

**From:** Joey Ereneta [<mailto:forbiddenmedicine@gmail.com>]

**Sent:** Wednesday, September 09, 2015 5:02 PM

**To:** Robert J. Little <[rlittle@agri.nv.gov](mailto:rlittle@agri.nv.gov)>

**Subject:** Public comment for Medical Marijuana Pesticide requirements Hello Mr. Little,

I was unable to attend today's discussion but would like to submit my urgent public comment for review in this process.

My name is Joey Ereñeta. I am the Lead Horticulture Instructor at Oaksterdam University and the Director of Cultivation for Green Therapeutics. I have been cultivating medical cannabis for 21 years.

I am writing to express my concern about the omission of one troublesome chemical from the list of prohibited pesticides, and my concern about the inclusion of one very safe product that is included.

1. The first concern involves the omission of Bifenazate

[http://www.epa.gov/pesticides/chem\\_search/reg\\_actions/registration/fs\\_PC-000586\\_01-Jun-99.pdf](http://www.epa.gov/pesticides/chem_search/reg_actions/registration/fs_PC-000586_01-Jun-99.pdf)

This pesticide is unfortunately very commonly used in the cultivation of cannabis to fight infestations of Spider Mites. Bifenazate is only intended for use on ornamental plants, not for food or medicinal based plants. It is used by many growers and contaminates much of the finished product consumed by patients. It is extremely important that this pesticide be included in the list of prohibited pesticides, due to its prevalence of use in cannabis cultivation and it being off-label use as an ornamental-only pesticide. The required testing should include this analyze, so that patients are protected from the nefarious growers who would try to use it.

2. The second concern involves the inclusion of Spinosad

<http://npic.orst.edu/factsheets/spinosadgen.html>

Spinosad is an extremely safe, OMRI-listed organic pesticide, used all over the world by organic food producers. It is very effective at eliminating thrips and other pests from cannabis crops. I have no idea why it was included, and firmly contend that this organic pesticide should be removed from the prohibited list, as it is considered very safe for humans and other animals.

Perhaps removing Spinosad and adding Bifenazate to the prohibited list? Please contact me with any further questions...

Joey Ereñeta

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**From:** Shane Johnson [<mailto:shane@silverstatetrading.com>]  
**Sent:** Wednesday, September 09, 2015 11:43 AM  
**To:** Charles Moses <[cmoses@agri.nv.gov](mailto:cmoses@agri.nv.gov)>  
**Cc:** Richard Kurtiz <[richard@silverstatetrading.com](mailto:richard@silverstatetrading.com)>  
**Subject:** Pesticide Policies

Dear Charles,

Firstly, thank you, and the Dept. of Ag, for stepping in and "helping out," with the issue of pesticide use on marijuana crops.

I am unable to make today's meeting, but want to express my concerns regarding the use of pesticides on marijuana crops.

Especially given that the current regulations call for pesticide testing on only the plant material and not on concentrates, coupled with the fact that pesticide use tends to lead to pest resistance, I would encourage the Dept. of Agriculture to be cautious and NOT consider adding any more pesticides to the approved list in the absence of further data. Every day there is another article from other states highlighting the issues with pesticide use in this industry, and specifically the fact that pesticides will also be concentrated when concentrates are made. For instance, see this article that came out yesterday:

<http://www.mmjobserver.com/pesticides-found-in-marijuana-months-after-state-run-tests/7201/>

As a medical doctor, and patient advocate, I already think the list is overly "generous" to growers who truthfully ought to be growing to organic standards to provide the best medicine to patients, vs. potentially harming patients with product that passes testing standards but still has pesticide residue.

Thank you for considering my input as you continue forward. Should you wish to meet / discuss at any time, I would be delighted to do so.

Regards,  
Shane

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***Nevada's premier cultivator, manufacturer and distributor of medical-grade cannabis and associated products***

**From:** Mona Lisa [<mailto:monalisaloveslife@gmail.com>]

**Sent:** Wednesday, September 09, 2015 5:29 PM

**To:** Charles Moses <[cmoses@agri.nv.gov](mailto:cmoses@agri.nv.gov)>

**Subject:** Today's Meeting on MJ Cultivation

Hello Chuck,

It was great to see you at today's meeting... I, myself, was in attendance in Las Vegas, but I sat completely off camera. My friend and I found the perfect spot where we could sit, entirely invisible to those in Sparks. Lol. I'm writing because I had a few questions about what was discussed. I hope you don't mind. I'm trying my best to get this information clear...

As I understand it, the allowable pesticides and chemicals (or the ones provided as, "not illegal to use on cannabis") have two specifically different applications and/or "safe" levels. One is for mj plants that will be smoked, and the second, for use on plants that will be produced into food or extracts. You could not find one pesticide (or chemical) which was safe to apply, under both types of use. Is that right? So in essence does this mean... Cultivators will have to decide whether they are growing mj for either smoking OR food/extract production in order to figure out which pesticide (or chemicals) they can use (and at what level)? Do I have this correct?

Also, as I understand it, as the NAC is now being worked out, we have a small window of opportunity to affect the list of allowable substances for use on mj. The Dept of Ag has opened the process to accept info and conduct research (at a cost) with the amendment made today. But what exactly is this window of time, specifically? I want to make sure we stay on top of this as a community, so please let me know the dates... I also wonder whether or not at this time we can start to discuss setting up policy or procedure which would allow pesticide-free registered grows from being exempt from certain testing (keeping costs down) in return for stricter registration standards along with mandatory protocol. I worry that our medical patients will have to pay more down the road, for chemical free/pesticide free plant material when maybe a system can be worked out now, in which costs for specific cultivation practices in relation to testing outlines, could be reduced or eliminated in order to keep the purest medical marijuana grown under strict guidelines from costing more out of pocket (less testing should keep costs down for patients). This state is ONLY dealing with medical marijuana as it is now anyway. My hope is that we can set standards which are geared toward "best practice" more so than only establishing what is "commercially compliant". ms

As you know all too well, there is much to consider in relation to the pesticides used on mj as it relates to the body's absorption, whether it be through the lungs or via the liver, and I hope to get some people working on providing you good information so I thought I'd better double check with you first, to see if I missed something... If nothing else, I wanted to make sure I understood what we're up against. My goal is to help insure Nevada does things not just for the good of industry, but for our community's most vulnerable. Our medical marijuana patients are not the criminal element nor are they the laughable stereotype... They are our sick, injured, and dying. Turns out I'm here to watch out for them, so I'll be seeing around, mister! Thanks for ALL your hard work. I want you to know that the medical patients in Nevada appreciate your very genuine effort and because of it, we think you're AWESOME and we're glad you're on our team! Thank you SO much.

Sincerely,

Mona Lisa Samuelson