

Compliance Planning 01/02/20

Hi Ari, compliance outline dives right in to where you all are with current breeding program. Your teams' program is already advanced which benefits compliance. TY Paul

- **Compliance Project**

To assist the partners current seed breeding program/initiative. Provide traceability for compliance regulations from greenhouse and growing to production, inventory, quality assurance and sales, recipe/formulation IP protection.

- Gather current regulatory documentation for hemp seed sales, governance and risk management.
- Help with IP protection in plant breeding for partners under the Plant Variety Protection Act, PVPO. Breeding partners may have started this process.
- Compliance deliverables are essential building blocks in marketing & sales of hemp seeds.

- **Compliance Roadmap**

Hemp Seed certification

OSU Seed Certification - experimental application then to AOSCA Seed Certification.

- Currently active in OSU's seed breeding program creating operational SOP's for seed certification standards i.e. depollenization procedures between runs, germination testing, seed sampling and amounts required etc.
- Develop critical operational greenhouse processes SOP's as noted by partners (Mateo) i.e. STS application, pest control, cleaning standards etc.

Non-Certified Seed

- 2020 Non-certified seeds given increased THC testing can be approved for sale in many states. We can contact those state (i.e. Montana) for definition.

Federal & State Regulation Documents – US sales and non-US exporting

Import permits (IP), bills of lading, manifests, shipping invoices, foreign export certificates (if applicable), inspection certificates, labeling regulations, possible phytosanitary certificate, PPQ form 577 etc.

Banking Compliance

US and non-US banking requirements (CC may information and / or partner on this).

Routing instructions, wire instructions, fees, holding accounts.

Client identification and information requirements.

Product Marketing (derived from the subject matter experts)

- Work with Richard to understand how to pull necessary research data for applications, regulatory document, marketing factsheets etc. Seed breeding partners (Richard or ??) will review documents for data and content accuracy before submitting.

- **Next steps**

- Agree to continue.
- Formulate prioritization list. Create a project plan based on scope and priorities.
- Have access to partners to ask questions.
- In progress - currently gathering industry and sales information (US and non-US).
- In progress - currently working with OSU to create seed breeding standardized guidelines for greenhouse and field. Note: OSU to help guide AOSCA seed certification process.

Note: The OSU experimental certification process could begin this month. Requirements are current female plants have started to flower and not yet pollinated. Requires an OSU field visit to 238, first of two. Have more details when we chat.