



November 5, 2018

The Honorable Pat Roberts
Chairman
Senate Committee on Agriculture, Nutrition & Forestry
328A Russell Senate Office Building
Washington, D.C. 20510

The Honorable Debbie Stabenow
Ranking Member
Senate Committee on Agriculture, Nutrition & Forestry
328A Russell Senate Office Building
Washington, D.C. 20510

The Honorable Mike Conaway
Chairman
House Committee on Agriculture
1301 Longworth House Office Building
Washington, D.C. 20515

The Honorable Colin Peterson
Ranking Member
House Committee on Agriculture
1301 Longworth House Office Building
Washington, D.C. 20515

Dear Chairmen Roberts and Conaway and Ranking Members Stabenow and Peterson:

We write to follow up on our [April 19, 2018 letter](#) to House and Senate leadership, on which we copied you, expressing concern about the significant legal, regulatory, and procedural impediments that prevent or make it difficult for researchers to conduct legitimate and important research on industrial hemp (the plant genus *Cannabis sativa L*, and any part of such plant, with a THC concentration of not more than 0.3%). Attached is a copy of that letter, which provides more detail about our concerns. We bring this to your attention now as you are conferencing the House and Senate versions of H.R. 2, the “Agriculture Improvement Act of 2018” (the Farm Bill).

We continue to believe that there is a need for clear federal guidance specifying that researchers at institutions of higher education:

- 1) May obtain, cultivate, and conduct research on industrial hemp seed, cultivars, and “all parts of the plant” (which should be clearly defined to include extracts and derivatives of industrial hemp plants) without the need to apply for a Schedule I registration from the federal Drug Enforcement Agency (DEA); and
- 2) May transfer and receive industrial hemp seed, cultivars and “all parts of the plant” (which should be clearly defined to include extracts and derivatives of industrial hemp plants) between and within states with legalized programs within the U.S. without the need for a DEA registration or any type of DEA license.

Many of our concerns would be effectively addressed by provisions contained in the Senate Farm Bill, including Section 7415 (“Legitimacy of Industrial Hemp Research”), Section 12608 (“Conforming Changes to Controlled Substances Act”), and Section 10111 (“Hemp Production”), which would among other things:

- Amend the Controlled Substances Act to exclude industrial hemp from the definition of marijuana (Section 12608); and
- Define hemp to include seeds, derivatives, extracts, and cannabinoids derived from the hemp plant which have a THC concentration of less than 0.3%. (Section 10111)

While these provisions are of general applicability (i.e., they are not focused solely on research applications), together, they would significantly address the concerns of the research community. The provisions make it possible for scientists to conduct research on industrial hemp (including extracts from industrial hemp plants, like cannabidiol extract, which is one extract of great interest for its potential therapeutic effects) without needing to undertake the time-consuming and cumbersome process of securing a Schedule I DEA registration. Furthermore, under the Senate language, researchers would not be significantly limited as to where they may obtain the hemp and hemp derivatives needed for their research. **As you debate many differences between the House and Senate Farm Bills, we urge you to include the important Senate provisions regarding industrial hemp research in the final conference of the bill.**

While this letter is focused on the federal barriers to conducting research involving the variety of cannabis known as industrial hemp, our members also have serious concerns about the significant impediments to conducting legitimate (and much-needed) research on other cannabis strains and species, and we will be following up with appropriate Members to urge action on those additional concerns.

Thank you for your consideration; please let us know if we can provide more information or assistance that can aid in achieving reform in these areas.

Council on Governmental Relations
Association of Public and Land-grant Universities
Association of American Universities

CC: Senate Majority Leader Mitch McConnell
Senate Minority Leader Charles Schumer
House Speaker Paul Ryan
House Minority Leader Nancy Pelosi

About the signatory associations: The Council on Governmental Relations (COGR) is an association of 188 research universities and affiliated academic medical centers and research institutes. COGR concerns itself with the impact of federal regulations, policies, and practices on the performance of research conducted at its member universities. The Association of American Universities is an association of 60 U.S. and two Canadian preeminent research universities organized to develop and implement effective national and institutional policies supporting research and scholarship, graduate and undergraduate education, and public service in research universities. The Association of Public and Land-grant Universities (APLU) is a research, policy, and advocacy organization with a membership of over 200 U.S. public research universities, land-grant institutions, and state university systems, that is dedicated to strengthening and advancing the work of public universities.