

**From:** Schwartz, Thea [thea.schwartz@vermont.gov]  
**Sent:** Tuesday, December 13, 2016 4:20 PM  
**To:** Schmalz, Tim; Pepper, James; Ross, Chuck; Leland, Jim  
**Subject:** RE: I Hemp Sampling and Analysis Announcement Letter  
**Attachments:** 20161213 Hemp Sampling and Analysis Announcement Letter TS comments.doc

Hello,

Put some comments in track changes. It is attached. Also as to who to address, is this being sent to each current registrant and also posted on the web?

Thea

---

**From:** Schmalz, Tim  
**Sent:** Tuesday, December 13, 2016 2:25 PM  
**To:** Pepper, James <James.Pepper@vermont.gov>; Ross, Chuck <Chuck.Ross@vermont.gov>; Leland, Jim <Jim.Leland@vermont.gov>; Schwartz, Thea <thea.schwartz@vermont.gov>  
**Subject:** I Hemp Sampling and Analysis Announcement Letter

Attached is the cleaned up version of the industrial hemp sampling and analysis letter we have been working on. The addressee is a little stilted, but I wasn't sure who we should address this to.



AGENCY OF AGRICULTURE, FOOD & MARKETS

Charles R. Ross, Jr., Secretary

Agriculture.vermont.gov

116 State Street • Montpelier, Vermont 05620-2901 • (802) 828-2431 • (802) 828-1410 FAX

December 13, 2016

Vermont Industrial Hemp Registrant:

The Vermont Agency of Agriculture, Food and Markets (the Agency) announces its 2017 industrial hemp sampling and analytical pilot program. The Agency plans to offer preliminary cannabinoid analytical services during the field season to hemp growers located in Vermont that are registered with the Agency. Participation in the 2017 program is voluntary. The Agency also anticipates offering analysis of tetrahydrocannabinol (THC), cannabidiol (CBD), the acid forms of both compounds (THCA and CBDA), and cannabinol (CBN) content as part of the analytical package. Participants will have the opportunity to obtain State of Vermont certification of THC content in their plants.

The Agency aims to perform analyses on approximately 50 samples in 2017. It intends to increase its sampling capacity in the future once it streamlines the sampling process and increased resources. The Agency's ability to increase its sampling capacity is also dependent upon the timing of the relocation of its laboratory from its temporary location at the University of Vermont to its new permanent home. The Agency currently expects this relocation to occur in 2018.

Agency staff will perform sampling of hemp prior to harvest. The sampling will be scheduled to allow adequate time to provide sampling results before harvest. Results will be presented to growers as soon as they are available. Growers are advised that if the sampling results show the 0.3% THC (dry weight) statutory threshold is exceeded, the Agency is required to and will provide notice to local law enforcement.

Using high performance liquid chromatographic (HPLC) technology, the Agency plans to analyze constituents including THC, THCA, CBD, CBDA, and CBN. Providing accurate and prompt results on these five compounds will be the Agency's focus for the 2017 program. The Agency may find that it can offer additional analytes (such as terpenes) in the future.

Participating growers will be required to pay a service charge to help offset costs of sampling and analysis. The assessment of a service charge is authorized under 6 V.S.A. § 9. The service charge for the 2017 program will be \$150.00 per sample.





AGENCY OF AGRICULTURE, FOOD & MARKETS

**Charles R. Ross, Jr., Secretary**

Agriculture.vermont.gov

116 State Street • Montpelier, Vermont 05620-2901 • (802) 828-2431 • (802) 828-1410 FAX

The Agency will draw upon its practical experience of implementing the 2017 program in its rulemaking for an industrial hemp rule, which it plans to begin in the upcoming year. An industrial hemp rule will formalize sampling and analytical practices and notification procedures, and provide guidance and structure for the future of the program. The Agency hopes to work in close partnership with registered growers, producers, consumers, law enforcement and other interested stakeholders in developing the rule and final program design. The Agency invites growers and members of the public to send comments, questions, or suggestions regarding rulemaking or other hemp related issues to Tim Schmalz ([tim.schmalz@vermont.gov](mailto:tim.schmalz@vermont.gov)) INSERT PHONE NUMBER.

Growers who would like to participate in the 2017 sampling and analytical program should contact Tim Schmalz immediately. The number of participants is limited to XX, and growers will be chosen by XX PROCESS.

The Agency looks forward to continuing to work with growers to help develop industrial hemp as a vibrant and viable crop in Vermont.

Sincerely,

Chuck Ross, Jr.  
Secretary, Agency of Agriculture, Food and Markets

