



The following document includes a summary of relevant regulatory requirements, and may provide examples and recommendations based on program staff research and experience, and shared findings from industry stakeholders including Missouri producers. This document is not a legal interpretation of the law.

Concepts included in this document are:

- What is an inspection?
 - Who is present?
 - What to expect
 - How to prepare
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WHAT IS AN INSPECTION

Inspections are on-site visits that typically include a tour of facilities and/or crops, and an audit of records. These visits help to ensure compliance, and provide an opportunity for direct communication between licensees and program staff.

All Registered Producers and Agricultural Hemp Propagule and Seed Permit holders are subject to inspection.

Inspections are scheduled on a routine and as-needed basis. License holders should anticipate at least one routine inspection per three years. Inspections are based on regulatory compliance, and program staff does not evaluate plant health or quality, or offer production advice.

WHO IS PRESENT

Inspections are completed by program staff (Alan Freeman or Erin Casey-Campbell). Certified Industrial Hemp Samplers are not inspectors. At least one key participant (executive control of the operation) of the license should be present throughout the inspection. In some cases, a representative who is not a key participant of the license may be authorized to meet with program staff instead. Additionally, if there is a specific individual who is responsible for recordkeeping, they should be present for the audit portion of the inspection.

WHAT TO EXPECT

Program staff will consult with license holders to identify preferred times and dates for inspections, but may not be able to accommodate requests. Routine inspections are typically scheduled 1-3 weeks in advance of the proposed date. Scheduling for as-needed inspections may vary.

Routine inspections typically last 45 – 90 minutes, but length can vary widely depending on several factors including:

- Quality, organization, and completeness of records
- Scale of operation
 - Quantity and size of lots, including past and current production
 - Quantity of licenses included in inspection (registrations and permits)
- On-site discussions

Registered Producers should be prepared to give program staff a tour of production areas and related facilities. If the production area(s) are not accessible by foot and/or are not accessible by a standard passenger vehicle, please provide notice well in advance of the inspection or provide appropriate transportation on site.



Additionally, many inspections are completed July through September, which can provide heat-related challenges for all parties involved. If possible, consider submitting electronic records ahead of your inspection (see next section). Or, if indoor or climate-controlled facilities are available for the audit portion of the inspection, please identify this opportunity with program staff ahead of time.

HOW TO PREPARE

The best way to prepare for an inspection is ensuring your records are complete and organized.

Records for the last three (3) years, including inactive licenses, will be reviewed including:

- [Planting Reports](#) (previously called Lot Identification Forms)
- [Lot Reports](#)
 - Including [origin documentation](#) for each variety
- Certificates of Analysis
 - Compliance tests required
 - Preliminary tests optional
- Destruction Reports, if applicable
- Remediation Reports, if applicable
- [FSA Crop Reporting](#) evidence – Form 578 or other reporting ‘receipt’
- [Distribution & Sales Report](#), if applicable (permits only)

If using **electronic records**, records must either be (1) submitted to the Department *at least five business days* in advance of the inspection, or (2) are available on site at the time of inspection on a computer or tablet; phone access is not sufficient. Electronic files must be organized and appropriately named; use lot names and years whenever possible.

If using **paper-based records**, all records must be available on site at the time of inspection. Files must be organized; preferably by year and lot, where applicable.

APPLICABLE RULE SECTIONS

2 CSR 70-17.080 (2) Registered producer or permit holders shall have no reasonable expectation of privacy from the department or law enforcement, with respect to the parcel of land where viable industrial hemp is produced, sold, distributed, or offered for sale.

2 CSR 70-17.080 (3) A registered producer or permit holder, whether present or not, must allow the department or a representative of any law enforcement agency to enter the parcel of land or structure, with or without cause, where viable industrial hemp is produced, sold, distributed, or offered for sale.

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Please contact the program for questions about this document at hempprogram@mda.mo.gov, or contact your Extension staff for more information about these topics.

Lincoln University Hemp Institute: <https://bluetigerportal.lincolnu.edu/web/hemp-institute/home>

University of Missouri Extension – Industrial Hemp: <https://extension2.missouri.edu/programs/industrial-hemp>