

Pesticide use on Hemp

A Registrant Perspective

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Registrant Considerations

- Registerability
- Data Requirements
- Efficacy, phytotoxicity and any potential liability
- Business Case

Registerability

- EPA Requirements
 - Vary by type of product
 - Vary by profile of product
 - Weight of Evidence
- Room in the risk cup
- State Requirements

Data Requirements

- 25B
- Exempt from the Requirement for a tolerance
- No residue situation
- Residues

Efficacy, phytotoxicity and any potential liability

- Separate from any state requirements, registrants do their own testing for comfort on rate, performance, etc.
- Can vary depending on what data already exist and what level of comfort there is in bridging data
- Standard screen for phytotoxicity -number of studies varies by type of compound and available information
- Liability concerns – in addition to efficacy and potential for crop damage – any liability from alleged reactions, residues, etc.

Business Case

- Typically one required for adding any new use
- Cost of adding to the label and potential profit from sales
 - Dollars but also cost of money considerations
 - Dollars spent on this project versus other opportunities
 - Short term and longer term
- Risk versus benefit
 - Varies by company
 - Considers non-monetary risk and benefits as well