

To whom it may concern,

I am writing this letter in regards to the Interim Final Rule (IFR) issued by the U.S. Drug Enforcement Agency (DEA) this morning. This document[1] which serves to:

Codify in the Drug Enforcement Administration (DEA) regulations the statutory amendments to the Controlled Substances Act (CSA) made by the Agriculture Improvement Act of 2018 (AIA), regarding the scope of regulatory controls over marihuana, tetrahydrocannabinols, and other marihuanarelated constituents.

is a gross overextension of the DEA's regulatory power as it pertains to the production of hemp and hemp-derived products. If, indeed, the DEA begins to enact regulations in the manner set forth in this IFR, it will serve as a major blow to the burgeoning hemp and hemp-extract market in **STATE**. In 2019, ODAFF licensed 21,635 acres to 359 hemp farmers[2] in Oklahoma, and given the wealth of agricultural land available to Oklahomans, this number has the potential to grow steadily for years to come. The economic impact of hemp farming to Oklahoma's farmers and populace-at-large is incontrovertible, but only if the hemp crop is to be processed further into an extract.

Typically, a hemp farmer can receive around \$300 an acre for hemp grain, around \$500 an acre for hemp fiber, and anywhere between \$2,500 to \$60,000 an acre when producing hemp for extraction[3]--*this translates to billions of dollars in yearly revenue for **STATE** farmers*. The issue with the IFR released today, is that it jeopardizes all "Work in Progress Hemp Extracts" (WIPHE) by stating:

A cannabis derivative, extract, or product that exceeds the 0.3% D9 -THC limit is a schedule I controlled substance, even if the plant from which it was derived contained 0.3% or less D9 -THC on a dry weight basis.

Unfortunately, the process of hemp-extraction, in which CBD and other legal, naturally-occurring cannabinoids are created, involves several steps in which the concentration of D9-THC will exceed 0.3% by weight, even if the final product contains non-detectable concentrations of D9-THC. As such, the hemp extraction market, which drives the high price-point of hemp will be placed in a delicate legal position that will *certainly* open the door for federal prosecution.

It is clear that the DEA's intent is a misinterpretation and misrepresentation of the 2018 AIA, and will have devastating effects on the hemp industry of the state. I am asking that you oppose, in whatever way possible, this IFR and its potential to destroy the state's hemp farmers.

Respectfully,
John Doe