



Association of Western Hemp Professionals

RE: Hemp Cultivation Tracking Initiatives

Recently during a February 6th, 2020 phone call with Hemp stakeholders, USDA confirmed that while they are not planning to make any changes to the IFR for 7 CFR 990 before its sunset date in 2021, they are planning to reopen public comment in 2021.

In an effort to inform USDA on their decisions for potential future changes to be reflected in the Final Rule, it is prudent for our members involved in cultivation to track key metrics during the 2020 season:

- 1. Registered acreage, in which state and under which program*
- 2. Actual acreage planted and number of plants*
- 3. Significant weather events and subsequent effects on plant*
- 4. Number of Testing Labs available for official testing DEA and non-DEA-Registered*
- 5. Preharvest Testing to harvest process*
 - a. Date sampling was requested*
 - b. Date of samplers conducted sampling*
 - c. Sampling method used 1/3 below flower, top 8", etc.*
 - d. Notable occurrences/issues during the sampling process*
 - e. Moisture content at time of sampling*

- f. *Sample drying and Filtering methods*
- g. *Testing methods used and date of test results returned*
- h. *Notable occurrences/issues during the analytical process*
- i. *Number of tests over 0.3% THC*
- j. *Date of when crop was eligible to enter commerce*
- k. *Dates of harvest beginning and end*
- l. *Harvest method utilized*
- m. *Total harvest metrics including harvest type (biomass, flower, fiber, etc.)*
- n. *Notable occurrences/issues during the harvest process (including drying, storage, transport, etc.)*
- o. *Number of crops and yields that made it to market in which state, under which program*