

From: Phyllis & Bill Morris
Sent: Monday, April 01, 2013 2:39 PM
To: Reiley Beth
Subject: Pesticide Reporting Bill

Dear MS Reiley,

After reading SB800 I have a few comments as a farmer and a private licensed applicator.

1. Currently all persons who sell pesticides must keep records of who they sell to, exact products distributed, quantities purchased and address's associated with the licensed applicator. This provides a source if an investigation is necessary of date and time of purchase and quantity even if the applicator did not keep records.
2. As a modern farmer, I already keep an excel spread sheet that documents my daily activities on the farm. Included are additional spread sheets that document the formulas I use to calculate each spray for each of the different types of spray equipment I have. Included on that sheet are the product names, EPA #s, OZ per acre, # of acres sprayed, acreage location, Date of spray, Temperature, wind speed, Humidity, soil temp, total amount of product used, tank mix instructions, PPE needed, product price and Total cost of spray. Utilizing GAP's provided by the Hazelnut Association (other farmers use their GAP's as a guide), we all are working hard to minimize the amount of overall pesticides we use and make an effort to use what we do responsibly. Lord knows that with the costs at what they are today, we have to spray with sustainability in mind.
3. If you need my information, please call me and ask me for it. I do not need to fill out another form every 60 day for you to keep track of. I keep my records on my computer by year, so you can look back as long as I have been farming and see what I have done each year. I do this so that I can:
 1. View each year retrospectively and prospectively for seasonal and economic purposes
 2. Over view my business plan for the upcoming year and make decisions based on results from the previous years
 3. Track my beneficial insect population to be sure that my property is healthy and meets my personal and GAP standards.
 4. Review how many years I have gone without spraying insecticides because of the increase in beneficial insects and the change in my farm plan.

Since Oregon Pesticide division discontinued its reporting requirement, I and all the farmers I know have continued to note what pesticides we use, and how we use them. If anything, more of us are using our Associations GAP program guidelines to increase our standards or exceed them.

After reading the purpose for the enactment of this bill;

“SECTION 5. Section 2 of this 2013 Act and the amendments to ORS 634.146 by section 4 of this 2013 Act apply to pesticide applications made on or after January 1, 2014. The Oregon Health Authority and the Department of Environmental Quality shall make the form described in section 3 of this 2013 Act available to state agencies, local governments and pesticide operators no later than December 31, 2013.

“SECTION 6. This 2013 Act being necessary for the immediate preservation of the public peace, health and safety, an emergency is declared to exist, and this 2013 Act takes effect on its passage.”.

I find the reason in section 6 to be ridiculous. If an emergency is declared to exist, there are so many other ways of obtaining the information you are seeking without adding another government overseer and pages of documentation that are unnecessary.

The majority of Farms are required to have GAP's from their processor and their associations. The FDA is asking all of us to keep records for food safety purposes and in order to obtain a processor/handler, these requirements are enforced. If you need help during an emergency in obtaining information, begin with asking the person's involved who their distributor/distributors are, and you will be able to get all the information you need from them. Next, compare that to the persons farm record keeping system.

The benefit you seek from passing this bill does not equate with the expense it will take for the department that takes it on, nor the people doing the documenting.

In essence this is like asking a patient who picks up his pills from the pharmacist to send in a document every 60 days to give you a schedule on how and when he/she took them.

Solution: If you feel you want to track how and where chemicals are applied, I would start with the distributors. They are the one that receive the chemicals. Upon distribution, they could simply add to the receipt a note (required at the time of distribution) A. Acreage to applied to B. Dates of application (best guess/weather is always a factor)

C. Reason for application

This way is you needed additional information in an emergency, you could go directly to the distributors business records and quickly obtain what you are looking for without adding additional personal and reporting requirements.

Those are my comments in a nut shell.

Sincerely,

Phyllis Morris

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PS, If you would like to see a copy of some of my record keeping, I would be happy to share it with you.