

MEASURE: HB 2427
EXHIBIT: B
H AG & NAT RESOURCES
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Willamette
Valley
Oilseed
Producers
Association

SB 433 and HB 2427 – Take no action

The Oregon Legislature should allow the Oregon Department of Agriculture (ODA) to regulate the coexistence between Brassica specialty seed crops and canola. ODA has exercised its expertise through the administrative rule process. ODA has a successful track record of managing the balance between economic interests and agricultural interests. **We urge the Oregon Legislature to take no action on SB 433 and HB 2427.**

ODA has solicited extensive input and has invested significant time and energy into developing a comprehensive administrative rule that allows non-irrigated grass seed and grain growers on the edges of the Willamette Valley to incorporate *limited* canola acreage into their crop rotation. The new ODA rule maintains 85% of the area in the center of the Willamette Valley as a Canola Exclusion Zone where isolation from canola crops will be guaranteed. This is the area where most specialty seed is grown.

The ODA administrative rule is not perfect. However, WVOPA supports the ODA administrative rule as a reasonable compromise between specialty Brassica seed growers and the grass seed and grain growers.

All agricultural enterprises and individual growers want to maintain access to all of their crop options. Competition for acreage in the Willamette Valley between various crops and different companies will always be the norm. *Cropping decisions are the responsibility of farm owners and operators. The more options growers have in the Willamette Valley, the stronger the markets will be for all crops grown here.*

- Canola is the ideal rotation crop for non-irrigated grass seed and grain ground in the Willamette Valley.
- Canola should not be held to a higher standard than other identical brassica crops. Canola poses no pest, disease or weed risks greater than any other Brassica species already produced in the Willamette Valley. Today there are more than 10,000 annual acres of radish seed and turnip seed produced in the Willamette Valley.
- Currently canola production is very profitable. Canola can provide a better net return than many grass seed, grain and specialty seed varieties. Canola requires minimal fertilizer and chemical inputs.
- The administrative rule created by the ODA allows only 2,500 acres of canola to be grown on the edges of the Willamette Valley each year. This area represents less than 0.7% of the 400,000 Willamette Valley acres annually planted to grass seed or wheat.

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	Rapeseed	Turnip	Radish
Pests	same	same	same
Diseases	same	same	same
Weedy Volunteers	2-3 yrs	5-10 yrs	10-50 yrs
Annual Acreage	Actual :: 100-300 Proposed :: 2,500	Actual :: ~4,000	Actual :: >10,000
Cross-pollinate with Brassicas	Yes	Yes	No
ODA Oversight	Heavily regulated	Unregulated	Unregulated
Marketing	Commodity	Usually contract	Contract
GMO varieties	Yes	No	No

Canola is the best rotation crop for grass seed and wheat growers. Why?

- No irrigation required
- Deep tap root breaks soil, mines nutrients
- Easy to control grassy weeds in broadleaf crop
- 10% to 20% yield increase for grass or grain following canola
- Identical planting and harvesting equipment for grass seed or wheat
- Excellent yields: > 3,500 lbs/A average
- Good pricing: \$0.25/lb to \$0.27/lb = > \$875/A
- Commodity crop: paid in 30 days, no contract required
- Multiple buyers for crop
- No hard seed

Isolation, rotation and good management are the safeguards for all seed purity

- **No rapeseed production allowed in Rapeseed Exclusion Zone**
- **So isolation distances are as great or greater than specialty seed association requires**
- **Contract with ODA required**
- **Location of all rapeseed fields is public information**
- **Disease-free seed required**
- **Two year in five rotation; cannot plant back-to-back**
- **Growers control volunteers within ¼ mile of fields**
- **Only 2,500 acres of rapeseed production per year**