



Has USDA set a specific date in August that Oregon needs to submit a new rule under the interim final rule? When is USDA approval of Oregon's state hemp plan expected?

USDA has requested that states submit plans by August 16, 2020. USDA has 60 days to review the state plans.

Can you clarify what is classified as "hemp processing" and when a hemp handler registration is needed?

We understand this is very confusing and are always happy to discuss your specific situation with you. The definitions for growers and handlers are in statute so ODA has limited flexibility. A grower is only defined as growing. If you are doing minimal processing to prepare the plant material for sale to a processor, you do not need a handler registration. This can include separating the higher quality buds from the rest of the biomass/plant material. When you start trimming the bud into a retail ready product, you will need a handler registration. Or, if you are doing any other processing, like an extract or concentrate, you will also need a handler registration. Again, if you have a specific situation you are not sure about, contact the Hemp Program.

Is ODA going to enforce Oregon's testing standard on hemp products in Oregon?

Even with the new inspection staff, ODA has limited ability to randomly inspect products in the retail market. ODA will continue to follow up on complaints we receive.

Does the state require test results on the label?

Oregon does not have labeling laws for hemp products. This can be extra tricky for food products where labeling is regulated by the US Food and Drug Administration (FDA) given FDA's stance on the interstate movement of hemp products.

What restrictions are there on where growers can source seed, clones, and tissues cultures?

The Hemp Program does not have any restrictions on where growers source the material that they use to grow hemp. There may be requirements under the [Nursery Program](#) or [Seed Regulatory Program](#) for those bringing plant material into Oregon from outside the state.

Has ODA and OLCC come to an agreement on hemp derived THC being allowable in the marketplace and what registration/license is needed?

ODA does not regulate how any hemp-derived items enter the OLCC system. Please visit the hemp page on their website for specific information - <https://www.oregon.gov/olcc/marijuana/Pages/Hemp.aspx>

Will there be training sessions for the labs this year?

Training is going online this year and will be available soon.

Will complaint sites be randomly checked?

ODA will follow up on complaints. ODA does not generally do unannounced inspections. We will typically contact the business prior to arrival.

Where can we see a list of records we should be keeping for inspectors? What records should we be keeping?

The record keeping requirements can be found in [OAR 603-048-0500](#) for both growers and handlers. Additional handouts are being developed and will be available on the hemp website when available.

Can processors/handlers request to be inspected?

Handlers will be included in the record inspections. Staff are happy to add you to their list if you are specifically interested in having a site visit.

How quickly will the inspections be scheduled?

Staff will start scheduling inspections after July 15, 2020.

With the changeover in November, does the pre-harvest testing timeline change?

If there is no extension of ODA's ability to operate under the 2014 Farm Bill, the pre-harvest testing timeline may change. Meaning, any testing and harvesting in November and December would have to be within 15 days of harvest rather than the 28 days that Oregon currently has.

What triggers the requirement for a post-harvest test? If we want to sell products to be ingested in any way, when are we required to have this test done?

Anything that is going to be used for human ingestion – which includes by definition in statute inhalation, ingestion, and applications to skin or hair – require post-harvest testing. You can find the requirements in the [hemp rules](#) available on our website.

The 2019 grower registration didn't list all addresses on the face of the permit. Has this been changed for the website?

The website does not include any specific addresses. If you are looking for that information, the addresses can be obtained through a public record request email to hemp-records@oda.state.or.us. Also, in 2019, the registration requirements were slightly different and specific locations were not included on the permit.