



March 25, 2019

Senator Michael Dembrow,
Chair Senate Environment & Natural Resources Committee

Dear Chairman Dembrow:

Subject: Opposition to Oregon SB 853

The Western Wood Preservers Institute (WWPI) is a non-profit trade association founded in Oregon in 1953. WWPI represents 16 facilities and some 356 employees in the state of Oregon along with industry members from the other western states. Membership includes, wood manufacturers, chemical manufacturers, wood preservers, environmental consultants, equipment providers, inspections companies and product distributors. WWPI serves the interests of the wood preserving industry in so that renewable resources, exposed to the elements, can maintain favorable use in aquatic, building, commercial and utility industries.

This letter is in response to proposed legislation, SB 853 relating to listing neonicotinoids as restricted use pesticides under ORS 634.316. Specifically, the bill includes Imidacloprid in the definition of Neonicotinoid thereby including several preserved wood products that utilize Imidacloprid as a co-biocide to protect wood structures. Namely Propiconazole, Tebuconazole Imidacloprid (PTI) which is 4.8% Imidacloprid. Another wood preservative DCOI utilizes small Imidacloprid additives of less than 2% to help protect from termites and fungi.

To be approved for use, all wood preservatives must, in the words of the EPA, quote "show that they can be used without causing unreasonable adverse effects to human health or the environment." This bill has an impact on nontraditional pesticide applicators. Wood is protected from decay, rot, mold, and wood eating insects by putting the wood into a closed cylinder where the preservative is pressurized into the wood, then excess preservative is vacuumed out leaving the wood sterilized. The preservative is maintained in controlled storage tanks and any drippage is collected so the preserved wood industry has zero pollinator impacts.

It is important for the wood preservation industry to have options as to which preservative to use and on which commodities on a case by case basis. For example, in some site-specific applications there is a need to avoid heavy metals that could impact sensitive aquatic environments, such as copper impacts on fish. PTI or DCOI would be among those alternatives that ensure that the preserved wood used is both sustainable and safe.

We need the safety of preservatives. They protect our wood infrastructure from rail ties, and utility poles to guardrails along the freeway and pilings at ports. In fact, the very first board installed in every house, the sill plate, is preserved wood. It protects the rest of the lumber and thus protects the house from decay, insects and rot. The state even uses Imidacloprid in a number of applications including bridge handrails to protect the wood and provide a disinfected surface to touch.

Through preservative treating, we add to sustainability by making wood last for decades, far beyond the time it takes to grow a new tree to supply our future needs. This is the essence of sustainability and no other material offers this benefit. In its current form, the bill is counterproductive toward its intended goal of environmental stewardship.

Sincerely,

Dallin Brooks
Executive Director
Western Wood Preservers Institute