To: Senate Committee on the Environment and Natural Resources

Chair Dembrow

Senator Olsen

Senator Bentz

Senator Prozanski

Senator Roblan

Date: March 26, 2019

Re: SB 853 & HB3058

I urge you to take into account all the information below and please vote NO for this legislation.

HB 3058 & SB 853 will open the door for legislators making pesticide chemistry decisions product-by-product and chemical makeup instead of relying on the science experts and regulators at our state and federal agencies (e.g. Environmental Protection Agency, Oregon Department of Agriculture, Department of Environmental Quality).

All pesticides pose some level of risk. A 'risk assessment' is the process for evaluating the risks and benefits of using a pesticide. It often requires a complex combination of data to complete. Several governmental and international organizations perform formal risk assessments about pesticides. For example, the World Health Organization evaluates potential cancer risks, risks from food residue, and risks to the environment. In the United States, the Environmental Protection Agency (EPA) identifies the hazards and potential exposure(s) before calculating the overall risk. Two major types of pesticide risk assessments are human health and ecological health.

Human Health Risk Assessments look at possible health risks to humans who might be exposed to pesticides in water, food, air, and through other activities. This can include the use of pesticides at home and at work. The four steps of a human health risk assessment are: Hazard Identification, Dose-Response Assessment, Exposure Assessment, and Risk Characterization.

Ecological Risk Assessments look at how wildlife, plants, and water sources can be affected by a pesticide. They require data on plant and animal toxicity, as well as environmental fate. There are four phases of an ecological risk assessment: Planning, Problem Formulation, Analysis, and Risk Characterization.

The EPA is currently reviewing and evaluating the risk assessments for neonictinoids. I request that the State of Oregon to place these legislative measures on hold until the scientific community and experts at the EPA finish and conclude their risk assessments for neinictinoids.

Neonicotinoid insecticides are integral to season-long IPM programs managing pests in major commodity crops and specialty crops in the State of Oregon. I further request the State of Oregon to strongly consider the benefits of neonicotinoid use for managing numerous pests across many Integrated Pest Management systems and their importance as a unique mode of action for managing the evolution of insect resistance when considering further restrictions, recognizing that such decisions can have serious and unintended impacts on food security.

Many crops grown in Oregon are labeled for neonictinoid use: apples, blueberries, broccoli, potatoes, nursery, onions, peaches, pears, grapes, corn, and ornamentals amongst others. Restricting neonictinoid use on these crops could result in increased crop loss, or require the use of more toxic insecticides.

In 2014, the Oregon Legislature took a proactive step to address pollinator health, establishing a Pollinator Task Force which was tasked with finding collaborative solutions to pollinator concerns. The diverse 10-member board, which OFS served on, met seven times in 2014 and released their final report (https://olis.leg.state.or.us/liz/2013I1/Downloads/CommitteeMeetingDocument/41335) with priority recommendations. The State of Oregon should recognize that this diverse group of stakeholders agreed the successful way to protect pollinator health was with additional regulation of pesticides but with cooperative methods to education, outreach and research.

Overall the majority of scientific studies do not find impacts at the colony level. Scientist from the EPA, the U.S. Department of Agriculture and University of Maryland *(Dively GP, Embrey MS, Kamel A, Hawthorne DJ, Pettis JS (2015*) *Assessment of Chronic Sublethal Effects of Imidacloprid on Honey Bee Colony Health)* confirmed what other research has shown, that field-relevant exposures to neonictinoids have negligible effect on honey bee colony health.

Furthermore; Many of Oregon's specialty crops have state approved Special Local Need registrations of chlorpyrifos since there are no alternative products available for certain pests. The unique nature of Oregon's diverse agriculture results in very few, if any, products available for controlling pests for some crops. Chlorpyrifos is vital for protecting Oregon's minor crops.

HB 3058 & SB 853 will take hundreds of effective and easy to use products away from homeowners and gardeners.

HB3058 & SB 853 will widen the equity gap by placing unfair financial burdens on our low income, at risk community; forcing them to hire a professional pest control company to use some of the most efficient and effective low risk chemistry to control common household pest

(i.e. ants, spiders, bed bugs and cockroaches). If someone wants to handle a pest problem on their own, this regulation will force them to use less effective and more costly pesticides. These proposed bills will force our at risk communities to make the decision to either live with pest problems longer or pay for costly professional service; instead of taking care of the pest problem themselves. By removing a specific class of chemistry that is proven to be low risk and effective; an unforeseen consequence of this regulation is the potential increase in asthma within children due to them being forced to live with pest longer and in higher numbers. It is well documented that children living in environments with pest have an increase risk to asthma. This regulation will compound health and mental stress related issues in our low income, at risk youth. The overall livability of all citizens whom live, work and play in the State will decrease due to these proposed bills.

Another unanticipated action of this regulation is there will likely be an increase in the total pesticide load entering our environment, because less effective pesticides will replace the use of the low risk and effective chemistry these bills seek to restrict, causing more pesticide to be used and having more applications being conducted on a regular basis. Additionally with more applications taking place, we are increasing a chemical applicators (professional and novice) risk to more pesticide exposure.

Thank you for taking the time to read my entire testimony.

Mr. Carver