



To Whom it May Concern,

Trace Analytics wants to address the growing concerns over the detection of pesticide residues in cannabis material. These initial results do not necessarily dictate a fail for the cannabis material in which residues are detected, nor does it imply a pass. Trace is currently testing for the presence of nearly 200 residues. If a result states that no residues were detected, it simply means none of the residues Trace tests for were detected. Also this result does not imply "Pesticide Free" as it would be nearly impossible to test for every pesticide known to man.

What needs to be understood is that the Department of Health has a proposed list of pesticides that are considered banned substances. The proposed list contains acceptable pesticides at certain concentrations, pyrethrins at 1.0ppm and piperonyl butoxide at 2.0ppm.

Many of the samples tested by Trace have been positive for the presence of banned substances. What needs to be kept in focus is that some of these results are in the parts per billion. These are extremely low concentrations. Some of these concentrations are so low that the source of pesticides could be over spray from a nearby farm or simply from migratory animals that have been exposed to pesticides.

Trace has identified that Eagle 20 has been detected fairly frequently in cannabis samples. It is important to understand that when this substance is subjected to heat hydrogen cyanide gas is created. This can be a very dangerous situation for the end user. Trace's intent to build a comprehensive pesticide test was to ensure, to the best of its ability, that the safest product possible makes it to the retail and dispensary shelves. Clearly, some producers either don't know how hazardous some of these substances are or they don't care. In any event, awareness and push back from the community is necessary to ensure that the safest possible product is available for consumers.

The pesticide test isn't meant to be a pogrom or inquisition, but merely a benchmark for safety. Trace has had clients completely shocked that their material has tested positive for pesticides. It is in these cases that Trace tries to help the clients understand the source of their pesticides. Sometimes the sources of the pesticides are the result of deliberate application by growers. Other times, it may be from a perpetual contamination that exists in an extraction unit, which was unknown and unintentional. There are reasons why good producer/processors could be affected negatively by the presence of these residues. Trace is here to help people understand what is in their product at baseline and provide results that help people stay on track or get on track to provide the cleanest material possible.

As noted in Baker et al. 2002, and similarly at the 2003 Eco Farm Conference in Monterey, CA. They were clear to point out that despite employing "organic" practices many products were subject to low levels of residue exposure due to a multitude of environmental conditions, "pesticides are ubiquitous and mobile across agricultural landscapes." In the agriculture industry this is referred to as "Pesticide Drift", which can be accounted for by numerous means; airborne spraying, water, soil, human/animal cross contamination, proximity, etc. It is just a fact of living in a chemical based world that these compounds are present in our environment and everyday life. Armed with this information a grower now has the ability to track down the source and take steps to limit his/her pesticide exposure.

We all need to work together as an industry in Washington to ensure that the safest possible product is made available to end users and patients.

Sincerely-

Trace Analytics

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