



U.S. Hemp Authority[®]
Standard version 3.0 Development Process
First Consultation Round Summary

During the first public comment round on the draft for version 3.0 of U.S. Hemp Authority Standard, The Technical Committee received a total of 66 written comments from consumers, brand owners, processor/manufacturers, growers, certification bodies, retailers, and industry advocates, which are summarized as follows:

Comments that did not warrant or result in changes to the draft:

- A number of comments were simply supportive of the draft and encouraging of the U.S. Hemp Authority's efforts without offering further critique. We received an equal number of additional comments where stakeholders lauded the benefits of hemp and CBD, without further suggestions for the draft.
- Slightly more comments were received criticizing or objecting to federal and/or state regulations where stakeholders felt that certain restrictions such as limits on THC content, restrictions on growing and pre-harvest crop testing, and other regulatory issues are too strict or onerous. It is beyond the U.S. Hemp Authority's purview to override such regulations; legal compliance is embedded in the U.S. Hemp Authority Standard. The U.S. Hemp Authority interfaces with legal advocacy groups such as the U.S. Hemp Roundtable and other organizations interested in the evolution of the hemp sector to participate in the ongoing public-private dialogue on hemp-related regulations.
- A couple of commenters suggested infrastructure or technology amendments to the program, such as implementation of blockchains or similar traceability mechanisms. The program appreciates these suggestions but does not have the capacity at this time to implement such possibilities.

Changes made to the draft based on stakeholder comments:

- A few commenters made impassioned pleas that we do not create a standard that only large or wealthy operators could meet in terms of requiring additional audits, personnel, or financial resources. The U.S. Hemp Authority intends that its certification program be inclusive of all high-quality operations regardless of their size. The language in the draft has been analyzed and adjusted to clarify that it provides feasible pathways for all scales of operators to participate and attain certification.
- Clarifications were requested regarding the ways in which federally mandated good manufacturing practices (cGMPs) and food safety requirements fit into the program. We have clarified the interface between the U.S. Hemp Authority Standard and other auditing programs that also specifically address such practices, so that redundant work and expense is avoided without compromising integrity of the U.S. Hemp Authority seal.



- The requirement for full supply chain compliance has been removed, while clarifications have been added about supplier qualification both for processor/manufacturers and brand owners.
- We received some questions regarding some of the definitions in the draft. The Technical Committee has spent considerable time weighing many possible definitions for certain terms, most notably full-spectrum extract and broad-spectrum extract. While the program anticipates that these definitions may need to be adjusted in the future to keep pace with government regulations and evolved sector understanding, those posed in the current version are the best compromise that the Technical Committee has been able to craft.
- Analytical protocols for testing hemp and hemp derivatives have been revised and expanded to include some additional norms.
- The Standard now is clearer as to how its scope includes hemp fiber, pet products, and a full range of other hemp-derived goods. It also clarifies the U.S. Hemp Authority's position that edible products marketed specifically to promote their THC content are outside of the program's scope.
- Clarifications have been made with respect to retail product labeling, in particular with respect to country of origin declaration and claims such as "THC free."
- Numerous minor adjustments to the text were made in response to specific stakeholder suggestions to improve wording.
- An annex has been added to describe the certification process.

Further inquiries about the Standard's development process may be directed to info@ushempauthority.org.