

## Notes From the Regulation 84 Hemp Work Group Meeting - 2-25-2019

The purpose of this meeting was to solicit input from members of the Colorado hemp industry regarding using reclaimed water to irrigate hemp. A presentation was provided by Brandi Honeycutt from the Water Quality Control Division with open discussion with stakeholders that followed. Notes and feedback from stakeholders are outlined below.

### Water Quality for Hemp Irrigation

- Stakeholders recommended different reclaimed water categories for different uses and/or portion of the hemp plant to be used for the end product.
  - Category 1
    - If hemp is used as a rotational crop.
  - Category 2
    - If hemp is used for fiber.
  - Category 3 (toilet and urinal flushing treatment in Regulation 84)
    - If the portion of the hemp crop is the flower or the grain. Also, clones and products used for dermal applications were recommended to be irrigated with this quality of water.
- The end use of hemp should be clearly defined, and reclaimed water categories should align with whether or not hemp is being used for industrial or edible uses.
- Hemp plants are highly absorbent of constituents.
  - There is particular concern about the root uptake of heavy metals.
  - If using the above mentioned Category 3 reclaimed water to irrigate clones, it was recommended to require additional pre-treatment prior to use.
    - Currently there is little to no pre-treatment for current sources of water for hemp irrigation.

### Federal and Other Hemp Regulations

- The Food and Drug Administration and the Environmental Protection Agency have upcoming regulations for hemp. Worker safety in hemp growing facilities is not currently well defined in regulations.
- Clones that are grown indoors in a greenhouse setting provide significant human/worker exposure. Water quality should be most restrictive with regards to treatment. Also, should consider OSHA rules.

### Other Notes

- Edible hemp and industrial hemp should have their own definitions in Regulation 84.
- Hemp is likely more resistant to TDS than other crops.
- Water regulations should not impact interstate commerce of hemp products.