

Pesticide Use on Hemp

Pesticide Regulatory Officials Perspective

PESTICIDE PROGRAM DIALOGUE COMMITTEE

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Impacts of 2018 Farm Bill

Commercial Agricultural Production of Hemp

- ▶ Pesticide regulatory agencies are developing “Hemp Programs”
 - ▶ Proposing new or amending existing regulations;
 - ▶ Credentialing programs for agricultural producers
 - ▶ Ongoing research.
- ▶ ***Options for pesticide use on hemp;***
- ▶ Laboratory testing:
 - ▶ THC levels; and
 - ▶ Pesticide use
- ▶ Development of sampling protocols for hemp;
- ▶ Method development for sample analysis;
- ▶ Storage and disposal of samples;
- ▶ Food safety guidance to:
 - ▶ Food manufacturers and retail food establishments interested in manufacturing or selling food or a dietary supplement containing hemp-derived extracts, including CBD oil; and
 - ▶ Processors planning to produce hemp-derived products intended for human consumption.
- ▶ Transportation; and
- ▶ Destruction of high value crop.

Pesticide Use on Hemp

- ▶ Beginning with the previous Farm Bill, research is ongoing including soils, growing conditions, and harvest methods; and pests (for example, insects, mites and other “bugs”).
 - ▶ Hemp is many different kinds of crops (extracts; seeds; and fiber); and
 - ▶ Pest management issues will vary by production method and end use.
- ▶ As with all agricultural production, it may be necessary to control pests using a variety of approaches including the application of pesticides.
- ▶ All registered pesticides can only be legally applied to sites (e.g., crops) for which they are labeled.
 - ▶ Prior to the 2018 Farm Bill, cannabis was not recognized as a crop.

PESTICIDE USE ON HEMP

- *There are currently 6 EPA registered pesticides which list Hemp on the pesticide label.¹*
- *No food tolerances or exemptions from food tolerances exist for Hemp thus these pesticides may not be used on Hemp that is being grown for consumption.*

Pesticides which reference use on hemp or industrial hemp			
State/Federal Registration	Product Name	EPA Reg. No.	Use
Federal	Arcus FS	84846-13	Plant Growth Regulator
Both	Optify*	33270-37	Plant Growth Regulator
Both	Optify/Stretch	33270-40	Plant Growth Regulator
Both	PBO-8 Synergist	89459-33	Synergist (increases effectiveness of pesticide)
Both	Prentox PBO-8**	655-736	Synergist
Both	SynerPro PBO	53883-258	Insecticide Synergist
*Registered federally as Optify TM but marketed in Virginia as Optify			
**Product transferred and is in discontinuance. Same as PBO-8 Synergist.			

¹Search "Virginia" and "Hemp" - National Pesticide Information Retrieval System (April 2019)

Approaches to the Use of Pesticides on Hemp

“When you know how one state works, you know how one state works...”

- ▶ Status of programs vary greatly.
 - ▶ Default to federally registered pesticides that list “hemp” on label;
 - ▶ Allow pesticides that meet minimum criterion:
 - ▶ The active ingredient is exempt from the requirements of a tolerance on all food crops;
 - ▶ The label has directions for use on unspecified food crops (e.g. bedding plants);
 - ▶ The pesticide is registered by the EPA or exempted from registration;
 - ▶ The pesticide is registered by the State;
 - ▶ The label language is sufficiently broad to include hemp and does not specifically prohibit its use on hemp;
 - ▶ Other???
 - ▶ List of allowable products or not.

In General, Pesticide Regulatory Officials

- ▶ Looking to EPA to take (registration) action(s);
 - ▶ Concerns regarding unregulated, illegal and potentially unsafe use of pesticides to manage pests;
 - ▶ In the absence of information and viable options, default to other sources, for example, Intranet or hearsay.
- ▶ Training Staff;
- ▶ Collaborating with Pesticide Safety Educators (Extension);
- ▶ Conducting outreach and education to growers:
 - ▶ Experienced agricultural producers;
 - ▶ New to production agriculture:
 - ▶ Versatility; and
 - ▶ High revenue/low acreage ratio,



www.aapco.org

Liza Fleeson Trossbach

Liza.Fleeson@vdacs.Virginia.gov

804-371-6559