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March 27, 2017

Senate Committee On Environment and Natural Resources  
Oregon State Legislature  
900 Court St., NE  
Salem, OR 97301

RE: Oregon Senate Bill 928


Dear Chairman Dembrow and Members of the Committee,

Far West Agribusiness Association is a 57-year-old regional trade association with over 120 business members within the states of Oregon, Washington, Idaho, Utah, and Nevada. Our members are primarily retailers who sell crop protection products, fertilizers and agronomic services to farmers for the many commodities they produce. In addition, we have wholesalers, applicators, and equipment dealers as members. We also administer the NW Regional Certified Crop Adviser program for those states plus Alaska and British Columbia.

We write today to share our comments on Senate Bill 928, of which we oppose. The bill requires the addition of the word "neonicotinoid" which is both unnecessary and costly. Unnecessary, because it is redundant since the federal requirements for FIFRA products already requires the content and percentage of active ingredient on the label and as the Environmental Protection Agency advocates - "The label is the law". Our members' field personnel are trained to handle hazardous materials and as part of the recommendation and sale process, advise the users of the specifics contained within the label much like a pharmacist advises their customer. Costly, because this would require manufacturers to re-tool their labels to satisfy the needs of one state. Our concern is that this added requirement and cost may prompt a decision to not make the product available in Oregon due to the cost-benefit considerations. This may then prevent responsible, well trained individuals from acquiring what is needed to produce crops which are important to the public and the economy.

We urge you to not pass SB 928 out of the committee and very much appreciate the opportunity to provide our comments and recommendation. Please feel free to contact us if you have questions or concerns either directly or through Amanda Dalton @ 503-884-0415; [amanda@daltonadvocacy.com](mailto:amanda@daltonadvocacy.com)

Sincerely,

  
James F. Fitzgerald  
Executive Director