

# **Pesticides and the Medical Cannabis Regulation and Safety Act**

George Farnsworth  
Assistant Director

Department of Pesticide Regulation

# Background: Pesticide Use in California

- All pesticides sold or used in California must be registered by U.S. EPA and California
- Label language and pesticide tolerances are set by the U.S. EPA
- DPR monitors pesticide residue in fresh produce from recognized fruit and vegetable commodities

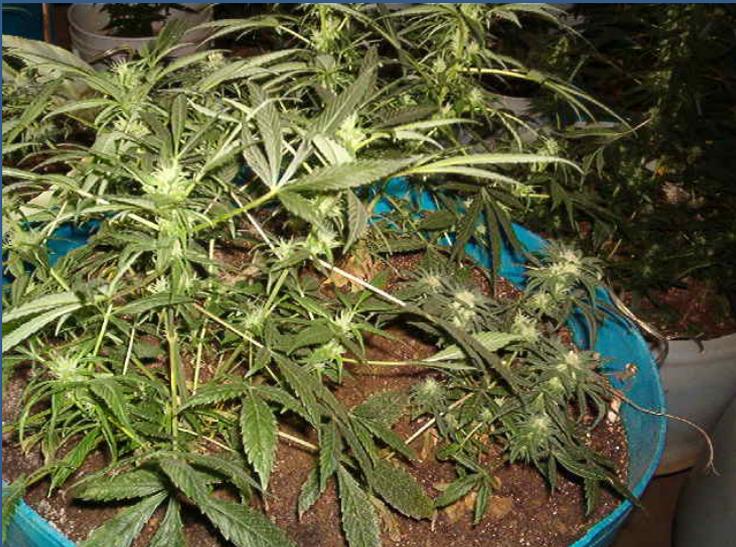


# DPR's Roles Under The Act

- Provide guidance on the use of pesticides in cannabis cultivation
- Provide assistance to the Bureau in developing regulations for pesticide testing methodologies and pesticide residue levels

# Background: Cannabis and Pesticides

- Cannabis is federally listed as a schedule 1 drug and cannot be assigned to a crop group
  - No pesticides registered for use on cannabis
  - No pesticide residue tolerances established for cannabis



Photos from DEA Image Gallery

# Guidance: Pesticides in Cannabis Cultivation

- Enforcement Letters (ENF 15-15 and ENF 16-19)
- Pesticide Use on Marijuana (Guidance Document)
- Legal Pest Management Practices for Marijuana Growers in California



All documents can be found using the search function on the DPR homepage.

# Guidance: Pesticides in Cannabis Cultivation

## Legal Pest Management Practices for Marijuana Growers in California

- Identifies pesticide use that is not illegal
  - Exempt from a tolerance and broad label language  
or
  - 25b exempt from registration

# Pesticides in Cannabis Cultivation

- Special Local Need registration (24C)
  - Requested by a pesticide company or third party (ie. grower group)
  - SLN requests can be made for a product with similar use patterns including use:
    - On food
    - On tobacco
    - By the same type(s) of application methods
    - On crops with agronomic characteristics similar to cannabis
    - In the same kind of structure as the proposed SLN use

# Provide assistance to the Bureau

## Pesticide testing methodologies

- Third party laboratories will be responsible for testing for potency and contaminants
- DPR will be assisting in determining the appropriate testing methodologies and pesticides to test for



# Guidance: Pesticide residue levels

- Residue Risk Analysis (RRA) for pesticides that are currently used on cannabis

DPR's focus is on determining maximum residues that would not be expected to result in acute health concern. We are not evaluating how pesticides are used on cannabis.

# Guidance: Pesticide residue levels

- Prioritization of RRAs for pesticides that are currently used on cannabis
  - Exclude restricted materials
  - Exclude active ingredients not registered for a food use in California
  - Exclude pesticides on ground water protection list

# Provide assistance to the Bureau Pesticide residue levels

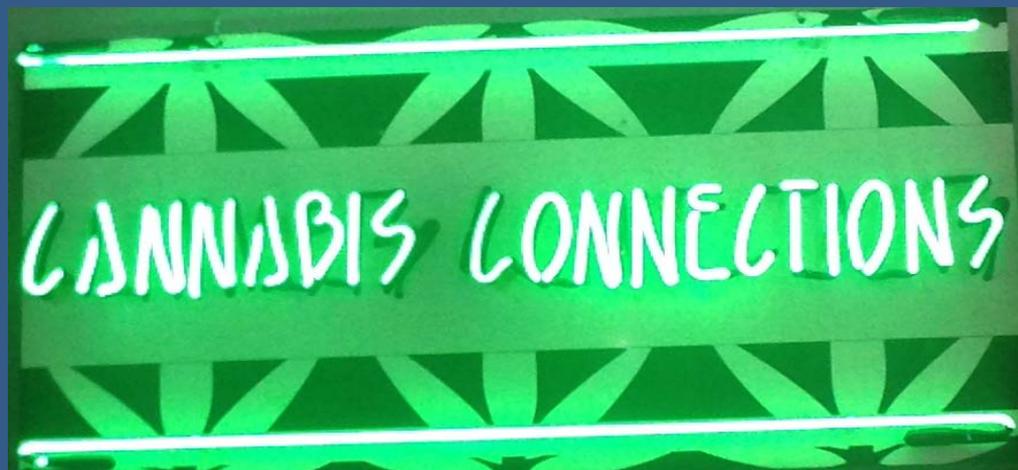
- Residue Risk Analysis (RRA)
  - Identify methods of cannabis consumption
    - Edibles, rubs, vaporizing...



# Provide assistance to the Bureau

## Pesticide residue levels

- Residue Risk Analysis (RRA)
  - Identify pesticide exposure from cannabis consumption
    - Ingestion
    - Inhalation
    - Dermal Absorption



# Next Steps

- Continue to reach out to cannabis industry for information
- Continue to communicate and learn from other states
- Continue to develop guidance and work with DCA on their regulations
- Develop website with information on pesticide use compliance for cultivators

# Questions?

George Farnsworth

Assistant Director

Department of Pesticide Regulation

[George.Farnsworth@cdpr.ca.gov](mailto:George.Farnsworth@cdpr.ca.gov)

