

**TO: Senator Michael Dembrow, Chair**  
Members of Senate Committee on Environment and Natural Resources

**FR: Blake Rowe**  
CEO, Oregon Wheat Growers League

**RE: SB 928 and 929**

The Oregon Wheat Growers League is proud to represent the nearly 2000 farm across Oregon that produce wheat, one of our State’s largest and most valuable crops. Wheat contributes hundreds of millions of dollars in direct and indirect value to Oregon’s economy, especially Oregon’s rural economy.

The large majority of Oregon’s wheat production is conventional, and many if not most of our conventional growers use a neonicotinoid product as a seed treatment to protect their wheat seed and young plants from pests like wireworms and aphids. Neonicotinoids are used in a similar way on many other crops. They are very important products to our farmers.

SB 928 proposes three types of labeling involving neonicotinoids; labels on pesticide products that contain neonics, labels on seeds that contain or are treated with neonics, and labels on raw commodity products that have been grown using a neonic product. The proposed label requirements for pesticide products would conflict with federal requirements under the Federal Insecticide, Fungicide, and Rodenticide Act. Requiring labels on seed, will duplicate requirements under the Federal Seed Act and will likely create a whole new set of testing compliance procedures just for Oregon.

Requiring labels on raw agricultural commodities produced with neonics, will have little impact on wheat because very little wheat is sold as a raw commodity. However, we are still opposed to SB 928 because it is the wrong approach and sets a bad precedent from a marketing standpoint. There are clear standards for the kind of information that must be included on product labels; information about ingredients, nutrition, safety, etc. Beyond that, we believe that it is fine for a producer or group of producers to voluntarily promote their product by providing truthful information about its quality, how it was produced or other attributes. However, it would be wrong for the State to force farmers to go beyond the legal requirements for labels.

This is exactly what SB 928 does; it forces producers who use neonics to label their products, likely putting them at a marketing disadvantage. If there is a market interest in having products produced without neonics, then the proper way to approach it is to let producers who don’t use neonics label their products as “not produced with neonics”. They can do that now, so there is no need to pass SB 928.

SB 929 proposes to reclassify the entire group of neonicotinoid products as restricted use pesticides in Oregon. We appreciate that the bill recognizes the importance of neonics to farmers and agriculture by providing that farmers can continue to buy these products without having to have a commercial pesticide applicators license. However, this legislation is still poor public policy for several reasons. We think ODA’s authority to add additional restrictions on the use of a particular pesticide is best used to address specific, limited, perhaps unique situations. ODA’s adoption of additional limits on the use on neonics on Linden trees is a good example of this approach. SB 929 goes far beyond this kind of targeted approach, proposing a blanket reclassification of neonic pesticide products as restricted use pesticides. There haven’t been any across-the-board problems that would justify this action. ODA certainly hasn’t reported any. It seems unreasonable to deny Oregonians access to neonic products that are safe, effective, and commonly available in 49 other states.

Oregon has an excellent pesticide regulatory program and ODA does a good job of administering the program. They have the scientific and technical expertise to identify and adopt any needed regulatory changes for neonics. We hope you will leave this work to ODA and join us in opposing SB 928 and 929.