

HEMP POLICY APRIL 3, 2000

REQUIREMENTS FOR FORMULAS/STATEMENTS OF PROCESS FOR DOMESTIC HEMP PRODUCTS

After April 3, 2000, when submitting a formula/statement of process for an alcohol beverage containing hemp or a hemp component, you must also:

- Submit a lab analysis of the hemp component (oil, seeds, etc.) that will be used in your product, conducted at the direction of the foreign producer/supplier by a qualified laboratory that specifically addresses the detection of Tetrahydrocannabinol (THC). The lab report must:
 - Specify the amount of THC detected, or state that none was detected.
 - Specify the lowest level of THC that could be detected by that particular laboratory.
- Submit a lab analysis of the hemp component (oil, seeds, etc.) conducted by a U.S. laboratory that specifically addresses the detection of THC. The lab report must:
 - Specify the amount of THC detected, or state that none was detected.
 - Specify the lowest level of THC that could be detected by that particular laboratory.
- Submit detailed description of the method of analysis utilized by the U.S. lab to test the hemp component.

After April 3, 2000, all new formulas/statements of process for an alcohol beverage containing hemp or a hemp component will be qualified by TTB as follows:

- Finished product cannot contain a controlled substance.
- Hemp component(s) must be tested in the U.S. for controlled substance(s) each time it is imported and results must be maintained on your premises for inspection.
- A detailed description of the method of analysis used by the U.S. lab to test for controlled substance must be maintained at your premises for inspection.

REQUIREMENTS FOR IMPORTED HEMP PRODUCTS

After April 3, 2000, when applying to TTB to import an alcohol beverage that contains hemp or a hemp component, you must:

- Submit a list of ingredients and the method of manufacture of the finished product.
- Submit a lab analysis of the hemp component (oil, seeds, etc.) that is used in your product, conducted at the direction of the foreign producers/supplier by a qualified laboratory that specifically addresses the detection of THC. The lab report must:
 - Specify the amount of THC detected, or state that none was detected.
 - Specify the lowest level of THC that could be detected by that particular laboratory.
- Submit a sample of the finished product for testing at our lab.

After April 3, 2000, all new approvals for imported alcohol beverages containing hemp or a hemp component will be qualified by TTB as follows:

- This product cannot be imported into the U.S. if it contains a controlled substance.

REQUIREMENTS FOR LABELS

After April 3, 2000, all new labels for alcohol beverages that contain hemp or hemp components must meet the following requirements:

- You are prohibited from using the term hemp on an alcohol beverage label (in the brand name, fanciful name, text, etc.) **EXCEPT** when it is specifically stated in an approved statement of composition specifying hemp seeds/oil, etc. (e.g. *Ale brewed with hemp seeds*).
- You are prohibited from using depictions, graphics, designs, devices, puffery, statement, slang, representations, etc. implying or referencing the presence of hemp, marijuana, any other controlled substance; or any psychoactive effects.

After April 3, 2000, all new Certificates of Label Approval (COLAs) for products that contain hemp or a hemp component will be qualified as follows:

- This label may not be used on a product that contains a controlled substance.
- Hemp component(s) must be tested in the U.S. for the presence of controlled substance(s) each time component is imported and results must be maintained on your premises for inspection.
- A detailed description of the method of analysis used by the U.S. lab to test for controlled substance must be maintained on your premises for inspections.

REQUIREMENTS FOR NEW LABELS FOR PRODUCTS WITH PREVIOUSLY APPROVED FORMULAS/STATEMENTS OF PROCESS

If you have a previously approved formula/statement of process for an alcohol beverage containing hemp or a hemp component and you submit new labels after April 3, 2000 you must also:

- Submit a lab analysis of the hemp component (oil, seeds, etc.) that will be used in your product, conducted at the direction of the foreign producer/supplier by a qualified laboratory that specifically addresses the detection of THC. The lab report must:
 - Specify the amount of THC detected, or state that none was detected.
 - Specify the lowest level of THC that could be detected by that particular laboratory.
- Submit a lab analysis of the hemp component (oil, sees, etc.) conducted by a U.S. laboratory that specifically addresses the detection of THC. The lab report must:
 - Specify the amount of THC detected, or state that none was detected.
 - Specify the lowest level of THC that could be detected by that particular laboratory.
- Submit detailed description of the method of analysis utilized by the U.S. lab to test the hemp component.

We will attach these documents to your previously approved formula/statement of process, etc.

After April 3, 2000, all new Certificates of Label Approval (COLAs) for products that contain hemp or a hemp component will be qualified as follows:

- This label may not be used on a product that contains a controlled substance.

- Hemp component(s) must be tested in the U.S. for the presence of controlled substance(s) each time component is imported and results must be maintained on your premises for inspection.
- A detailed description of the method of analysis used by the U.S. lab to test for controlled substance must be maintained on your premises for inspection.

EXISTING LABELS

The COLA holder may voluntarily surrender current labels that do not meet the new policy or TTB will institute formal revocation proceedings.