

## **Hemp Feed Coalition Disputes Overly Broad Concerns**

This release is in response to the February 9<sup>th</sup> release from the Association of American Feed Control Officials (AAFCO) to agricultural leaders and policymakers.

The Hemp Feed Coalition (HFC) is a non-profit organization composed of industry professionals across animal feed, animal supplements, feed analytics, veterinary science, and hemp industries. HFC's mission is to bring back safe and nutritional, hemp derived ingredients to the feed production system. We strive to achieve this mission by supporting and submitting applications to AAFCO and Food and Drug Administration-Center for Veterinary Medicine (FDA-CVM) for the use of hemp grain in animal feed.

HFC has focused its efforts in evaluating products derived from hemp seed, also known as hemp grain. Hemp grain products are generally recognized as safe (GRAS) by FDA for human consumption and it is well established that the grain does not produce any cannabinoids (organic compounds developed within the flower). In 2020, HFC led efforts to submit "Hemp Seed Meal, for Laying Hens" as an animal feed ingredient application to FDA-CVM. Hemp seed meal is the by-product of the seed after the oil has been extruded and is a highly nutritious protein supplement. The study demonstrated that the eggs of the laying hens showed multiple nutritional benefits. Just as important, the results also showed no cannabinoid transference, safety concerns, or impact on the hens or the eggs.

Unfortunately, FDA-CVM sent the application back to HFC and requested that the laboratory analysis be rerun at even lower levels of cannabinoid detection. HFC recently spent additional time and resources to gather the requested data and it is currently under FDA-CVM review for a second time. *This request for lower levels of detection of compounds that are physiologically NOT produced in the ingredient is why HFC and the industry at large continues to be frustrated with bureaucratic hurdles strangling the potential of the hemp industry.* These feed applications cost roughly \$250,000 each, require years to complete, and are specific to the ingredient and the species. At the current rate of approval, it will be millions of dollars and decades before the government allows the hemp industry even an opportunity to compete in the greater feed market.

Like our colleagues, HFC prioritizes animal health and safety. In December 2021, HFC requested to be included in AAFCO's Hemp Committee to share the research, data, and expertise we have acquired in our years in the industry. Surprisingly, AAFCO denied this request for collaboration and followed it with their written release to agricultural leaders and state policymakers. *This release paints the industry with an overly broad brush, conflates hemp grain with cannabinoids, and sets back years of progress the industry has made in educating the traditional agricultural world and policymakers about the highly nutritious value grain brings to animal feed and the farm.*

Grain's rich history as a well-recognized feed stock and agricultural commodity in the United States dates back to the 1900's. It stands to argue that hemp seed ingredients should be grandfathered into the approved animal feed ingredients list since it is proven to have been commercially used and safe well before 1958. While AAFCO still remains highly regarded and trusted they do not have regulatory authority – they simply recommend policy. Although we objectively appreciate and respect the current regulatory path to approval for hemp grain as an animal feed, it is crucial state policymakers understand their ability to move much quicker than the federal government to ensure our farmers have a chance to compete in the national and international feed markets.

*For further information about hemp ingredients, their nutrition and value to humans and animals please visit [hempfeedcoalition.org](https://hempfeedcoalition.org) and contact us at [hempfeedcoalition@gmail.com](mailto:hempfeedcoalition@gmail.com)*