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March 24, 2021

Dr. Ralph Paroli
 D37 Cannabis Committee chair
 ASTM Standards International
 P.O. Box C700
 West Conshohocken, PA 19428-2959
 USA

Re: Hemp-Specific Terminology, Standards, Guides, and Test Methods

Dear Dr. Paroli:

Hemp organizations around the world appreciate the interest of ASTM's D37 Cannabis Committee in industrial hemp (hemp) and the development of associated terminology, standards, guides, and test methods. In general, the development of standards for hemp can be an important tool to assist trade, meet customer needs and marketplace demand.

Hemp, as a non-intoxicating, non-addictive, and non-habituating agricultural product, has a unique and distinct 4,000-year history with a focus on food, feed, fibre, and fractions production. Recent modern advances in technology have allowed for uses such as: insulation, absorbents, biocomposites, paints and sealants; and, health and wellness (low-THC extracts). Regulations uniquely guide the hemp industry in most national, subnational, and supernational jurisdictions. These hemp regulations are typically less restrictive than regulations developed for the high-THC cannabis sector.

Taxonomically, hemp is the same plant as high-THC cannabis, but over thousands of years of plant breeding and industrial use, unique hemp characteristics have defined our industry and have become critical to the growth of the global hemp industry. The unique and common primary difference within most regulations is the distinctly low concentration of THC in hemp's flowering heads (fruiting tops) and leaves. Hemp produced solely under cannabis regulations would be subject to more complexity and cost - encumbering the competitiveness of this agricultural crop. We note that hemp has never been associated with the historical mystic/spirituality or modern recreational movements due to its lack of ability to intoxicate. To recognize this, the following definition was submitted for ASTM's D37.91 terminology subcommittee:

Hemp, n – a Cannabis sativa L. plant, or any part of that plant, in which the concentration of total delta-9 THC in the flowering tops is equal to or less than the regulated maximum level as established by authorities having jurisdiction. The term Hemp is synonymous with Industrial Hemp.

For hemp standards to support global commerce, differentiation within legal frameworks, banking/investment, insurance, consumer use, and regulatory considerations, it is key to reflect the global hemp industry's requirement for unique hemp-specific terminology, standards, guides, and in some cases test methods.

The undersigned representatives of the global hemp industry, request ASTM's D37 cannabis committee and its subcommittees to clearly respect differences between hemp and high-THC cannabis (marijuana), and facilitate the development of hemp-specific terminology, standards, guides, and where appropriate, hemp- specific test methods.

Thank you for consideration of this important matter.

Yours Sincerely,

Tim Schmidt, President, Australian Hemp Council (Australia)
Charles Kovess, Secretary, Australian Industrial Hemp Alliance (Australia)
Robert Bell, Founder, Australian Industrial Hemp Conference (Australia)
Rebekah Shaman, Managing Director, British Hemp Alliance (UK)
Keith Jones, Board Chair, Canadian Hemp Trade Alliance (Canada)
Xueqiang Liu, General Secretary, China Hemp Alliance (P.R. China)
Daniel Kruse, President, European Industrial Hemp Association (Europe)
Hunter Buffington, Executive Director, Hemp Feed Coalition (USA)
Rick Trojan, President, The Hemp Industries Association (USA)
Dr. Harumi Kikuchi, Representative Director, Hokkaido Industrial Hemp Association (Japan)
Rohit Sharma, President, Indian Industrial Hemp Alliance (India)
Lorenzo Rolim da Silva, President, Latin American Industrial Hemp Association (Latin America)
Anar Artur, Founder & Director, Mongolian Hemp Association (Mongolia)
Joseph V. Spencer II, President, National Albanian Hemp Industry Association (Albania)
Aleksander Laçaj, Executive Director, National Albanian Hemp Industry Association (Albania)
Geoff Whaling, Board Chair, National Hemp Association (USA)
Richard Barge, Chair, New Zealand Hemp Industries Association Inc. (New Zealand)
Joon Lee, Managing Director, Seoulution Corp. (South Korea)
Jacob Waddell, President, US Hemp Building Association (USA)
Corey Peebles – President, Alberta Hemp Alliance (Canada)
James Vosper, President, New South Wales Industrial Hemp Association (Australia)
Wayne Richman, President, California Hemp Association (USA)
Samatha Walsh, Vice President, Colorado Hemp Industries Association (USA)
Jeff Greene, Founder and Director of Business Development, The Florida Hemp Council (USA)
Joseph W. Hickey, Founder and Executive Director, Kentucky Hemp Association (USA)
Jamie Campbell Petty, Executive Director, Midwest Hemp Council (USA)
Andrew Bish, President, Nebraska Hemp Industries Association (USA)
Courtney N. Moran, President, Oregon Industrial Hemp Farmers Association (USA)
Joe Kirkpatrick, President, Tennessee Growers Coalition (USA)
Tillery Timmons, Sims, Executive Director, Texas Hemp Growers' Association (USA)

CC: Bob Morgan, ASTM Staff Liaison (D37)