



Consumable Hemp: Retailer and Distributor Product Submission Guide

Bureau of Cannabis Regulation
Division of Compliance and Administration
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INTRODUCTION

This guide is designed to help consumable hemp retailers and distributors submit and renew their registration, as well as maintain and edit their product lists pursuant to [641 IAC 156](#). Retailers and Distributors will select items from the Master Product List for retail sale and distribution. Products included in the Master Product List have already been reviewed for their compliance. Retailers and Distributors cannot sell products that are not included in the Master Product List.

Retailers and distributors are required to submit a product list upon the registration of their facility, as well as maintain up-to-date product lists throughout the duration of their registration.

Retailers and Distributors selling products that are not selected from the Master Product List are in violation of 641 IAC 156.2(1)c. and 2(2)c, which requires Retailers and Distributors to maintain a complete and up-to-date list of products.

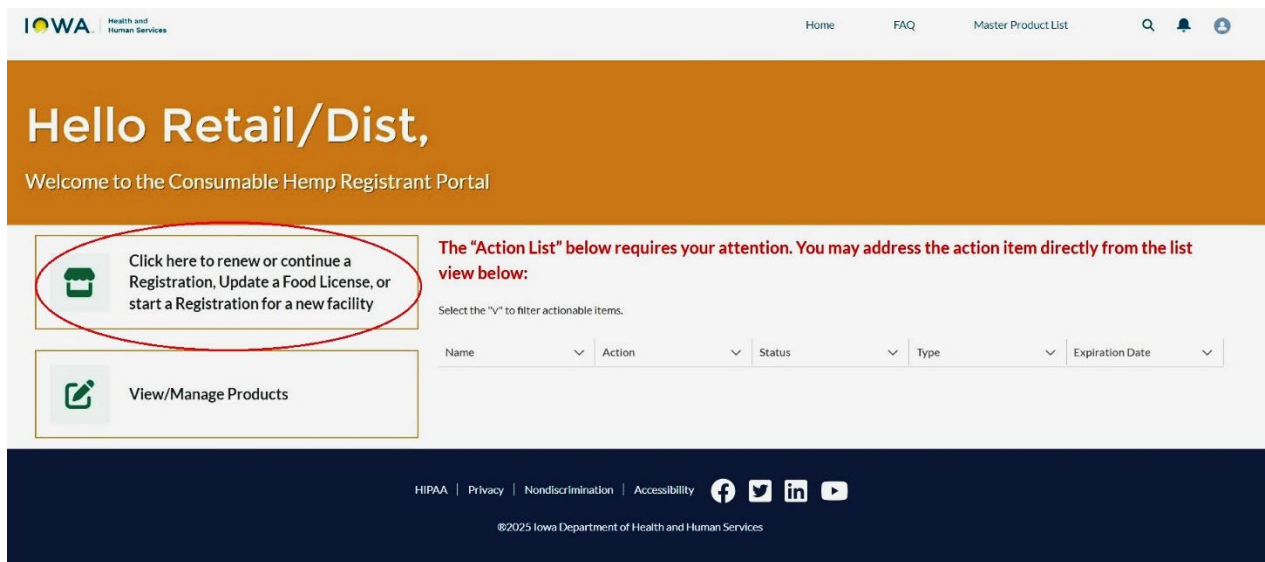
Retailers and Distributors in violation of these rules are subject to enforcement, confiscation, and criminal or civil penalty.

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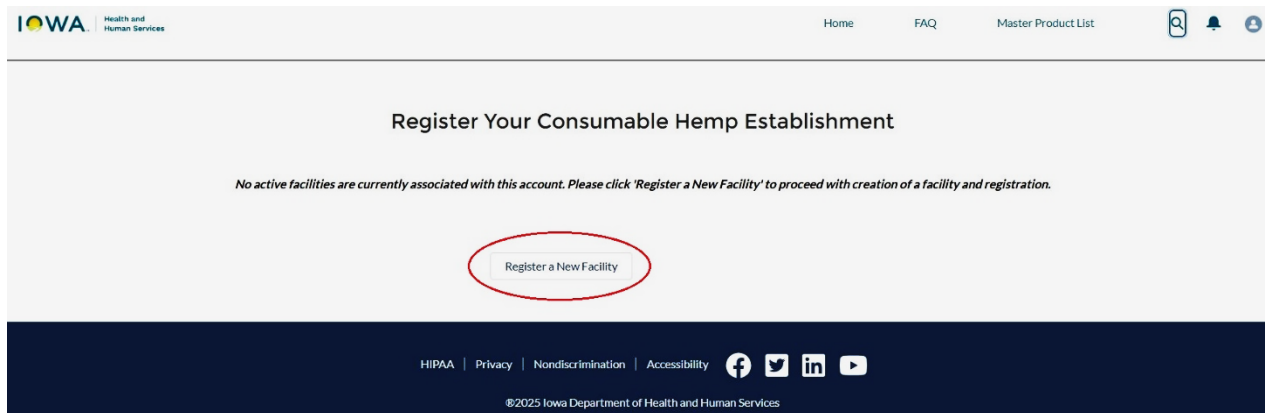
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I. Register your Facility

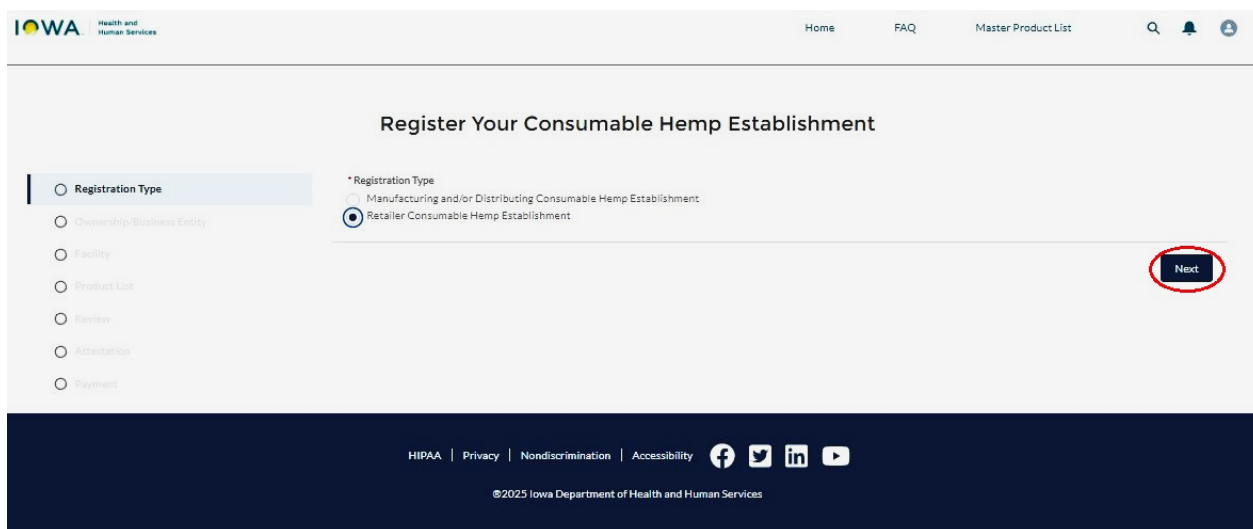
After logging in to the Consumable Hemp Registration portal, you can either create or renew an existing registration, create and update your product list, and manage your food license (if applicable). For new facilities click the option indicated below.



- Click on "Register a New Facility" to begin.



- Select the appropriate Registration Type. Retailers should select “Retailer Consumable Hemp Establishment” as pictured below and click “Next”.



Register Your Consumable Hemp Establishment

Registration Type

- ☐ Ownership/Business Entity
- ☐ Facility
- ☐ Product List
- ☐ Review
- ☐ Attestation
- ☐ Payment

*** Registration Type**

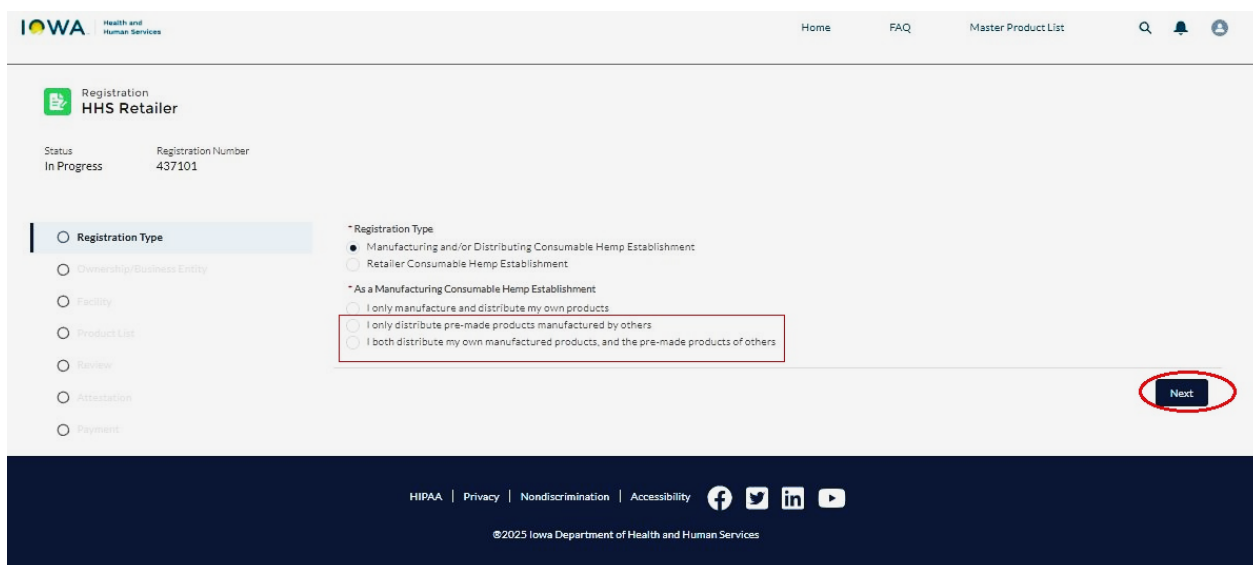
- ☐ Manufacturing and/or Distributing Consumable Hemp Establishment
- ☒ Retailer Consumable Hemp Establishment

Next

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- Distributors should select either “I only distribute pre-made products manufactured by others” or “I both distribute my own manufactured products, and the pre-made products of others” (combined manufacturers and distributors). Please refer to the Manufacturer Product Upload Guide for instructions on how to submit products as a manufacturer. Click “Next” to continue.



Registration HHS Retailer

Status: In Progress | Registration Number: 437101

Registration Type

- ☐ Ownership/Business Entity
- ☐ Facility
- ☐ Product List
- ☐ Review
- ☐ Attestation
- ☐ Payment

*** Registration Type**

- ☒ Manufacturing and/or Distributing Consumable Hemp Establishment
- ☐ Retailer Consumable Hemp Establishment

*** As a Manufacturing Consumable Hemp Establishment**

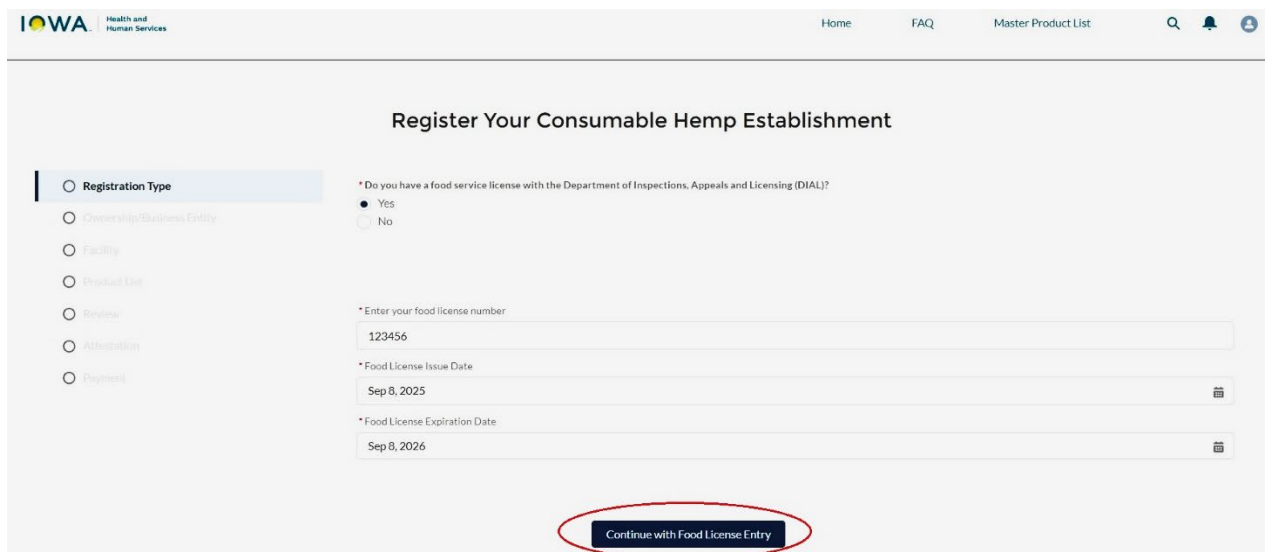
- ☐ I only manufacture and distribute my own products
- ☐ I only distribute pre-made products manufactured by others
- ☒ I both distribute my own manufactured products, and the pre-made products of others

Next

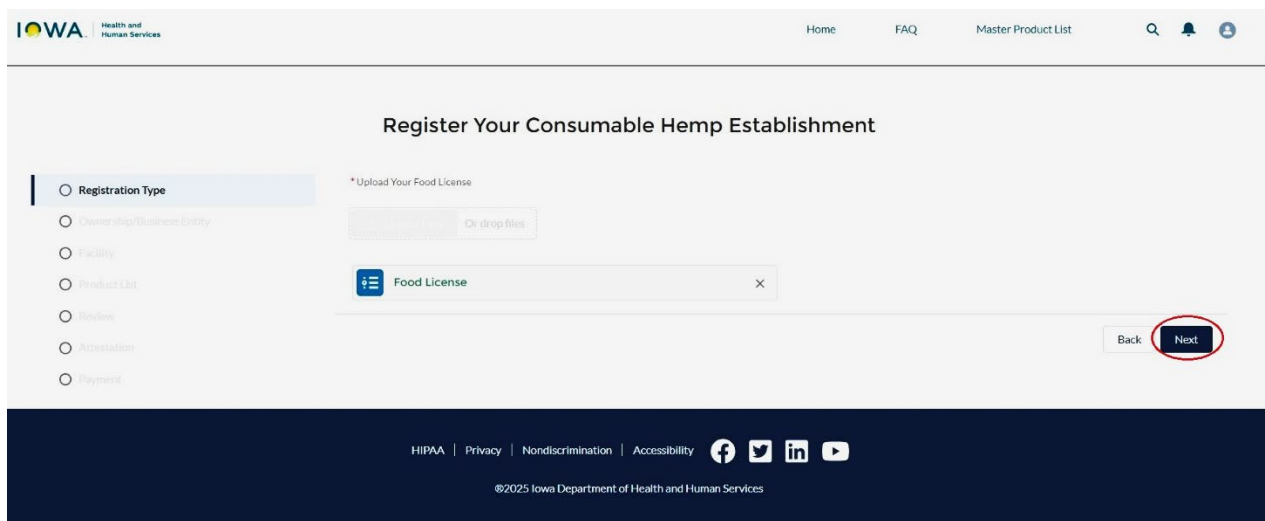
[HIPAA](#) | [Privacy](#) | [Nondiscrimination](#) | [Accessibility](#)

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- Distributors and some retailers may be required to have a food license. Provide the food license information as indicated below and click “Continue with Food License Entry”.



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



- Enter the Ownership/Business Entity information, the name of business, legal entity, the manufacturer's website, owner's address, mailing address and click "Save and Next".



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





Register Your Consumable Hemp Establishment

✓ Registration Type

☒ Ownership/Business Entity
 ☐ Facility
 ☐ Product List
 ☐ 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

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

* Business Website

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

Street

City

State/Province

Zip/Postal Code

Country

Mailing Address (This is the mailing address for your ownership entity)

Street

City

State/Province

Zip/Postal Code

Country

Ownership information is only editable in the user profile

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

Register Your Consumable Hemp Establishment

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

Facility Address

This information pertains to the physical location of your consumable hemp establishment. A consumable hemp establishment's registration is only valid for one physical location.

* County
Polk

To Ensure the best result we recommend that you search for your address in the Google Search Address Here field and select your address when it appears!

* Facility Address
Google Search Address Here
321 E 12th

* Street
321 East 12th Street

* City
Des Moines

* State/Province
IA

* Zip/Postal Code
50319

* Country
United States

Next

- Confirm the address. Make any edits if needed. Otherwise, click “Continue” to proceed.

Register Your Consumable Hemp Establishment

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

!! Please confirm that this is the correct address for your facility. This will be the address listed on your license and must match the physical address. !!

321 East 12th Street
Des Moines, Iowa
50319
Polk

Note!! If your suite number was not included with the Google Address, Click Edit Address below and add it directly to the Street field.

Edit Address

Continue

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- Retailers and distributors will select products from the Master Product List. Click on “Choose Products to Sell” to build your product list.

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[FAQ](#)

[Master Product List](#)







Register Your Consumable Hemp Establishment

✓ Registration Type

✓ Ownership/Business Entity

✓ Facility

☒ Product List

☐ Review

☐ Attestation

☐ Payment

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.

- HF2605 made several changes to the consumable hemp program. When creating or maintaining product lists, please keep the following changes 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 87.7% of THCA. (See Iowa Code 204.2).
 - 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 retail facility license, you can only select products from a pre-approved list. Custom product creation is not permitted, and you are only allowed to sell items from that list.

Choose Products to Sell

- Your product list is displayed in the table “My Distributed or Retail Hemp Products”. For new Registrations, this will initially be blank. Products that have been reviewed and available for retail sale or distribution are in the “Available Products for Distribution or Retail” table.

Home

FAQ

Master Product List

Register Your Consumable Hemp Establishment

✓ Registration Type

✓ Ownership/Business Entity

✓ Facility

○ Product List

○ Review

○ Attestation

○ Payment

If you have finished adding and removing products from your distribution or retail list you may complete this part of the registration by clicking "Submit".

Below are products that are currently listed as being distributed or retailed by your facility. If there are any products listed below that you no longer distribute or retail, please select them from the table and click the "Remove Product" button.

My Distributed or Retail Hemp Products

Enter search term...

This table currently has no data to display

Remove Products

Below are the list of active products that are available to sell in the state of Iowa. Select any products you would like to add to your distribution or Retail list for retail and click "Add Products".

Available Products for Distribution or Retail

Enter search term...

	☐ Manufacturer Product ID	☐ Hemp Product Name	☐ Brand Name
1	☐ 00001169	All Natural CBD Lotion	All Natural CBD
2	☐ 00001168	All Natural CBD Oil	All Natural CBD
3	☐ 00001170	All Natural CBD Tincture	All Natural CBD

8

Rev. 08/25 V2.0

- To begin populating your product list, select the product check box in the “Available Products” table. Scroll down and click “Add Products”. The selected products now appear on your list. When your list is complete, scroll down to the bottom of the page and click “Submit”.

The screenshot shows the 'Register Your Consumable Hemp Establishment' form. On the left is a sidebar with steps: Registration Type, Ownership/Business Entity, Facility, Product List (selected), Review, Attestation, and Payment. The main content area has a 'Submit' button at the top right. Below it, a message states: 'If you have finished adding and removing products from your distribution or retail list you may complete this part of the registration by clicking "Submit".' Another message follows: 'Below are products that are currently listed as being distributed or retailed by your facility. If there are any products listed below that you no longer distribute or retail, please select them from the table and click the "Remove Product" button.'

My Distributed or Retail Hemp Products

	☐ Manufacturer P...	Hemp Product...	Brand Name	Product Form	SKU
1	☐ 00001169	All Natural CBD Loti...	All Natural CBD	Topical	13755
2	☐ 00001168	All Natural CBD Oil	All Natural CBD	Topical	1354346
3	☐ 00001170	All Natural CBD Tin...	All Natural CBD	Oral	361665

Remove Products

- Review your retail/distributor product list. You can make edits before confirming if needed. Click “Confirm Product List” to proceed.

The screenshot shows the 'Register Your Consumable Hemp Establishment' form. The sidebar now highlights 'Review'. The main content area has a message: 'Please confirm that these are the products you are selling or distributing'. Below this is a table with the following data:

Manufacturer Product ID	Brand Name	SKU	Product Form	Hemp Product Name
00001170	All Natural CBD	361665	Oral	All Natural CBD Tincture
00001169	All Natural CBD	13755	Topical	All Natural CBD Lotion
00001168	All Natural CBD	1354346	Topical	All Natural CBD Oil

At the bottom right, there are two buttons: 'Edit Product List' and 'Confirm Product List' (which is circled in red).

- Sign and date the attestation and continue to Payment to submit the registration fee. You will receive an email confirming the submission of your registration. HHS will review your registration within 30 days.

Registration Type

Ownership/Business Entity

Facility

Product List

Review

Attestation

Payment

Register Your Consumable Hemp Establishment

Attestation / Endorsement

Complete and sign the following release statement. By electronic signature, the signatory is attesting that they understand the following requirements of consumable hemp registrants, and will not engage in the following prohibited activities pursuant to 641 Iowa Administrative Code 156, and that engaging in prohibited activities is grounds for embargo or suspension of the registration:

Requirements of Consumable Hemp Registrants

The undersigned attests acknowledgment of the following requirements:

- Submission and maintenance of a complete list of all consumable hemp products the consumable hemp retailer intends to sell, along with documentation of the jurisdiction of origin for each consumable hemp product (See 641 IAC 156.2)
- A consumable hemp registration is not transferable to a new owner or new physical location. The registrant will notify the Bureau of Cannabis Regulation will be notified by the registrant with any changes in ownership or physical location to my registration (See 641 IAC 156.2(6))
- It is prohibited to sell, give, or otherwise distribute consumable hemp products to individuals under the age of 21 (See Iowa Code 204.14D)

Consumable Hemp Registrant Prohibitions

The undersigned attests that they will not engage in any of the following prohibited activities:

- **Product-Specific Prohibitions**
 - Manufacture, distribute, or sell consumable hemp products with a total THC (accounting for all derivatives and isomers of THC) greater than 0.3% (See 641 IAC 156.3);
 - Manufacture, distribute, or sell consumable hemp products with a total THC (accounting for all derivatives and isomers of THC) that exceeds four milligrams per serving and ten milligrams per container on a dry weight basis (See Iowa Code 204.2);
 - Manufacture, distribute, or sell consumable hemp products containing synthetic or semi-synthetic cannabinoids (See 641 IAC 156.1);
 - Manufacture or sell consumable hemp products intended or advertised for inhalation, including all forms of vaporization or combustion, including but not limited to: forms of vaporization (disposable, pod-based, cartridge-based, etc.), and forms of hemp flower or cigarettes intended for combustion (See Iowa Code 204.14A);
 - Sell consumable hemp products manufactured in countries other than the United States of America; or
 - Sell any consumable hemp product not currently registered with Bureau of Cannabis Regulation (See 641 IAC 156.6(2)(d))
- **Marketing and Advertising Prohibitions**
 - Market a consumable hemp product as intended to cure, treat, mitigate, prevent disease or affect the structure or function of the human body (See 641 IAC 156.6(2))
- **Premises Prohibitions**
 - Manufacture or sell consumable hemp on the premises of a temporary location, including a food stand, roadside stand, temporary booth, or any other temporary structure, including: door-to-door, vending machines, or private parties. Farmer's markets have specific exemption requirements. (See 641 IAC 156.6(1)(2)); or
 - Manufacture or sell consumable hemp on the premises of a private residence, except a portion of a private residence that is distinctly separate from any living space (See 641 IAC 156.6(1))
- **Applicability with other Laws**
 - Introduce consumable hemp into any of the following:
 - Meat or Poultry product for which the individual or entity is subject to Iowa Code chapter 189A (See 641 IAC 156.5(2));
 - Dairy product for which the individual or entity is subject to Iowa Code chapters 190 to 192 (See 641 IAC 156.5(4)); or
 - Alcoholic Beverage product for which the individual or entity is subject to Iowa Code chapter 123 (See 641 IAC 156.5(2)).

Products will be reviewed by the Department using the laws and regulations currently in effect on the date that the products are reviewed. It is the responsibility of the registrant to keep informed of any changes to the laws and regulations of the consumable hemp program and to adjust product lists accordingly.

By signing below, I certify under penalty of perjury that the information on this registration is complete, true, and submitted for the purpose of obtaining a State of Iowa Consumable Hemp Registration. I understand that providing false or misleading information may result in the denial, cancellation, or suspension of my Consumable Hemp Registration and that the law provides severe penalties (fine and/or imprisonment) for the willful submission of known false information.

I hereby declare that the information provided on this registration to be true and accurate and agree to the terms and conditions outlined above.

* Name

* Attestation Date

[Continue to Payment](#)

II. Managing Your Product List

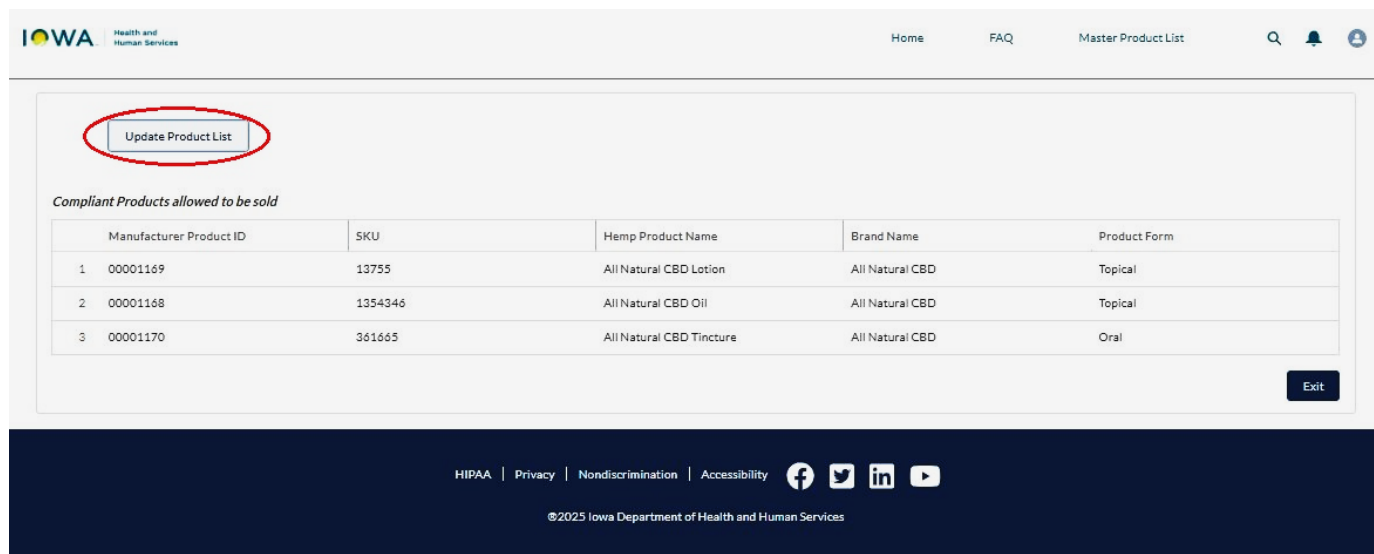
- Retailers and Distributors are required to maintain an up-to-date product list throughout the duration of their registration. To add or remove products from your product list, click on the “View/Manage Products” button.

The screenshot shows the 'Hello Retail/Dist,' welcome message and a navigation bar with links to Home, FAQ, and Master Product List. Below the welcome message, there are two main action buttons: 'Click here to renew or continue a Registration, Update a Food License, or start a Registration for a new facility' and 'View/Manage Products'. The 'View/Manage Products' button is circled in red. To the right of these buttons, there is a section titled 'The “Action List” below requires your attention. You may address the action item directly from the list view below:' followed by a table with columns: Name, Action, Status, Type, and Expiration Date. The footer contains links for HIPAA, Privacy, Nondiscrimination, and Accessibility, along with social media icons and the copyright notice '©2025 Iowa Department of Health and Human Services'.

- Select your facility and click “Next”.

The screenshot shows the 'Facilities' section with a table listing available facilities. The table has columns: Business Name (DBA), Registration Number, Registration Type, and Registration Expiration Date. A single facility is listed: 'HHS Retailer' with registration number '437098', type 'Consumable Hemp Retailer', and expiration date 'Sep 23, 2026'. Below the table is a 'Clear Selection' button. At the bottom right of the table area, there is a 'Next' button circled in red. The footer is identical to the previous screenshot, showing links for HIPAA, Privacy, Nondiscrimination, and Accessibility, social media icons, and the copyright notice '©2025 Iowa Department of Health and Human Services'.

- Your current product list is displayed. Click on “Update Product List”.



The screenshot shows the 'Master Product List' page. At the top, there is a navigation bar with links for Home, FAQ, and Master Product List. A search icon, a notification bell, and a user profile icon are also present. The main content area features a button labeled 'Update Product List', which is highlighted with a red circle. Below this button, the section is titled 'Compliant Products allowed to be sold'. It contains a table with the following data:

	Manufacturer Product ID	SKU	Hemp Product Name	Brand Name	Product Form
1	00001169	13755	All Natural CBD Lotion	All Natural CBD	Topical
2	00001168	1354346	All Natural CBD Oil	All Natural CBD	Topical
3	00001170	361665	All Natural CBD Tincture	All Natural CBD	Oral

An 'Exit' button is located at the bottom right of the table area. The footer of the page includes links for HIPAA, Privacy, Nondiscrimination, and Accessibility, along with social media icons for Facebook, Twitter, LinkedIn, and YouTube. The copyright notice reads '©2025 Iowa Department of Health and Human Services'.

- To remove products from your list, click the check box in the “My Distributed or Retail Hemp Products” and click “Remove Products”. To add products, select products from the Master Product List in the “Available Products for Distribution or Retail” table and click “Add Products” at the bottom of the table.



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HomeFAQMaster Product List





Save and Return

Below are products that are currently listed as being distributed or retailed by your facility. If there are any products listed below that you no longer distribute or retail, please select them from the table and click the “Remove Product” button.

My Distributed or Retail Hemp Products

	Manufacturer P...	Hemp Product ...	Brand Name	Product Form	SKU
1	☐ 00001169	All Natural CBD Loti...	All Natural CBD	Topical	13755
2	☐ 00001168	All Natural CBD Oil	All Natural CBD	Topical	1354346
3	☒ 00001170	All Natural CBD Tin...	All Natural CBD	Oral	361665

Remove Products

Below are the list of active products that are available to sell in the state of Iowa. Select any products you would like to add to your distribution or Retail list for retail and click "Add Products".

Available Products for Distribution or Retail

	Manufacturer Product ID	Hemp Product Name	Brand Name	Product Form
1	☐ 00002348	Apple	Climbing Kites	Other
2	☐ 00001749	Apple Gummy	Trev's Trees	Edible
3	☐ 00001223	Be Social Hot Chocolate	BCR Hemp Co.	Beverage
4	☒ 00000738	Blue Gummy	Capital City CBD	Edible
5	☒ 00001219	Calm Yourself Gummies	BCR Hemp Co.	Edible
6	☒ 00001220	Calm Yourself Spritzer	BCR Hemp Co.	Beverage
7	☒ 00001221	Calm Yourself Tincture	BCR Hemp Co.	Oral
8	☐ 00001377	CalmCraft Elixir	EverGreen Alchemu	Oral

- The product list has now been updated. Click “Save and Return” to exit.



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HomeFAQMaster Product List





Save and Return

Below are products that are currently listed as being distributed or retailed by your facility. If there are any products listed below that you no longer distribute or retail, please select them from the table and click the “Remove Product” button.

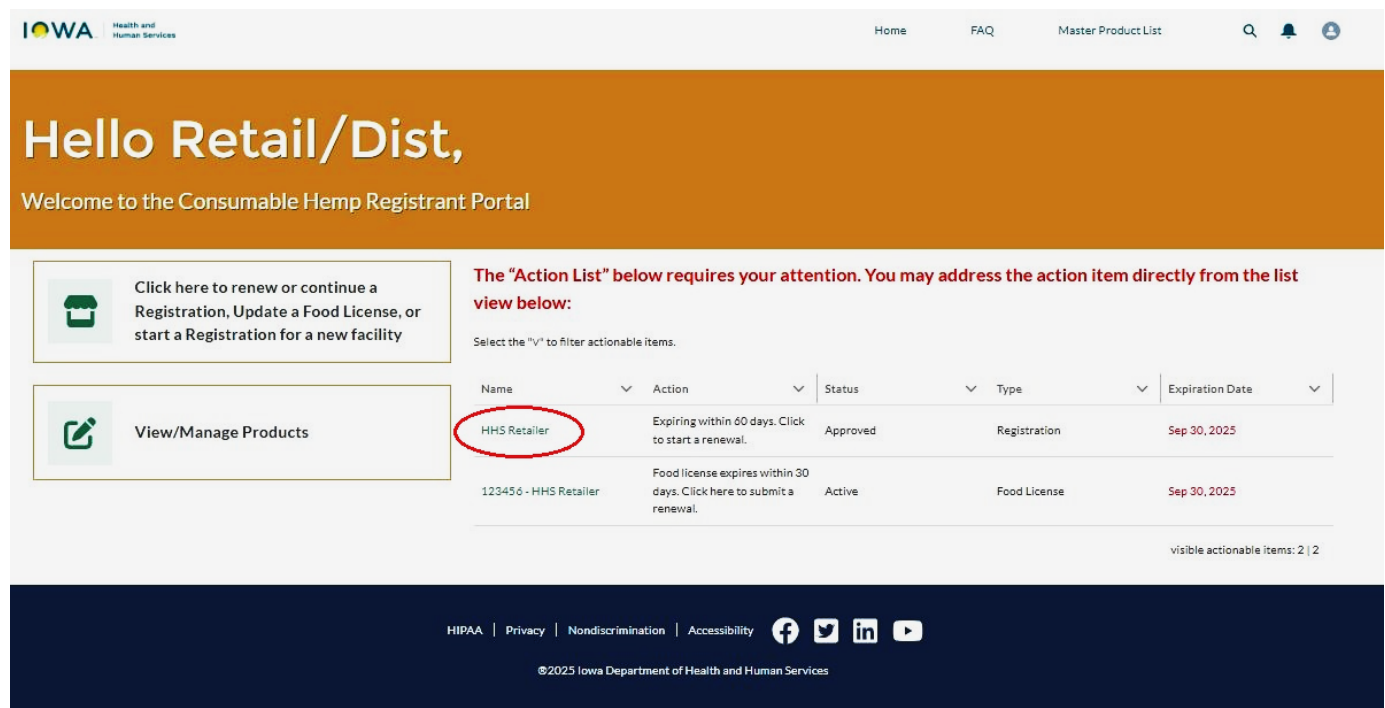

My Distributed or Retail Hemp Products

	☐ Manufacturer P... ▾	☐ Hemp Product... ▾	☐ Brand Name ▾	☐ Product Form ▾	☐ SKU ▾
1	☐ 00001169	All Natural CBD Loti...	All Natural CBD	Topical	13755
2	☐ 00001168	All Natural CBD Oil	All Natural CBD	Topical	1354346
3	☐ 00001219	Calm Yourself Gum...	BCR Hemp Co	Edible	8523645
4	☐ 00001220	Calm Yourself Spritz...	BCR Hemp Co.	Beverage	3546
5	☐ 00001221	Calm Yourself Tinct...	BCR Hemp Co.	Oral	151354
6	☐ 00000738	Blue Gummy	Capital City CBD	Edible	320

Remove Products

III. Action List Alerts

- The Home Page of the Consumable Hemp Portal will display Action Items if an action needs to be taken on a food license or registration. To renew a Registration, click on the link in the Action List.



The screenshot shows the 'Hello Retail/Dist,' welcome message and two main action buttons: 'Click here to renew or continue a Registration, Update a Food License, or start a Registration for a new facility' and 'View/Manage Products'.

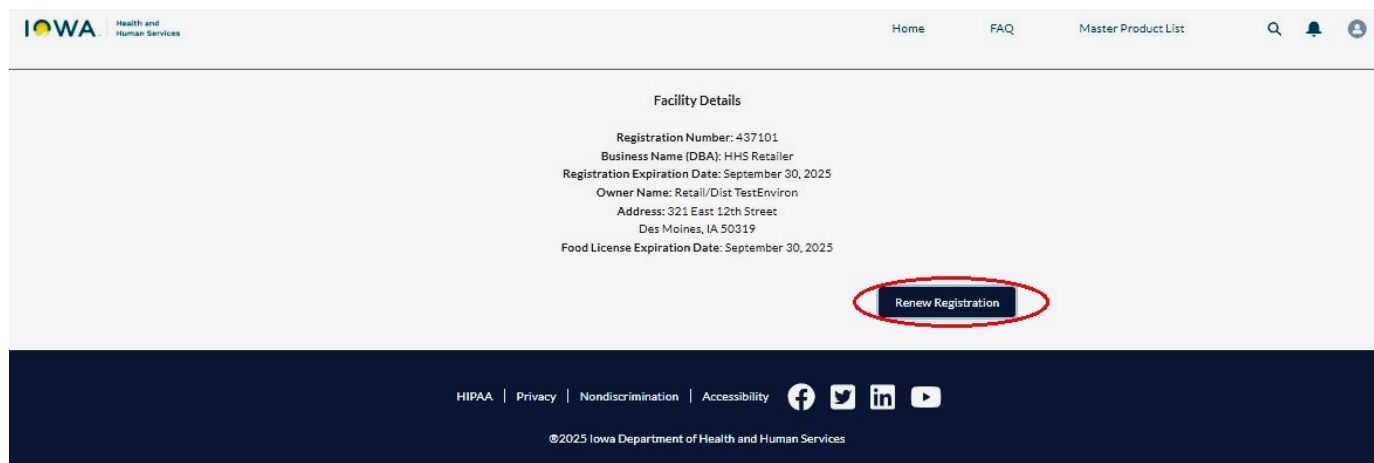
The 'Action List' section contains the following table:

Name	Action	Status	Type	Expiration Date
HHS Retailer	Expiring within 60 days. Click to start a renewal.	Approved	Registration	Sep 30, 2025
123456 - HHS Retailer	Food license expires within 30 days. Click here to submit a renewal.	Active	Food License	Sep 30, 2025

visible actionable items: 2 | 2

Footer: HIPAA | Privacy | Nondiscrimination | Accessibility | ©2025 Iowa Department of Health and Human Services

- Confirm the facility information click “Renew Registration”



Facility Details

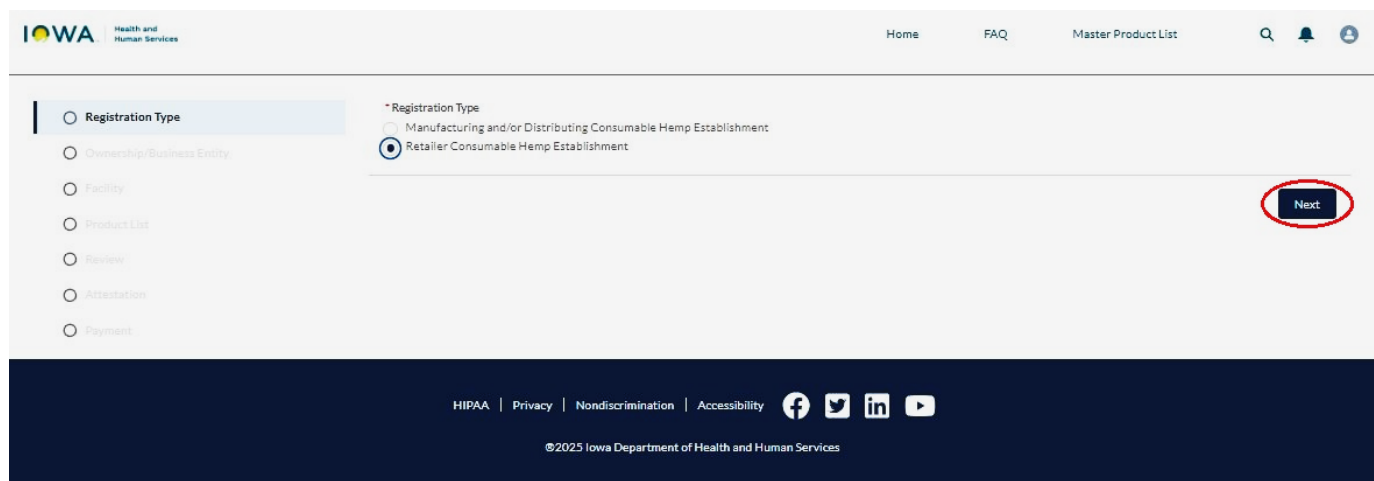
Registration Number: 437101
Business Name (DBA): HHS Retailer
Registration Expiration Date: September 30, 2025
Owner Name: Retail/Dist Test Environ
Address: 321 East 12th Street
Des Moines, IA 50319
Food License Expiration Date: September 30, 2025

[Renew Registration](#)

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- Select the Registration Type and click “Next”



Registration Type

☐ Ownership/Business Entity

☐ Facility

☐ Product List

☐ Review

☐ Attestation

☐ Payment

*Registration Type

☐ Manufacturing and/or Distributing Consumable Hemp Establishment

☒ Retailer Consumable Hemp Establishment

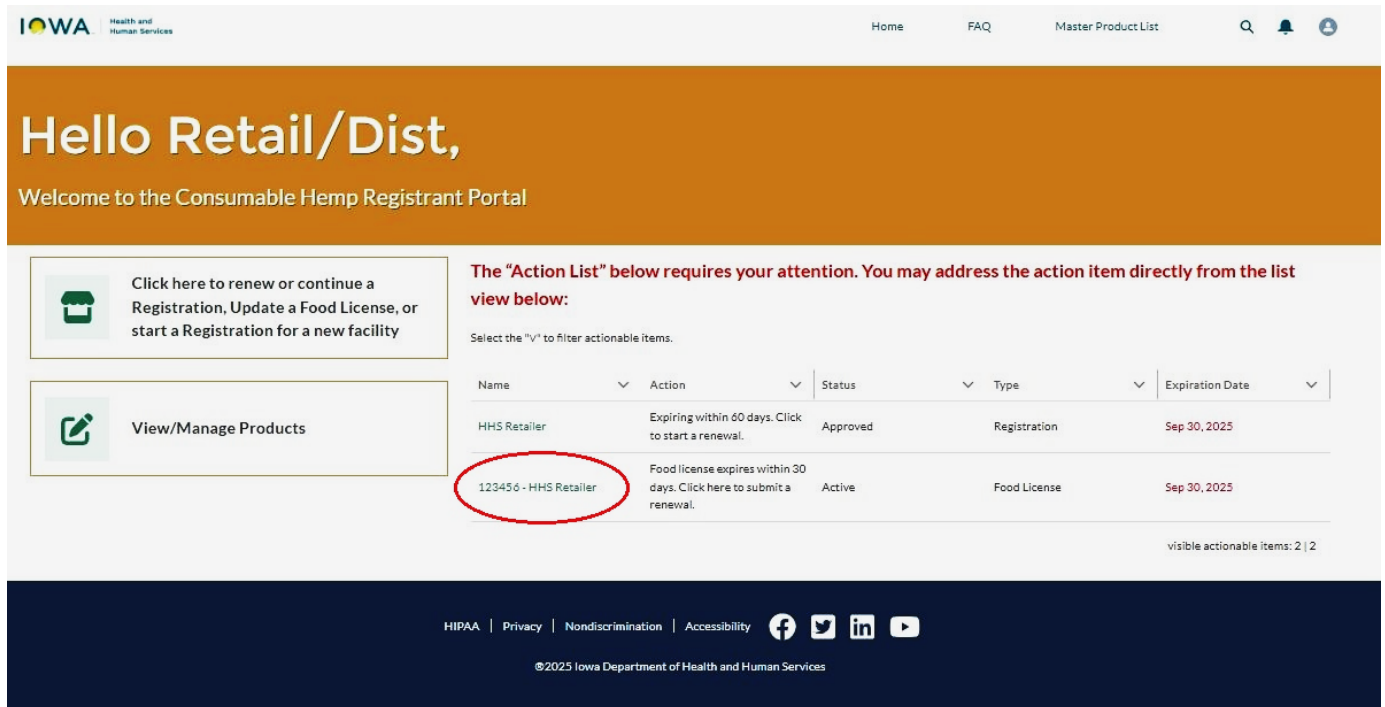
[Next](#)

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See Section 1 for instructions on how to Complete Ownership/Business Entity, Facility and Product List steps. Sign the Attestation and submit the payment to complete the renewal.

- To update an expiring food license from the Action List, click on the Food License link.



Hello Retail/Dist,
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

View/Manage Products

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.

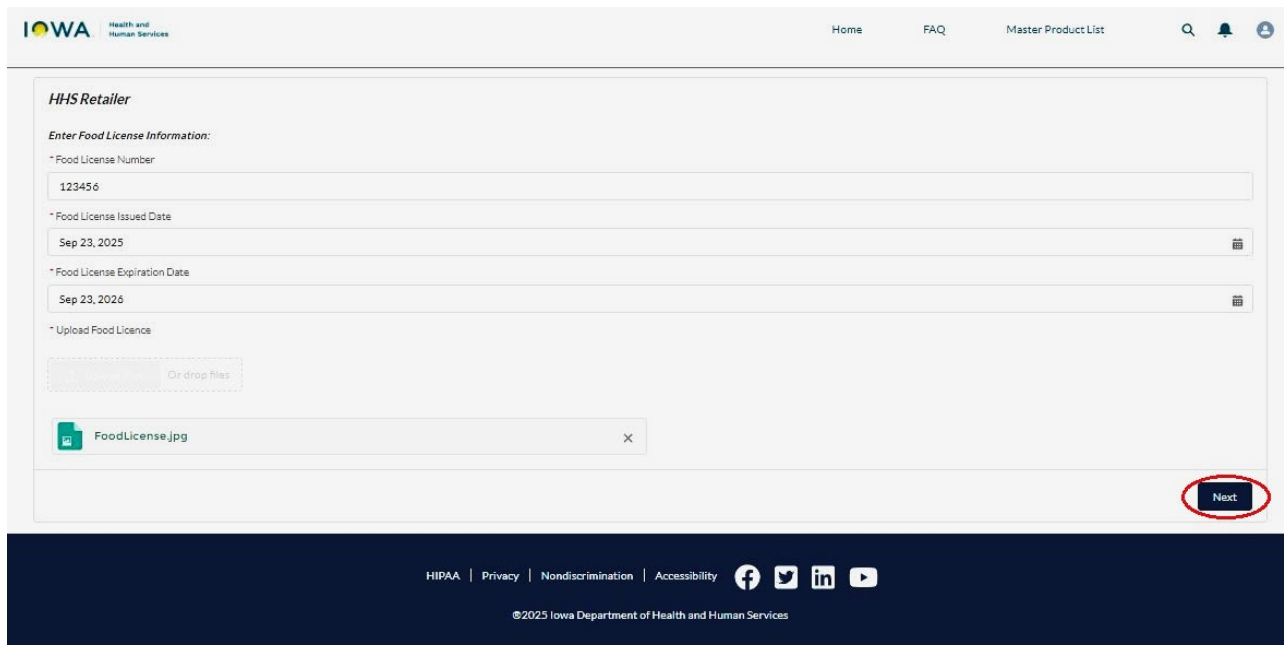
Name	Action	Status	Type	Expiration Date
HHS Retailer	Expiring within 60 days. Click to start a renewal.	Approved	Registration	Sep 30, 2025
123456 - HHS Retailer	Food license expires within 30 days. Click here to submit a renewal.	Active	Food License	Sep 30, 2025

visible actionable items: 2 | 2

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- Enter the Food License Number, Issue and Expiration Date, and upload an image of the food license. Click "Next" to continue. The Food License renewal has been completed and removed from the Action List.



HHS Retailer

Enter Food License Information:

* Food License Number
123456

* Food License Issued Date
Sep 23, 2025

* Food License Expiration Date
Sep 23, 2025

* Upload Food License
Or drop files

FoodLicense.jpg

Next

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III. Prohibited Products, Compliance, and Penalties

Prohibited Product	Citation	Penalty
Inhalable Products	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
Products exceeding 4 mg THC per serving and/or 10 mg THC per container	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
Liquids under 12 fluid ounces	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
Adulterated Products	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
Synthetic Cannabinoids	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
Products exceeding 0.3% THC	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
“Flower” or “bud” form	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
Products marketed to or intended to cure, treat, mitigate, prevent disease, or affect the structure of the human body (this includes over-	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

the-counter medications).

Bread, cake, pie, or other “cottage food” items made in a person’s home kitchen or other residential space	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
Manufactured alcoholic beverages, meat or poultry products, or dairy products infused with hemp	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
Other food not produced in a licensed food-processing plant	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
Products manufactured in other countries or jurisdictions without an approved USDA hemp plan	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

Retailers and Distributors selling products that are not selected from the Master Product List are in violation of 641 IAC 156.2(1)c. and 2(2)c, which requires Retailers and Distributors to maintain a complete and up-to-date list of products.

Retailers and Distributors in violation of these rules are subject to enforcement, confiscation, and criminal or civil penalty.

iv. 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</i> - Carbonated/noncarbonated	12 oz, 4 mg	1	Yes
<i>Beverage</i> - Carbonated/noncarbonated	16 oz, 5 mg	1-2	Yes

<i>Beverage - Carbonated/noncarbonated</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:

Product, Volume	Per Serving Label Claim (THC)	Per Serving COA Value (THC)	Compliant
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.

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 are permissible in <12 oz containers and follow serving suggestions from Table 2.