Date: 2-1-2017

From: Mona Lisa Samuelson

To: The MJ ILAC Committee

Re: This Statement is for Public Record

Is it true that we've been putting medical marijuana patients in detriment due to lack of proper industry oversight? Because as a dedicated patient advocate who attends all these MJ ILAC meetings, my understanding is that there are several serious issues which must be addressed immediately if Nevada is to assure the safety of its commercially cultivated marijuana.

I'll begin by telling you that patients have serious concern with the fact that most chemicals currently allowed by the Department of Agriculture for growing cannabis, have safety levels attached to them which do NOT apply toward smoking. Is someone petitioning the Department of Health for further input and research? Patients are now formally requesting the MJILAC put **that** at the top of their list along with the issues on today's agenda regarding the various toxic chemicals currently being used which continue to go unregulated.

Furthermore, we know you're working to finalize state policy regarding current lab-testing procedures which insure each lab does the exact same testing process, the exact same way – each, and every time. Patients also recognize the important work you're doing to initiate round robin testing procedure but as you know, there's much talk about corners being cut, in order to be more favorable toward profit. Which is why I'm here to remind you, although the medical patients in Nevada shouldn't have to be the ones to point this out. There is MUCH to examine when new, billion dollar industry is not only allowed, but in our case here in Nevada, very much ***encouraged***, to regulate itself.

We want you to know that the medical patients are watching **everything** you and this industry does, and product safety is number one on our agenda. Which reminds me to ask once again, does Nevada yet have a policy or procedure in place for product recall for consumer safety?

I'd also like to know where the public can find all the online video to these committee meetings for the MJ ILAC and I want to request that the public comment given in this forum become part of official record. It's VERY important the public voice is heard. Thank you!

NVCLA Nevada Cannabis Laboratory Association

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February 1, 2017

Mr. Chad Westom
Bureau Chief
Division of Public and Behavioral Health
4150 Technology Way, Suite 200
Carson City, NV 89706

Dear Mr. Westom

This letter is a discussion of the proposed and recently implemented changes to the pesticide monitoring list.

DPBH is considering adding Malathion and Diazinon to the pesticide monitoring list. Last Summer, DPBH added Paclobutrazol and Daminozide to the list.

At the July 2017 meeting, during the discussion of adding Paclobutrazol and Daminozide, it was mentioned that laboratories needed time to evaluate the feasibility of adding those two compounds to the list. However, in August, those two compounds were added before DPBH received feedback from the labs.

Laboratories are not being given enough warning as to the proposed compounds prior to discussion (agendas are issued 1 day prior to the meeting), and detailed technical research cannot be completed in that amount of time to make recommendations.

Pesticide analysis is performed using an extraction and cleanup step. For the original list of pesticides, they could all be performed by the same extraction and cleanup step. Paclobutrazol, Malathion, and Diazinon are all expected to also be extracted along with the original list, and are not anticipated to cause undue hardship on the labs, depending on what the limits are set at. Limits are being set without feedback from the labs as to whether or not it is possible to meet

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those limits with the current equipment. While, a lab may estimate a detection limit if pressured, it really should be checked experimentally to be certain.

However, Daminozide analysis requires a separate extraction and separate analysis, which, in effect, doubles the workload for a single compound.

While the NVCLA understands the DPBH position of wanting to screen for multiple pesticides, the NVCLA feels that DPBH should employ the same standards that are being used throughout the rest of the agricultural community.

In the rest of the industry, enforcement of banned pesticides is done by inspection of the premises. Inspectors look for evidence of banned products on site either through observation of containers containing those pesticides, or from effects on the plants themselves that would indicate those pesticides are being used. Testing labs for the agricultural industry are not tasked with broad screening for multiple pesticides on every lot of plants. Instead, when an inspector suspects that a pesticide is being used, then use the Department of Agriculture resources to perform spot checks.

The NVCLA respectfully requests that DPBH:

1. Provide a reasonable amount of time to elicit feedback when changing testing requirements. Notification of additions less than 24 hours prior to a meeting to discuss is disruptive to the business and results in incomplete and potentially inaccurate feedback on which decisions are being made. In some cases, experiments would need to be performed to determine how low the detection limit is, and that cannot be done in 24 hours.

2. Consider removing Daminozide from the monitoring list and go to an inspection and spot check model.

Sincerely,

Benjamin Chew, Ph.D.

Vice President, NVCLA