Purpose smoking;
- Infringement of Tobacco Control Law
- Etc.
- Bankruptcy in 2026

[Pradžia](#) > [Bytų sąrašas](#) > UAB "Biotecus" IB33972 (JA bankrotas)

UAB "Biotecus" IB33972 (JA bankrotas)

Bendroji informacija

JURIDINIO ASMENS, KURIAM PRADĖTAS BANKROTO PROCESAS NE TEISMO TVARKA, DUOMENYS

JA pavadinimas

UAB "Biotecus"

Buveinės adresas

Vilnius, J. Savickio g. 4-7, LT-01108

JA kodas

305659694

Savivaldybė

Vilnius

Promises of hemp CBD

Biossyd.

[EU GMP \(API\)](#) [Products](#) [Services](#) [Certificates](#) [About](#) [Contact](#)

Repair and Rejuvenate.

Biossyd is proud to offer a wide range of Industrial Hemp-based wellness solutions for customers around the world. With full vertical integration and a commitment to innovative cannabinoid science, we offer the highest quality **Natural Cosmetics.**

Cosmetics play an important role in personal care and appearance, but the type of cosmetics a person uses can have a significant impact on their skin and overall health. Natural Cosmetics offer a range of benefits over conventional cosmetics, including fewer potentially irritating chemicals, a more eco-friendly production process, nourishing ingredients, the absence of harmful additives, better suitability for sensitive skin, and a promotion of a

CBD for cosmetic products is mostly imported.

CBD issue in Lithuania. No export, just imports

- CBD derived from hemp can be used legally in EU, while regulation depends on the specific product use (ingestible, cosmetics, medicines, etc.);
- China introduced CBD precursor controls in September 2024;
- EUDA reports CBD use in production of some semi-synthetic cannabinoids and a 2026 precursor assessment;
- NO mechanism for controlling of diverting CBD use for conversion to THC.

The commercialization risk is clearest in semi-synthetic cannabinoids

CBD / LOW-THC HEMP

INPUT

Abundant CBD extracted from low-THC hemp can serve as a precursor.



CHEMICAL CONVERSION

CONVERSION

HHC and other semi-synthetic cannabinoids have been produced from CBD.



CONSUMER FORMATS

RETAIL

EUDA reports flavoured vapes, edibles and sprayed low-THC cannabis, including online and physical retail.

- By end-2025, EUDA had identified 40 semi-synthetic cannabinoids on European drug markets.
- Products can vary substantially in identity and concentration; undeclared cannabinoids have been detected.

Lithuania's youth vaping environment is a vulnerability

According to ESPAD 2024 in Lithuania **51%** lifetime e-cigarette use, **31%** first e-cigarette use at age 13 or younger

ESPAD measures e-cigarette use among 15–16-year-old students. It does show a **large population already familiar with a discreet inhalation platform.**

EUDA reports that cannabinoid vapes are spreading in Europe and may attract new, possibly younger consumers. **Device familiarity lowers the behavioral barrier** even when the substance is different.

In June 2026 Lithuanian Government announced institutional reform, that will eliminate Drug, tobacco and alcohol control department and re-distribute it's functions

BNS

Lietuvių

Registruotis

Prisijungti

Naujienos

Prenumerata

Spaudos centras

Spaudos konferencijos

BNS+ NT

BNS Foto

BNS Video

BNS Sprintas

BNS Inicijuota

Vyriausybė užsimojo naikinti Narkotikų kontrolės departamentą, funkcijas perduoti SAM įstaigoms - BNS TEMA

08:05 2026-06-08



Skirmanto Lissauskas / BNS nuotr.

Commercialization: potential risks

- Concentrated stock can be lost, diverted or transferred without adequate records;
- Product contents can differ from the label or the declared purpose;
- Online marketing and new formats can increase consumer and youth exposure;
- Commercial promises can outpace evidence about benefits, harms and regulatory capacity.

The case continues...

- agricultural „hemp innovation“ is transforming into a **cannabinoid industry** in Lithuania;
- liberalizing hemp into cannabinoid industry requires effective enforcement and **control institutions**, which currently are **incapacitated** and in the process of being **dismantled**;
- advocacy is weak due to lack of resources and **legal instruments**;
- High e-cigarette exposure and familiarity increases young populations vulnerability to cannabinoid use.
- legal higher-THC intermediary product export increases the risk of local spill-over and **increased THC availability in EU** countries;
- Public-health protection needs independent evaluation and effective control of the process.