

INDUSTRIAL HEMP

Hemp Grower Self-Audit Checklist

Michigan Department of Agriculture and Rural Development
Phone: 800-292-3939 Online: www.Michigan.gov/HempGrowing

Under the authority of Public Act 220 of 2020, the Industrial Hemp Growers Act, as amended, the Michigan Department of Agriculture & Rural Development (MDARD) conducts routine inspections of persons performing activities related to industrial hemp cultivation. MDARD is providing this document as a checklist for growers learn about PA 220 requirements and to review in preparation for inspection. The following inspection criteria are found in PA 220 of 2020, as amended.

Self-Audit Checklist

Grower Registration & Growing Locations			
1. Are you currently registered? Registration cycle is Feb 1 to Jan 31.	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
2. Do you have a copy of your registration to show the inspector?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
3. Are all areas where hemp is being grown reported on your registration application, or have you submitted a growing location modification form to MDARD?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
4. Is the following information on your application for each indoor or outdoor location accurate? <ul style="list-style-type: none"> • Acreage or indoor square footage • Address • Legal description • GPS coordinates • Maps including entrances, field boundaries, and location of GPS coordinates provided 	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
5. If not, did you submit a growing location modification form to MDARD?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
6. Are all locations owned or leased and completely controlled by you, the registered grower?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
7. If you have contracts with other farmers to grow hemp for you, are they registered hemp growers?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

8. Are you and all key participants free from conviction of a controlled substance felony since the background checks you submitted with your application were performed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
9. Are you only growing and/or in possession of hemp – unless you meet CRA requirements under MRTMA, MMFLA, or MMMA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
10. Is hemp only being grown in locations that are not dwellings?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Processing			
11. If selling or transporting viable hemp plants or seed, do you possess a processor license under PA 547?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
12. Are you only selling harvested industrial hemp to someone that is licensed as a processor under PA 547 or MMFLA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
13. If you are processing, brokering, or marketing smokeable flower or hemp intermediary, in-process, or finished industrial hemp product, do you have a processor license under PA 547 or MMFLA?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Sampling & Harvesting			
14. Did you contact MDARD by filing out the online preharvest sampling request form 20 to 30 days before your anticipated harvest date for MDARD to collect an official sample?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
15. If growing to sell clones, transplants, microgreens, sprouts, or greens – did you contact MDARD for preharvest sampling prior to movement offsite or sale and do you participate in performance-based sampling (optional) to reduce regulatory sampling needs?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
16. Was hemp harvested only after a preharvest sample was collected by MDARD, that was found to be compliant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
17. Did you harvest hemp within 30 days of preharvest sampling by MDARD?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
18. Did you use DEA-registered labs for compliance monitoring testing?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
19. Did you allow inspector access to all fields, structures, files, documents, and media related to hemp production and allow collection of samples?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Posting			
20. Are signs posted in a conspicuous location at each boundary line of each location where hemp is being grown?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
21. Do signs include the following:			
Have the statement “Industrial Hemp Registered with the Michigan Department of Agriculture and Rural Development”	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
List Grower’s Name	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
List Grower’s Registration Number	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
At least 8x10 inches	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Clearly legible with text 3/8 inch or greater	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Weather-resistant	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Recordkeeping & Reporting			

22. Do you provide records of sales to customers (licensed processors) containing the following? Name of processor License No. of processor Total weight of hemp purchased Total sale price of hemp purchase Date of sale Official test report (THC results)	<input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No	<input type="checkbox"/> NA <input type="checkbox"/> NA <input type="checkbox"/> NA <input type="checkbox"/> NA <input type="checkbox"/> NA <input type="checkbox"/> NA
23. Are records of sales maintained for at least 5 years?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
24. Do you maintain the name and mailing address of any person from whom viable hemp (seeds, clones, transplants) was purchased? 25. Is this information maintained for at least 5 years?	<input type="checkbox"/> Yes <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> No	<input type="checkbox"/> NA <input type="checkbox"/> NA
26. Do you maintain the names of each hemp variety grown? 27. Is this information maintained for at least 5 years?	<input type="checkbox"/> Yes <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> No	<input type="checkbox"/> NA <input type="checkbox"/> NA
28. Did you report to MDARD by November 30 the total acreage grown, harvested, and disposed of? <i>Via online survey or inspector postharvest inspection contact</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
29. After planting hemp, and by July 15 (or within 15 days if planting occurred after July 15), did you file an acreage report with the USDA Farm Service Agency (<i>note: file using your exact hemp grower registration number assigned by MDARD</i>)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
30. Did you maintain records that show the acreage report was submitted (<i>a service receipt or a completed FSA-578 provided by FSA for all growing locations</i>)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
31. Is the evidence of submittal maintained for at least 5 years?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Disposal of Noncompliant Lots			
32. Did you submit a Grower's Notice of Intent to Dispose online before disposing of lots that MDARD found to be noncompliant due to THC? <i>does not include disposal due to health, pests/disease, weather, rogue males</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
33. If your THC monitoring during the season found a noncompliant lot, did you submit a Notice of Intent to Dispose or a request for Remediation Sampling, or a request for MDARD to test the noncompliant lot?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
34. Was the Notice of Intent to Dispose submitted at least 48 hours prior to disposal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
35. If an inspector did not witness the disposal, did you submit a Notice of Disposal within 48 hours of disposal that included: date, method, total acreage/square footage, reason, and photo or video evidence?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
36. Are Notices of Disposal (for unobserved disposal) or Disposal Observation Reports (for observed disposal) maintained for at least 5 years?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

37. Was hemp disposed of (made nonretrievable or noningestible) using one of the approved methods in PA 220? (<i>burn, deep burial, mow/shed, mulch, or plow</i>)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
38. Was noncompliant hemp disposed of within 30 days of receipt of sample results?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Remediation of Noncompliant Lots			
39. Did you contact MDARD to collect a remediation sample of biomass or non-floral material at least 20 days prior to the anticipated date of remediation?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
40. Was hemp remediated by either removing all floral material AND disposing of floral material, OR shredding plants into biomass?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
41. Was successfully remediated hemp harvested within 30 days of receiving sample results?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
42. Was a Grower's Notice of Intent to Dispose submitted for unsuccessfully remediated hemp (biomass or non-floral material) at least 48 hours prior to disposal?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
43. If an inspector did not witness the disposal of an unsuccessfully remediated lot, did you submit a Notice of Disposal within 48 hours of disposal that included: date, method, total acreage/square footage, reason, and photo or video evidence?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
44. Are Notices of Disposal (for unobserved disposal) or Disposal Observation Reports (for observed disposal) of biomass and non-floral maintained for at least 5 years?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
45. Are Industrial Hemp Remediation Sampling & Report on Sample reports maintained for at least 5 years? <i>serve as Notice of Disposal for floral material</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA

Please review results and correct deficiencies. Requirements are also described in several compliance assistance documents posted at www.Michigan.gov/HempLaws. Please visit www.Michigan.gov/HempGrowing, email MDARD-Industrialhemp@michigan.gov, phone 800-292-3939, or contact your district Plant Health Inspector with questions.