

Industrial Hemp: Recommendations to the California Department of Food and Agriculture for the 2023 Farm Bill

The Industrial Hemp Advisory Board (IHAB) would like to thank Secretary Ross and the California Department of Food & Agriculture for engaging with stakeholders across California as the nation begins compiling policy initiatives and priorities for the reauthorization of the Farm Bill.

Industrial Hemp Program / California Focused 2023 Farm Bill Recommendations

California's Industrial Hemp program would benefit tremendously from modification in the 2023 Farm Bill. These suggested recommendations seek to inform the CDFA's discussion with a lens on supporting existing hemp farms and encouraging deeper commitments to California's hemp agriculture.

Recommendation 1 It is vital to expand access to grant programs to those farmers growing for the flowering tops of the hemp plants. In our experience with USDA, grants and loans that are accessible to hemp farmers growing for fiber and farmers of other crops are not available to hemp farmers growing for flower and its byproducts. We recommend the CDFA make a priority of the Farm Bill direction to expand its loan and grant mandate to include allowance for hemp, specifically those farming for the flowering tops of the plant.

Recommendation 2 Request Farm Bill funds to assist in the administration of the Industrial Hemp Program. The program is currently in a deficit that will not be cured solely by assessing more and more fees to farmers. We implore CDFA and the California Congressional delegation to look for opportunities within the Farm Bill for financial resources to reduce administrative costs and not simply push those costs on to farmers.

Recommendation 3 We encourage the CDFA to identify opportunities to streamline and remove duplicative aspects internally as well as externally - requirements currently set forth by the 2018 Farm Bill. This has the dual benefit of (a) reducing the programs overall financial costs and (b) improving efficiency overall. CDFA should advocate for streamlining the registration, sampling, testing and reporting requirements associated with Industrial Hemp. The multiple layers of duplicative reporting requirements and tight timelines stress both farmers and local Agricultural commissioners' offices.

Recommendation 4 Fit-for-purpose Regulations. Hemp not grown for human consumption or that **does not** contain cannabinoids should not be encumbered with onerous barriers such as the

DEA-certified laboratory requirements and the mandatory criminal background checks for producers. Hemp should be treated and regulated like any other agricultural commodity. As such, farmers who do not produce hemp intended to be used for its cannabinoid content should not be burdened with additional requirements that farmers of other crops do not encounter. In comparison grapes and hops do not encounter additional requirements for DOJ/FBI level background checks or DEA-certified laboratory testing.

Recommendation 5 Presently, hemp farmers have a 30 day window in which to harvest after receiving a passing Certification of Analysis. There is no other crop in which farmers have a defined harvest window. Should the crop test over .3% at initial pre-harvest testing or as part of an extension harvest request, the farmer suffers a total crop loss. There are multiple reasons why a farmer would need longer than 30-days to harvest a crop, most completely outside of the farmer control - equipment failure; labor shortages and/or inclement weather. There is no pathway to remove usable non-THC related parts of the plant. We recommend the CDFA support request to the Farm Bill include allowance for compassion over total destruction including pathways for hot hemp remediation into a regulated supply chain. Hemp plants don't stop producing delta-9 THC just because the government has identified a cap.

Thank you for taking the time to consider our input on the matter and we hope that we will be utilized in the future as the body of experts that we are to advise the secretary on any matters regarding Industrial Hemp that fall within CDFA's purview.

IHAB