

**The Board of Directors
Women Leaders in Cannabis
Eugene, Oregon 501 (c) 6
March 19, 2019**



We, the Board of Directors for Women Leaders in Cannabis, are passionately committed to campaigning for “Organic Land Care” through the Non-Toxic Oregon platform of Beyond Toxics. We are pioneering an industry heavily regulated towards ensuring the health and safety of people and the environment. We feel it is incredibly incongruous that current land management laws allow the use of toxic chemicals in public space while the Cannabis industry was asked to implement, within one season, the most heavily regulated pesticide-use program of any agricultural crop or landscape management program. (OAR 845-025-2070 referencing accordance with ORS 634 and OAR 603-057)

Currently, it is legitimately safer to smell a Cannabis flower in Oregon, than a rose growing in a city park. Oregon law ensures that the Cannabis flower was never sprayed with neonics or chlorpyrifos, and was tested by an accredited lab to verify this; but the rose is routinely doused with toxins with little to no public posting. Children and recreational public space users are in constant, direct contact with lawns, flowers, and shrubs that are routinely sprayed with toxic chemicals that have documented human health and environmental risks. This direct contact with chemicals puts them at risk of critical and life-altering health complications. Non-toxic, minimal risk, biological, and organic alternatives abound; it is time to change the law to reflect Oregon’s prioritization of human and environmental health over conventional attachment to chemicals.

We don’t understand why the Cannabis industry has been able to implement a set of safe, allowable, residue-tolerance exempt and/or 25(b) FIFRA exempt products (OAR 333-007-0400) successfully on their crops, and yet city officials are refusing “Organic Land Care” proposals or are asking for years to phase out chemicals we know are hurting people and the environment. After the passing of Measure 91, Recreational & Medical Cannabis production quickly became subject to a set of rules and guidelines (OAR 333-007-0400 and OAR 845-025-2070 which diverts to ORS 634 & OAR 603-057) that strictly prohibited the use of RUP’s and any non-exempt pesticides. We didn’t receive a phase-out period since The State recognized the immediate dangers of pesticide exposure. The cost to producers was that many of their crops had to be destroyed (OAR 333-007-0450) because they didn’t meet the new rules. We aren’t asking that city landscapes take the same loss in productivity without available alternatives. We are asking that toxic chemicals are prohibited from use in public space, while tried and true organic alternatives are proposed and implemented immediately.

It is true that the risks associated with pyrolyzing pesticides on Cannabis are vastly unknown. Yet we were still asked to implement and adhere to safety guidelines in the interest of human health. The dangers of chemicals (like chlorpyrifos) currently being used on city landscapes ARE KNOWN. Countries around the world have banned their use entirely. Our fellow testifiers have detailed the extreme human health and environmental risks associated with exposure to these chemicals. If a young, pioneering industry can support and adopt pesticide-safety rules immediately, we see no reason why the spaces we bring our children to play are not subject to



the same regulations. While we understand that landscapes are not meant for consumption (like Cannabis), they are inherently created as “safe spaces” for people, plants, and animals. It is beyond debate that park space users make direct contact with plants that have been sprayed with chemicals, entering human and environmental systems through touch and unintended consumption. If the risks for direct contact are known (i.e. required use of PPE’s and abiding by REI’s to prevent known health issues) on public landscape plants, but the risks of consuming Cannabis sprayed with RUP’s are unknown, we cannot see the logic in regulating one arena and not the other. We are protecting one industry from unknown dangers while “purposefully avoid(ing) inconvenient truths” (Barnett, 2018) about pesticides in landscape management. How can one justify the regulation of one industry’s pesticide use, limited to consumption by adults, but not regulate another industry (public land management) where we both know the documented health effects, and can predict frequent child use of the space? This premise is illogical, and the time for change is now.

The success of the Cannabis industry’s immediate adoption of regulated pesticide use proves that when given the chance, Oregon will implement regulations that protect its citizens and environment first. We are giving you that chance now, to make changes that undo outdated, toxic land management policy in favor of “Organic Land Care” that has proven to increase both the safety and productivity of our land. We trust you will choose people and the environment over age-old attachments to conventional practices that have been proven to harm both people and the environment. If we can do it, so can you! Thank you for taking action to protect Oregon’s landscapes, prohibiting chemical pesticides in public space, for considering Beyond Toxics’ land care IPM, and for setting a national example for how “Organic Land Care” can solve the issue of pesticide-related illness, environmental degradation, and can simultaneously reduce the use of petrochemicals and fossil fuels. Please support SB 853.

In Earnest,

Erika Winters (Charity Director)
Wendy Mintey (Board Secretary)
Anna Kaplan (Board President)
Heidi Fikstad (Board Vice-President)
Bunni Krass (Board Treasurer)
Micayla Harland (Membership Director)
Bridget Gavin (Board Seat).
Kathryn Albert (Board Seat)

Link to guidelist →

<https://www.oregon.gov/ODA/shared/Documents/Publications/PesticidesPARC/GuidelistPesticideCannabis.pdf>

Link to bulletin →

https://www.oregon.gov/olcc/marijuana/Documents/Interagency_Cannabis_Pesticides_Letter.pdf

ODA Guidelist - OAR 845-025-2070 referencing accordance with ORS 634 and OAR 603-057 - ODA Guidelist originally introduced 1/11/16