

Cannabis and Pesticides

AAPCO Meeting

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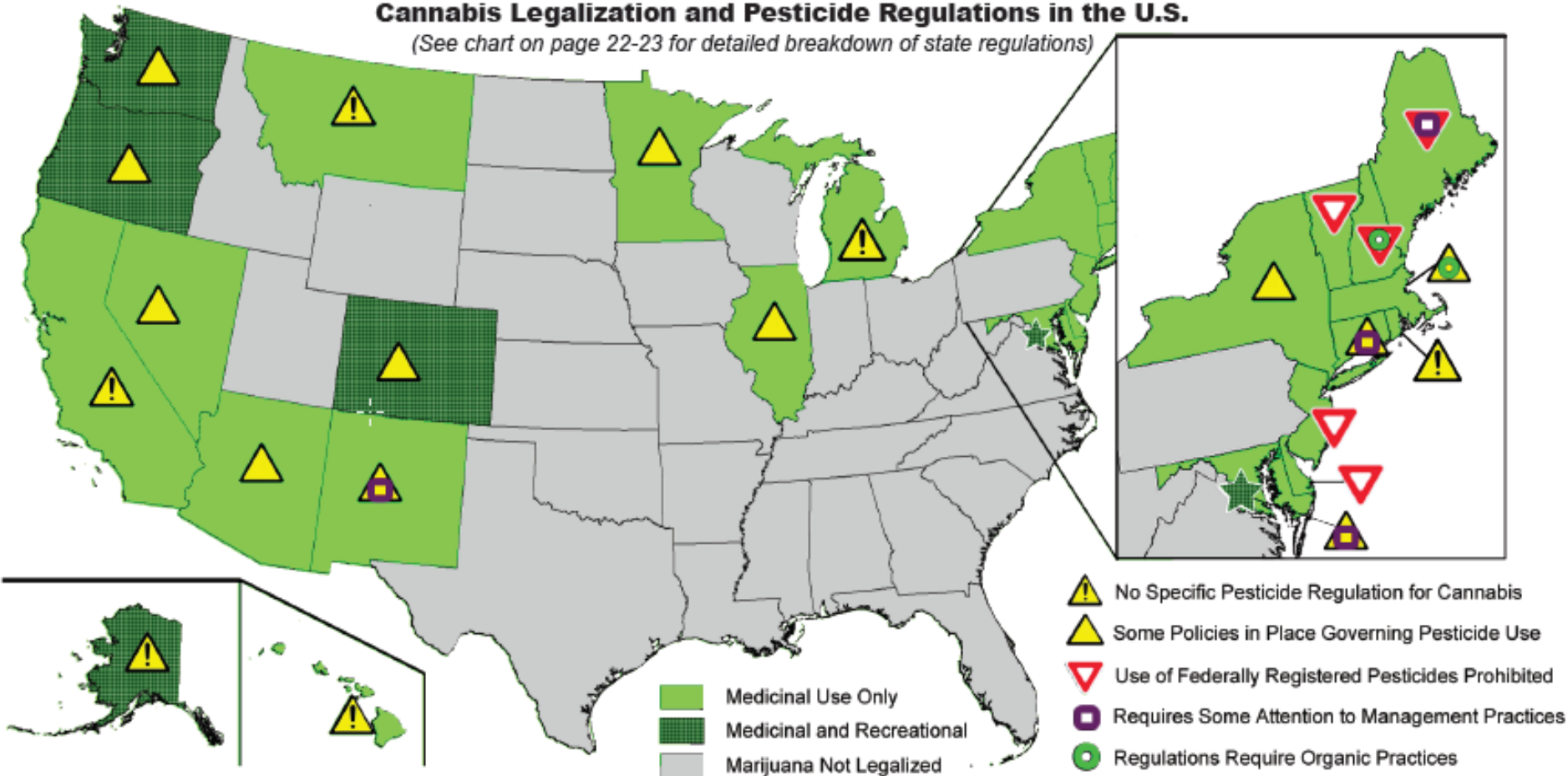
Why is EPA involved?

- ▶ A growing number of states and tribes are allowing recreational and/or medical use of marijuana
- ▶ EPA is aware that growers are using pesticide
 - ▶ Increased cultivation leads to pest problems
- ▶ EPA is concerned about protecting human health and the environment



Cannabis Legalization and Pesticide Regulations in the U.S.

(See chart on page 22-23 for detailed breakdown of state regulations)



EPA's Position



- ▶ The label is the law
- ▶ Marijuana is not federally legal (illicit drug under Substances Control Act)
- ▶ Doesn't fit in any general crop category (i.e., herb, spice, or vegetable)
- ▶ EPA has not authorized the use of any pesticide specifically on marijuana
- ▶ EPA has yet to receive any applications for pesticide use on marijuana and, therefore, we have not evaluated the safety of any pesticide on marijuana.
- ▶ The use of unregistered pesticides on marijuana may have unknown health consequences, as no pesticides have undergone risk assessments for use on marijuana at this time.

EPA Position

- ▶ EPA has not reviewed the lists of pesticides on state websites.
- ▶ Can use Section 24c Special Local Needs
 - ▶ On May 19, 2015, EPA sent a letter to Colorado outlining the information that would be needed to for a 24(c) on marijuana.
 - ▶ If no unreasonable adverse effect on the environment
 - ▶ If current registration has a similar use pattern (food, burned, application method). Exposure pathways are unique
 - ▶ Will take significant time and resources to create required toxicity data
 - ▶ At this time, EPA has not received any SLN registrations for marijuana.
 - ▶ EPA continues to meet with and provide guidance to the states and tribes to address issues/concerns about the 24(c) process.

Actions to Date

- ▶ Scoping meeting with several states in December 2015
- ▶ Web statement in February 2016:
<http://www.epa.gov/pesticide-registration/pesticide-use-marijuana>
- ▶ OPP team formed to facilitate the use of the 24(c) process
- ▶ National Workgroup

Questions?