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.
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.

<table>
<thead>
<tr>
<th>State/Federal Registration</th>
<th>Product Name</th>
<th>EPA Reg. No.</th>
<th>Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal</td>
<td>Arcus FS</td>
<td>84846-13</td>
<td>Plant Growth Regulator</td>
</tr>
<tr>
<td>Both</td>
<td>Optify*</td>
<td>33270-37</td>
<td>Plant Growth Regulator</td>
</tr>
<tr>
<td>Both</td>
<td>Optify/Stretch</td>
<td>33270-40</td>
<td>Plant Growth Regulator</td>
</tr>
<tr>
<td>Both</td>
<td>PBO-8 Synergist</td>
<td>89459-33</td>
<td>Synergist (increases effectiveness of pesticide)</td>
</tr>
<tr>
<td>Both</td>
<td>Prentox PBO-8**</td>
<td>655-736</td>
<td>Synerlost</td>
</tr>
<tr>
<td>Both</td>
<td>SynerPro PBO</td>
<td>53883-258</td>
<td>Insecticide Synergist</td>
</tr>
</tbody>
</table>

*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

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