



**OREGON
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AGRICULTURE**

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To: Jonathan Sandau, Deputy Director, Oregon Department of Agriculture
Subject: Hearing Officer's Report
From: Sunny Summers
Date: September 25, 2025

Rule Summary - The purpose of this rulemaking was to allow public comment on proposed rules to allow for co-location of commercial and research hemp.

Public Hearing – ODA did not receive any comments during the public hearing.

SUMMARY OF COMMENTS - ODA accepted written testimony from the public through 5:00 p.m. on September 19, 2025. One written comment, in support, was received and can be found on the next page.

Dated this 25th day of September 2025.

A handwritten signature in black ink, appearing to read 'Sunny Summers', is written over a horizontal line.

Sunny Summers, Hearings Officer
Oregon Department of Agriculture
635 Capitol Street NE
Salem, OR 97301
sunny.summers@oda.oregon.gov
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Comments

Commenter	Comment	Response
Global Hemp Innovation Center	<p>As a public institution of higher education, Oregon State University conducts hemp research that has been affected by current rules requiring the separation of research activities from commercial production. We appreciate the Oregon Department of Agriculture's efforts to revise these rules, which have previously limited the flexibility of research operations, particularly our collaborative efforts with private industry.</p> <p>We write in support of the proposed rule change to allow co-location of commercial and research hemp activities. We respectfully request that the final rule explicitly permit research institutions to operate in co-located spaces under a single research license, without requiring a separate commercial license.</p> <p>Under the current rules, we were required to obtain both a research license and a commercial license because our research was conducted in greenhouse space rented from a commercial operation. This imposed an unnecessary administrative burden, increased processing time, and added costs to our program, even though our work is strictly non-commercial and conducted for academic and scientific purposes.</p> <p>Allowing academic institutions to co-locate within commercial facilities under a single research license would reduce these burdens and enable more efficient</p>	<p>Thank you for your comment and for your dedication to hemp research. Under these proposed rules, a research license would not need a separate commercial license to operate under a research license.</p>



	<p>use of available infrastructure. This flexibility is essential as we expand our research beyond the capacity of our on-campus facilities and seek to utilize advanced commercial infrastructure to scale our work in support of Oregon’s hemp industry.</p> <p>We urge the Oregon Department of Agriculture to make this adjustment in the final rule to better support the state’s research community and foster innovation in the hemp sector. OSU has an over a 100-year history of partnering with Oregon’s agriculture sector and regularly conducts crop trials and other research on commercial agricultural properties. This rule change will allow us to conduct similar partnerships in the hemp sector.</p>	
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