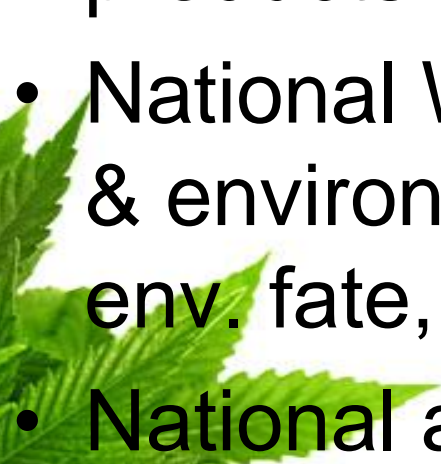


The background of the slide is a vibrant green, featuring several cannabis leaves with serrated edges. The leaves are layered, with some in the foreground and others in the background, creating a sense of depth. The overall color palette is a rich, uniform green.

**Proposal for Cannabis Regulation
in Vermont by the Agency of
Agriculture, Food & Markets
(VAAFAM)**

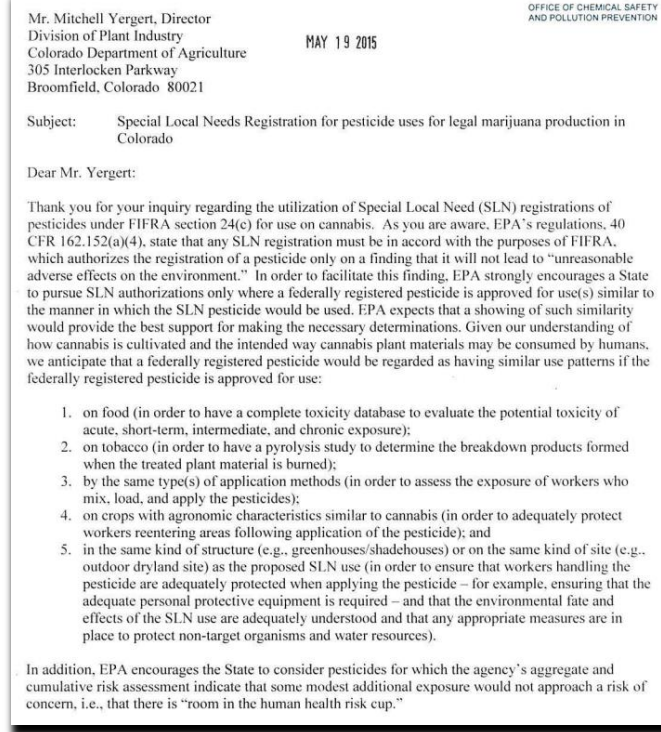
VAAFM activities to date or in progress



- State hemp regulation
 - State certification of applicators
 - Laboratory method development-resources
 - Authority to provide access to approved (legal) pesticide products
 - National Workgroup to obtain multi-state input for human & environmental risk assessment resources (toxicology, env. fate, worker exposure...)
 - National agriculture workgroup “proposed model bill”
- 


EPA Special Local Needs “State Registration” for pesticide products

- EPA letter of intent of Colorado
 - Provides a path forward
 - Outlines conditions required
 - http://www.epa.gov/sites/production/files/2016-01/documents/epa_letter_to_cda_5-19-15_slns_for_marijuana.pdf
- Requires states to perform risk assessments
- Requires support from the pesticide product registrants



State FIFRA Issues Research and Evaluation Group- SFIREG



- Workgroup – Created December 2015
 - NV has been developing two 24(c) applications.
 - CropLife America expressed concerns from registrants, and suggested that they be included in a workgroup as well. They also want hemp to be included in the conversation.
 - Risk cup considerations are a significant issue. If the risk cup is already close to full, the product will not be pursued.
 - Colorado agricultural statistics for the 2015 season show \$800 M for alfalfa, \$700 M for cannabis, and \$600 M for corn.
 - National meeting in March with State Lead Agency's and EPA
- 

Why do we need legal pesticides and certified applicators?




If there is not a legal solution growers will use whatever works.

- High residues in concentrates
- Undisclosed pesticide active ingredient in products
- Word of mouth

News release: Pesticide product Guardian ordered removed from sale

NEWS RELEASE, PESTICIDES FEBRUARY 5TH, 2016 86 VIEWS

Pesticide product Guardian™ ordered removed from sale, growers asked to stop its usage

- *February 5, 2016... The Oregon Department of Agriculture has ordered stoppage of sale and the removal of the pesticide product Guardian, which is labeled for use on ornamental, food, and feed crops for mite control but also used by cannabis growers. In addition, ODA is asking growers who may have purchased the pesticide product to refrain from using it. ODA's actions come following an investigation of the product that found the presence of the pesticide active ingredient abamectin, which is not listed on the product label.*
- 

Pot products made with unapproved pesticides recalled by Denver companies

Scope of recall covers dozens of products from several retailers, all grown by TruCannabi Denver

By David Migoya
The Denver Post

Check Your Stash: Are you consuming pesticide-peppered pot? Full recall list

MARIJUANA

Hickenlooper issues executive order to declare tainted pot a threat to public

Any marijuana grown with unapproved pesticides would be removed from commerce and destroyed

By David Migoya and Ricardo Baca
The Denver Post

POSTED: 11/13/2015 12:01:00 AM MST
UPDATED: 11/13/2015 12:55:46 PM MST

Colorado's largest pot grower sued by two consumers over pesticide use

Colorado marijuana business LivWell has been sued by two cannabis consumers over selling pot grown with an unallowed pesticide that allegedly turns into cyanide when smoked

DENVER AND THE WEST

Denver releases 28,000 marijuana products it had recalled for pesticides

The release comes despite Gov. John Hickenlooper's executive order mandating all contaminated cannabis be destroyed

By Ricardo Baca and David Migoya
The Denver Post

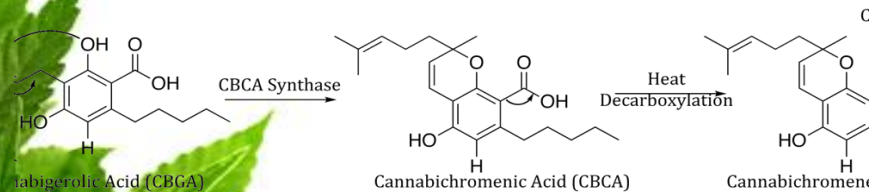
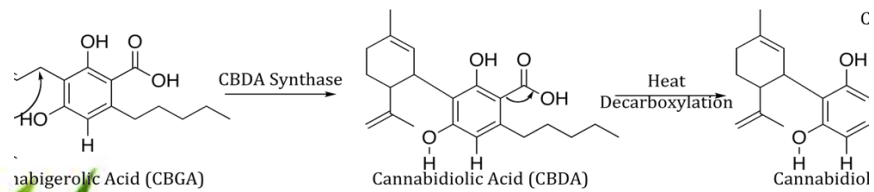
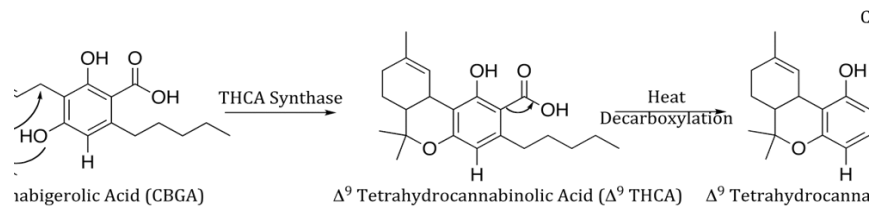
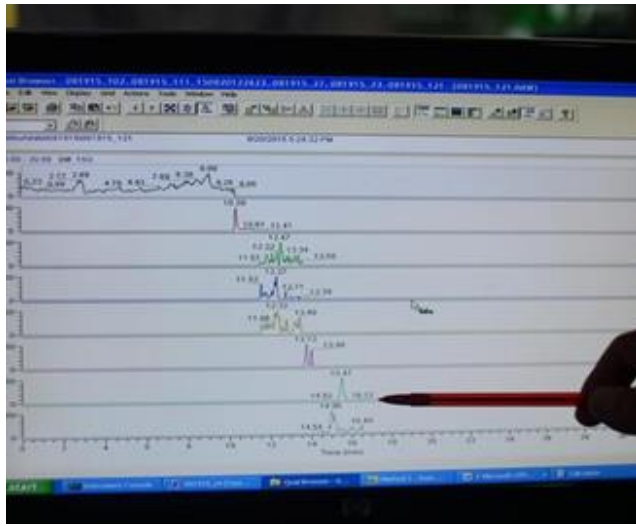
POSTED: 02/02/2016 05:51:21 PM MST
UPDATED: 02/03/2016 05:40:35 PM MST

24 COMMENTS

Advanced Medical Alternatives yanks pot concentrates in state's 11th recall

Denver marijuana shop Advanced Medical Alternatives is recalling some pot concentrates with extremely high levels of pesticides banned for use on cannabis plants in Colorado


Cannabis regulatory program at the Agency of Agriculture



- Cannabinoid concentration validation
 - THC
 - THCA
 - CBD
 - CBDA
 - CBN
- Pesticide Residue Analysis
- Adulterated products
 - Powdery Mildew
 - Pathogens (e-coli, salmonella)
- Establish testing protocols and reporting requirements for Vermont

Proposed VTAAFMM responsibilities under Vermont regulatory framework




- **Cultivation and processing operations** addresses cultivation practices, pesticide use, facility requirements, management of water resources, record keeping, Worker protections standard compliance, and information disclosure.
 - **Laboratory operations** is a complement to existing good laboratory practices, these recommendations focus on the personnel, security, sample handling and disposal, and data management and reporting activities that may be unique to laboratories analyzing cannabis samples.
- 

Program Development



Have


- Condemnation authority over raw agricultural commodities (flowers) – when deemed adulterated.
 - Pesticide use & applicator certification regulatory authority
 - Consumer protection (recalls), environmental and human health program experience
 - In-depth knowledge of pesticide registration process
- 

Need

- Condemnation authority over all cannabis products. (oils, dabs, waxes and shatters)-when deemed adulterated.
- Authority for laboratory standards
- Funding
- Human Capital

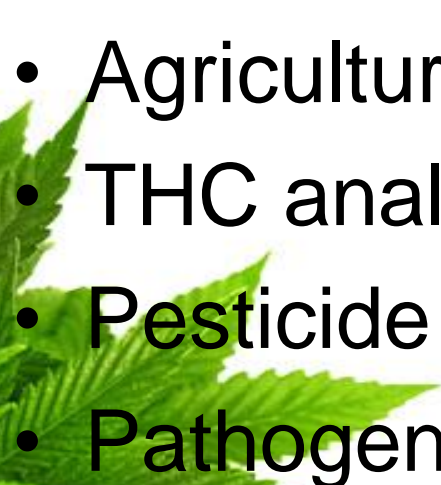
Opportunities..



- Build on pre-existing partnerships with other states that have gone before Vermont
 - Nationwide Network of State Regulators currently dealing with Cannabis
 - Relationship with EPA and Pesticide registrants
 - Development of Vermont specific standards for cannabis production
 - Nutrient best management practices
 - Cultivation input controls-Fertilizers, heavy metals, pathogens, approved pesticides
- 


Immediate Needs 2016-2017



- Program Lead- Assemble internal Cannabis Program Development team
 - Legal Support-Rules development
 - Outreach-Stakeholder group- Vermont Cannabis Collaborative- Dispensary involvement
 - Agricultural Authority to possess Standards and material
 - THC analysis methods development
 - Pesticide residue method development
 - Pathogen testing
- 


Future Needs 2018 and beyond



- Field Inspection Support
 - Program Support
 - Laboratory Staff and Instrumentation
 - Agricultural Development coordination-
 - Outreach and compliance assistance
- 

Cannabis Consumption Survey



- This survey is intended to obtain a better understanding of the type, manner and amount of marijuana consumed by end users.
 - Responses will be used to develop future pesticide use risk assessments to determine potential exposures to residues on Cannabis.
- 

Cannabis Consumption Survey



- Who?
 - Age Range
 - What?
 - Flower
 - Concentrates
 - How?
 - Inhalation
 - Ingestion
 - Transdermal
 - How Much?
 - How Often?
- 