

HEMP SEED/CLONES OSIA RESPONSE TO TDCANN Institute RECOMMENDATIONS 2/28/19

Recommendation: Designate OSIA to oversee this program with appropriate allotted funding for this important project. (Funding to be used for assistance in launching and regulating the emerging Hemp project in Ohio by: expanding OSIA staff to establish a strain and variety database, Hemp library, funding annual for training OSU student interns and OSIA field inspector, traveling to regional field days, expanding OSIA Hemp herbarium, assisting Ohio Department of Agriculture (ODA) as needed to field inspect, audit and monitor field production of licensed commercial fiber, oil and grain and under glass medicinal Hemp producers as needed or requested, regulate Ohio certified Hemp seed production, provide training to the Ohio Crop Variety Review Board and serve as an educational resource to Ohio farmers, researchers, seed producers and the public).

Recommendations: Both certified and non-certified seed should be allowed to be cultivated in Ohio.

1 - By default all Association of Official Seed Certifying Agencies (AOSCA) eligible certified Industrial Hemp seed varieties are to be included on a State of Ohio approved cultivar or variety list for seed production by members of the Ohio Seed Improvement Association or other domestic or international certified seed agency growers. Certified seed will be available for sale to all licensed commercial industrial Hemp growers.

2 - Non-certified seed: A compliant seed label must be provided indicating that a state approved chemical lab test result has been obtained by a grower who submitted their seed sample for official lab testing. Results must verify that the branded, farmer saved, Landrace, or "Strain" seed planted for commercial production is in fact a fiber, grain or oil seed lot kind with a Delta 9 THC concentration of 0.3% or less. Such seed lots must also comply with State of Ohio Seed Law labeling requirements for a lab test report and label documenting that the seed has been tested for germination, pure seed, inert, other crop, weed seed percentages and any noxious weeds prior to being offered or advertised for sale. Other ODA Seed Law requirements such as an annual seed sales license and tonnage tax may also be applicable to entities who offer seed for sale.

Note: All Ohio Industrial Hemp certified seed and commercial fiber, grain and oil production fields grown by state licensed producers will likely be subject to ODA field sampling prior to harvest to confirm that a sample collected from such field production complies with the Industrial Hemp requirement of Delta 9 THC concentration of 0.3% or less.

Clones: Currently no finalized designated authority or third party North American standardized known Hemp clone regulatory genetics or labeling program are known. However, consideration of this need is work in progress. Additional Information is needed which may include the following: Clones are asexually reproduced crops and include vegetative reproduced mother plant cuttings grown for transplanting for under glass greenhouse, controlled environment chamber, hoop house or field production. From the individual producer or production firm information regarding the origin of the source material; genetic pedigree; name of the variety, brand, Landrace, or "Strain", from which mother plant sources were selected; origin of seed stock; breeding method and history; selection and maintenance procedure of clones; and documentation authorizing a license from a genetic originator allowing a producer to propagate clonal material from proprietary genetics. In addition, described

phenotypic plant traits; test and observation data versus other check varieties; production data; adaptation and maturity data; propagation method(s) such as tissue culture or cuttings; disease and insect tolerance ratings; DNA test patterns substantiating genetic distinction, uniformity and stability; and verifiable molecular marker information and all would be important documentation items. Lastly, if the clone was established from a certified seed variety, then the certification certificate, certification seed tag or an invoice showing the variety seed class and lot number must be furnished as proof of seed source.

Montana requirements: Would recommend replacing the Montana requirements and citing the Association of Official Seed Certifying Agency (AOSCA) "Standards for Certified Industrial Hemp Seed" which are slightly different.

Hemp Seed Info: This is a very good reference Canadian model of Hemp oil product requirements and having the traceability of variety(s) used in production. A varieties eligible list is referred to in both Section 1.3 page 5, and on page 8, Product Identity and Specifications indicating that "all cultivars comply with Health Canada's Healthy Environments and Consumer Safety Branch Industrial Hemp Regulations". I doubt if Canadian regulations would allow non-certified seed varieties for production, since farmer saved Hemp seed, "Strains" and Landraces can be and have not been distinct, uniform or stable and of questionable pedigree and origin. This relates to transparency of product traceability and food safety.

End of Comments.

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