



# **Consumable Hemp: Manufacturer Product Submission and Upload Guide**

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## INTRODUCTION

This guide is designed to help consumable hemp manufacturers submit and renew their registration, as well as maintain and edit their product lists pursuant to [641 IAC 156](#). Manufacturers are required to create and submit a product list upon the registration of their manufacturing facility, as well as maintain up-to-date certificates of analysis (COA). After submission and HHS review, products determined to be compliant will be added to the Master Product List. Retailers and Distributors will select items from the Master Product List for retail sales and distribution. Distributors and retailers are also required to maintain an accurate product list throughout the lifecycle of their registration.

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## I. Required Consumable Hemp Product List Information

1. **“Brand Name”** - Pursuant to 641—156.1, this field must indicate the Brand name of the product provided by the Manufacturer. Non-cannabis examples include "Toyota", "Ford," "Coca-Cola," etc. Real world examples of Consumable Hemp Brand Names may include “Charlotte’s Web,” “Lumi Labs,” “CV Sciences,” etc.
2. **“SKU”** - To avoid duplicate products upon updates, registrants must provide an identifier unique to the product (SKU), as provided on the label by the manufacturer. The generally conserved format for SKU is below:



When submitting SKU information for a product, refer to an individual product container, or request this information from the Manufacturer.

3. **“Product Name”** - This free-text entry represents the specific Product Name as provided by the manufacturer. In the Brand Name examples of "Toyota", "Ford," "Coca-Cola," corresponding Product Names may be “Camry,” “F-150,” and “Coke Zero,” respectively.

In the Brand Name examples of “Charlotte’s Web,” “Lumi Labs,” “CV Sciences,” corresponding Product Names may be:

- 25MG CBD Oil Capsules
- D9 THC Strain Specific Gummies
- CBD Infused Roller

Please capitalize each individual word of the Brand Name as provided in the examples and by the Manufacturer, as well as any punctuation.

4. **“Product Form”** – The manufacturer must assign the most appropriate “Product Form” definition for the product.

- **Edible**

- A product that contains food, or what a reasonable person would determine as having food ingredients
- Examples include, but are not limited to gummies, chocolate, hard candies, etc.

- **Beverage**

- *Liquid* products must be in containers that have 12 oz or more in volume, regardless of the indicated serving size in CFR Table 2. 12 oz containers may have less <4mg THC, but not more.
- Please see section VII. Liquids and Beverages Less and Greater Than 12 oz. for detail on compliance beverage products.

- **Oral**

- These are products that may be ingested orally, but may not be considered edibles or include specific food ingredients
- Lipid and oil-based “tincture” products are “ingestible fats and oils” and exempt from 12 oz minimum container requirements, assuming they are not in an alcohol-based matrix. Please see Table 2 for “Fats and Oils.”
- Examples include, but are not limited to unflavored tinctures, unflavored capsules or tablets, unflavored water-soluble mixes, etc.

- **Topical**

- This is a product intended to be applied to the skin.
- Topical products are exempt from the 4 mg THC serving limit, but cannot contain > 10 mg THC per container.

- Examples include, but are limited to lotions, creams, ointment, salves, rollers, etc.
  - **Other**
    - If a product does not clearly fit into one of the above categories, please select “Other” and complete the rest of the required columns for this product.
5. **“Total THC per Serving”** - Pursuant to 641—156.1, if THC is contained within, or marketed for the product by the Manufacturer the amount of THC per serving must be provided in milligrams (mg). Consumable hemp products containing more than 4 mg per serving  $\geq \text{Delta-9 THC} + (0.877 \times \text{THCa})$  total tetrahydrocannabinol (THC) per serving will be prohibited from sale in Iowa on July 1, 2024. Examples of Total THC per Serving may be “2,” “2.5,” or “4,” etc. Enter the total THC rounded to the nearest decimal. *Note:* Products containing “*synthetic cannabinoids*,” including but not limited to Delta-8, Delta-10, THC-P, HHC, THC-O etc., are prohibited in Iowa.
6. **“Total THC per Container”** - Pursuant to 641—156.1, a registrant must submit documentation indicating the aggregate amount of all THC per container as provided by the manufacturer. Consumable hemp products containing more than 10 mg per container  $\geq \text{Delta-9 THC} + (0.877 \times \text{THCa})$  will be prohibited from sale in Iowa on July 1, 2024. Examples of Total THC per Container may be “2,” “7.5,” or “10,”. Enter the total THC rounded to the nearest decimal.
7. **“Certificate of Analysis”** (COA) - Pursuant to 641 IAC 156.4(1)(f), the Manufacturer must provide an accessible link or PDF document of the individual product’s COA. This COA shall include:

- Information indicating the presence and concentration of THC, including delta-9 tetrahydrocannabinol, tetrahydrocannabinolic acid, cannabidiol, and any other THC for which the product is being marketed
- Information indicating the total delta-0 tetrahydrocannabinol concentration does not exceed 03. % (inclusive of any isomers, derivatives, and analogs, whether naturally occurring or synthesized)
- Information indicating the consumable hemp product is from a batch that has been tested for pesticides, residual solvents, metals, harmful pathogens, and toxicants and does not exceed limits pursuant to 641 IAC 156.3(2).
- The COA shall not be considered valid and usable for the batch of consumable hemp if its issuance date is greater than one year old.

Please review the detailed requirements for COAs [641 IAC 156](#) prior to submitting your product list. You may also use the [Certificate of Analysis Requirements for Consumable Hemp Products](#) guide hosted on our website. It is the responsibility of the Manufacturer to ensure each product has a corresponding, compliant COA.

## II. Register your Facility

After logging in to the Consumable Hemp Registration portal, you can either create or renew an existing registration, create and update your product list, and manage your food license (if applicable). For new facilities or to renew an existing registration click the option indicated below.

Hello Test,  
Welcome to the Consumable Hemp Registrant Portal

Click here to renew or continue a Registration, Update a Food License, or start a Registration for a new facility

Click here to view and manage products for your Registration(s)

The "Action List" below requires your attention. You may address the action item directly from the list view below:

Select the "v" to filter actionable items.

Name	Action	Status	Type	Expiration Date
------	--------	--------	------	-----------------

HIPAA | Privacy | Nondiscrimination | Accessibility

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- A manufacturer's product list will be created during the initial registration. Creating new products, updating COAs, or updating a food license can be completed anytime during the registration period. Click on "Register a New Facility" to begin.

Register Your Consumable Hemp Establishment

No active facilities are currently associated with this account. Please click 'Register a New Facility' to proceed with creation of a facility and registration.

Register a New Facility

- Select the appropriate registration type below.

### Register Your Consumable Hemp Establishment

☐ Registration Type
 ☐ Ownership/Business Entity
 ☐ Facility
 ☐ Product List Upload
 ☐ Review
 ☐ Attestation
 ☐ Payment

**\*Registration Type**

☒ Manufacturing/Distributing Consumable Hemp Establishment

☐ Retail Consumable Hemp Establishment

**\*As a Manufacturing Consumable Hemp Establishment**


☒ I only manufacture products

☐ I only distribute products

☐ I manufacture and distribute products

**\*\*For information on the "Registration Type" you require, please visit the FAQ in the upper right. If you visit the FAQ, the P**

- Iowa based manufacturers will be required to upload their current food license. Enter your food license information and click "Continue with Food License Entry" to upload an image of your food license.



[Home](#)
[FAQ](#)
[Master Product List](#)

### Register Your Consumable Hemp Establishment

☐ Registration Type
 ☐ Ownership/Business Entity
 ☐ Facility
 ☐ Product List Upload
 ☐ Review
 ☐ Attestation
 ☐ Payment

**\*Do you have a food processing plant license with the Department of Inspections and Appeals and Licensing (DIAL)?**

☒ Yes

☐ No

**\*Enter your food license number**

ABC789

**\*Food License Issue Date**

May 5, 2025

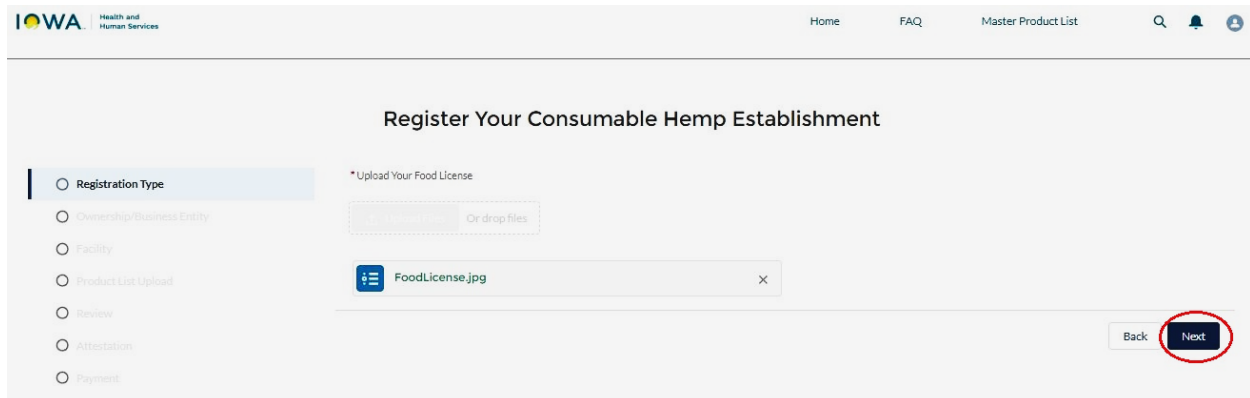
**\*Food License Expiration Date**

May 5, 2026

**Continue with Food License Entry**



- Upload an image of your food license and click “Next”



**Register Your Consumable Hemp Establishment**

☐ Registration Type

☐ Ownership/Business Entity

☐ Facility

☐ Product List Upload

☐ Review

☐ Attestation

☐ Payment

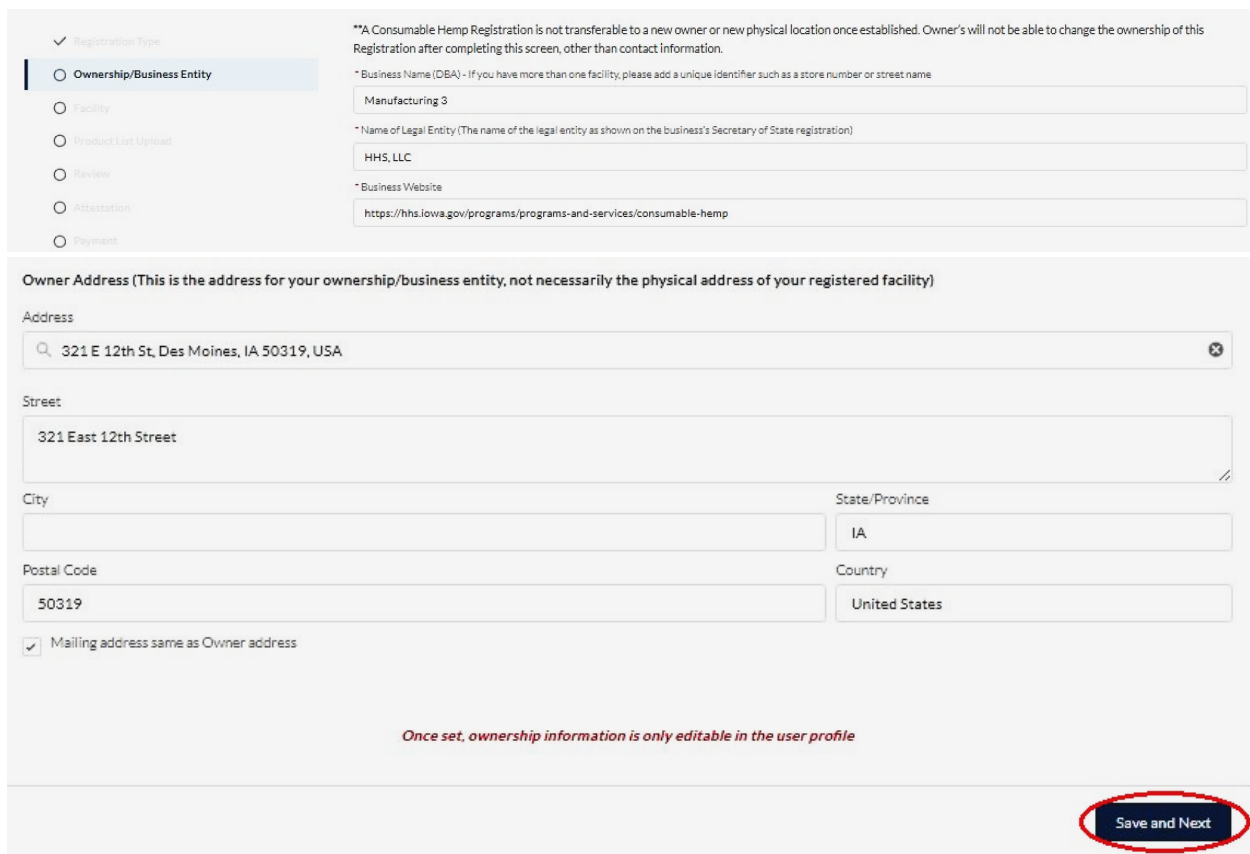
**\* Upload Your Food License**

Or drop files

FoodLicense.jpg

Back Next

- Complete the Ownership/Business Entity information, the name of business, legal entity, and the manufacturer’s website, owner’s address, and mailing address and click “Save and Next”



☒ Registration Type

☐ Ownership/Business Entity

☐ Facility

☐ Product List Upload

☐ Review

☐ Attestation

☐ Payment

**\*\*A Consumable Hemp Registration is not transferable to a new owner or new physical location once established. Owner’s will not be able to change the ownership of this Registration after completing this screen, other than contact information.**

**\* Business Name (DBA) - If you have more than one facility, please add a unique identifier such as a store number or street name**

Manufacturing 3

**\* Name of Legal Entity (The name of the legal entity as shown on the business’s Secretary of State registration)**

HHS, LLC

**\* Business Website**

https://hhs.iowa.gov/programs/programs-and-services/consumable-hemp

**Owner Address (This is the address for your ownership/business entity, not necessarily the physical address of your registered facility)**

Address

321 E 12th St, Des Moines, IA 50319, USA

Street

321 East 12th Street

City

State/Province

IA

Postal Code

50319

Country

United States

☒ Mailing address same as Owner address

*Once set, ownership information is only editable in the user profile*

Save and Next

- Enter the facility address and click “Save and Next”

Owner Address (This is the address for your ownership/business entity, not necessarily the physical address of your registered facility)

Address

321 E 12th St, Des Moines, IA 50319, USA

Street

321 East 12th Street

City

State/Province

IA

Postal Code

50319

Country

United States

☒ Mailing address same as Owner address

*Once set, ownership information is only editable in the user profile*

Save and Next

After creating your consumable hemp facility, you can proceed by submitting your product list.

### III. MANUAL PRODUCT LIST ENTRY (ONE-BY-ONE)

After owner and facility information has been entered, manufacturers are required to create and submit a product list. Click on “Manage Products” to begin creating the product list.

**Register Your Consumable Hemp Establishment**

**Manage Your Products**

Prior to Approval, consumable hemp registrants must submit a complete list of consumable hemp products the retailer or manufacturer intends to sell. This product list must include jurisdiction of origin and product certificates of analyses.

- When creating or maintaining product lists, please keep the following compliance criteria in mind:
  - The maximum total THC permitted per serving is four (4) milligrams per serving and ten (10) milligrams per container. This includes Delta-9 THC and 8.77% of THCA. (See Iowa Code 204.2).
  - For Liquid or beverage products:
    - Liquid products must be in containers that have 12 oz or more in volume, regardless of the indicated serving size in CFR Table 2. 12 oz containers may have less <4mg THC, but not more.
    - Liquid products in containers >12 oz may increase the THC potency in the following volume-potency increments: 16 oz – 5 mg THC, 20 oz – 6.66 mg THC, 24 oz – 8 mg THC, 30 oz – 10 mg THC
    - Liquid products in containers >12 oz may not use a suggested serving size from CFR Table 2 that is less than the 12 oz serving for carbonated and non-carbonated beverages.
    - HHS cannot offer flexibility for variance with the 4 mg THC per serving and 10 mg per container limit. 12 oz, 4 mg THC = compliant. 12 oz, 4.06 mg THC = not compliant
  - Synthetic consumable hemp products, such as products containing Delta-8 THC, Delta-10 THC, Hexahydrocannabinol (HHC), Tetrahydrocannabinol (THC-P), and Tetrahydrocannabinol-O-acetate (THC-O), and other synthetic and semisynthetic cannabinoids are prohibited from sale in Iowa after July 1, 2024. This is not a comprehensive list of prohibited synthetic and semisynthetic cannabinoids. (See Iowa Code 204.14A).
  - Raw or dried flower form of hemp is not permitted in the consumable hemp program. Any raw or dried hemp flower marketed or distributed in Iowa must be sold as a raw or dried agricultural commodity and have a notice stating it is not suitable for consumption. Raw or dried flower marketed for introduction into the human body will be in violation of 641 Iowa Administrative Code 156. (See Iowa Code 204.14A).

Please refer to the [Consumable Hemp Product List Guide](#) for specific information required on the product list. Please also refer to the [Consumable Hemp FAQ](#) for additional information.

With a manufacturing registration license, you will need to submit a complete list of the products you're manufacturing.

**Manage Products**

- Select “Manually Enter” to begin

**Registration Manufacturing 3**

Status: In Progress | Registration Number: 437024

**Product List Upload**

**Manually Enter**

To add new products to your list click on one of the following:

- "Use Excel Template" - This will allow you to upload an excel file with all your products listed (a template will be provided)
- "Manually Enter" - This will allow you to manually enter all necessary product information

Clicking "Remove Products" will bring you to a screen where you can remove any products that have not yet been submitted for review

If the "Save and Exit" button is clicked, edits to the products in the table and uploaded COAs will be saved but registration will remain incomplete until the product list is submitted for review.

Clicking "Submit Product List" will submit your products for review and complete this stage of the registration process.

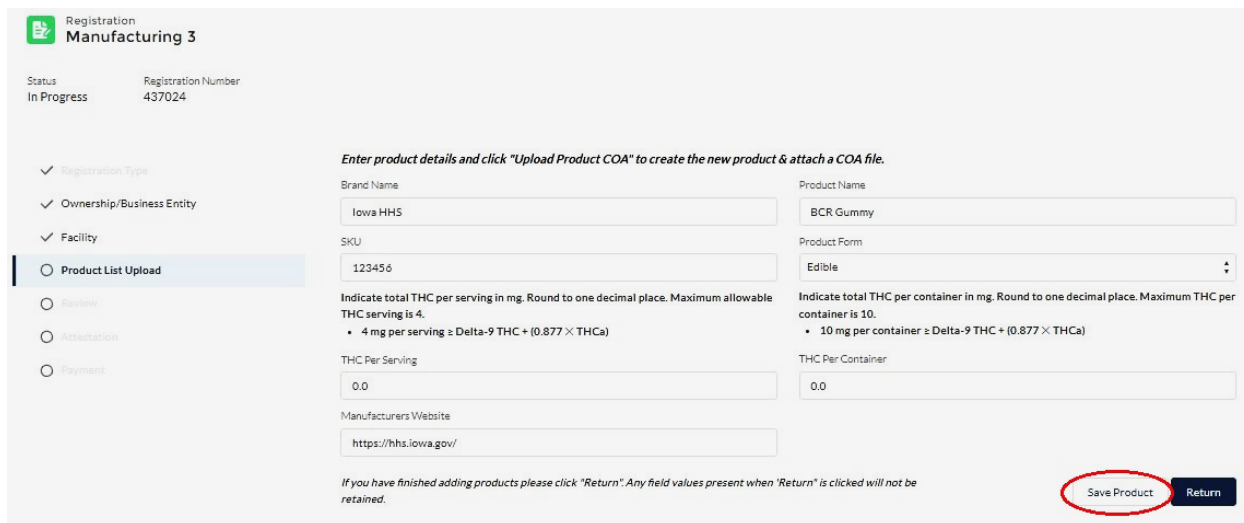
Make any necessary updates to your products directly on the datatable below:

**New and Pending Products**

This table currently has no data to display

**Save and Exit** **Submit Product List →**

- Enter all required information; Brand Name, Product Name, SKU (must be unique), select a product form from the drop-down menu, enter Total THC per serving to the nearest decimal and Total THC per container to the nearest decimal. Provide the manufacturer website if it is different from what was entered with the ownership information. When all required information is entered, click “Save Product”.



**Registration Manufacturing 3**

Status: In Progress | Registration Number: 437024

☒ Registration Type  
☒ Ownership/Business Entity  
☒ Facility  
☐ **Product List Upload**  
☐ Review  
☐ Attestation  
☐ Payment

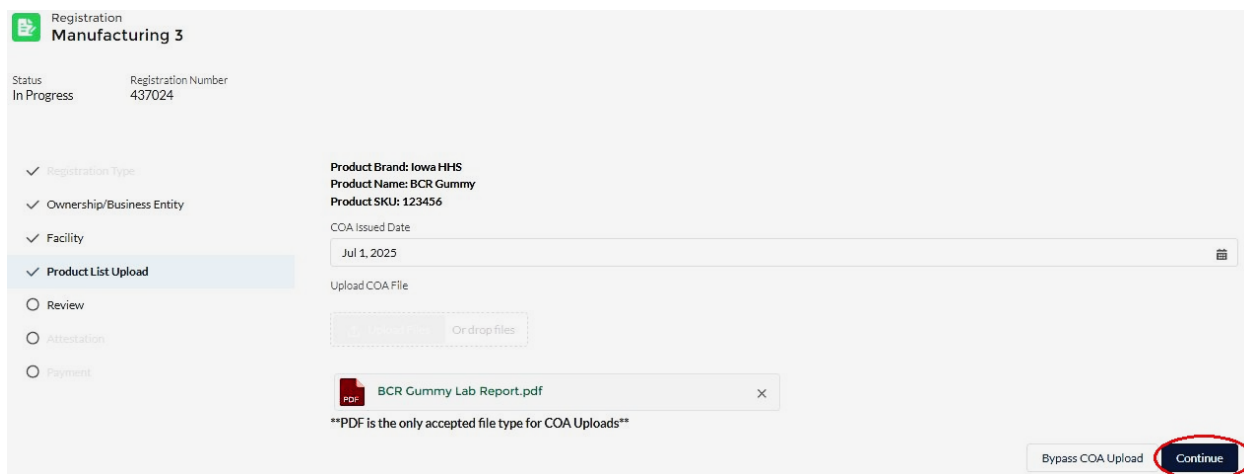
*Enter product details and click "Upload Product COA" to create the new product & attach a COA file.*

Brand Name:   
 SKU:   
 Indicate total THC per serving in mg. Round to one decimal place. Maximum allowable THC serving is 4.  
 • 4 mg per serving  $\geq$  Delta-9 THC + (0.877  $\times$  THCa)  
 THC Per Serving:   
 Manufacturers Website:

Product Name:   
 Product Form:   
 Indicate total THC per container in mg. Round to one decimal place. Maximum THC per container is 10.  
 • 10 mg per container  $\geq$  Delta-9 THC + (0.877  $\times$  THCa)  
 THC Per Container:

*If you have finished adding products please click "Return". Any field values present when "Return" is clicked will not be retained.*

- Enter the COA issue (results) date and upload the COA. Only PDFs can be accepted for this file. COAs must have full panel test results, be issued within the last year, include brand name, product name, serving and container size, and batch specificity. Click on “Continue” to add more products.



**Registration Manufacturing 3**

Status: In Progress | Registration Number: 437024

☒ Registration Type  
☒ Ownership/Business Entity  
☒ Facility  
☐ **Product List Upload**  
☐ Review  
☐ Attestation  
☐ Payment

Product Brand: Iowa HHS  
 Product Name: BCR Gummy  
 Product SKU: 123456  
 COA Issued Date:   
 Upload COA File:

BCR Gummy Lab Report.pdf

**\*\*PDF is the only accepted file type for COA Uploads\*\***

- Continue entering products until your list is completed. After entering all products and COAs, click on “Return”. New products will be displayed on the table below. Only products with corresponding COAs will be reviewed by HHS. Click on “Submit Product List”.

**Registration Manufacturing 3**

Status: In Progress      Registration Number: 437024

☒ Registration Type  
☒ Ownership/Business Entity  
☒ Facility  
☒ **Product List Upload**  
☐ Review  
☐ Attestation  
☐ Payment

To add new products to your list click on one of the following:

- “Use Excel Template” - This will allow you to upload an excel file with all your products listed (a template will be provided)
- “Manually Enter” - This will allow you to manually enter all necessary product information

Clicking “Remove Products” will bring you to a screen where you can remove any products that have not yet been submitted for review

If the “Save and Exit” button is clicked, edits to the products in the table and uploaded COAs will be saved but registration will remain incomplete until the product list is submitted for review.

Clicking “Submit Product List” will submit your products for review and complete this stage of the registration process.

**Make any necessary updates to your products directly on the datatable below:**

☒ New and Pending Products

	Manufacturer Product ID	SKU	Status	Brand Name	Product Name	Product Form	COA File Uploaded
1	00001794	459595	New	Iowa HHS	Hemp Beverage	Beverage	<input checked="" type="checkbox"/>
2	00001791	123456	New	Iowa HHS	BCR Gummy	Edible	<input checked="" type="checkbox"/>

- Confirm the newly created product list. The “Active” column indicates the products have not yet been reviewed by HHS. Make any edits or click on “Confirm Product List”.

**Register Your Consumable Hemp Establishment**

Please confirm that these are the products you are manufacturing

	Brand Name	Manufacturer Product ID	SKU	Product Name	Product Form	Total THC per Serving	Total THC per Container
1	Iowa HHS	00002336	123456	BCR Gummy	Edible	0.0	
2	Iowa HHS	00002337	459595	Hemp Beverage	Beverage	2.5	
3	Iowa HHS	00002338	888777	THC Test	Edible	2.5	

You have successfully completed the product list creation process via Manual Entry. For new or renewing Manufacturer registrations, sign and date the attestation and submit the registration fee.

Using a .XLS or .CSV file allows manufacturers to create their product list on a spreadsheet and bulk upload all products at once into the portal. The template is pre-formatted by HHS and available for download in the portal. To begin, click on “Use Excel Template”.

- Click on the “Product List Excel” to download the template.

- Do not modify the first row of the template, it is pre-formatted with notes in each cell. Complete the template with each product beginning with row 2. Hovering over the cells in row 1 will display the notes for what is required in each column.

Rev. 08/25 V2.0

- After completing the product list on the spreadsheet, upload the file.

Registration  
Manufacturing 3

Status: In Progress      Registration Number: 437024

- ✓ Registration Type
- ✓ Ownership/Business Entity
- ✓ Facility
- ✓ **Product List**
- ✓ Review
- Attestation
- Payment

### Upload a Product List

Product List Excel export

To download an Excel file of your current product list, click the link above and make the edits directly on the downloaded file of products to be sold at this consumable hemp establishment. If you do not need to make any changes to your product list, don't do anything on this page and just click "Upload Products"

Using the File Upload button below please re-insert the updated Product List file after completing any changes or additions.

Import Excel File

Or drop files

QA1List.xlsx

- Each product uploaded will require a COA. Upload the corresponding COA with each product along with the COA issue date (date of lab results). Click on "Next Product" until every product has a COA.

Registration  
Manufacturing 3

Status: In Progress      Registration Number: 437024

- ✓ Registration Type
- ✓ Ownership/Business Entity
- ✓ Facility
- ✓ **Product List**
- ✓ Review
- Attestation
- Payment

Please use this screen to upload a COA file to the selected Product. This is only needed for Products that do not have a current active COA file. Use the Next Product button to select the next product to add a COA file. Once you have completed all uploads please select 'Uploads Complete' to exit the process.

Select Product

HHS Gummy

COA Issued Date

Jul 7, 2025

Upload COA File

Or drop files

HHS Gummy COA.pdf

\*\*PDF is the only accepted file type for COA Uploads\*\*



- New products will be displayed on the table below. Click on “Submit Product List”

**Registration Manufacturing 3**

Status: In Progress      Registration Number: 437024

☒ Registration Type  
☒ Ownership/Business Entity  
☒ Facility  
☐ **Product List**  
☒ Review  
☐ Attestation  
☐ Payment

[Use Excel Template](#)   [Manually Enter](#)   [Remove Products](#)

To add new products to your list click on one of the following:

- “Use Excel Template” - This will allow you to upload an excel file with all your products listed (a template will be provided)
- “Manually Enter” - This will allow you to manually enter all necessary product information

Clicking “Remove Products” will bring you to a screen where you can remove any products that have not yet been submitted for review

If the “Save and Exit” button is clicked, edits to the products in the table and uploaded COAs will be saved but registration will remain incomplete until the product list is submitted for review.

Clicking “Submit Product List” will submit your products for review and complete this stage of the registration process.

**Make any necessary updates to your products directly on the datatable below:**

**New and Pending Products**

	Manufacturer Product ID	SKU	Status	Brand Name	Product Name	Product Form	COA File Uploaded
1	00002242	123456	New	HHS	HHS Gummy	Edible	✓
2	00002243	234999	New	HHS	CBD Drink	Beverage	✓
3	00002244	ABC222	New	HHS	CBG Lotion	Topical	✓

[Save and Exit](#)   [Submit Product List →](#)

- Product submissions can be reviewed before final submission. Edits can still be made in the table if needed, otherwise click on “Confirm Product List”.

**Register Your Consumable Hemp Establishment**

Please confirm that these are the products you are manufacturing

	Brand Name	Manufacturer Product ID	SKU	Product Name	Product Form	Total THC per Serving	Total THC per Container
1	Iowa HHS	00002336	123456	BCR Gummy	Edible	0.0	
2	Iowa HHS	00002337	459595	Hemp Beverage	Beverage	2.5	
3	Iowa HHS	00002338	888777	THC Test	Edible	2.5	

[Edit Product List](#)   [Confirm Product List](#)

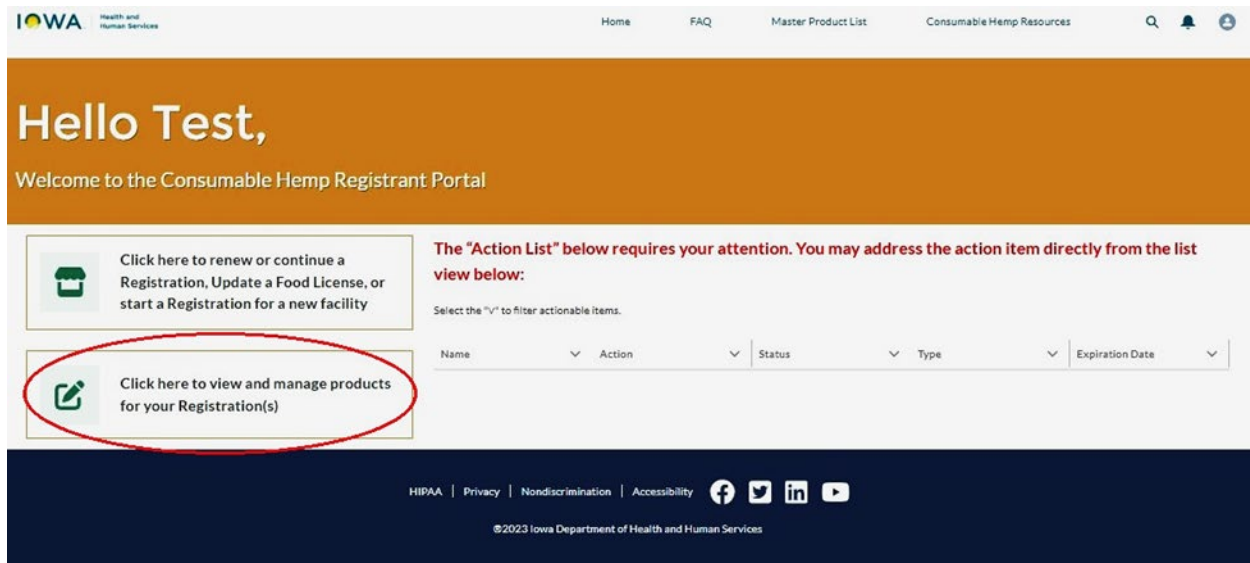
You have successfully completed the product list creation process with the spreadsheet. For new or renewing Manufacturer registrations, sign and date the attestation and submit the registration fee.



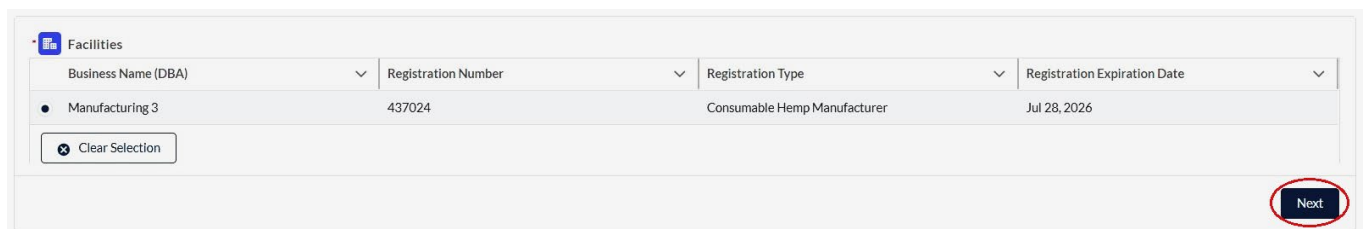
## V. MANAGING AND UPDATING COAs

COAs can be updated at any time during the registration period of a manufacturer. COAs must contain compliant information and meet all requirements pursuant to (641 IAC 156.) including but not limited to brand name, product name, batch specificity, full panel test results indicating less than trace amounts of pesticides, residual solvents, metals, pathogens, cannabinoid content and potency. You may also use the [Certificate of Analysis Requirements for Consumable Hemp Products](#) guide hosted on our website. To update a COA, follow the steps below.

- Click on the option to view and manage your products.



- Select the appropriate registration and click “Next”



- The product list is displayed; you can add/update products, deactivate products, or update your COA. Click on “Update your COAs”

Add/Update Products

Deactivate Products

Update your COAs →

Approved Products allowed to be manufactured

	SKU	Manufacturer Prod...	Brand Name	Product Name	Product Form	Total THC per Servi...	Total THC per Cont...	Manufacturer
1	123456	00002242	HHS	HHS Gummy	Edible	0.0	0.0	<a href="https://hhs.iowa.gov/">https://hhs.iowa.gov/</a>
2	ABC222	00002244	HHS	CBG Lotion	Topical	0.0	0.0	<a href="https://hhs.iowa.gov/">https://hhs.iowa.gov/</a>
3	234999	00002243	HHS	CBD Drink	Beverage	2.0	2.0	<a href="https://hhs.iowa.gov/">https://hhs.iowa.gov/</a>

Exit

- Select the product you wish to update and click on “Update COA”

Save and Return

Please select the product you would like to update the COA value for

Manufacturer Product ID	SKU	Product Name	Brand Name	Product Form	Active COA Expiration ...	COA File Uploaded
<input checked="" type="radio"/> 00002242	123456	HHS Gummy	HHS	Edible	Mar 3, 2026	✓
<input type="radio"/> 00002243	234999	CBD Drink	HHS	Beverage	Jul 7, 2026	✓
<input type="radio"/> 00002244	ABC222	CBG Lotion	HHS	Topical	Jul 14, 2026	✓

Clear Selection

Update COA

- Enter the issue (date of test results) and upload the new COA. Click “Next”

Please Upload your COA file here and enter the issued date.

\* COA Issued Date

Jul 21, 2025

\* Upload COA File

Or drop files

HHS.GummyCOA.pdf

\*\*PDF is the only accepted file type for COA Uploads\*\*

Previous

Next

- The Active COA Expiration has now been updated. HHS will review the COA to confirm issue date and other required information. Click on “Save and Return” to exit.

Save and Return

Please select the product you would like to update the COA value for

Manufacturer Product ID	SKU	Product Name	Brand Name	Product Form	Active COA Expiration ...	COA File Uploaded
<input type="radio"/> 00002243	234999	CBD Drink	HHS	Beverage	Jul 7, 2026	✓
<input type="radio"/> 00002244	ABC222	CBG Lotion	HHS	Topical	Jul 14, 2026	✓
<input type="radio"/> 00002242	123456	HHS Gummy	HHS	Edible	Jul 21, 2026	✓

Update COA

## VI. Prohibited Products, Compliance, and Penalties

Prohibited Product	Citation	Penalty
<b>Inhalable Products</b>	Iowa Code 204.14A	Serious misdemeanor, civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Products exceeding 4 mg THC per serving and/or 10 mg THC per container</b>	Iowa Code 204.2(2)(c)(2)(b)	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Liquids under 12 fluid ounces</b>	Iowa Code 204.7(1)(c), 641 IAC 156.1	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Adulterated Products</b>	641 IAC 156.1, 156.6(5)	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Synthetic Cannabinoids</b>	Iowa Code 204.14A(3)	Serious misdemeanor, civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Products exceeding 0.3% THC</b>	Iowa Code 204.2(2)(c)(2)(a)	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>“Flower” or “bud” form</b>	Iowa Code 204.14A	Serious misdemeanor, civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or

		suspension or revocation of future registrations
<b>Products marketed to or intended to cure, treat, mitigate, prevent disease, or affect the structure of the human body (this includes over-the-counter medications).</b>	641 IAC 156.4(1), 156.6(3)	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Bread, cake, pie, or other “cottage food” items made in a person’s home kitchen or other residential space</b>	641 IAC 156.6(1)	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Manufactured alcoholic beverages, meat or poultry products, or dairy products infused with hemp</b>	641 IAC 156.5	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations. May also be subject to penalty under Iowa Code 137F, 137D, 123, 189A, or 190-192
<b>Other food not produced in a licensed food-processing plant</b>	Iowa Code 204.7(1)	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations
<b>Products manufactured in other countries or jurisdictions without an approved USDA hemp plan</b>	Iowa Code 204.7(6)	Civil penalty of up to \$2,500 per violation, confiscation and disposal of non-compliant products, and/or suspension or revocation of future registrations

Submission of non-compliant product forms may be grounds for the pending and/or denial of a registration.

## VII. Liquids and Beverages, Less and Greater Than 12 oz.

Statute and Administrative rule do not further define or indicate that any “liquid consumable hemp product” is exempt from the requirement for the container to be a minimum of 12 fl oz. This means that regardless of serving sizes indicated in Table 2 for a liquid consumable hemp product, the container must be 12 oz or greater to be compliant and added to a product list.

Additionally, for any liquid consumable hemp product packaged in a container >12 oz and containing greater than one serving, the incremental increase in THC potency shall not exceed the following volume-potency increments listed in Table 1:

**Table 1.**

Volume	Servings	THC Potency
12 oz	1	4.00 mg
16 oz	1.33	5.33 mg
20 oz	1.66	6.66 mg
24 oz	2.0	8.00 mg
30 oz	2.5	10.00 mg

Regardless of the serving size indicated in Table 2, beverage or liquid products packaged in containers >12 oz may not use a multiple of a serving size <12 oz (“juices, fruit drinks, syrups, drink mixes, etc.”) as indicated by the standard 12 oz serving size for “beverages.” Some examples are provided below:

### Examples:

Product	Volume, THC Potency	Servings	Compliant
<i>Beverage - Carbonated/non-carbonated</i>	12 oz, 4 mg	1	Yes
<i>Beverage - Carbonated/non-carbonated</i>	16 oz, 5 mg	1-2	Yes

<i>Beverage - Carbonated/non-carbonated</i>	16 oz, 10 mg	2	No, does not follow Table 1
<i>Fruit drink</i>	8 oz, 4 mg	1	No, container <12 oz
<i>Fruit drink</i>	16 oz, 8 mg	2	No, does not follow Table 1
<i>Drink mix, syrup</i>	4 oz, 4 mg	1	No, container <12 oz

HHS does not have authority to provide flexibility for variance from the 4 mg THC per serving or 10 mg THC per container limit. Compliant products must contain a COA that indicates less than those serving limits for a compliant volume-potency claim, or rounds down to those limits. Some examples are provided below:

**Examples:**

<b>Product, Volume</b>	<b>Per Serving Label Claim (THC)</b>	<b>Per Serving COA Value (THC)</b>	<b>Compliant</b>
Beverage, 10 oz	2.5 mg	2.5 mg	No, container <12 oz
Beverage, 12 oz	4 mg	3.85 mg	Yes
Beverage, 12 oz	4 mg	4.04 mg	Yes
Beverage, 12 oz	4 mg	4.06 mg	No, >4 mg THC/serving
Beverage, 16 oz	5 mg	5.13 mg	Yes
Beverage, 16 Oz	5 mg	5.41 mg	No, >4 mg THC/serving

Additionally, lipid and oil-based “tincture” products are “ingestible fats and oils” and exempt from 12 oz minimum container requirements, assuming they are not in an alcohol-based matrix. Please see Table 2 for “Fats and Oils.”

## Conclusion

- Liquid products must be in containers that have 12 oz or more in volume, regardless of the indicated serving size in Table 2. 12 oz containers may have less <4mg THC, but not more.
- Liquid products in containers >12 oz may increase the THC potency to correlate with the volume-potency table above
- Liquid products in containers >12 oz may not use a suggested serving size from Table 2 that is less than the 12 oz serving for carbonated and non-carbonated beverages.
- HHS cannot offer flexibility for variance with the 4 mg THC per serving and 10 mg per container limit.
- Oil- or lipid-based tinctures (does not contain an alcohol matrix) are permissible in <12 oz containers and follow serving suggestions from Table 2.