

Industrial Hemp Product Endorsement Guide



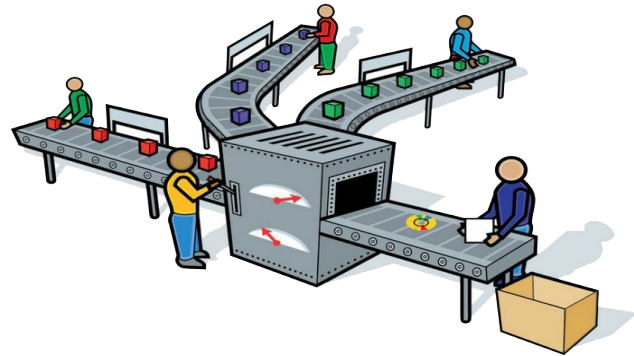
Recitals:

- Under 11 AAC 40.400(a), “[b]efore being offered with or without compensation to a consumer, any industrial hemp product processed beyond its raw form and intended for human, or animal consumption must be endorsed by the division.”
- Under 11 AAC 40.400(d) “[t]he division may not endorse a product that contains delta-9-THC or a non-naturally occurring cannabinoid, including a cannabinoid made from an ingredient extracted from industrial hemp and modified beyond its original form”.
 - This prohibits intoxicating cannabinoids such as delta-8-THC, delta-10-THC, HHC, THCA, THCV, THCP and other downstream products made from hemp-derived CBD.
- Under 11 AAC 40.640(a), “[i]ndustrial hemp products intended for human or animal consumption shall be tested or screened for the contaminants listed and may not exceed the following permissible levels”.
- Under 11 AAC 40.640(c), “[t]he results of the testing or screening required in this section shall be reported to the division on a certificate of analysis that was **completed not more than 12 months** before the date the application for endorsement is postmarked or received by the division”.
- Under 11 AAC 40.900(13), “[c]onsumption’ means any method of ingestion of or application to the body, including eating, drinking, inhaling, absorbing, or injecting[.]”
- Under 11 AAC 40.910 (30), “[i]ndustrial hemp product or hemp product means an item **in its final form** derived from all parts and varieties of a cannabis **species plant**”.
- Endorsed product shall apply to any ingestible product like a gummy, tincture, capsule, or beverage, and any dermally applied topical product. It also applies to pet products.
- No hemp products are registered until official notification has been received from the Alaska Division of Agriculture- Plant Materials Center. The division will provide a written endorsement for each approved product.
- An industrial hemp product endorsement is valid for 12 consecutive months from the date it is issued.
- The fee to endorse industrial hemp products is **\$25 per product SKU**. If you want to register 10 products the fee would be \$250.
- A certificate of analysis is required for each product in its **final form**. We will not accept COAs for batches of isolate, distillate, concentrate, blends. Even if you test your product at different stages of production, we still require a final product COA for all contaminants (pesticides, microbials, heavy metals, mycotoxins, and residual solvents).

Who is Required to Register?

Manufacturers of industrial hemp product and extracts. This includes products manufactured in Alaska, another state, or another country. Hemp fiber products and hemp seed oils are exempt from the registration requirements.

If you are the brand owner and distributor of hemp products, but they are manufactured by another company, please continue with the application (the application form accounts for these scenarios).



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Annual registration fee of \$25 per product SKU. Product registration is valid for 12 consecutive months from the date of approval. A new registration is required every year for every registered product.

Endorsing Hemp Products

All industrial hemp products before being offered with or without compensation to a consumer in state must be endorsed annually with the division.

Application for endorsement of hemp products shall be made to the division on a form provided by the division and shall include the following information in the application.

- The name of the registrant
- The name and address of the manufacturer/person whose name should appear on the product label. Often shown as Distributed by or Manufactured for: (this is often the brand owner name)
- If the products are white labeled/private labeled co-packed product, the name of the actual manufacturer and address.
- The name and address of the firm submitting the application.
- A complete color copy of the label that will appear on the product(s).
- A certificate of analysis (COA) from a laboratory for each product in its final form.
- A product list for each product presented as you would like them to appear on the approved product list available to the public.
- The associated registration fees.



A retailer or registrant **may not** register a product in lieu of the product manufacturer if the product does not carry an endorsement. **The manufacturer or brand owner must carry the product endorsement.**

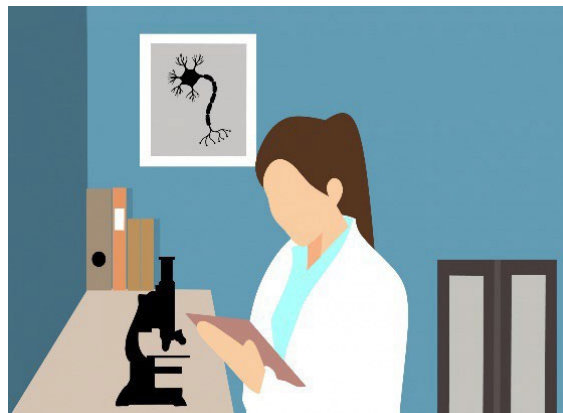
Categories of hemp products that can be indorsed include:

- Oil (tinctures)
- Capsules & Sofgels
- Gummies
- Topicals (balms, creams, ointment, lotion, salve, roll-ons, transdermal patches)
- Pet (soft chews, hard chews, tinctures)
- Vaping (vape pens)

Certificate of Analysis

A certificate of analysis is required for each product in its final form and shall include the following information:

- A batch or lot number identification.
- The date the certificate of analysis was received.
- The date the certificate of analysis was completed.
- The method of analysis for each test conducted.
- The product name.
- The image of the product in its final form on the certificate of analysis.



The certificate of analysis for all hemp products shall include cannabinoid potency for delta-9- THC and cannabidiol, cannabigerol, cannabichromene, and cannabidvaria, including acid forms. In addition, each certificate of analysis shall be tested for the contaminants listed below and may not exceed the following permissible levels as found in 11 AAC 40.640. Contaminants.

- Residual Solvents
- Microbials (excluding topical products)
- Mycotoxins (excluding topical products)
- Pesticides
- Heavy Metals

The results of the testing or screening required in this section shall be reported to the division on a certificate of analysis that was completed not more than 12 months before the date the application for endorsement is postmarked or received by the division (11 AAC 40.640(c)). To determine this, find the “Completion Date” on the COA.

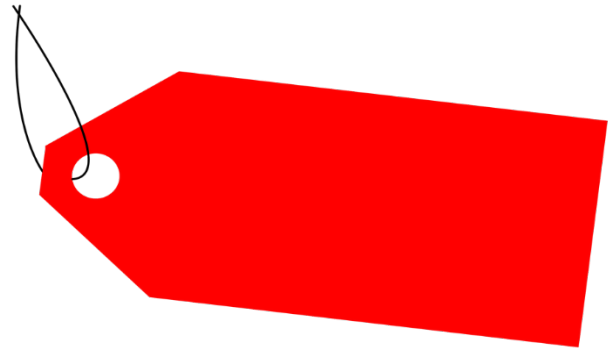
A certificate of analysis shall be provided for each hemp product that is registered. If a COA is not provided or does not include testing for the contaminants above, you will be asked to obtain these tests which will delay your product registration.

Products that only contain hemp ingredients that have been given generally recognized as safe (GRAS) status by the FDA are exempt and do not have to carry an endorsement.

Hemp Product Labeling

Industrial hemp products intended for human or animal consumption must be labeled with the following:

- The product name.
- The total quantity of the product by weight or volume.
- The serving size or recommended dose; and
- A list of all ingredients.



Industrial hemp products intended for human or animal consumption may not contain health or medical claims on the label, packaging, advertisement, or any other marketing material.