LEGAL PEST MANAGEMENT PRACTICES FOR CANNABIS GROWERS IN CALIFORNIA

PESTS OF CANNABIS IN CALIFORNIA

Cannabis pests vary according to cultivar (variety), whether the plants are grown indoors or outdoors, and where the plants are grown geographically. The pests included in this review are preliminary and based on the following sources: a presentation given in 2013 by Whitney Cranshaw, an extension entomologist at Colorado State University, and a review article by John M. McPartland, a professor of family medicine at the University of Vermont. We also received input from Kevin Hoffman, former Primary State Entomologist, California Department of Food & Agriculture (CDFA).

PRODUCTS THAT CAN BE LEGALLY APPLIED TO CANNABIS PRODUCTS IN CALIFORNIA

A pesticide product can legally be applied to cannabis under state law if the active ingredients found in the product are exempt from **residue tolerance requirements**¹ and the product is either exempt from **registration requirements**² or registered for a use that's broad enough to include use on cannabis.

Residue tolerance requirements are set by U.S. EPA for each pesticide on each food crop and are the amount of pesticide residue allowed to remain in or on each treated crop with "reasonable certainty of no harm." Some pesticides are exempted from the tolerance requirement when they're found to be minimal risk.

Active ingredients exempt from registration requirements are mostly food-grade essential oils such as peppermint oil or rosemary oil.

GUIDANCE TABLES

Pages 4-8 include tables that provide guidance to cannabis growers seeking information on legal pest management practices in California.

Table 1 lists examples of active ingredients that fit these criteria. This is *not* an exhaustive list of active ingredients that may fit the legal use criteria. Note that DPR does not track products that fit the criteria and the user bears the responsibility for ensuring product labels meet the criteria. Tables 2 and 3 list pests of cannabis grown outdoors and indoors, and Table 3 shows pests arranged by the portion of the plant they attack. An explanation of the column labels for Tables 2 and 3 follow.

PESTS. The tables show the most likely pests in California based on Cranshaw's presentation and McPartland's list and gleaned from California-based web sites and blogs. Some pests that drew attention on several blogs (e.g., russet mites) may be worse during drought years. Many pests have cyclic population fluctuations and others are mainstays of general greenhouse cultivation (e.g., whiteflies, thrips, and fungus gnats). We'll add weeds to this compendium when we have more information.

DAMAGE. For damage caused by greenhouse pests, we used information from Cranshaw's presentation; for that of outdoor pests when there wasn't any overlap, we used McPartland's list and information from UC IPM for various crops. Accounts of damage by rodents are anecdotal.

PESTS NOT OFFICIALLY IDENTIFIED IN CALIFORNIA

Several cannabis pests in other states are not yet known in California. These pests would add to the russet mites, aphids, cutworms, budworms, borers, and flea beetles already in California. As more and more cannabis is planted throughout the state, collecting potential pests will enable entomologists to identify new species.

THE IMPORTANCE OF CORRECT IDENTIFICATION. It's

essential to identify the potential pest or you may launch a futile program for a mite or insect that isn't a pest. And likewise, you need to know the correct species or you may use the wrong management strategy. For accurate identification, bring specimens to an entomologist.

HOW TO PRESERVE SPECIMENS FOR IDENTIFICATION. If the insect specimen is hard bodied (e.g., a beetle or moth), carefully place it in a small pill vial and cushion with crumpled tissue paper. If your specimen isn't yet dead, put it in a jar and place in a freezer overnight. Do

Place soft-bodied specimens (e.g., mites, leafhoppers, aphids, caterpillars) in a jar filled with rubbing alcohol.

not wrap specimens in tissue and seal them in plastic

bags or you'll end up with smashed bug parts.

¹ 40 C.F.R., § 180, et seq.

² under FIFRA section 25(b) and 3 CCR section 6147.

Include written information such as where on the plant you found the specimen, the general location of the plant, and date captured. Note original color and texture, since these will change once you immerse the specimen in alcohol. Also helpful are photographs of the specimen in its original habitat.

IPM PRACTICES. Most of these are standard practices for pests on plants other than cannabis. For more detailed explanations, see information compiled by the University of California Statewide IPM Program (UC IPM) at www.ipm.ucdavis.edu. You can enter a pest name in the search box (e.g., cutworm) and read about IPM practices for the pest on crops other than cannabis. For cannabis grown indoors, go to the UC IPM home page, click on Agricultural Pests and scroll down the alphabetical list until you reach ornamental nurseries.

Some practices were excluded because they apply to nearly all of the pests. For example, when targeting aphids, whiteflies, and thrips on crops grown outdoors, growers can attract predaceous and parasitic arthropods by planting strips or borders of cover crops (e.g., California buckwheat) and insectary plants especially those in the carrot, mustard, and sunflower families (Pickett & Bugg, 1998).

LEGAL PESTICIDES. These are covered above in the Table 1 description and are **exempt from residue** tolerance requirements *and* either exempt from registration requirements or registered for a use that is broad enough to include use on cannabis.

REFERENCES

Cranshaw, Whitney. 2013. Challenges and opportunities for pest management of medical marijuana in Colorado. Presentation.

McPartland, J.M. 1996. *Cannabis* pests. J. Internatl. Hemp Assoc. 3(2): 49, 52–55.

Pickett, C.H. & R.L. Bugg, eds. 1998. Enhancing Biological Control: Habitat management to promote natural enemies of agricultural pests. UC Press, Oakland, Calif. Table 1. Active ingredients that are exempt from residue tolerance requirements^a and either exempt from registration requirements^b or registered for a use broad enough to include use on cannabis. [updated on September 22, 2017]

	ACTIVE INGREDIENT	PEST OR DISEASE	
1	azadirachtin ^a	aphids, whiteflies, fungus gnats, leafminers, cutworms	
2	<i>Bacillus amyloliquefaciens</i> strain D747 ^{a1}	root and crown diseases, powdery mildew, Botrytis	
3	Bacillus subtilis QST ^{a1}	root diseases, powdery mildew	
4	Bacillus thuringiensis ^{a4} subsp. kurstaki	moth larvae (e.g., cutworms, budworms, borers)	
5	Bacillus thuringiensis ^{a4} subsp. israelensis	fly larvae (e.g., fungus gnats)	
6	Beauveria bassiana ^{a5}	whiteflies, aphids, thrips	
7	Burkholderia spp. strain A396 ^{a4}	mites, leafhoppers, aphids, whiteflies, thrips, moth larvae	
8	capsaicin ^a (= capsicum oleoresin)	repellent (insects + vertebrates); mites, leafhoppers, whiteflies, thrips, moth larvae	
9	castor oil ^b	repellent (moles, voles, gophers)	
10	cinnamon, cinnamon oil ^b	slugs and snails, mites, leafhoppers, aphids, whiteflies, moth larvae	
11	citric acid ^b	bacteria, fungi, mites, insects	
12	cloves and clove oil ^b	bacteria, fungi	
13	corn oil ^b	fungi, mites, insects	
14	cottonseed oil ^b	fungi, mites, insects	
15	garlic and garlic oil ^b	mites, leafhoppers, aphids, whiteflies, moth larvae	
16	geraniol ^b	fungi, rodent repellent, mites, insects	
17	Gliocladium virens ^{a2}	root diseases	
18	horticultural oils ^a (petroleum oil)	mites, aphids, whiteflies, thrips, powdery mildew	
19	insecticidal soaps ^a (potassium salts of fatty acids)	aphids, whiteflies, cutworms, budworms	
20	iron phosphate ^a , sodium ferric EDTA ^a	slugs and snails	
21	Isaria fumosorosea ^{a5} *	mites, aphids, whiteflies, thrips	
22	neem oil ^a	mites, powdery mildew	
23	peppermint, peppermint oil ^b	bacteria, fungi, mites, leafhoppers, aphids, whiteflies, moth larvae	
24	potassium bicarbonate ^a ; sodium bicarbonate ^a	powdery mildew	
25	potassium silicate ^a	powdery mildew, mites, aphids	
26	potassium sorbate ^b	fungi, mites, insects	

27	predatory nematodes ^a	fungus gnats		
28	putrescent whole egg solids ^b	squirrel, rabbit, and deer repellent		
29	rosemary, rosemary oil ^b	bacteria, fungi, leafhoppers, aphids, whiteflies, moth larvae		
30	sesame and sesame oil ^b	mites, leafhoppers, aphids, whiteflies, moth larvae		
31	sodium chloride ^b	[minor active ingredient in some fungicide and insecticide formulations]		
32	soybean oil ^b	mites, insects		
33	<i>Reynoutria sachalinensis</i> extract ^{a3}	powdery mildew		
34	sulfur ^a	mites, flea beetles		
35	Trichoderma harzianum ^{a2}	root diseases		
36	thyme oil ^b	mites, leafhoppers, aphids, whiteflies, moth larvae		
^b F	0 CFR (Code of Federal Regulations) IFRA §25(b) and 3 CCR §6147 [FIFRA = the Federal Insecticide, Fungicide, and Rodenticide Act; CCR = California Code of Regulations] <i>* Isaria fumosorosea</i> was formerly <i>Paecilomyces</i> <i>fumosoroseus</i>	 ¹ Bacterial-based fungicide ² Fungal-based fungicide ³ Plant-based fungicide ⁴ Bacterial-based insecticide ⁵ Fungal-based insecticide 		

PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
MITES & INSECTS			•
two-spotted spider mites <i>Tetranychus urticae</i> (and other Tetranychidae)	Suck plant sap; stipple leaves	 Keep dust down by hosing off plants (if dust is a problem) Release predatory mites 	neem oil, horticultural oil
broad mites Polyphagotarsonemus latus	Distort leaves and buds	 Inspect plants; disinfest or dispose of infested plants Release predatory mites and sixspotted thrips 	_
russet mites Aculops spp.	Suck plant sap; kill leaves and flowers	Release predatory mites	neem oil, horticultural oil, sulfur
crickets (field & house)	Eat seedlings	 Use floating row covers or cones on individual plants 	_
termites	Eat roots	Flood nests	_
leafhoppers	Suck plant sap; weaken plants	 Encourage natural enemies by planting nectar sources 	horticultural oil or insecti- cidal soaps for nymphs
whiteflies Trialeurodes vaporariorum, Bemisia tabaci, B. argentifolii	Suck plant sap; weaken plants	 Hang up yellow sticky cards Use reflective plastic mulch 	azadirachtin, horticultural oil, insecticidal soaps, rosemary + peppermint oils, Beauveria bassiana
thrips Heliothrips haemorrhoidalis, Frankliniella occidentalis, Thrips tabaci	Stipple and scar leaves; vector viruses	Hang up yellow or blue sticky cards	horticultural oil, insecticidal soaps, rosemary + pepper- mint oils, <i>Beauveria bassiana</i>
aphids Myzus persicae, Aphis fabae	Suck plant sap; weaken plants	 Hang up yellow sticky cards (alates) Hose off plants 	azadirachtin, horticultural oil, insecticidal soaps, Beauveria bassiana
leafminers <i>Liriomyza</i> spp.	Bore into roots and leaves	 Remove older infested leaves Use biocontrol: release Diglyphus parasitoids 	azadirachtin

	PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES		
LEPIDOPTERA	cutworms Agrotis ipsilon, Spodoptera exigua (Noctuidae)	Eat seedlings	 Use pheromone traps to detect adults. Remove weeds, which serve as a reservoir for cutworms and other noctuids 	Vegetative stage only: Use Bacillus thuringiensis kurstaki if egg-laying adults found, insecticidal soap; azadirachtin		
	budworms <i>Helicoverpa zea</i> (Noctuidae)	Eat flowering buds	 Shake plants to dislodge larvae Remove infested buds Plant corn as trap crop 	Vegetative stage only: Use Bacillus thuringiensis kurstaki, insecticidal soap		
COLEOOPTERA	flea beetles (Chrysomelidae)	Bore into stems (grubs); feed on seedlings and leaves of larger plants (adults)	 Use reflective mulches Plant trap crops (e.g., radish or Chinese mustard) 	sulfur		
COLE	scarab grubs (Scarabaeidae) possibly other beetles)	Bore into stems	Use parasitic nematodes	_		
MAI	MAMMALS					
mice	e (e.g., house mice)	Eat young sprouts and seeds	Double wrap a 3'-tall chicken wire fence around plants			
	rats , <i>Rattus rattus</i> d rats , <i>Neotoma</i> spp.	Strip bark from stems to build nests	Trap (minus rodenticides)Mount barn owl boxes	rodenticides*		
pocket gophers , Thomomys spp.		Tunnel through planting areas; feed on plants; gnaw on irrigation lines	 Install underground fencing (hardware cloth or ¾" mesh poultry wire) Mount barn owl boxes 			
Odo	mbian black-tailed deer, coileus hemionus mbianus	Knock over plants; leave dander, droppings, and ticks behind	Install deer fencing	_		
blac	k bears , Ursus americana	Knock over plants	Install electric fencing	_		

* If using a rodenticide always read and follow the label and check to make sure that the target rodent is listed. Secondgeneration anticoagulant products (contain the active ingredients brodifacoum, bromadiolone, difenacoum, and difethialone) are DPR-restricted materials not labeled for field use and should never be used in or around cannabis cultivation sites. Permits for the use of DPR-restricted materials will not be issued to cannabis cultivators. Any federally restricted use pesticide must be applied by a certified applicator consistent with the registered labeling.

Table 3. PEST MANAGEMENT PRACTICES FOR CANNABIS GROWN INDOORS

(e.g., greenhouses, sheds, and grow rooms)

PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
DISEASES	-	•	
powdery mildew Sphaerotheca macularis	Grow on leaves as white and gray pow- dery patches	Use fans to improve air circulation	horticultural oil; neem oil; sodium bicarbonate, potassium bicarbonate; <i>Bacillus subtilis</i>
pythium root rots <i>Pythium</i> spp.	Attack root tips and worsens when plants grow in wet soil	Avoid hydroponic production or wet soil conditions	Incorporate biocontrol agents into root-growing media (e.g., Gliocladium virens, Trichoderma harzianum, Bacillus subtilis)
MITES & INSECTS		•	
two-spotted spider mites <i>Tetranychus urticae</i> (and other Tetranychidae)	Suck plant sap; stipple leaves	 Disinfest cuttings before introducing to growing area Release predatory mites (<i>Amblyseius</i> spp., <i>Phytoseiulus persimilis</i>), or lacewings (<i>Chrysoperia</i> spp.) 	neem oil, horticultural oil, sulfur
broad mites	Distort leaves and buds	 Inspect plants; disinfest or dispose of infested plants Release predatory mites (<i>Amblyseius</i> spp.) and six- spotted thrips 	
leafhoppers	Suck plant sap; weaken plants	 Encourage natural enemies by planting nectar sources 	horticultural oil or insecticidal soaps for nymphs
whiteflies Trialeurodes vaporariorum, Bemisia tabaci, B. argentifolii	Suck plant sap; weaken plants	 Hang up yellow sticky cards Use biocontrol: Amblyseius swirskii, Encarsia formosa, Delphastus catalinae, Steinernea feltiae 	azadirachtin, <i>Beauveria bassiana,</i> cinnamon oil, horticultural oil
thrips Heliothrips haemorrhoidalis, Frankliniella occidentalis, Thrips tabaci	Stipple and scar leaves; vector viruses	 Sterilize soil and pots before growing Hang up yellow or blue sticky cards Use biocontrol Stratiolaelaps scimitus, Amblyseius cucumeris, Amblyseius swirskii, Orius insidious 	azadirachtin, horticultural oil, insecticidal soaps, rosemary + peppermint oils, <i>Beauveria</i> <i>bassiana</i>

PEST	DAMAGE	IPM PRACTICES (monitoring; cultural, physical, mechanical, biological)	PESTICIDES
rice root aphid Rhopalosiphum rufiabdominalis	Feed on roots; stunt and weaken plants	 Dispose of weakened infested plants Mix in sharp soil amendments such as diatomaceous earth Use biocontrol: Stratiolaelaps scimitus, Dalotia coriaria, Steinernema feltiae 	Beauveria bassiana
dark-winged fungus gnats (Diptera: Sciaridae) <i>Bradysia</i> spp.	Damage roots and stunt plant growth	 Avoid overwatering Use growing media that deters gnat development Hang up yellow sticky cards Use biocontrol: <i>Stratiolaelaps scimitus,</i> <i>Dalotia coriaria,</i> <i>Steinernema feltiae</i> 	Bacillus thuringiensis israelensis (BTI); predatory nematodes; azadirachtin soil drenches