

## **From the Michigan Department of Agriculture and Rural Development:**

- Any product derived from industrial hemp with a THC concentration above 0.3% is classified as marijuana and regulated under the laws that apply to those products through the Michigan Department of Licensing and Regulatory Affairs.
- Products derived from industrial hemp, including CBD oil, fall under several different categories. Any substances that will be added to food or drink or marketed as dietary supplements must first be approved by the U.S. Food and Drug Administration for that intended use. At this time, the FDA has not approved CBD for use in food or drink or as a dietary supplement. Therefore, it's currently illegal to add CBD into food products or drinks or sell it as dietary supplements.
- GRAS (Generally Regarded As Safe) is a list of substances that the FDA considers safe to add to food. Hulled hemp seeds, hemp seed protein and hemp seed oil are considered GRAS, as of 12/20/18. CBD is currently not considered GRAS, as of 3/29/19. In Michigan, any food production falls under the Michigan Food Law and the licensing requirements within the law.
- Growing industrial hemp will require a license from the Michigan Department of Agriculture and Rural Development (MDARD). MDARD is in the process of developing a licensing program for growers to meet the requirements of both state and federal laws to allow interstate commerce of the plants

### **Hemp/CBD at A2 (From Renegade Acres' presentation)**

Follow same A2 market rules as any other product.

Example: Produce, honey, soap

Follow all laws regarding licensing.

Growers license + Producer/Handlers license

Follow all laws regarding FDA

No health claims

No food

No dietary supplements

Require documentation.

Licenses

Certificate of analysis – showing both hemp, as grown, and final product, meet current Michigan laws (<=0.3% total THC)

Possible Products: Tinctures, Salves, Cosmetics, Textiles, Smokable Flower (?), Plants (?), Seeds (?)