

March 26, 2019

The Honorable Michael E. Dembrow, Chair  
Senate Environment and Natural Resources Committee  
900 Court Street, Room 347  
NE Salem, OR 97301

**RE: Senate Bill 853- OPPOSE**

Dear Chair Dembrow:

On behalf of the Household & Commercial Products Association, I respectfully oppose Senate Bill 853, which would restrict use of neonicotinoid pesticides.

The Household & Commercial Products Association (HCPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. HCPA member companies employ hundreds of thousands of people globally. Products HCPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

Consumer pest products allow Oregon residents in all communities the ability to clean and protect their homes with safe and affordable products against a variety of public health pests. Without access to such products, consumers must choose between taking no action against these pests or paying someone to perform the services for them which can be cost-prohibitive.

Neonicotinoids are a class of neuro-active insecticides chemically related to nicotine. Neonicotinoids used in both indoor and outdoor pest control products to manage insects including bed bugs, stink bugs, cockroaches, grubs, and invasive species like Emerald Ash Borer. The neonicotinoids were developed in large part because they show reduced toxicity compared to previously used organophosphate and carbamate insecticides. Most neonicotinoids show much lower toxicity in mammals than insects. Under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency (EPA) reviews all current pesticide registrations to ensure they continue to meet the protective FIFRA risk standard in light of new information and evolving science. US EPA is currently in the process of reviewing the safety of neonicotinoids in response to Pollinator Task Force Action Plan and the planned completion in 2019<sup>1</sup>.

In addition, the U.S. Department of Agriculture and the US EPA recently released a comprehensive scientific report on honey bee health. The report states that there are multiple factors playing a role in honey bee colony declines, including parasites and disease, genetics, poor nutrition and pesticide exposure. One of the key

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<sup>1</sup> <https://www.epa.gov/pollinator-protection/schedule-review-neonicotinoid-pesticides>

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findings of the report is that the parasitic *Varroa* mite is recognized as the major factor underlying colony loss in the U.S. and other countries.

When used properly, pesticides protect plants and home from public health pests. The safety of consumers is the highest priority for HCPA members. HCPA member companies manufacture products that are safe when used according to the directions on the label. Manufacturers are continuously focusing on the safety of products and packaging, as well as helping to prevent their products from reaching children. Users are encouraged to determine the most appropriate product for the need and to read and follow all label directions.

We support continued research on the risks to bee health and readily acknowledge the critical importance of pollinators to the agricultural economy, however, in recognition of the review underway at US EPA and lacking adequate science to support the measure, HCPA respectfully asks for your no vote on the bill.

Sincerely,

A handwritten signature in black ink, appearing to read "Allyson Azar". The signature is fluid and cursive, with the first name being more prominent.

Allyson Azar  
Manager, State Government Relations