



U.S. Hemp  
Roundtable

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## **Written Testimony of Jonathan Miller**

**General Counsel of the U.S. Hemp Roundtable  
Before the House Committee on Oversight and Accountability**

*April 9<sup>th</sup>, 2025*

Mr. Chairman, Ranking Member Connolly, I am grateful for the opportunity to testify before your committee today. The subject of today's hearing is a matter of urgency for the U.S. hemp industry, for which the U.S. Hemp Roundtable, serves as a national advocacy organization.

Mr. Chairman, I am also grateful for your decades-long leadership on behalf of Kentucky and U.S. hemp farmers. You and I started on this journey in 2012 and worked across the aisle to secure hemp's legalization in the Bluegrass State. Indeed, hemp's policy success has always been a bipartisan hallmark. It's no wonder – hemp products are made in the USA, harvested from crops grown by American farmers, manufactured by innovative U.S. entrepreneurs, and sold by small businesses dotting the nation.

Over the past eleven years, U.S. farmers have rebuilt a domestic supply chain of hemp and hemp products under the authorities of the 2014 and 2018 Farm Bills. Of note, American farmers are supplying the feedstock for the hemp extract market that has surged to \$28.4 billion, creating 328,000 agriculture and retail jobs, with a \$13.2 billion employment impact and \$1.5 billion generated in state tax revenues.<sup>1</sup>

Unfortunately, however, the U.S. hemp industry continues to encounter avoidable bureaucratic headwinds in the marketplace. And this turmoil is due in large part to statements, actions, and indecisions of the U.S. Food & Drug Administration, the FDA.

When Congress passed the 2018 Farm Bill, it explicitly legalized the sale of hemp and its derivatives such as CBD by removing them from the Controlled Substances Act.<sup>2</sup> Farmers across the nation relied on this government action, and invested considerable time and resources to plant, grow, and market commercial hemp crops, and particularly for the market for which there was immediate processing infrastructure and consumer demand: hemp-derived CBD and other popular cannabinoids.<sup>3</sup>

But just a few hours after the Farm Bill was signed into law, the FDA reasserted its opinion that it was illegal to market CBD as a dietary supplement or to use as a food additive. Beyond warning letters targeting illegal disease claims, such as that CBD cures cancer or COVID, the agency has not engaged in meaningful enforcement on this public stance. But its inconsistent position, coupled with lack of action, has cast a cloud over the industry.

We've watched in bewilderment as FDA has jerked back and forth with contradictory opinions. First, the agency affirmed its ability to regulate CBD under current law.<sup>4</sup> And leaders at the agency clearly recognized that Congress wanted FDA to act quickly.<sup>5</sup> But then, in the intervening years, FDA stalled, even ignoring congressional appropriations report directives to take expedited action. Meanwhile, federal

regulatory uncertainty severely impacted the hemp and CBD market, with reduced manufacturing demand resulting in a more than 90% commodity price decline, crushing opportunities for U.S. farmers. Please refer to Figures 1-6 below.

Then finally, in January 2023, the agency stated that it cannot regulate CBD under existing regulatory pathways because of its concern over the substance's safety, essentially punting this responsibility to Congress.<sup>6</sup> But in so doing, the FDA relied on a narrow set of research mainly focused on high-dosage CBD isolate formulations often using drug-level dosages that exceed 1000 milligrams – while refusing to acknowledge a range of studies that demonstrate the safety of various CBD formulations at much lower amounts – 30, 40, 50 milligrams/serving -- such as those typically found in CBD dietary supplements and foods sold at retail. Please see the “summary of studies” section below.

Because of this lack of action, the CBD market continued its downward spiral. Numerous adverse consequences resulted:

- State and local agencies have threatened and/or taken enforcement actions against the sale of CBD products, citing FDA guidance. Many big-box retailers are reluctant to carry CBD products due to FDA's position, while the nation's top food companies have delayed efforts to introduce new CBD products into the marketplace.<sup>7</sup>
- Chilled and stagnant CBD commerce has resulted in a continuing oversupply of hemp biomass and derivative products, such as crude oil, with hemp commodity prices dropping sharply, adversely impacting hemp farmers. According to independent reporting agency Hemp Benchmarks, aggregate prices for hemp CBD biomass, crude oil, full spectrum distillate, and CBD isolate declined more than 90% between April 2019 and October 2022. (See Figures 1-4). While prices stabilized somewhat in late 2021, any significant and sustained price increases are not expected in the foreseeable future, barring regulatory clarity.
- Regulatory uncertainty has resulted in a severe downturn in US hemp production. In 2021, roughly 200,000 acres were registered with state hemp programs, down more than 50% compared to 430,000 acres registered in 2020.<sup>8</sup> Of those registered, only 54,200 acres were grown across the country in 2021, representing a 50-75% decline in acreage dedicated to hemp production from 2019-2020.<sup>9</sup> And of the hemp grown, a much smaller portion was actually harvested: Colorado, for example, planted more than 10,000 acres of hemp, but only harvested 31 percent of it.<sup>10</sup> 2022 brought further declines; as of October, only 21,172 acres had been planted *nationally*, with only 7485 acres grown for CBD. (See Figure 5). And just because a farmer managed to harvest hemp doesn't mean the hemp was successfully sold: Despite significantly less supply coming to the market, observed wholesale prices remain depressed. (See Figures 1-4).
- The COVID-19 crisis also weighed heavily on hemp farmers. The pandemic led to significant increases in shipping costs; for example, Hemp Benchmarks reported that average costs to ship bulk hemp products increased between 22-94% during 2021.<sup>11</sup> While hemp farmers were finally deemed eligible by the USDA for Coronavirus Food Assistance Program funds in September 2020, the benefits were much less generous than most other crops, paying only \$15/acre of 2020 crops.<sup>12</sup> Unlike other segments of the economy, the hemp extract market did not bounce back from a 2020 COVID-related sales slump: one economic study pegs the growth of U.S. CBD sales at only 2.5% in 2021, barely recouping an estimated 2.0% downturn in 2020, and a far cry from the meteoric annual growth observed pre-pandemic.<sup>13</sup>
- At least three major hemp companies have filed for bankruptcy, including Atalo Holdings<sup>14</sup>, GenCanna Global<sup>15</sup>, and Elemental Processing.<sup>16</sup> In each instance, regulatory uncertainties were cited as a

leading cause of bankruptcy. Atalo and GenCanna specifically attributed their bankruptcies to declining sales, closing markets, and frozen investment in the time since the release of FDA's public comments.<sup>17</sup>

- At the same time, major banks and payment processing services, including Chase and PayPal, are refusing to onboard hemp and CBD companies, citing regulatory uncertainty. Some, like Visa, are even levying significant penalties against financial services providers that process hemp and CBD transactions, which has caused merchants' accounts to be suspended. As a result, farmers and hemp companies are being left without critical financial and merchant services, further compromising their farms and businesses. Impacts are not limited to the hemp CBD industry, but are also being felt by hemp fiber and grain companies, and even hemp non-profit organizations and ancillary hemp industry service providers. Further, private investment in the industry has dried up; there's been a "precipitous decline" in M&A deals.<sup>18</sup>
- Even more cases have been brought by farmers against processors for non-payment and breaching hemp contracts.<sup>19</sup> These lawsuits are tying up cash and disrupting business operations and supply chains.

The FDA's inaction doesn't just threaten the current and future CBD market for American farmers and consumers. A new industry focused on the adult market has emerged to meet strong consumer demand for hemp-derived cannabinoids like delta-8 THC, delta-9 THC and CBN. These products provide plant-based options for adults seeking products with functional health and wellness benefits that have not been effectively addressed. Furthermore, a promising new hemp beverage industry has soared into popularity, meeting adult consumer demand for non-alcoholic options through domestic inputs from our farmers.<sup>20</sup> Most hemp companies pride themselves on self-regulation, using good manufacturing practices, truth in labeling, and taking steps like restricting sales to adults 21 years and older that help keep these products out of the hands of children.

Unfortunately, lack of uniform quality control standards for hemp products at the federal level has forced responsible farmers and small business owners to compete against unscrupulous actors who generate headlines by distributing poorly manufactured products that are sometimes inappropriately marketed to children and can be confusing to adults. Reports persist of Chinese manufacturers selling purely synthetic cannabinoids – those that have no relation to the hemp plant – in the marketplace, endangering public health and safety.<sup>21</sup> We applaud the joint efforts of the FDA and Federal Trade Commission in recent years to take action against "copycat food products" that could be mistaken for popular candy and snack food products, especially products that appear to target children.<sup>22</sup> However, FDA action against bad actors is few and far between. The agency's 2023 promise to work on a regulatory path with Congress has gone unresolved. And *Politico* reported just this week that agency staff claim that recent layoffs at the FDA will result in even less engagement on the issue.<sup>23</sup>

A political backlash has ensued. Language was added into the 2024 House Farm Bill<sup>24</sup> – and then subsequently inserted into the House Agriculture Appropriation bill<sup>25</sup> -- that purported to crack down on the bad actors in the space. Unfortunately, the language went much, much farther: It would have federally banned all ingestible hemp products with any "quantifiable" level of THC – 90-95% of the hemp product marketplace. This would not only prohibit products that potentially impair, but it would also ban the vast majority of non-intoxicating CBD products. It would also have banned a promising future domestic animal feed market for American farmers- at a time where research is showing spent biomass is safe for the animal feed supply and as hemp grain feed for laying hens has been recommended for approval by FDA Center for Veterinary Medicine and the Association of American Feed Control Officials (AAFCO).<sup>26</sup> And it would have wreaked havoc in the hemp fiber and grain market: It would require the destruction of the

genetic seed stock American farmers have built for the last 11 years by arbitrarily redefining “hemp.” The hemp plant cannot be cultivated—even for industrial uses like fiber, grain, building materials, or plastics—without containing at least a detectable amount of THC. All hemp plants naturally produce some level of THC, even if minimal.

The prohibition efforts are being led by a handful of companies who seek to destroy the hemp industry to capture market share for their own benefit and to the detriment of American farmers and consumers. House Agriculture Chair G.T. Thompson called them out for their deceptive advocacy “My observation was there are members who felt that the Agriculture Committee was taken advantage of.” Thompson continued: “Depending on how this bill goes, how the Senate feels about it – yeah, it is one of the more controversial parts, so I don’t know how this ends up in the final farm bill.”<sup>27</sup>

I want to be very clear. The hemp industry is united behind an appropriate response to these challenges: robust regulation of hemp products, not misguided prohibition. Dozens of nonprofit organizations in the hemp space support a regulatory approach that includes the following four pillars:

1. Restrict Youth Access – restrict the retail and online sale of human consumable hemp products with any THC to adults 21 and older, using innovative technologies to safeguard direct-to-consumer sales.<sup>28</sup>
2. Increase Quality Control Standards – mandate Good Manufacturing Practices (GMPs) and strict testing performed by independent, qualified laboratories to provide accurate identification of product contents.
3. Standardize Labeling – empower adult consumers to make informed choices and manufacturers to create uniform labels across individual states.
4. Standardize Packaging – institute child-resistant packaging and eliminate “look-a-like” products that can potentially confuse adults and may be attractive to children.

In the absence of FDA action, the hemp industry has established the US Hemp Authority (“USHA”), a self-regulatory organization that provides a certification seal to good actor farmers and manufacturers, to provide high standards and promote best practices.<sup>29</sup> USHA, which sets rigorous standards for safety, quality, and transparency across the supply chain, has recently launched a new adult product certification program, empowering consumers with the ability to distinguish among products in the federally unregulated marketplace.<sup>30</sup> From farming practices to finished consumer products, the industry has proactively adopted best practices and third-party certifications to ensure compliance and consumer trust. This commitment to accountability demonstrates that the industry isn’t trying to avoid regulation—it’s asking for it, and in the meantime, it’s doing everything it can to hold itself to high standards.

The FDA could act today on applying this four-pillar approach to hemp products. There are abundant consumer safeguards encompassed in the Federal Food, Drug and Cosmetic Act that apply to hemp products. For example, for products sold as dietary supplements, the law prohibits the manufacture and distribution of mislabeled and adulterated products and requires products to be manufactured in accordance with FDA GMPs to help ensure their safety, consistency, and quality. The law also requires reporting and recordkeeping of adverse events, requires that all claims be truthful and substantiated, and mandates compliance with strict labeling guidelines, including if FDA desires, warnings against the use of

products by children. Finally, the FDA with the Consumer Product Safety Commission could require child-resistant packaging.

We are hopeful that new leadership at the FDA will reverse the past course of inaction and take deliberate action leveraging their current authorities to robustly regulate hemp products. This issue is precisely in line with the new Administration's focus on providing adult consumers the freedom to make health care choices on behalf of their own families, with holistic solutions that are grown on American farms. If that's the case, we ask Congress to ensure that the agency is properly resourced to implement good policy.

But if laws must be changed, we urge Congress to act now. There are two viable pathways. First, we hope you will consider Senator Ron Wyden's effort in the last Congress: S.5243, the Cannabinoid Safety and Regulation Act. That bill would ensure that the FDA takes the responsibility to regulate hemp products, in conjunction with the Alcohol and Tobacco Tax and Trade Bureau, and USDA where appropriate, applying the regulatory approach that includes the four pillars I mentioned earlier.

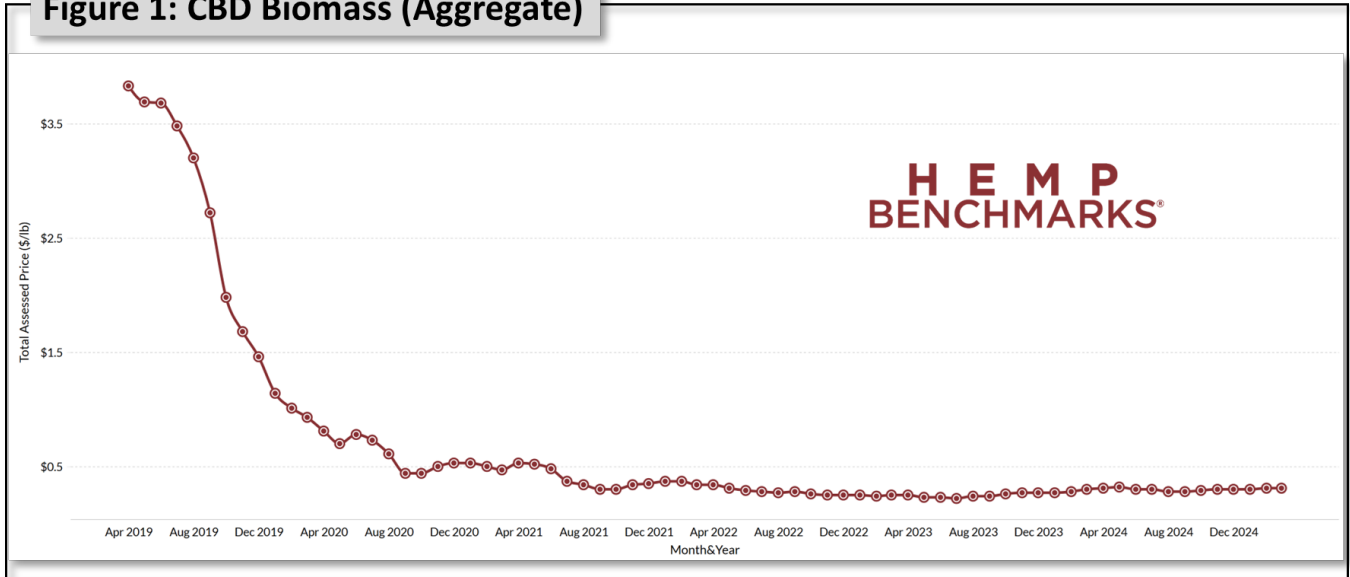
A parallel approach would be to invest more authority in the states to properly regulate their own markets. In the absence of federal regulation, many states have filled the policy void left by FDA's inaction by directly engaging their respective industries to develop new laws and regulations that balance market access with consumer safety. Mr. Chairman, I am particularly proud of the bi-partisan efforts in our home state of Kentucky, where all varieties of hemp products are regulated robustly, with adult products kept out of the hands of children.<sup>31</sup> We urge you to implement a federal framework that authorizes the sale of hemp food and dietary supplements, and develops uniform standards for labeling, packaging and testing, while allowing states flexibility on more complex issues. There is no reason that Nevada and Utah must be identical in their approaches to product composition, but uniform federal standards for how the products are manufactured and labeled would eliminate the current patchwork problem that vexes interstate commerce.

The hemp industry may be unique in that we are coming to Congress to ask: Please, regulate us! A rational, sensible regulatory framework for the hemp industry can also provide a needed financial jolt to our nation - an economic stimulus package for the nation's farmers and small businesses without requiring one dime from the American taxpayer.

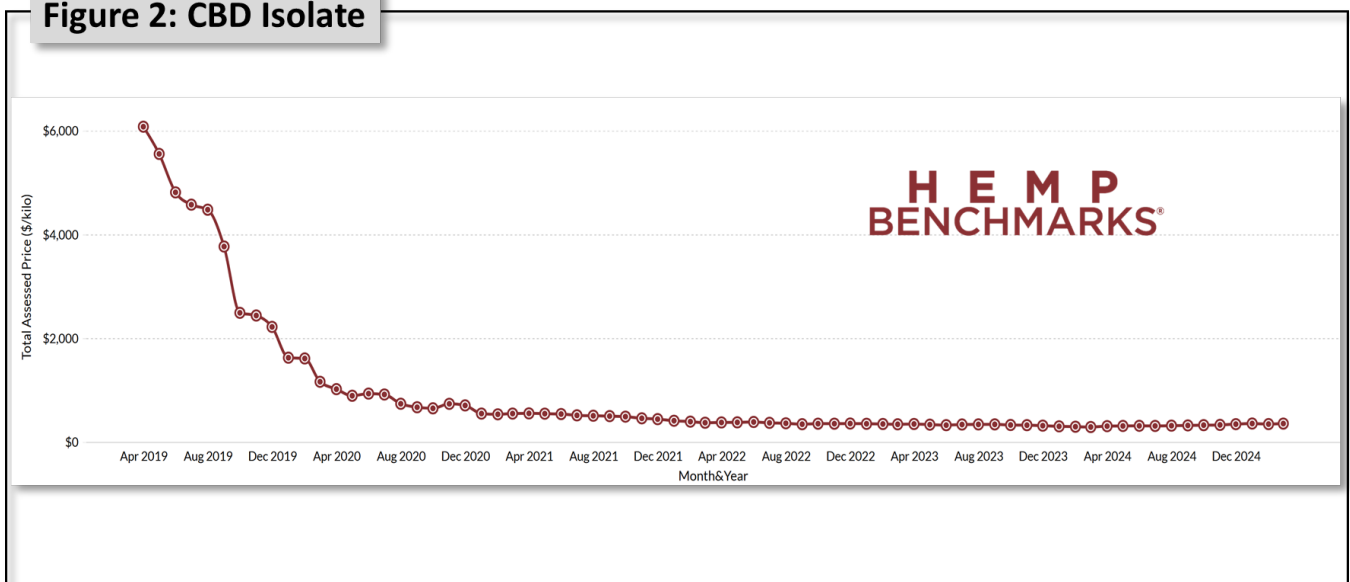
Thank you for your consideration.

# Hemp Pricing Data

**Figure 1: CBD Biomass (Aggregate)**

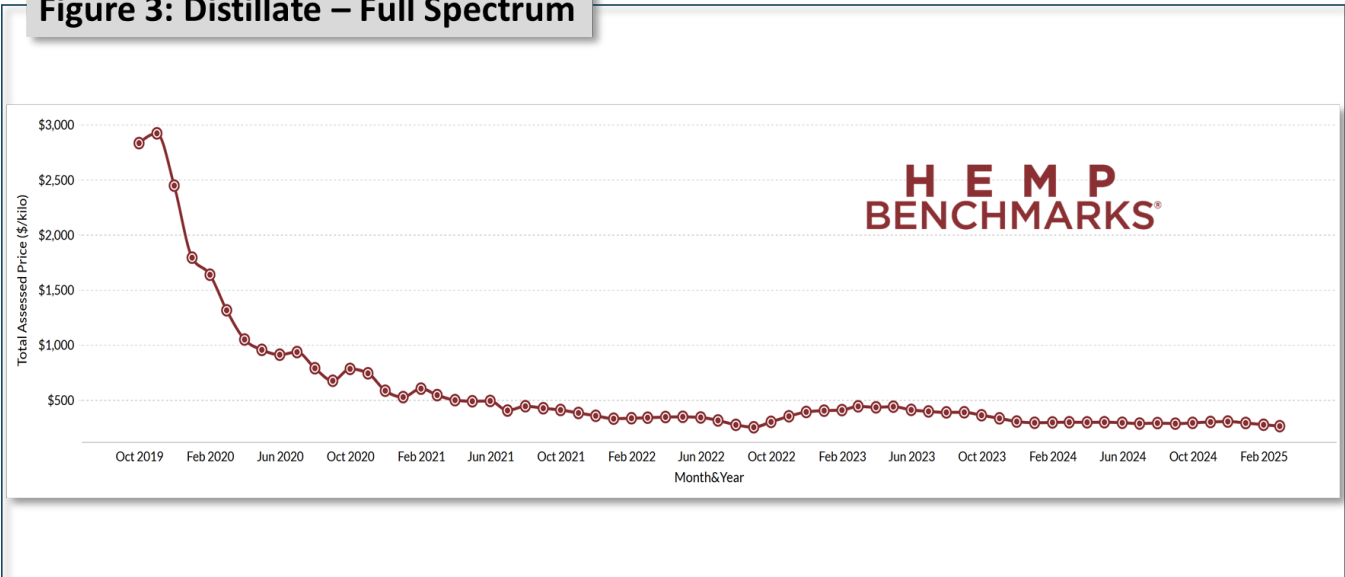


**Figure 2: CBD Isolate**

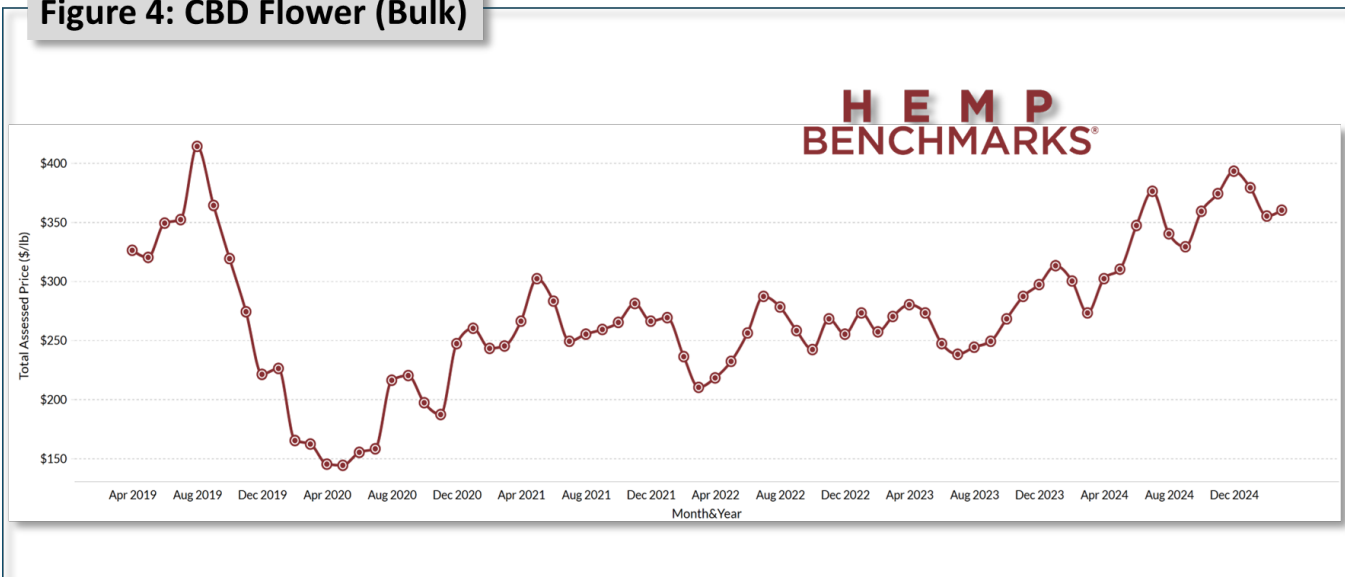


# Hemp Pricing Data

**Figure 3: Distillate – Full Spectrum**

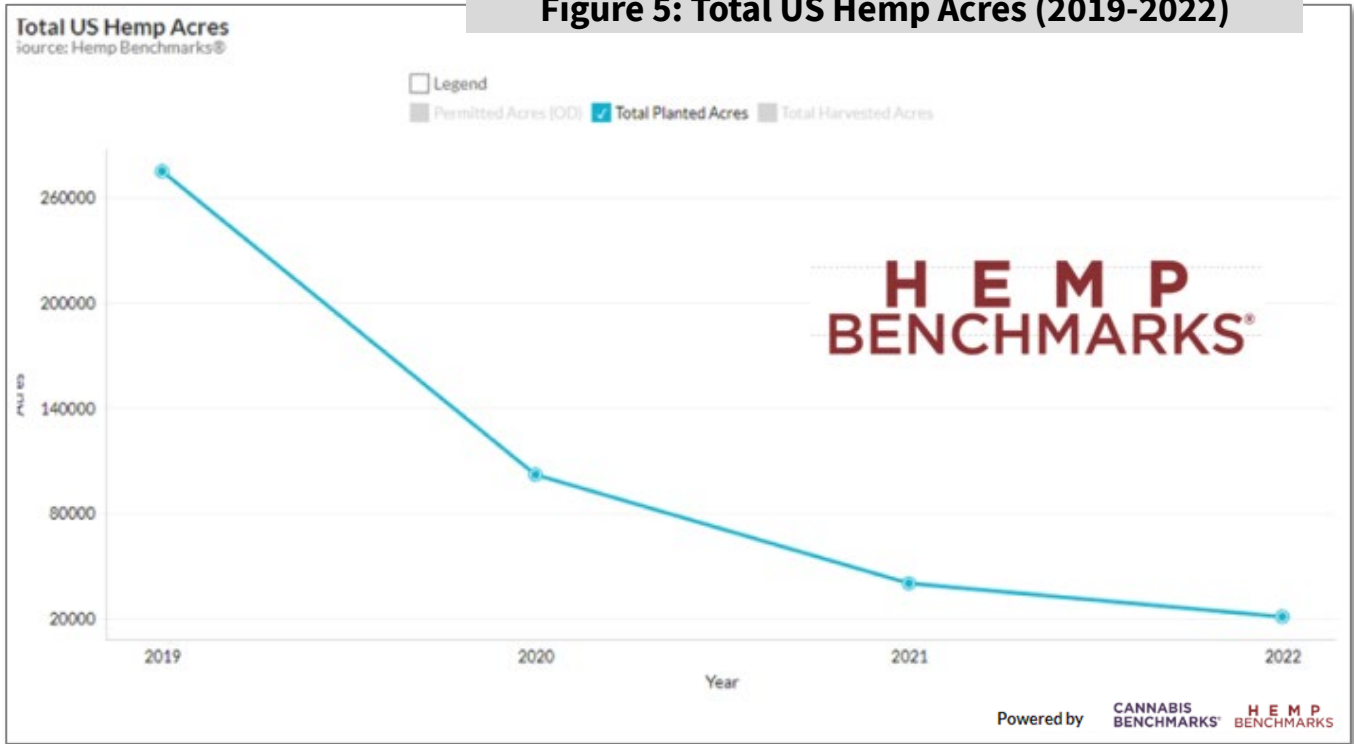


**Figure 4: CBD Flower (Bulk)**

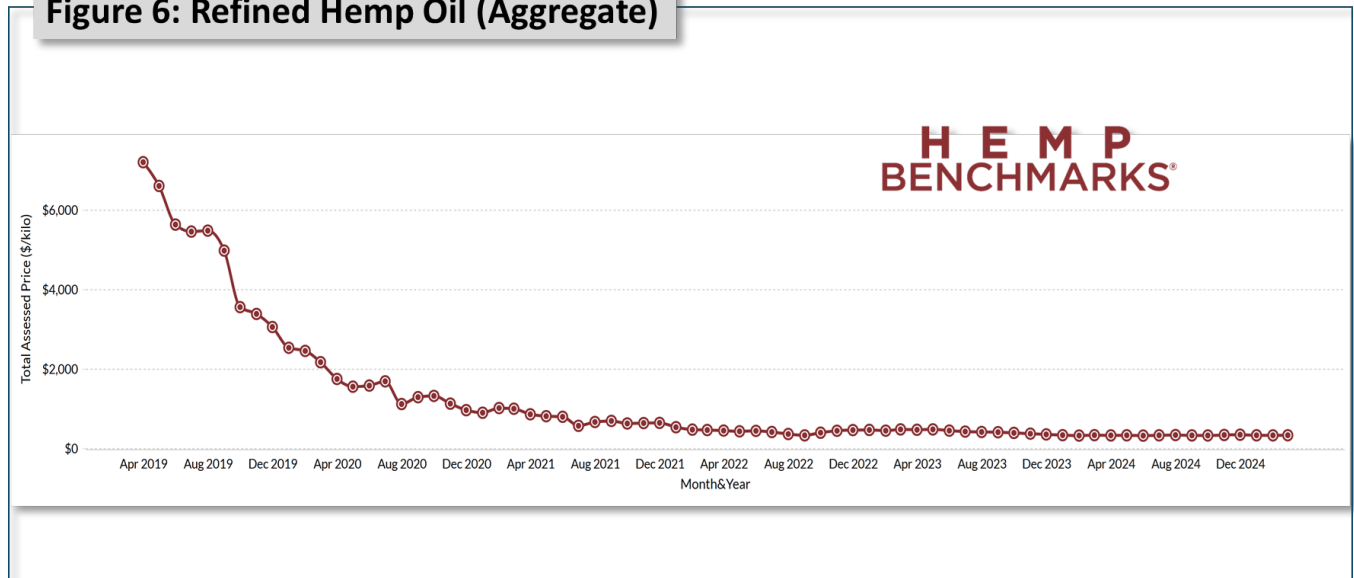


# Hemp Pricing Data

**Figure 5: Total US Hemp Acres (2019-2022)**



**Figure 6: Refined Hemp Oil (Aggregate)**





## Summary of Studies Supporting the Safety of CBD as Hemp Extract and Isolate

FDA's repeated claims that CBD poses safety risks is directly contradicted by a growing body of scientific evidence. While FDA relies on studies based on high-dosage, pharmaceutical-grade CBD formulations, more than a dozen studies demonstrate the safety of CBD at much lower amounts – such as those typically found in CBD dietary supplements and foods sold at retail – and belies the agency's safety concerns about the compound.

Three 90-day toxicity studies in animals, conducted in accordance with established scientific protocols and following FDA procedures for ingredients that are Generally Recognized as Safe (GRAS), demonstrate that CBD-containing hemp extracts studied thus far are safe. Two toxicity studies published in 2023 provide useful data regarding the safety of CBD isolate, including addressing developmental and reproductive toxicity concerns. Another study published in 2023 on a proprietary, high-CBD hemp extract found that the extract was well-tolerated. Six additional 90-day toxicity studies in animals that have not yet been published reported similar positive safety findings and include studies on both hemp extract and CBD isolate. Recently conducted human clinical trials on hemp extract reinforce these conclusions and reported zero serious adverse events.

This science is also backed up by several years of adverse event data maintained by the industry, as required by federal law for dietary supplements. This data indicates an extremely low number of adverse events associated with CBD, with an even lower number of serious adverse events, and correlates with observational data demonstrating the safety of CBD.

Taken together, these toxicity studies covering a range of CBD-containing ingredients, combined with the safety data in humans reflected in clinical trials, observational studies, and low number adverse event reports, demonstrate that CBD can be safely consumed at the serving sizes found in most CBD dietary supplements and foods sold at retail.

### References:

- Three published toxicity studies on three different types of hemp extract, conducted as part of independent GRAS affirmations, have consistently demonstrated the safety of CBD at serving sizes typically found in products sold at retail.<sup>32</sup>
- A fourth toxicity study published in 2023 on CBD isolate and a fifth toxicity study on a high-CBD hemp extract also reported positive findings with respect to CBD's safety.
- A sixth toxicity study published in 2023 evaluating the effects CBD isolate provides the relevant data needed to establish safe intake levels related to male and female developmental and reproductive toxicity, which addresses an important data gap identified by FDA.<sup>33</sup>
- A genotoxicity evaluation, also published in 2023, concluded that CBD is unlikely to pose a genotoxic hazard<sup>34</sup>
- Unpublished studies presented confidentially to FDA yielded additional positive safety findings, with two studies using hemp extract and two using CBD isolate. Most of these studies are expected to be published in 2023-2024.
- Another toxicity study with additional safety was data submitted to FDA in conjunction with a Citizen Petition, further demonstrating the safety of another CBD-containing hemp extract.<sup>35</sup>
- A further study, based on Phase II and phase III clinical trials utilizing full and broad-spectrum hemp extracts, up to 150 mg of hemp extract daily was not associated with elevated liver tests, notable drug interactions, or adverse events.<sup>36</sup>
- Observational data and the results of another study provide additional evidence of CBD's safety in over 4,000 participants collectively:

- A 2021 observational study conducted by Validcare in over 800 participants using CBD products showed no increase in the prevalence of elevated liver function tests when compared to a population with a similar incidence of medical conditions.<sup>37</sup>
- Another Validcare study of over 1,000 participants, completed in March 2022, showed that CBD is not associated with elevated liver tests, low testosterone levels, or daytime drowsiness.<sup>38</sup>
- The results of a Radicle Sciences study published in November 2022 and using 2,800 participants reported only minor side effects (e.g., gas, headache) in less than 10% of participants, with no severe side effects.<sup>39</sup>

<sup>1</sup> 2023 U.S. [National Cannabinoid Report](#) - Whitney Economics - Public Facing 10-26-23. A more recent survey focused on Texas showed that in the Lone Star State alone, hemp products resulted in \$5.5 billion in revenues, \$267 million in sales tax revenues, and the creation of 53,000 jobs, paying \$2.1 billion in wages. [New Report Reveals Texas Hemp Market Contributes \\$10 Billion to State Economy | Cannabis Business Times](#)

<sup>2</sup> <https://www.mcconnell.senate.gov/public/index.cfm/pressreleases?ID=0B71B14E-5F77-4283-9084-561F67EFBC70> (Senate Majority Leader Mitch McConnell: “Congress’ intent was clear with the passage of the Farm Bill that these products should be legal, and our farmers, producers and manufacturers need clarity as well as a workable pathway forward regarding the Agency’s enforcement and potential regulatory plans for certain CBD products”); <https://www.wyden.senate.gov/download/062519-wyden-letter-to-fda-hhs-on-hemp-cbd-> (Senator Ron Wyden: “The passage of the 2018 Farm Bill is Congress’s clear intent to further advance and support the domestic production and sale of hemp and hemp derivatives like CBD.”)

<sup>3</sup> <https://www.reporterherald.com/2020/05/18/enthusiasm-leads-to-oversupply-of-hemp-in-colorado/> (Colorado: 79% of acreage in 2020 dedicated to hemp grown for CBD products.); <https://www.kyagr.com/marketing/hemp-overview.html> (Kentucky: 92% of hemp acreage grown for CBD in 2019.)

<sup>4</sup> Commissioner Scott Gottlieb stated the day the Farm Bill was signed into law, “Congress explicitly preserved the agency’s current authority to regulate products containing cannabis or cannabis-derived compounds under the Federal Food, Drug and Cosmetic Act (FD&C Act) and section 351 of the Public Health Service Act. In doing so, Congress recognized the agency’s important public health role with respect to all the products it regulates. This allows FDA to continue enforcing the law to protect patients and the public while also providing potential regulatory pathways for products containing cannabis and cannabis-derived compounds.” (Statement of FDA Commissioner Scott Gottlieb, M.D. on signing of the Agriculture Improvement Act and the agency’s regulation of products containing cannabis, cannabis-derived compounds” December 20, 2018); In April of 2019, Dr. Gottlieb announced a May public hearing as well as a high-level internal agency working group that would study potential pathways for marketing of CBD-containing products as dietary supplements and also as conventional foods. At that time, Dr. Gottlieb reiterated the language above about the agency’s current authority and the agency titled his statement in terms of “potential regulatory changes.” (Statement from FDA Commissioner Scott Gottlieb, M.D. on new steps to advance agency’s continued evaluation of potential regulatory pathways for cannabis-containing and cannabis-derived products.” April 2, 2019.)

<sup>5</sup> FDA has been acutely aware of the broad public support for a regulatory framework for CBD, but has been unwilling to act. Former FDA Commissioner Scott Gottlieb testified that “[FDA] heard Congress loud and clear...Congress wants there to be a pathway for CBD to be available.”<sup>5</sup> Former FDA Commissioner Stephen Hahn stated it would be a “fool’s game” to try to completely shut down the CBD marketplace.<sup>5</sup> Former Acting Administrator Janet Woodcock has tried to combat the perception that FDA is opposed to CBD in dietary supplements as a matter of policy. However, she argues that the “law is very clear about this, and so it puts us in a stalemate position.”<sup>5</sup> Former FDA Commissioner Robert Califf testified to his disappointment in the lack of agency action on CBD during a congressional hearing, and expressed his interest in developing a regulatory path, asking Congress for broader regulatory powers: “I don’t think the current authorities we have on the food side or the drug side necessarily give us what we need to have to get the right pathways forward...We’re going to have to come up with something new. I’m very committed to that.”

<sup>6</sup> [FDA Concludes that Existing Regulatory Frameworks for Foods and Supplements are Not Appropriate for Cannabidiol, Will Work with Congress on a New Way Forward | FDA](#)

<sup>7</sup> <https://www.barrons.com/articles/hemp-cbd-demand-is-poor-prices-are-falling-in-a-blow-to-farmers-51580482811> (“Consumer packaged-goods giants like PepsiCo (PEP) and big retailers like Walmart (WMT) haven’t committed to CBD-laced products. A big reason is concerns voiced by the U.S. Food and Drug Administration, which says it can’t permit the biologically-active ingredient in food and drink without tests of CBD’s safety.”)

<sup>8</sup> [Hemp Benchmarks, Hemp Spot Price Index Report, Dec 2021](#)

<sup>9</sup> [National Hemp Report 02/17/2022 \(usda.gov\)](#); compare to: [VH 2020 Crop Report final \(votehemp.com\)](#)

<sup>10</sup> [National Hemp Report 02/17/2022 \(usda.gov\)](#)

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- <sup>11</sup> [Hemp Benchmarks, Hemp Spot Price Index Report, Dec 2021](#)
- <sup>12</sup> <https://www.farmers.gov/cfap>; See also <https://hempindustrydaily.com/hemp-industry-daily-taking-stock-of-how-coronavirus-has-affected-farmers-businesses/> (54% of hemp companies have reported that applications for COVID-19 relief funds have gone unanswered, and another 29% report their applications being denied outright or relief loans going unfulfilled.)
- <sup>13</sup> [Brightfield Group, US CBD Market Industry Update, October 2021.](#)
- <sup>14</sup> <https://www.forbes.com/sites/davidcarpenter/2020/03/18/hemp-company-files-for-bankruptcy-as-confounding-regulatory-guidelines-hamper-growth/#417b60955794>
- <sup>15</sup> <https://www.winchestersun.com/2020/02/06/gencanna-files-for-chapter-11-bankruptcy/>
- <sup>16</sup> <https://hempindustrydaily.com/kentucky-extractor-elemental-processing-files-for-bankruptcy-protection/>
- <sup>17</sup> <https://www.thefencepost.com/news/gencanna-exec-blames-fda-for-hemp-industry-troubles/>; (GenCanna: FDA’s “uncertainty over how to regulate hemp...has diminished the interest of big companies in hemp food products and ‘frozen’ processors access to capital.”); <https://www.forbes.com/sites/davidcarpenter/2020/03/18/hemp-company-files-for-bankruptcy-as-confounding-regulatory-guidelines-hamper-growth/#417b60955794> (Atalo: “The path to growth has been impeded by confounding guidance from regulatory agencies.”)
- <sup>18</sup> <https://www.forbes.com/sites/mergermarket/2020/04/27/precipitous-decline-in-hemp-and-cannabis-ma-continuing-amid-covid-19-pandemic/#2d8825375c05>
- <sup>19</sup> <https://www.courtlistener.com/docket/17027232/third-wave-farms-llc-v-pure-valley-solutions-llc/>
- <sup>20</sup> [The Hemp Beverage Market Grows Despite Legal Challenges - CRB Monitor News](#)
- <sup>21</sup> [Visiting the Factories in China Where Synthetic Marijuana Gets Made](#)
- <sup>22</sup> [FDA, FTC Warn Six Companies for Illegally Selling Copycat Food Products Containing Delta-8 THC | FDA Politico Pro, \*Morning Cannabis\*, April 7, 2025](#)
- <sup>24</sup> [MaryMillerAmendment-VOTENO.pdf](#)
- <sup>25</sup> [Harris-Language.pdf](#)
- <sup>26</sup> [AAFCO Votes Yes on Hemp Seed Meal for Laying Hens | Hemp Industry News | lancasterfarming.com](#)
- <sup>27</sup> [Lobbyists-Fight-to-Restrain-Maintain-28-Billion-Hemp-Industry.pdf](#)
- <sup>28</sup> See [Microsoft Word - USHR Direct-to-Consumer State Legislative Language, 2025.02.17.docx](#)
- <sup>29</sup> [The U.S. Hemp Authority® Certification Program is our industry's initiative to provide high standards, best practices, and self-regulation, giving consumers and retailers confidence in hemp and CBD products.](#)
- <sup>30</sup> [USHA-Adult-Use-Hemp-Certification-Program-Standard.pdf](#)
- <sup>31</sup> [902 KAR 45 0120 v. 4.22.24](#)
- <sup>32</sup> An Assessment of the Genotoxicity and Subchronic Toxicity of a Supercritical Fluid Extract of the Aerial Parts of Hemp (2018), <https://doi.org/10.1155/2018/8143582>; Safety Assessment of a Hemp Extract using Genotoxicity and Oral Repeat-Dose Toxicity Studies in Sprague-Dawley Rats (2020), <https://doi.org/10.1016/j.toxrep.2020.02.014>; Toxicological safety of VOHO Hemp Oil; a supercritical fluid extract from the aerial parts of hemp (2022), <https://doi.org/10.1371/journal.pone.0261900>
- <sup>33</sup> Oral toxicity evaluation of cannabidiol (2023), <https://doi.org/10.1016/j.fct.2023.113778>; Toxicological safety assessment of HempChoice® hemp oil extract; a proprietary extract consisting of a high concentration of cannabidiol (CBD) in addition to other phytocannabinoids and terpenes derived from Cannabis sativa L (2023), <https://doi.org/10.1016/j.heliyon.2023.e16913>; Reproductive and developmental toxicity evaluation of cannabidiol (2023), <https://doi.org/10.1016/j.fct.2023.113786>.
- <sup>34</sup> Genotoxicity evaluation of cannabidiol (2023), <https://doi.org/10.1016/j.yrtph.2023.105425>.
- <sup>35</sup> Citizen Petition from Daniel Fabricant, Ph.D. on behalf of Natural Products Association, Docket No. FDA-2022-P-0600, <https://www.npanational.org/wp-content/uploads/2022/02/CBD-CP-on-CBD.pdf>.
- <sup>36</sup> Presented confidentially to FDA. Pregnant women were excluded from the studies.
- <sup>37</sup> Observed Impact of Long-term Consumption of Oral Cannabidiol on Liver Function in Healthy Adults (2021), <https://www.liebertpub.com/doi/10.1089/can.2021.0114>.
- <sup>38</sup> <https://hempsupporter.com/news/new-study-demonstrates-cbds-strong-safety-profile-amplifies-calls-for-fda-regulation>.
- <sup>39</sup> The Safety and Effectiveness of Commercially Available Cannabidiol Products for Health and Well-Being: A Randomized, Multi-Arm, Open-Label Waitlist-Controlled Trial (2022), <https://doi.org/10.1089/imr.2022.0081>.

# 2025 U.S. HEMP ROUNDTABLE MEMBERSHIP

## EXECUTIVE COMMITTEE

<b>AMERICAN SHAMAN</b>	<b>BRĚZ</b>	<b>CORNBREAD HEMP</b>	<b>CRONOS GROUP</b>
<b>BAYOU CITY HEMP</b>	<b>CYCLING FROG</b>	<b>JUST BRANDS</b>	<b>MEDTERRA</b>

## BOARD OF DIRECTORS

<b>AMERICAN SHAMAN</b>	<b>CLIMBING KITES</b>	<b>CYCLING FROG</b>	<b>PANDA BIOTECH</b>
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<b>CBD FX</b>	<b>CRONOS GROUP</b>	<b>JUST BRANDS</b>	<b>U.S. HEMP AUTHORITY</b>
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