



State of Rhode Island  
DEPARTMENT OF BUSINESS REGULATION  
1511 Pontiac Avenue, Bldg. 68-1  
Cranston, Rhode Island 02920

## Office of Cannabis Regulation Bulletin Number 2020-2

### Certain Purchases and Sales of Hemp and Hemp-Derived Cannabidiol (“CBD”)

This Bulletin is issued by the Rhode Island Department of Business Regulation (“DBR”), Office of Cannabis Regulation (“OCR”) to provide guidance regarding sales of hemp and hemp-derived CBD by licensed hemp growers and/or handlers to licensed medical marijuana program (“MMP”) compassion centers and/or licensed cultivators.

Pursuant to 230-RICR-80-10-1, *Rhode Island Industrial Hemp Agricultural Pilot Program* (“Hemp Regulations”), §1.7(E): “No industrial hemp plants shall be included in any licensed marijuana production programs, without the prior approval of DBR in its discretion...” OCR has received inquiry regarding whether this provision prohibiting the inclusion of hemp plants in marijuana production programs also prohibits a Rhode Island licensed hemp grower’s/handler’s sale of harvested hemp and hemp-derived CBD to a licensed compassion center or licensed cultivator. Section 1.7(E) does not prohibit such sales, and such sales are permissible subject to the following:

- A Rhode Island licensed hemp grower or handler may sell the harvested hemp and/or hemp-derived CBD that it produces to licensed cultivators or compassion centers at wholesale, provided the hemp licensee complies with the growth, sales and recordkeeping requirements in the Hemp Regulations.
- A Rhode Island licensed cultivator or compassion center can purchase harvested hemp and/or hemp-derived CBD from a licensed hemp grower/handler at wholesale, provided the cultivator/compassion center licensee complies with 230-RICR-80-05-1, *Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation* (“MMP Regulations”), including but not limited all manufacturing, labeling, packaging, product designation restrictions, pesticide use and record keeping requirements.
- Additionally, all licensed compassion centers’ and cultivators’ products, including those containing hemp and hemp-derived CBD, must comply with testing requirements pursuant to 216-RICR-60-05-6, *Licensing Analytical Laboratories for Sampling and Testing Medical Marijuana*, before being offered for sale at a compassion center.

- Copies of all purchase order and records regarding the sale, purchase and transfer of harvested hemp and hemp-derived CBD shall be maintained by both the hemp licensee seller and the cultivator or compassion center licensee purchaser, and such records may be inspected by the OCR at any time.

Any questions concerning this Bulletin or the requirements described herein should be submitted by email to [Erica.ferrelli@dbr.ri.gov](mailto:Erica.ferrelli@dbr.ri.gov) or by phone to (401) 462-9533.

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