Hemp Panel Discussion – Focus on Securing Seed
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10 minute Introduction

Kentucky’s Hemp Program
- Kentucky Department of Agriculture’s Industrial Hemp Research Pilot Program began in 2014
- Hemp Program administered through the KDA Office of Agricultural Marketing’s Plant Division
- KDA issues Grower Licenses and Processor/Handler Licenses
- ~200 Grower Licenses with approval for 12,000+ acres – expecting ~3,000 actual planted acres
- 49 Licensed Processor/Handlers

Staff
- 3 Full-time staff (1 supervisor, 2 staff)
- 6 Part-time temporary inspectors for pre-harvest inspections and THC sample collections

Focus on Securing Seeds
- Seeds have been a primary focus for our program from the beginning.
- Can’t grow a crop without seeds and we certainly didn’t want to begin with cannabis seeds of unknown origins and THC levels.
- Seed import in 2014 began discussions with the DEA to develop a hemp seed import process for all agricultural pilot programs authorized by the Farm Bill.
- Kentucky sources seeds from both:
  - International sources.
  - Domestic sources.

International Seed Acquisition
- KDA received a DEA Registration to Import controlled substances in 2014 for the purpose of importing hemp seed.
- Instructions and forms can be found on the DEA website to apply for registration - DEA Form 225. This process can sometimes take several months.
- Registered importers may then apply for an import permit (technically, the document is titled- Permit to Import, DEA Form 35). Their online system is very user friendly.
- Each shipment requires a separate import permit.
- Information Required by the DEA to request an Import Permit (Request = DEA Form 357):
  - Foreign Consignor (seed source) - Company Name, Street Address, City, Country.
  - Seed Quantity – Type of Container and KG / container.
  - Port of Export – City and Country.
  - Port of Import – City and State in U.S. where the shipment will clear customs.
• Export Date – Estimated date of export.
• Mode of Transportation – Air, Sea, Truck, etc.
• Name of Vessel/Carrier Name – Only list this if known, otherwise, To Be Determined.

• Request to KDA includes additional items:
  o Documentation regarding the ability of the hemp variety to comply with the 0.3% THC concentration limit. (Typically reference the EU or Health Canada approved varieties list)
  o Seed Variety & Quantity.
  o List of licensee(s) for distribution and respective quantity of seeds to be planted.

• Important Parameters in Kentucky
  o KDA does not select the seed source or the seeds.
  o Licensees select the hemp seeds they would like to purchase and submit a request to KDA for approval.

• DEA generally issues permits within 10 days and send to KDA as the Registered Importer.
• All seed orders, shipping arrangements, and costs are responsibility of the Licensee.
• Seeds arrive at KDA for inventory and distribution to licensees.
• KDA reports back to DEA regarding the import and provides detailed records to the DEA during our annual inspection.

**Domestic Seed Requests** must be submitted to KDA for approval

• Attach independent third party test results for each requested variety/cultivar/strain documenting the delta-9 THC concentration of 0.30% or less by GC or total THC by HPLC.
• Documentation verifying the source as a legal hemp operation in the state of origin.
• Permission to replicate from the previous owner if there are plans to replicate clones or save seeds.
• Seed/Plant Source – Company Name and State. (Must match state registration/license and client on THC test results)
• Hemp Variety/Strain, Type and Quantity

**Once approved**
• All orders, shipping arrangements, and costs are responsibility of the Licensee.
• All shipments arrive at KDA for inventory and distribution to licensees.

**Evaluation of Seed Varieties/Strains**

• All hemp crops are sampled.
• KDA monitors each variety for its THC content.
• Designation of VARIETY OF CONCERN- any variety which tests above 3000 ppm THC. This helps farmers plan for lower risk factors.
• If a particular variety does not consistently test within the THC limit set by law, it will be prohibited from future use in Kentucky.
• KDA has ordered destruction of crops grown in the hemp program, which failed the compliance testing.