Watts Remy

From: Kevin Osborne <kosborne@alliedseed.com>

Sent: Thursday, March 21, 2019 2:07 PM

To: SENR Exhibits **Subject:** SB 853 Comments

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To Whom It May Concern,

I am emailing today in opposition of SB 853. I am a resident of Ontario, OR and the Production Manager for Allied Seed LLC which is an Idaho based company but we also operate a warehouse in Albany, OR and contract nearly 12,000 acres of seed production throughout the Williamette Valley, Union County, Baker County, and Malheur County. These seed crops include but are not limited to, perennial ryegrass, annual ryegrass, tall fescue, clovers, radish, mustard, alfalfa, and orchard grass.

We stand heavily in opposition of the complete ban on Chloropyrifos as this chemical is one of the few chemicals that provide us with a tool to control insect pressure in our seed crops. We deal with several species of insects that include thrips, lygus, weevil, maggot, aphid, among many other insects. These insects, if left unchecked, have been known to devastate seed crops to the point that the crop is deemed a failure which is both costly to our growers as well as to the seed dealers contracting these crops. Chloropyrifos is a broad spectrum insecticide that has a proven record of working well on these insects and provides a cost effective tool to our growers to ensure that we are able to have successful seed crops. Aside from the direct harm to crops that a ban on Chloropyrifos would put on Oregon growers it would also put Oregon growers at a marketing disadvantage to other states and countries that will continue allowing the use of the chemical. Without a proven chemical such as Chloropyrifos, Oregon growers will be forced to look for alternatives that may be more costly or will have to apply more chemical because the alternatives are not as effective as Chloropyrifos which will put more strain on the environment and will cost growers more in application costs. Since these growers compete in marketing with those states and countries that will continue to have proven, cost effective chemicals they will be able to market at lower prices and continue to maintain margins that Oregon growers will not be able to collect.

Regarding requiring that neonicitinoids be listed as a restricted use chemical, requiring an applicators license, we consider this a moot point as to our knowledge all of the neonicitinoids that our growers are using are already labeled as restricted use. Also the majority of our growers, if not all, already carry licenses to use restricted use chemicals. This bill seems to be merely a redundancy to the system that is already in place by our federal government.

For these reasons I ask that you vote down this proposed legislation.

Thank You,

Kevin V. Osborne

Production Manager

Allied Seed LLC

9311 Hwy 45

Nampa, ID 83686

kosborne@alliedseed.com

www.alliedseed.com

office 208.466.6700

Office 208.466.6700 Cell 208.960.4771 Fax 208.466.9074