



August 5, 2022

The Honorable Matthew Lohr
Secretary of Agriculture and Forestry
P.O. Box 1475
Richmond, VA 23218

Dear Mr. Secretary,

The Virginia Farm Bureau Federation (VFBF) appreciates the opportunity to submit comments to the Secretary of Agriculture and Forestry Task Force to Analyze Industrial Hemp Extracts and Other Substances Containing Tetrahydrocannabinol Intended for Human Consumption.

Virginia Farm Bureau is the Commonwealth's largest general farm organization, representing more than 33,000 farmers of nearly every type of crop and livestock across Virginia. Farm Bureau and its members have worked together to build a sustainable future of safe and abundant food, fiber, and renewable fuel for the United States and the World.

On July 19, 2022, the Board of Agriculture and Consumer Services adopted as final 2 VAC 5-595, *Regulations Governing the Manufacture and Sale of Products that Contain Industrial Hemp Extracts Intended for Human Consumption*, and authorized staff to take any and all steps necessary to have this become a final regulation of the Board through an exempt regulatory action as authorized by Section 3.2-5145.5 of the Virginia Food and Drink Law.

The passage of the 2018 Farm Bill removed hemp from the Controlled Substances Act, and, in doing so, led to a significantly increased interest in hemp production in the Commonwealth and elsewhere. Recognizing this interest, VFBF respectfully submits these comments based on VFBF policies, as they relate to this industry.

VFBF supports increasing the Tetrahydrocannabinol (THC) limit from 0.3% up to 1.0% in order to maximize the production of cannabidiol (CBD) in industrial hemp. VFBF supports the use of state-licensed and approved facilities to research the medical benefits of cannabis. VFBF supports the agricultural production of industrial hemp and all cannabis species allowed by law, however, while supporting the crop and market development, VFBF still remains compliant with federal regulations. Our members are very interested in making sure that industrial hemp farmers maintain the ability to produce value added products from industrial hemp in order to maintain a viable industrial hemp industry.

The Virginia Farm Bureau Federation respectfully submits these comments and appreciates the Administration's efforts to provide clarity and fill in regulatory gaps through promulgation of the regulation regarding industrial hemp extracts intended for human consumption.

Sincerely,

A handwritten signature in black ink that reads "R. Zachary Jacobs" with a long, sweeping horizontal line extending to the right.

R. Zachary Jacobs
Legislative Specialist
Virginia Farm Bureau Federation