

The following document includes a summary of relevant regulatory requirements, and also provides 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 a Lot?
- Lot Size
- Lot Arrangement

- Lot Labeling
- Reporting Lots
- Revising Lots

WHAT IS A LOT?

A "lot" is a group of plants of the same variety or strain grown in a continuous area.

A "variety" or "strain" is a subcategory of a plant species with the same unique traits. Examples of variety names are Cherry Blossom, T1, and Fibronova. Generic descriptions like "fiber", "CBG", or "hemp" are *not* variety names.

Ex: *Cannabis sativa '*Cherry Blossom' Genus species variety

Continuous areas are typically fields, greenhouses, groups of raised beds, and other similar production areas. The same variety grown both indoors and outdoors cannot be the same lot. Other continuous areas that should be split into different lots based on varying cultivation methods include direct seeding vs. transplanting, plastic mulch or bare rows, significantly different fertilization or irrigation practices, and more.

Each lot requires its own pre-harvest compliance sample.

All plants within a lot must be harvested **within thirty (30) days** of the pre-harvest compliance sampling. Producers should plan lots accordingly to ensure the ability to complete harvest within that timeframe, including sufficient labor and desired crop maturation.

LOT SIZE

There are no requirements on the minimum or maximum size of lot. Smaller lot sizes lower the 'all-or-nothing' compliance risk, but they can also increase cost and labor associated with sampling and testing. Registered Producers should evaluate the pros and cons to the varying sizes of lots when planning their production and decide the right balance for them.

For example, a producer has one large, 20-acre field. If kept as one lot, this creates an 'all-or-nothing' risk for compliance testing and all 20 acres must be harvested within the 30-day window. This producer may evaluate splitting into multiple lots, such as ten 2-acre lots. In that scenario, if one section of the property tests "hot", then only that two-acre lot is non-compliant, rather than the total 20 acres. Additionally, the producer can stagger compliance sampling of these "sub-lots" to lengthen the overall harvest window. This producer may also consider selecting more than one variety to diversify.



MISSOURI DEPARTMENT OF AGRICULTURE PLANT INDUSTRIES DIVISION INDUSTRIAL HEMP PROGRAM

LOT ARRANGEMENT

The physical arrangement of planting should have as much planning as any other element of your operation. Separation and labeling of lots is critical for compliance, especially if any compliance test results exceed the acceptable THC limit. Whenever possible, separate lots with natural breaks like tree lines, creeks, fence lines, or by planting in completely separate fields or areas like pictured on the right. If these types of preexisting separations are not feasible, utilize mowed paths or larger row spaces between the lots. Whenever possible, do not mix plants from different lots in the same row, bed, bench, or other production area.







LOT LABELING

Labeling is an extremely important measure to include in your operational plans from seed/clone acquisition through post-harvest storage. The rest of this section is specific to labeling during production.

For indoor producers or container-based planting, in-container or direct on-container labeling is recommended. Permanent metallic markers for dark-colored containers are common. Bench or tray labels are also options for these types of lots.

In traditional field settings, lot identification is often done with on-hand materials like plastic marking flags and permanent markers. Cardboard and similar materials are also often used, but should be sealed to ensure the signage endures throughout the season. Other store-bought materials or commissioned signs are acceptable but not required.



Separation must be maintained during and after harvest.



REPORTING LOTS

Registered Producers are required to report all industrial hemp lots **within thirty (30) days** after planting. This reporting is done through the MDA Planting Report, and additional instructions are available in <u>GS2101: How to Complete the</u> <u>MDA Planting Report</u>.

Additionally, Registered Producers are required to report planting to the Farm Service Agency. This is a separate reporting requirement, and producers should consult their <u>local FSA office</u> for reporting deadlines and details. Additional information is available in <u>GS2003: Farm Service Agency (FSA) Guidance</u>.

REVISING LOTS

Registered Producers may need to revise their lots after the original submission for a variety of reasons. The most common reasons include unexpected variable performance or maturation within a lot, and lack of sufficient labor to harvest within the allotted window. Registered Producers may revise their lots by redefining the lot boundaries *and lot names*, and submitting a revised MDA Planting Report to the Department prior to compliance testing. Only the affected and new lots need to be resubmitted.

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Please contact the program for questions about this document or regulatory topics at <u>hempprogram@mda.mo.gov</u>.

For production or other non-regulatory questions, please contact your local Extension staff: Lincoln University Hemp Institute: <u>https://bluetigerportal.lincolnu.edu/web/hemp-institute/home</u> University of Missouri Extension – Industrial Hemp: <u>https://extension2.missouri.edu/programs/industrial-hemp</u>