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Brad Witt, Chairman  
House Agriculture Committee  
State of Oregon

March 26, 2013

Subject: HB-2319, HB-2715, HB-2736

Chairman Witt and members of the Agriculture Committee,

My name is Martin Richards. My family operates an irrigated farm in the Central Oregon high desert. We grow hybrid carrot seed, Kentucky bluegrass seed, peppermint oil, hay and grain on 600 irrigated acres. In a typical year, we devote 80 to 100 acres to growing alfalfa for livestock feed. We added Roundup Ready alfalfa to our crop rotation when the seed became available in 2006.

The addition of a GE crop to our rotation has not only increased our profitability but has made our farm a safer place to work and live. We use significantly less herbicides and the herbicides we use are less toxic. The risk of herbicide drift or residues impacting adjoining crops, neighboring farms, private property, wildlife habitat, and future crops has been greatly reduced. Because we were raising seed crops, we have cultural practices in place to prevent the contamination of adjoining crops and the prevention of so called "superweeds". These cultural practices are easily adapted to the GE crop and are actually easier to implement. Our crops are more consistent, weed free, and higher value. We reduced our tillage needs, cutting fuel consumption and emissions, conserving crop residue and reducing soil erosion. The ability to add Roundup Ready alfalfa to our crop rotation has made our farm safer. It's also reduced the impact our farming practices have on the environment.

HB-2319 and 2715:

- While one bill focuses on ODA and one on counties, these two bills will have similar consequences of adding complexity and uncertainty to the regulatory process for GE crops, ultimately discouraging research and development of new beneficial technologies and preventing Oregon farmers from having access to safe, environmentally friendly and economically beneficial crop varieties.
- Research and development of new technologies is only feasible when a predictable regulatory process is in place that creates a path from investment to commercialization for safe, beneficial products. USDA and EPA already rigorously evaluate new GE crops to ensure that they don't pose any plant pest or environmental risks before they can be approved for use. The US regulatory process for biotechnology is considered a gold standard internationally. These bills would only serve to undermine the credibility and predictability of that process and add an additional layer of regulation that would be costly, unpredictable and not scientifically or economically justified.
- GE crops do not present any new or novel risks for farmers and the agriculture industry. There are a number of cultural and management practices that have been developed to

**A Family Farm**

help farmers maintain the purity and integrity of specialty crops. There is no justification for singling out GE crops.

- Any safeguards, growing restrictions or regulatory requirements should be based on real, scientifically validated risks.

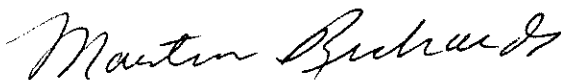
HB-2736:

- This bill is unnecessary and perpetuates a common misconception about patent restrictions on GE crops. Registration requirements would prove costly and burdensome for farmers and would discourage the adoption of safe, environmentally friendly crops and production practices.
- It is an unfortunate misconception that farmers may be liable for inadvertent presence and use of GE crops. There have been no cases of biotech companies suing growers for unintentional presence of biotech material in their crop due, for example, to crosspollination. Lawsuits have only involved intentional, known violations of patent restrictions. The vast majority of farmers are happy to comply with patent laws and respect intellectual property rights because they understand the need to preserve the incentives that drive research and investment in new, beneficial technologies.
- Requiring farmers to register with ODA to plant GE crops would be a costly and burdensome requirement for farmers that would ultimately discourage the adoption of safe, environmentally friendly and economically beneficial technologies and production practices. Moreover, mandatory registration creates privacy concerns for many farmers. There is no scientific or economic justification for targeting GE crops once USDA and EPA has determined that they are safe for commercial use and pose no more health or environmental risks as any other crop in use today.

I'm looking forward to our son moving his family home next week to join us on the farm. I would not choose to produce crops that I thought would put the health of my young grandson at risk. I have confidence in the testing and controls that are in place today. I trust the scientific evidence that has shown over and over that these crops are healthy and safe to grow and consume.

I oppose these bills because I believe they would harm my family financially; adversely affect the economy of my community; limit our ability to feed the world; and remove tools that currently enable us to create a safer environment for our employees, neighbors, and friends.

Sincerely,



Martin Richards, manager

Fox Hollow Ranch