

HEMP & ALCOHOL: ALCOHOL WHOLESALERS

Alcohol wholesalers include licensees that hold the following licenses: brewery, brewery-public house, distillery, grower sales privilege, warehouse, wholesale malt beverage and wine, and winery.

ALCOHOLIC BEVERAGES

Wholesalers are prohibited from storing, distributing, transporting, or selling any alcoholic beverages that contain CBD or THC.

This prohibition includes CBD or THC from any source, **including hemp**.

The OLCC prohibits storing or distributing an alcoholic beverage that contains any hemp or hemp-derived ingredient (such as CBD or THC) or other cannabinoids from any source without approval from the Alcohol and Tobacco Tax and Trade Bureau (TTB).

Currently the TTB is not approving any formulas that contain CBD or THC, the psychoactive ingredient in cannabis. [Read the TTB guidance here](#). Contact the TTB's Alcohol Labeling and Formulation Division at 202-453-2250 for more information or visit the [TTB website](#).

Some hemp ingredients that do not contain cannabinoids might be allowed in alcoholic beverages, subject to TTB approval.

NON-ALCOHOLIC BEVERAGES

OLCC rules do not prohibit an alcohol wholesaler from also storing or distributing non-alcoholic beverages containing hemp-derived ingredients, including hemp beverages that contain THC or CBD. However, businesses storing or distributing hemp beverages must comply with all Oregon laws and rules, including those summarized below.

Additionally, there may be other federal or state agencies regulating these types of products. Licensees may want to contact the FDA before introducing hemp beverages into interstate commerce.

In Oregon, the Oregon Department of Agriculture (ODA) and OLCC jointly regulate cannabinoid hemp products, including beverages.

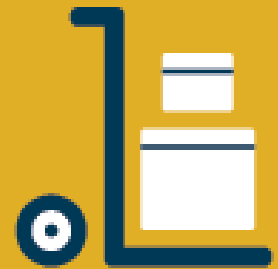
This document summarizes the major regulations that apply in Oregon.

ODA HEMP LICENSE REQUIRED

Distributing or storing hemp items in Oregon generally requires a Hemp Vendor license from ODA. For details, see the ODA Hemp Program website: <https://oda.direct/hemp>

Similarly, an ODA Hemp Vendor license is typically required for businesses selling cannabinoid hemp items at retail. Wholesalers may want to confirm that their clients are appropriately licensed to purchase hemp items.

See OAR [Chapter 603 Division 48](#) for ODA's hemp rules.



For more information contact:

The **OLCC** for questions about alcohol compliance: olcc.alcohol@olcc.oregon.gov

The **OLCC** for questions about THC and cannabinoid limits in hemp products: olcc.hemp@olcc.oregon.gov

The **OLCC** for questions regarding hemp registration and labeling: marijuana.packaging@olcc.oregon.gov

The **Oregon Department of Agriculture** for other questions about hemp or hemp testing: hemp@oda.oregon.gov; <https://oda.direct/hemp>



PRODUCT REGISTRATION AND LABELING

Cannabinoid hemp products must be registered with OLCC in order to be sold to consumers in Oregon. The registration includes labeling the product in compliance with OLCC rules. For details, see our [Hemp Registry Guide](#).

Wholesalers must confirm that a product is registered **prior to distributing** that product to retailers. Distributing an unregistered hemp item to a retailer for the purpose of sale to consumers in this state is a violation of OAR [845-026-6105\(3\)](#) and could result in civil penalties.

Wholesalers can check whether a hemp item is registered using [OLCC's hemp product search](#). It includes photos of the registered labels for comparison. The easiest way to search for a registration is by the label ID. All registered products are required to have a label ID; typically this is printed on the label, though a label can instead have the label ID accessible through a QR code. If there is no label ID either on the label or through a link or QR code, the product is not registered.

COMPLIANCE TESTING REQUIREMENTS

Any hemp beverage sold to consumers in Oregon must undergo compliance testing before being sold, and the retailer selling the item must have a copy of these compliance test results. If the retailer does not have a copy of the test results, the item cannot be sold.

Note that a manufacturer testing a single sample, or self-selecting samples for testing does not meet Oregon's compliance testing requirements. "Quality control" or "R&D" testing are distinct from compliance testing and do not satisfy the compliance testing requirement.

If you have questions about the compliance testing requirements, [contact the ODA hemp program](#) for additional information.

AGE RESTRICTIONS

Certain cannabinoid hemp products cannot be sold to a minor under 21 years of age. A product can only be sold to a minor if:

- It contains less than 0.5 mg total THC in the entire unit of sale;
- The compliance testing was sensitive enough to demonstrate that the product contains less than 0.5 mg total THC; and
- The product doesn't contain any artificially derived cannabinoids (like delta-8-THC made synthetically from CBD)

If a product contains more than 0.5 mg THC or other intoxicating cannabinoids, or if the testing was not sensitive enough to show that it does not exceed 0.5 mg of THC, or the product contains any artificially derived cannabinoids, it cannot be sold to minors. See OAR [845-026-0300](#) for details.

LIMITS ON THC AND OTHER CANNABINOID

There are also limits on the amount of THC that can be present in cannabinoid products sold to adults. In addition to the 0.3% limit on total THC:

- Hemp edibles, including beverages, are limited to 2 mg total THC per serving and 20 mg total THC per "container" (generally equivalent to a unit of sale).
- A full list of THC limits can be found in [Table 3](#) of OAR [845-026-0400](#) and [845-026-0410](#) or in our [Hemp Testing and Potency Quick Reference Guide](#).

Products that exceed these limits by more than 10% cannot be sold to Oregon consumers.

Products are generally prohibited from containing any artificially derived cannabinoids. At this time, none have received approval under OAR [845-026-0415](#). THC created by chemical conversion from CBD is prohibited for use in products sold to Oregon consumers.

BOTTLE BILL

Canned or bottle hemp beverages in Oregon must comply with Oregon bottle bill requirements.