

Testing Laboratories Collective thoughts For ILAC 4/5 Meeting:

Independent Testing Laboratories should only screen for approved pesticides, which are not exempt from tolerance (unless a case can be made by the Dept. of Ag that a certain unapproved pesticides are prevalent and pose a risk to consumers in Nevada). We strongly recommend Department of Agriculture to conduct inspections and enforce the pesticides use in the industry.

A. Mechanism of adding analytes to the monitoring list

- What's the mechanism to add these four pesticides (per agenda) to the monitoring list?
- Justification for the addition?
- Is there a Risk-based evaluation? (Weighted Decision Matrix draft attached courtesy of 374 Michael)
- Should the monitoring list include any banned (and not on the NDA approved list) substances?
- If there is no substantiated concern about these pesticides being present in the Nevada cannabis industry or if no sufficient number of cultivators requested them, Nevada should not and cannot just add them to say we have a larger monitoring list.

B. Feasibility from the laboratory aspects

- Nevada has been doing a much better job than Oregon of maintaining a reasonable list of pesticides, which has helped keep the cost and practicality within reason.
- Majority of the labs are in agreement of adding analytes that are necessary, but strongly oppose adding analytes for the sake of adding analytes.
- While these analytes can be added into existing methodology, they will increase the technical difficulty (cost) of analysis.
- It might not be much of a significant cost for one analyte, but continuously adding to the monitoring list definitely will result in financial hardship to the labs.
- Availability of reference standards that are matrices compatible with the original analytes on the monitoring list.

C. Specifics related to the pesticides on the Agenda

- We the labs speculate the detection limits for Imazalil, Malathion, and Diazinon are approximately 0.1ppm with LCMS-TQ. However, more trial runs are necessary to determine the levels and the required instrument time.
- Not much info available for Thiophanate-methyl and analytical methodology has to be developed for it, though it appears LCMS-TQ is a possibility.

D. Review of the monitoring list.

- Previously, ILAC had discussion of periodic review the monitoring list and eliminate any analytes that are no longer applicable or could not be quantified reliably, such as Daminozide.