

Date: March 16, 2017  
To: House Agriculture & Natural Resources Committee  
From: The Association of Oregon Counties  
Subject: House Bill 2469

Please add to the records of the House Agriculture & Natural Resources Committee these comments related to House Bill 2469, which is on the committee's agenda for public hearing on March 16, 2017.

### **AOC opposes House Bill 2469**

The Association of Oregon Counties believes that regulation of agricultural seeds or seed products is properly reserved to the State.

House Bill 2469 simply addresses the question of governance. The bill would overturn for a particular purpose the current preemption on local regulations that affirms the State is indeed the appropriate entity to control agricultural seed or seed products.

AOC opposes HB 2469 for these reasons:

- The statewide approach avoids the financial burden and regulatory nightmare of a highly technical/scientific determination process being imposed on counties, and potentially varying from county to county.
- Counties have neither the technical expertise nor the ability to enforce measures to protect production or use of seed or products that are not genetically engineered from adverse impacts of seed or products that are genetically engineered.
- Counties simply do not have the resources to manage an entirely new responsibility, the regulation of agricultural products related to genetic engineering.

In Oregon's shared services system of governance there is a careful balance between services regulated and delivered at the county level, those provided by the State, and those that are shared. Agriculture, fish and wildlife, geology and minerals, and teacher standards are a few examples of where the State is primarily responsible for regulation. HB 2469 would disrupt this balance in the area of agriculture.

AOC urges you to keep regulation of agricultural seeds or seed products where it belongs, with the State.

**Please oppose HB 2469.**