

National Plant Board 91ST Annual Meeting
August 15, 2017
Savannah, GA

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:
 - 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)
 - Seed Variety & Quantity.
 - List of licensee(s) for distribution and respective quantity of seeds to be planted.
- Important Parameters in Kentucky
 - KDA does not select the seed source or the seeds.
 - 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.