



# TECHNICAL BULLETIN

October 25, 2019  
Supersedes July 15, 2019

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## Department Banned Chemical Active Ingredients – Updated

The intent of this technical bulletin is to publish an updated list of banned chemical active ingredients in accordance with the Medical Marijuana Facilities Licensing Act (MMFLA), the Michigan Regulation and Taxation of Marijuana Act (MRTMA), and the corresponding Administrative Rules applicable to safety compliance facilities.

Administrative Rules promulgated under the MMFLA:

- *Rule 47(8) (R 333.247) states, “For the purposes of the chemical residue test, the department shall publish a list of acceptable levels. A marijuana sample with a value that exceeds the published acceptable level is considered to be a failed sample. A marijuana sample that is below the acceptable value is considered to be a passing sample.”*
- *Rule 47(12) (R 333.247) states, “The department shall publish a list of banned chemical residue active ingredients, the list for acceptable action limits must meet those set forth in legal regulations for tolerances and exemptions for chemical residues in food, 40 CFR part 180, subpart C, or 27 the federal insecticide fungicide, and rodenticide act, 7 USC 136 to 136y, whichever is more stringent.”*

Emergency Rules promulgated under the MRTMA:

- *Adult-Use Marijuana Establishment Emergency Rule 43(11) states, “For the purposes of the chemical residue test, the agency shall publish a list of action limits. A marijuana sample that is at or below the action limit is considered to be a passing sample. A marijuana sample with a value that exceeds the action limit is considered to be a failed sample.”*
- *Adult-Use Marijuana Establishment Emergency Rule 33(3) states, “The agency shall publish a list of banned chemical residue active ingredients which are prohibited from use in the cultivation and production of marijuana plants and marijuana products to be sold or transferred in accordance with the act or these rules.”*

Since there are no federally recognized and published limits for marijuana in 40 CFR part 180, subpart C, or the federal insecticide fungicide, and rodenticide act, 7 USC 136 to 136y; the department published the below list. The list will be continually evaluated and updated based on available scientific and industry information, or if the federal government adds marijuana to 40 CFR part 180, subpart C, or the federal insecticide fungicide, and rodenticide act, 7 USC 136 to 136y.



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All medical marijuana products will be screened for the banned chemical active ingredients in the list below. Any product with a value that exceeds the action limit will result in a failed test for chemical residue.

Use of unauthorized chemical active ingredients and failed chemical residue tests will be referred to the Marijuana Regulatory Agency (MRA) Enforcement Section for investigation and inspection. This may result in sanctions, including, but not limited to, license denial, limitation, fines, revocation, suspension, nonrenewal, administrative holds, and orders to cease operations. In addition, the use of these chemical active ingredients may be a violation of federal and state laws and may be referred to the appropriate authority. The department may issue future chemical active ingredient lists that supersede the information contained in this bulletin.

## Banned Chemical Active Ingredients

Analyte	Chemical Abstract Services (CAS) Registry number	Action Limit (ppm)
Abamectin	71751-41-2	0.5
Acephate	30560-19-1	0.4
Acequinocyl	57960-19-7	2
Acetamiprid	135410-20-7	0.2
Aldicarb	116-06-3	0.4
Azoxystrobin	131860-33-8	0.2
Bifenazate	149877-41-8	0.2
Bifenthrin	82657-04-3	0.2
Boscalid	188425-85-6	0.4
Carbaryl	63-25-2	0.2
Carbofuran	1563-66-2	0.2
Chlorantraniliprole	500008-45-7	0.2
Chlorfenapyr	122453-73-0	1
Chlorpyrifos	2921-88-2	0.2
Clofentezine	74115-24-5	0.2
Cyfluthrin	68359-37-5	1
Cypermethrin	52315-07-8	1



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Daminozide	1596-84-5	1
DDVP (Dichlorvos)	62-73-7	1
Diazinon	333-41-5	0.2
Dimethoate	60-51-5	0.2
Ethoprophos	13194-48-4	0.2
Etofenprox	80844-07-1	0.4
Etoxazole	153233-91-1	0.2
Fenoxycarb	72490-01-8	0.2
Fenpyroximate	134098-61-6	0.4
Fipronil	120068-37-3	0.4
Flonicamid	158062-67-0	1
Fludioxonil	131341-86-1	0.4
Hexythiazox	78587-05-0	1
Imazalil	35554-44-0	0.2
Imidacloprid	138261-41-3	0.4
Kresoxim-methyl	143390-89-0	0.4
Malathion	121-75-5	0.2
Metalaxyl	57837-19-1	0.2
Methiocarb	2032-65-7	0.2
Methomyl	16752-77-5	0.4
Methyl parathion	298-00-0	0.2
MGK-264	113-48-4	0.2
Myclobutanil	88671-89-0	0.2
Naled	300-76-5	0.5
Oxamyl	23135-22-0	1
Paclobutrazol	76738-62-0	0.4
Permethrins*	52645-53-1	0.2
Prallethrin	23031-36-9	0.2
Phosmet	732-11-6	0.2
Propiconazole	60207-90-1	0.4
Propoxur	114-26-1	0.2
Pyridaben	96489-71-3	0.2
Pyrethrins+	8003-34-7	1
Spinosad	168316-95-8	0.2
Spiromesifen	283594-90-1	0.2
Spirotetramat	203313-25-1	0.2
Spiroxamine	118134-30-8	0.4
Tebuconazole	80443-41-0	0.4
Thiacloprid	111988-49-9	0.2
Thiamethoxam	153719-23-4	0.2
Trifloxystrobin	141517-21-7	0.2



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- \* Permethrins cumulative residue of cis- and trans-permethrin isomers
- + Pyrethrins should be measured as the cumulative residues of pyrethrin 1, cinerin 1 and jasmolin 1 (cas numbers 121-21-1, 25402-06-6, and 4466-14-2 respectively)

*This technical bulletin does not constitute legal advice and is subject to change. It is intended to provide a technical clarification only to the Marijuana Regulatory Agency Administrative Rules. Licensees are encouraged to seek legal counsel to ensure their operations comply with the Medical Marijuana Facilities Licensing Act and associated Administrative Rules.*

More information on the MRA can be found at the bureau's [website](#)