

BatchBuddy.AI — PLM-ERP Platform for CPG Manufacturers

Hemp Handler License Compliance Matrix

How BatchBuddy maps to federal USDA hemp handler requirements (7 CFR Part 990 / 2018 Farm Bill) and key state-level variations for supplement, food, and CPG manufacturers handling hemp-derived ingredients and finished products.

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Platform Scope: BatchBuddy is a post-harvest compliance infrastructure platform for hemp handlers, processors, and CPG manufacturers. Its compliance scope begins at ingredient receipt and continues through lot control, COA/document retention, production records, traceability, and audit-ready reporting. Farm-side activities (e.g., cultivation licensing, acreage/GPS capture, and pre-harvest sampling) remain outside BatchBuddy's native scope and should be managed in producer/ag program systems.

Scope Boundary

In BatchBuddy's Scope

- ✓ Post-harvest ingredient receiving and lot intake
- ✓ COA upload, storage, and management
- ✓ Lot-level traceability (FSMA 204-aligned)
- ✓ Production batch records (EBR)
- ✓ CAPA and OOS investigation workflows
- ✓ Tamper-evident audit trail
- ✓ Recall simulation and impact assessment

Outside BatchBuddy's Scope

- Cultivation licensing and farm registration
- Acreage and GPS tracking
- Pre-harvest THC sampling programs
- Lab DEA/accreditation credential registry
- Renewal deadline calendaring

7

full coverage

10

strong coverage

3

partial coverage

10 / 10

federal requirements

6

key states covered

Federal Requirements — USDA 7 CFR Part 990 / 2018 Farm Bill

Req.	Requirement	BatchBuddy Features	Coverage
L-1	Licensing & Registration Federal (7 CFR §990.21)	Operator records · Document management · License/permit document repository for handler/manufacture records, with organized storage and retrieval for inspections. Does not manage renewal deadline calendaring. · Staff identity verification	Strong coverage
L-2	Land & Facility Records Federal (7 CFR §990.22)	Room Tracking module · Facility records · Location-linked batch records · Ingredient intake and lot-level receiving records (supplier, lot/batch IDs, dates, quantities, COA linkage) to establish chain-of-custody from receipt onward.	Strong coverage

Req.	Requirement	BatchBuddy Features	Coverage
L-3	Pre-Harvest THC Sampling Federal (7 CFR §990.24)	Lot-level traceability · COA and quality test record capture at intake/release, including test result metadata and lot association; supports QC disposition workflows. · COA import (OCR) · FSMA 204 trace chain. <i>Note: Pre-harvest sampling program management is outside BatchBuddy's scope.</i>	Partial coverage
L-4	DEA-Registered Lab Testing Federal (7 CFR §990.25)	COA management · HMAC-signed COAs · COA document storage with lab attribution fields (lab name, report number, date) and immutable audit trail. Lab credential/DEA registration verification remains the customer's responsibility. · Chain-of-custody logging	Strong coverage
L-5	THC Test Results & Recordkeeping Federal (7 CFR §990.25 / §990.71)	COA import & storage · HMAC v2 cryptographic signing · Tamper-evident audit trail · 3-year record retention	Full coverage
L-6	Non-Compliant Crop Disposal Federal (7 CFR §990.27)	CAPA + OOS module · Deviation tracking · Disposal event logging · Audit trail	Strong coverage
L-7	Reporting to USDA / HeMP Platform Federal (7 CFR §990.71)	Batch & lot records · Report-ready data exports · Audit trail · Document management	Strong coverage
L-8	Audit & Inspection Readiness Federal (7 CFR §990.72)	Hash-chain audit proof · HMAC-signed records · Recall simulation · Batch record search	Full coverage
L-9	Negligent Violation & CAPA Federal (7 CFR §990.76)	CAPA module · Deviation-to-CAPA workflow · OOS investigation · Corrective action logging	Full coverage
L-10	Interstate Commerce Documentation Federal (7 CFR §990 / 2018 Farm Bill)	COA generation · HMAC-signed COAs · Lot traceability · Shipping documentation	Strong coverage

Key State Variations — TX · FL · CO · GA · NY · SC

Req.	Requirement	BatchBuddy Features	Coverage
TX-1	Texas: Consumable Hemp Product License Texas (DSHS / GA-56)	License & operator records · Document management · Inspection readiness · Audit trail	Strong coverage
TX-2	Texas: Total THC + THCA Testing Texas (Executive Order GA-56, 2025)	COA import (OCR) · HMAC-signed COAs · Spec management · OOS tracking	Full coverage
TX-3	Texas: Labeling — Cannabinoid Content Per Serving Texas (GA-56 / DSHS)	Product specifications · COA-linked labeling data · Batch records · LabelBuddy integration: formulation data (serving size, ingredient quantities, cannabinoid content) pushed directly to LabelBuddy.ai for compliant label generation.	Strong coverage
FL-1	Florida: FDACS-Approved Lab Sampling Florida (FDACS / Rule 5K-4.034)	COA management · Retains COAs and associated lab identity metadata required for inspection evidence packages; credential verification remains external. · Chain-of-custody logging · HMAC-signed COAs	Strong coverage
FL-2	Florida: Full Contaminant Panel Florida (FDACS Rule 5K-4.034)	COA import & storage · Spec management · OOS tracking · Supplier COA management	Strong coverage

Req.	Requirement	BatchBuddy Features	Coverage
FL-3	Florida: Batch & Inventory Traceability Florida (FDACS)	Batch record management · Lot-level traceability · Inventory management · FSMA 204 chain	Full coverage
CO-1	Colorado: Pre-Harvest + Finished Product Dual Track Colorado (CDA / CDPHE 6 CCR 1010-24)	COA management · Batch records · Spec management · OOS tracking	Strong coverage
GA-1	Georgia: Full Contaminant Panel Georgia (SB 494)	COA import & storage · Maintains lot-linked COA documents and lab identity references for handler records; does not maintain independent lab accreditation registry. · Spec management · HMAC-signed COAs	Strong coverage
NY-1	New York: OCM QR-Code COA + THC-Per-Serving Limits New York (OCM)	COA generation · HMAC-signed COAs · Batch records · Spec management	Partial coverage
SC-1	South Carolina: Handler Permit — Annual Renewal South Carolina (SCDA)	Document management · SOP records · Batch records · Lot traceability	Strong coverage

Coverage guide:

Full coverage — direct built-in module coverage

Strong coverage — core functionality present

Partial coverage — foundational support, no dedicated module

Customer Responsibilities — The following compliance activities remain external to BatchBuddy and are the customer's responsibility:

- **Renewal deadline monitoring** — License and permit expiration calendaring and proactive renewal workflows must be managed outside the platform.
- **Farm licensing management** — Cultivation licenses, acreage reporting, and GPS boundary documentation are out of scope for BatchBuddy.
- **Pre-harvest sampling program** — Scheduling, conducting, and documenting pre-harvest THC sampling events per USDA/state requirements is a producer/ag program responsibility.
- **Lab DEA/accreditation credential verification** — Confirming that a testing laboratory holds current DEA registration and ISO 17025/state-required accreditation is the customer's obligation before accepting COA documents from that lab.

Important: Hemp handler licensing is administered at the state level in most jurisdictions. Requirements vary significantly by state and change frequently — particularly regarding total THC calculations (delta-9 + THCA), approved lab designation, and finished product contaminant panels. BatchBuddy's COA management, lot traceability, and tamper-evident audit trail provide the documentation infrastructure for compliance across all listed jurisdictions; always verify current state-specific requirements with your state department of agriculture and legal counsel.