



OREGON
ASSOCIATION OF
NURSERIES

**Testimony before the Senate Environment and Natural Resources
Senate Bill 882 – relating to preventing environmental harm from neonicotinoids**
By Jeff Stone, Executive Director, Oregon Association of Nurseries
March 30, 2015

Chairman Edwards, Vice-Chair Olsen, members of the committee, my name is Jeff Stone and I serve as the Executive Director of the Oregon Association of Nurseries. We oppose Senate Bill 882, which would ban the use of neonicotinoids as an integrated pest management tool. This testimony supplements the materials I submitted to the committee and is part of the official record.

The Economic Footprint of the Nursery and Greenhouse Industry

The nursery and greenhouse industry is the state's largest agricultural sector, and is finally seeing a resurgence following years of significant economic declines during and after the great recession. Oregon's nursery industry ranks third in the nation, with over \$766 million in sales annually to customers in Oregon, the rest of the United States, and abroad. In fact, nearly 75% of the nursery stock grown in our state leaves our borders – with over half reaching markets east of the Mississippi River. We send ecologically friendly green products out of the state, and bring traded sector dollars back to Oregon.

Nursery association members represent wholesale plant growers, Christmas tree growers, retailers, and greenhouse operators. Our members are located throughout the state, with our largest nursery growing operations found in Clackamas, Marion, Washington, Yamhill and Multnomah Counties.

The nursery industry needs pollinators and tools to battle pest and disease

As a proud part of U.S. agriculture, we certainly understand the importance of pollinators to the agricultural industry and our natural environment. We also recognize the importance of having effective pesticides with low environmental impact. House Bill 2589 targets Neonicotinoids (or Neonics), a chemical class when used properly, is vital to the success of our industry. They are important tools in defending trees, shrubs, and plants against destructive invasive species like the Japanese Beetle, Hemlock Woolly Adelgid and Asian Longhorned Beetle, in dealing with invasive and often chemical-resistant whitefly species, and preventing the spread of these and other pests.

The concerns around pesticide use and potential effects on bees are very important to all pesticide users, but especially those involved in agriculture. Oregon farmers depend on bees to pollinate many of their crops. They also depend on pesticides as tools to control destructive pests. Similarly, commercial beekeepers rely on healthy crops to optimize their pollination services. This means that Oregon growers and beekeepers have a lot at stake in this conversation. Both of us want to make sure that protecting bee health, and retaining pesticides as an effective tool, are not mutually exclusive.

The association conducted extensive outreach to our members – including retailers, greenhouse operators and wholesale growers - to increase awareness of the pollinator issue. We also wanted to assess the use of neonicotinoids and understand the number of licensed pesticide applicators. Beyond the dramatic headlines, the nursery industry expressed its support of the ODA action and the industry’s reservations regarding an outright ban of neonicotinoids. This chemical class, first developed in the 1990s, represents advancement over other chemical classes making them safer to both human and pollinators and is used as part of pest mitigation strategies by our greenhouse and nursery members. In some cases, neonicotinoids are approved regulatory treatments for certification and interstate movement of nursery and greenhouse crops.

The issue of banning neonics could result in economic impact in terms of loss of crop production without these chemistries. Significant money and scientific investment was made to develop these as alternatives to older chemicals. If they are banned, agriculture will need money for both bee research and for chemical research.

There is a better way, let science be the guide

Bee health is important to all of us. Nobody wants to see adverse incidents that add to the decline of bee populations. That being said, it is easy to let emotion drive the conversation. Instead, we should let science be our guide.

Based on current science, the Environmental Protection Agency (EPA) continues to allow application of neonicotinoids with appropriate guidelines. These chemistries are among the safest available to combat many pests. We have encouraged Congress to direct the research community to pursue its work on this issue without bias and identify the appropriate steps to alleviate environmental and pest pressures on pollinator health.

The call in Senate Bill 882 to ban neonicotinoids flies in the face of a cadre of reports that suggest their role in declining bee health is small. The USDA’s 2013 report on Honey Bee Health put pesticides, in general, near the bottom of the list of factors impacting bee health. The report highlighted other issues like colony management, viruses, bacteria, poor nutrition, lack of genetic diversity, and habitat loss as more impactful. The report continued to stress that, “the single most detrimental pest of honeybees” is the parasitic Varroa mite, first discovered in the U.S. in 1987.” Recent reports from the Australian Government’s Pesticides and Veterinary Medicines Authority (equivalent to our EPA) supported the conclusions of the USDA report.

No easy answer

While we can understand the concerns of beekeepers, and the public at large, and conflicting national studies relating to declining bee populations, unfortunately there is no simple answer. In fact, research on Colony Collapse Disorder (CCD) has highlighted a complex interaction of factors that play a role in bee health. No singular cause of the problem has been found. While pesticides are often noted as one factor, they are not considered the primary one.

Recently the University of Maryland conducted a field-based study that determined that honey bee colonies are not harmed by realistic levels of exposure to neonicotinoids. The three year study examined negative effects at many times (four and twenty) the EPA approved application rate for neonics and the long term impacts to pollinators. It is important to note that the study did not absolve pesticide use as a contributing factor to stress on pollinators; the study was supported by the United States Department of Agriculture-ARS Bee Research Laboratory, the Foundation for the Preservation of Honey Bees, the Environmental Protection Agency and the Maryland Agricultural Experiment Stations.

On March 20th, the National Agricultural Statistical Service, Agricultural Statistics Board, United States Department of Agriculture (USDA) released a report that honey production in 2014 from producers with five or more colonies totaled 178 million pounds, up 19 percent from 2013. The report indicated that 2.74 million colonies were producing honey in 2014, up 4 percent from 2013

While there is evidence presented that world-wide and United States pollinator populations are not in decline, the OAN is committed to research funding (both at the state level and the \$69 million pollinator research funding within the US Department of Agriculture), increasing pollinator habitat with abundant food sources, and industry adherence to labeling standards set by the Environmental Protection Agency.

ODA prohibits use of four neonicotinoids on linden trees

The Oregon Department of Agriculture (ODA) has [issued a new rule](#) restricting the application of any pesticide product containing dinotefuran, imidacloprid, thiamethoxam or clothianidin. These four neonicotinoids may not be applied — regardless of application method — to linden trees, basswood trees or other *Tilia* species.

The rule, which went into effect on February 27, 2015, supersedes label language. This means that even if a pesticide label provides directions for use on linden trees, the product cannot be used on linden trees, basswood trees or other *Tilia* species in Oregon. In conjunction with the new rule, ODA has published an [updated list of alternatives to neonicotinoid insecticides](#) (except for acetamiprid) for landscapers. Acetamiprid, another neonicotinoid, is not impacted by the new rule.

The OAN submitted official comments on the Oregon Department of Agriculture in opposition to proposed rule and urged caution on the expansion of active ingredients that do not have adequate or as efficacious alternatives.

Let the Task Force on Pollinator Health do its work

While the furor over the death of bees received national notoriety, the discussion in Oregon was engaged by beekeepers, environmental groups and farm organizations. In 2014, Oregon House Bill 4139 could have taken a negative approach and pitting interest group against interest group - but that did not happen. Instead, stakeholders listened to one another and determined that a science-based approach to pollinator health would lead to a better solution.

The “Report to the Oregon Legislative Assembly” by the Task Force on Pollinator Health was released in November 2014. Four main consensus items emerged that received the support of stakeholders. This year, the OAN and others advocated for the creation of three bills to enact the recommendations of the task force. They are below:

- I.** Oregon should develop a strong, effective outreach and education strategy on pollinator health, including best management practices. (**House Bill 3362**)
- II.** Oregon should fully fund a state-of-the-art bee health diagnostic facility at Oregon State University. (**House Bill 3360**)
- III.** An integrated pollinator health research plan should be developed and funded to improve understanding of the many issues affecting pollinator health. (**House Bill 3361**)
- IV.** A sustainable revenue stream to fund the proposed outreach, education and research programs is needed.

The OAN urges the House Committee on Agriculture and Natural Resources to examine all the facts, support legislation that solves problems for both pollinators and agriculture, and listen to the Task Force on Pollinator Health. Senate Bill 882 is not a productive use of the state’s time and we all have work to do to protect pollinators in Oregon.