

January 28, 2020

Bill Richmond, Chief
U.S. Domestic Hemp Production Program
Docket Clerk, Marketing Order and Agreement Division
Specialty Crops Program, AMS, USDA
1400 Independence Avenue SW
Stop 0237
Washington, DC 20250-0237

Re: USDA Agriculture Marketing Service
7 CFR 990 | Document # 2019-23749, Pages 58522-58564
Docket Number: AMS-SC-19-0042; SC19-990-2 IR
Publication Date: 10/31/2019

Dear Mr. Richmond:

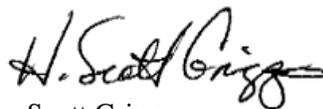
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We submit the following comments in response to the Agricultural Marketing Service, USDA interim final rule (IFR) on a Domestic Hemp Production Program published on October 31, 2019. ACIL supports the underlying principles of the Rule with a few critical comments on implementation outlined in the attached addendums. We especially encourage USDA to align the Program with industry standards and best practices to ensure the best outcomes for producers, laboratories and the consumer in this emerging sector.

Our detailed comments on the Rule follow and are organized into sections addressing Sampling, Testing, Lab Approval, Producer Violations, Cost Analysis and State Preemption in the IFR language. In addition, we have included ACIL and Independent Laboratories Institute (ILI) produced documents detailing the Cannabis National Laboratory Accreditation Program (CanNaLAP) established to validate protocol for accreditation bodies (ABs) and laboratories involved in the testing of cannabis and cannabis-derived products. **ACIL strongly urges USDA to align the industry-established requirements and standards outlined in these documents with its Domestic Hemp Production Program.**

In summary, ACIL appreciates the efforts being made by USDA to create a national standard for Hemp Production. We also seek to advance ACIL's CanNaLAP program as a model for the implementation of accreditation and laboratory requirements in the testing of cannabis products now and in the future.

Respectfully submitted,



Scott Griggs
Food Sciences Section Chair
American Council of Independent Laboratories