

Hemp Rules Bulletin: HEMP REGISTRY COMPLIANCE

DEADLINE UPDATE

Bulletin HE2025-01

September 8, 2025



The Oregon Liquor & Cannabis Commission (OLCC) periodically releases rules bulletins to hemp product manufacturers, distributors, and businesses who sell hemp items at retail to Oregon consumers.

This bulletin provides important information about compliance with OLCC rules. It is crucial that you read and understand this bulletin as failure to follow this bulletin's guidance could result *in an OLCC administrative violation and impact your ability to work or operate your business*. If you need clarification about any aspect of this bulletin, please contact the OLCC for help at olcc.hemp@olcc.oregon.gov.

Compliance Education Bulletin HE2025-01 covers the distribution and sale of cannabinoid hemp products to consumers in Oregon and specifically concerns how and when the OLCC will enforce the rules related to the new hemp product registry.

Summary

On **January 1, 2026**, the OLCC's hemp registry rules will become effective as mandated by House Bill 4121 (HB 4121), which was passed last year by the Oregon Legislature. However, the OLCC will generally begin taking compliance actions related to the hemp registry starting on **June 1, 2026**.

The OLCC is adopting this approach to compliance to ease the logistical constraints on implementing the registration and labeling requirements and to allow the OLCC to educate business and other stakeholders on their obligations under HB 4121.

The OLCC strongly encourages businesses to use the time before June 1, 2026 to register their products or to work with suppliers to ensure they can stock compliant inventory. Starting on June 1, 2026, sales of any hemp items that are not properly registered with the OLCC or do not follow HB 4121's other requirements will be prohibited and non-compliant inventory will have to be removed from store shelves.

The registry's requirements apply to all cannabinoid hemp products intended for human or animal use or consumption, other than topical products, that are sold to consumers in Oregon. They apply regardless of whether the products are sold at brick-and-mortar locations or sold online. This includes online retailers operating in other states selling products to Oregon consumers.

PLEASE NOTE: While the OLCC will not begin taking compliance actions based solely on a product not being registered or labeled in accordance with the hemp registry's rules prior to June 1, 2026, the agency **will** take action against hemp items that violate other laws and rules. This includes, for example, the sale of adult use hemp items to minors or the sale of hemp products with THC exceeding Oregon limits. The OLCC's [Selling Hemp in Oregon](#) page has a summary of the current legal requirements for selling hemp in the state.

Background

In 2024, the Oregon Legislature passed [House Bill 4121](#), requiring cannabinoid hemp products to be registered with the OLCC in order to be eligible for sale to consumers in Oregon, including both online and brick-and-mortar sales. This registration requirement applies to all cannabinoid hemp products for human or animal use with some limited exceptions; see the bill for exact language.

HB 4121 prohibits retailers from selling unregistered products and prohibits distributors from transferring unregistered products to retailers, beginning **January 1, 2026**. However, the OLCC is not authorized to accept registration applications until January 1, 2026. The OLCC understands the logistical implications of this: On January 1, 2026, all affected hemp products will be ineligible for sale or distribution because they will not have had the opportunity to register their products before the requirement takes effect.

Consequently, to reduce disruption in the cannabinoid hemp product market, the OLCC will generally not take compliance actions related to the hemp registry until **June 1, 2026**. Persons subject to the registry's requirements are encouraged to register their products before this deadline to avoid delays and possible compliance issues. Retailers of hemp products should also be mindful of these requirements as well.

By June 1, 2026, all hemp items subject to the registry requirements must be in compliance with all applicable laws and rules. This includes discontinuing sales of any hemp items that are not properly registered with the OLCC and labeled in accordance with the hemp registry's rules beginning on June 1, 2026. If label changes are required in order to comply with the registry requirements, older batches with noncompliant labels should not be sold or distributed beginning on June 1, 2026.

Who is affected

The hemp registration requirements affect the following people:

- Retailers who sell cannabinoid hemp items (see below) to Oregon consumers, including traditional "brick-and-mortar" retailers as well as online retailers.
- Manufacturers and distributors selling, transferring, or delivering cannabinoid hemp items to a retailer in Oregon for sale to Oregon consumers.

It **does not** affect OLCC-licensed marijuana retailers; they are already required to comply with the OLCC's labeling requirements for any products they sell, including cannabinoid hemp items.

What is affected

The hemp registration requirement applies to "hemp products that contain cannabinoids and are intended for human or animal consumption or use." It does **not** include:

- Products that are intended exclusively for topical use, such as lotions, soaps, and salves;
- Industrial hemp grain or fiber products that do not contain added cannabinoids, such as hulled hemp hearts, hemp milk, hemp seed oil, etc.;
- Commercial feed products for animals (which are instead registered under ORS 633.006 to 633.089);
- Products that do not contain cannabinoids; or
- Products transported through Oregon en route to a final destination in another state.

It **does** include hemp products like gummies, beverages, tinctures, capsules, vapes, smokable flower, and other non-topical products that contain cannabinoids like CBD, CBG, or THC. If you are unsure whether the registration requirements apply to a product that you sell, distribute, or manufacture, please contact the OLCC at olcc.hemp@olcc.oregon.gov.

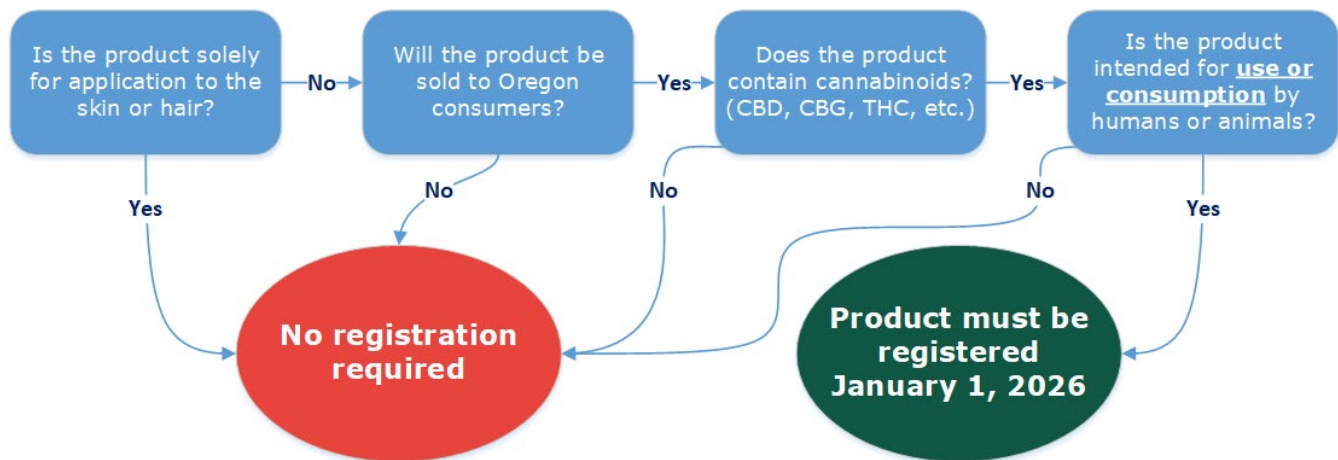
It **does not** affect cannabinoid hemp items sold by OLCC-licensed marijuana retailers; these products are already required to comply with the OLCC's labeling requirements.

Anticipated timeline to come into compliance

There are a number of requirements in Oregon laws and rules that hemp items must already comply with in order to be eligible for sale. These include, but are not limited to:

- Limits on the amount of THC and other cannabinoids in hemp items sold to Oregon consumers.
- Lab testing requirements for hemp items sold to Oregon consumers.
- Licensing requirements with the Oregon Department of Agriculture for many types of businesses, including hemp handlers and hemp vendors.
- Food safety licensing requirements for activities related to foods.

To sell hemp products to Oregon consumers, businesses are currently required to comply with these regulations and must continue to comply with these regulations. These are unrelated to the hemp registry and may continue to be enforced.



Persons responsible for registering products with the OLCC are encouraged to submit their registration applications as soon as possible when the OLCC begins accepting these in January 2026.

Product labels are one aspect of a registration application. Because registered products must be labeled in a manner consistent with an approved registration, business will likely want to wait until the registration is approved before they order new, compliant labels for products that are subject to the registry requirements.

However, by June 1, 2026, the OLCC expects all products sold to Oregon consumers to be registered and to be labeled in accordance with the approved registration. Businesses may want to make a plan to work with retailers and distributors to address old inventory that doesn't comply with the registration requirements prior to June 1, 2026.

Limited Non-Enforcement Discretion

While the OLCC will not take compliance action based solely on a product not being registered or labeled according to the hemp registry's rules prior to June 1, 2026, the OLCC may still take compliance actions against hemp items that violate Oregon laws and rules. This could include, but is not limited to:

- Selling adult use hemp items to minors.
- Selling hemp items that exceed Oregon's THC limits.
- Selling hemp items that contain intoxicating artificially derived cannabinoids.
- Selling hemp items that are adulterated in a manner described in HB 4121 Section 12(5), such as a cannabinoid hemp item that contains nicotine.

Note that the registration requirements **do** take effect on January 1, 2026. The OLCC does not have the authority to change the effective date of the law. The OLCC is just exercising discretion in *enforcing* the registration requirements.

Rulemaking Timeline

The OLCC has engaged in rulemaking related to the hemp registry. A rules advisory committee (RAC) was held in April 2025, the audio/video can be found [here](#) and draft language for the RAC can be found [here](#). The OLCC has also issued a “Proposed Notice of Rulemaking” that can be found [here](#). These proposed rules **are subject to change** prior to their adoption by the OLCC. It is anticipated that final adoption of these rules will occur in the fall of 2025. After the rules are adopted, the OLCC will issue a compliance bulletin explaining the rules and a user guide for the hemp registry.

Questions?

If you have any questions about these changes or this Bulletin, please send them to olcc.hemp@olcc.oregon.gov.