



Testimony on HB 2427
Ways and Means Subcommittee on Natural Resources
May 16, 2013
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Chairs Unger and Edwards, members of the committee:

Thank you for your consideration of HB 2427 today. Friends of Family Farmers previously submitted testimony in support of this legislation on March 19, 2013, outlining multiple concerns with proposals to introduce commercial canola (rapeseed) production into the Willamette Valley's pre-2013 rapeseed control district. Our testimony today will focus on the fiscal impact of the HB 2427 as amended by the House Agriculture Committee, and specifically the research component of the amended legislation. Further, we believe the -8 amendment, which was not adopted by the House Agriculture Committee, should not be adopted by this subcommittee, as it amounts to a significant policy revision that would effectively legislate ODA's controversial February 2013 canola rule.

Ultimately, we believe this committee's responsibility is to identify an affordable research proposal that maintains tight limits on both the location and amount of canola grown in the name of research. Further, we believe the following elements are key to the success of this legislation and the credibility of the research that would be conducted:

- 1) The moratorium on commercial canola production in the Willamette Valley until January 2, 2018 as approved by the House Agriculture Committee must be maintained.
- 2) Canola research fields and nearby areas should be monitored for at least 5 years for canola volunteers. Research from California published in 2011 ('Seed bank persistence of genetically modified canola in California,' Munier, et al; Environ Sci Pollut Res, 2011) found that seed-bank persistence of canola is a significant issue and can continue for at least four years and possibly many more. Stopping monitoring of fields too soon could miss a major issue of concern, which is the potential for a long-lasting presence of canola in the seed bank. A major concern with canola, confirmed by the research noted above, has been the spread of herbicide resistant traits from canola to existing weeds in the same family, making them increasingly difficult to eradicate with commonly available herbicides. This issue affects far more than just the specialty seed industry, but also clover producers, fresh-market vegetable growers and the organic industry, which combined represent well over \$100 million in economic activity in the Willamette Valley.
- 3) There should not be excess fields planted to try and account for freeze outs or other poor crop performance issues. Crop failures and poor crop performance should be factored into the final results, and not have the data discarded. Not counting crop failures or poor crop performance will skew the results of any research.
- 4) Maintain the economic assessment portion of the research included in the current amendment. To date, ODA has not offered nor, to our knowledge, conducted any credible economic studies justifying their decision to introduce canola into the former protected areas of the Willamette Valley. Major industries with significant economic value are being placed at potentially irreversible risk with canola, and the ability to sell pure vegetable and clover seed domestically and internationally will in fact be jeopardized with the introduction of this new, relatively low value, commodity crop that can be grown in many other locations outside the Willamette Valley. At a minimum, OSU should compile a literature review and assessment of what has occurred in Europe and other locations where specialty seed producing regions have been measurably impacted by introducing canola.
- 5) To keep down costs, limit and focus research on canola impacts and not specialty seed brassicas like radish and turnip. Based on previous research, canola is appropriately treated differently in regulation than other brassica crops, particularly those produced for specialty seed. The purpose of new research should not be to demonstrate the obvious similarities in biologically related crops (brassicas) but to help determine the biological and market/economic impact of the introduction of one particular new crop (canola) on existing industries. Further, we believe additional research into alternative oilseed and broadleaf crops that can be put into rotation with grass seed is warranted, since canola is not the only option out there, and others do not pose the same risks as canola does to specialty seed industries.

In conclusion, we have given significant thought to alternative research ideas that we are confident will cost less than some of the ideas we have heard proposed, and lead to more useful research that helps protect specialty seed, fresh market vegetable, organic and clover producers while deepening understanding of a range of economically viable alternatives for oilseed production and broadleaf rotation crops within the Willamette Valley.