

From: Brian Parker
To: [SENR Exhibits](#)
Subject: SB928 and SB929, A farmer's opinion
Date: Monday, March 27, 2017 2:26:04 PM

Sirs,

I would like to have the following added to the public hearing record regarding these 2 Senate Bills.

Regarding the two bills relating to Neonicotinoid insecticides, SB928 and SB929, I would like to offer the following comments:

SB 928:

- 1) This would be the first time a pesticide labeling requirement would be added to any product in Oregon agriculture. This is, of course, intended to persuade users to not use the product(s) to prevent any adverse reaction from the consumer community. I do not believe, if it were to pass, that this would be the last product to have such a restriction. The overall purpose of proponents of this bill, is to eliminate the use of neonicotinoid (indeed all) pesticides. Pesticides are as necessary to agriculture as are cars and trucks to our economy as a whole. Both can kill and or cause harm if used incorrectly, but are needed to allow us to function in a modern society at a cost we can all afford.
- 2) Additional labeling requirements will cause additional cost and trouble to our marketing system, and most likely will result in little added benefit.
- 3) The use of these products is already regulated by EPA and ODA. Adding additional regulations at the legislative level is neither efficient, nor well thought out. It is designed to get a result (reduced or eliminated pesticide use) by avoiding the current regulatory agencies available, who may not favor the same outcome as this bill's proponents.

SB 929:

- 1) Restricting the use of this class of chemicals can better be decided by the regulatory agencies already tasked with doing this job. EPA and ODA have systems in place, which scientifically evaluate many of the issues relating to safety with these products.

Neonicotinoid insecticides have a mode of action which is very safe for humans and other mammals in the environment. They are often used as seed treatments, prior to planting. This type of use closely targets the chemical to the location where it is needed, while using a bare minimum of chemical to accomplish the intended purpose. I think this is a very modern way to treat pests while causing as little side effect in the environment as possible.

Neonics also are a class of chemical different than widely used Pyrethroid chemicals. Insects, like weeds, can develop resistance to certain treatments, and it is very important that we, in agriculture, have access to treatments with differing methods of activity on pests, so as to reduce the problem of resistance.

Neonics have been involved in bee kills, most notably from a non agricultural use in the Portland area a few years ago. This was due to misuse of the product. There are regulatory

systems in place in Oregon via ODA, to deal with misuse of chemicals. Agriculture chemicals cause very few problems compared with the benefits of use. It seems many will not rest until their use is totally eliminated.

Agriculturalists in Oregon are quite clear regarding bee kill issues at this time. Outreach via ODA has begun, and clearly the word is out to be careful and follow directions regarding bee safety.

Finally, I do not believe that Legislative members have the background knowledge with these products to be able to make a scientific decisions regarding their use. These regulations should be left up to the people who are tasked with this job at EPA and ODA.

Thank you,

Brian

Brian Parker

Parker Seeds Inc.
96476 Smith Ln
Junction City, OR 97448
541-520-3800