

# ARGENTUM PARTNERS

August 31, 2022

Cannabis Compliance Board  
Tyler Klimas, Executive Director  
700 E. Warm Springs Road, Suite 100  
Las Vegas, NV 89119

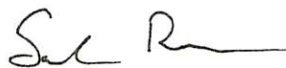
Dear Cannabis Compliance Board,

On behalf of Argentum Partners and our client, Green Life Productions (GLP), please accept this petition intended to amend current cannabis regulations to allow cultivation methodology in a manner consistent with current regenerative farming practices. GLP is Clean Green Certified, Dragonfly Earth Medicine Certified, Kind Certified and has been a licensed operator since 2015.

Pursuant to NCCR 4.145, GLP requests amendments and new definitions to NCCR 1.040 and 10.080 so that licensed Nevada cannabis cultivators may comply with US Department of Agriculture, National Organic Program, and Environmental Protection Agency (USDA/NOP/EPA) requirements. In particular, validated methods of composting, mulching, and utilizing the benefits of no-till living soil. There are several scientific articles covering composting techniques, living soil, mulching, and beneficial insects that are recognized by USDA/NOP/EPA. The CCB has reviewed scientific studies, data, and reports that support the request by GLP to utilize composting and mulching in the sustainable growing process. Composting renders cannabis unusable and creates mulch, teas and/or amendments to be used on site, closing the loop within the cultivation footprint. Residue management is a USDA accepted practice that benefits no-till living soil by leaving certain components of the plant in the soil, including root balls, stalks, leaves and stems. By using these methods we can not only ensure highly sustainable and regenerative agricultural practices, but also minimize the risk of diversion.

The effect of the draft regulations enclosed will allow licensed cannabis cultivators in Nevada to pursue sustainable and environmentally responsible cultivation practices while following USDA/NOP/EPA guidelines. By allowing cultivators to operate highly efficient, closed-loop systems, we will reduce waste and water usage while also limiting the amount of labor needed to plant and harvest cannabis. Additionally, it is our hope that the CCB will continue to look at sustainable cultivation practices that will limit the amount of energy, water, and waste needed to produce cannabis in Nevada.

Sincerely,



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## Proposed Changes to NCCR Regulation 1.040

### NEW LANGUAGE

1.040 Definitions. As used in these regulations, unless the context otherwise requires, the words and terms defined in NRS 678A.020 to 678A.240, NRS 678B.030 to 678B.070, NRS 678C.010 to 678C.110, and NRS 678D.010 to 678D.040 have the meanings ascribed to them in those statutes.

1.250 "Beneficial Insects" defined. "Beneficial insects" means the insects that have positive effects on a garden or landscape, as they aid in pollination and in some cases serve as natural pesticides. Beneficial insects are predatory and parasitic in nature and are often used as a pest control mechanism in organic farming and gardening or in integrated pest management (IPM).

1.260 "Beneficial Microbes" defined. "Beneficial microbes" means microorganisms which are naturally occurring bacteria, fungi, and other microbes that play a crucial role in plant productivity and health.

1.270 "Closed Loop Agriculture Systems" defined. "Closed Loop Agriculture Systems" means a farming practice that recycles all nutrients and organic matter material back to the soil that it grew in. This forms part of an agricultural practice that preserves the nutrient and carbon levels within the soil and allows farming to be carried out on a sustainable basis.

1.280 "Companion Plant" defined. "Companion Plant" means the close planting of different plants that enhance each other's growth or protect each other from pests.

1.290 "Cover Crops" defined. "Cover Crops" means the crops that cover the soil and may be used to reduce soil erosion, reduce nitrogen leaching, provide weed and pest suppression, and increase soil organic matter.

1.295 "Plant Residues" defined. "Plant Residues" means any plant material remaining after harvesting, including but not limited to leaves, stalks, branches, stems, and root balls.

1.300 "Fabric Pots" defined. "Fabric Pots" means fabric pots, fabric beds, bottomless fabric pots made of fabrics that promote the growth system.

1.310 "Living Mulch" defined. "Living Mulch" means the mulch is used as cover crops planted either before or with a main crop and maintained as a living ground cover throughout the growing season.

1.320 "Living Soil" defined. "Living Soil" means the soil is a living ecosystem—a large community of living organisms linked together through nutrient cycles and energy flows.

1.330 "Mulch" defined. "Mulch" means any non-synthetic material, such as wood chips, leaves, or straw, or any allowed synthetic material such as newspaper or plastic that serves to suppress weed growth, moderate soil temperature, or conserve soil moisture as stated in Section 7 CFR 205.2 of The National Organic Program (NOP).



1.340 "Thermophilic Compost" defined. "Thermophilic Compost" means the controlled aerobic biological decomposition of organic matter into a stable, humus-like product called compost. It is the same process as natural decomposition except that it is enhanced and accelerated by mixing organic waste with other ingredients to optimize microbial growth.

1.345 "Thermophilic Composting" defined. "Thermophilic Composting" means compost containing plant and animal materials is allowed in accordance with the National Organic Program Section 205.203(c)(2). Other examples of acceptable composting methods include:

1. Compost that is made from allowed feedstock materials (either non-synthetic substances not prohibited at Section 205.602, or synthetics approved for use as plant or soil amendments), and
2. The compost pile is mixed or managed to ensure that all the feedstock heats to the minimum of 131o F (55o C) for a minimum of three days. The monitoring of the above parameters must be documented in the OSP in accordance with Section 205.203(c) and verified during the site visit.

1.350 "Vermicompost" defined. "Vermicompost" means compost made of an organic matter of plant and/or animal origin, consisting of finely divided earthworm castings, produced non-thermophilically with bio-oxidation and stabilization of the organic material, due to interactions between aerobic microorganisms and earthworms, as the material passes through the earthworm gut.

1.355 "Vermicomposting" defined. "Vermicomposting" means an acceptable method of composting when:

1. It is made from allowed feedstock materials (either non-synthetic substances not prohibited at § 205.602, or synthetics approved for use as plant or soil amendments);
2. Aerobic conditions are maintained by regular additions of layers of organic matter, turning, or employing forced air pipes such that moisture is maintained at 70-90%; and
3. The duration of vermicomposting is sufficient to produce a finished product that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances.

1.360 "Plant Residue Management" defined. "Plant Residue Management" means using leftover plant materials (leaves, stalks, branches, stems, and root balls) called residue to nourish and to protect the soil.

## **Proposed Changes to NCCR Regulation 10.080**

### NEW LANGUAGE

NCCR 10.080 Cannabis establishment: Storage, management and disposal of waste.

1. Except as otherwise provided in subsection 2, a cannabis establishment shall:
  - (a) Store, manage, and dispose of all solid and liquid waste and wastewater generated during the processing of cannabis or production of cannabis products in accordance with all applicable state and local laws and regulations; and

(b) Render waste containing cannabis unusable before the waste leaves the cannabis establishment. Such waste includes, without limitation:

- (1) Waste from cannabis plants, including, without limitation, roots, stalks, leaves, stems, flower, trim or solid plant material and any plant material used to create an extract;
- (2) Solvents used in the processing of cannabis or extraction of concentrated cannabis;
- (3) Any plant material or solvents discarded as a result of quality assurance testing or any other testing performed by a cannabis testing facility; and
- (4) Any other waste as determined by the Board.

2. A cannabis distributor or cannabis sales facility may return a cannabis product to a cannabis cultivation facility or cannabis production facility to be rendered unusable.

3. Unless another method approved by the Board is used, waste containing cannabis must be rendered unusable by grinding and incorporating the waste with:

(a) For disposal using an organic method other than composting, the following kinds of compostable mixed waste:

- (1) Food waste;
- (2) Yard waste;
- (3) Soil; or
- (4) Other waste as approved by the Board; or

(b) For disposal in a landfill or other method not described in paragraph (a), the following kinds of non-compostable mixed waste:

- (1) Paper waste;
- (2) Cardboard waste;
- (3) Plastic waste; or
- (4) Other waste as approved by the Board.

→ The amount of waste containing cannabis in the resulting mixture must be less than 50 percent by volume. Such waste must not be disposed of by composting.

4. A cannabis establishment shall provide notice to the Board using the seed-to-sale tracking system before rendering unusable and disposing of cannabis or cannabis products

5. A cannabis establishment may compost all solid and liquid usable cannabis, cannabis or cannabis plants, including, without limitation: roots, stalks, leaves, stems, flower, trim or solid plant material and any plant material.

(a) The compost mix may include:

- (1) Woodchips;
- (2) Soil;
- (3) Soil amendments;
- (4) Yard waste;
- (5) Other materials as approved by the Board.

6. A cannabis establishment shall provide notice to the Board using the seed-to-sale tracking system before composting or mulching usable cannabis.

7. A cannabis establishment utilizing plant residues shall notify the Board, but does not need to track material in the seed-to-sale tracking system.