

**From:** [Brenda Frketich](#)  
**To:** [Exhibits HAGLU](#)  
**Subject:** Please oppose SB 853 & HB 3058  
**Date:** Tuesday, March 26, 2019 10:20:06 AM

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Dear Chair Clem,

My name is Brenda Frketich. I am third generation farmer from St. Paul. I farm 1000 acres alongside my husband Matt and our three small children. We are a sustainable and diverse farm raising filberts, grass seed, wheat, clover, vegetables and vegetable seeds.

I'm writing in opposition to SB 853 & 3058. I'm here as you heard as a farmer, as a certified applicator, and as a mother. I am also a farmer's daughter who was raised on the same land and in the same dirt that my kids now play in.

I'm opposed to SB 853 & 3058 for six reasons:

1. We need these tools in our toolbox.
2. We have no good alternatives.
3. We use these products safely and carefully.
4. Chlorpyrifos: As a restricted use pesticide it is already heavily tested and regulated.
5. Both are regulated both federal and at the state level.
6. Neonicotinoids: Are used not only by farmers who have pesticide licenses.

We need these tools in our toolbox.

We use chlorpyrifos on our farm for a number of crops that we grow. One example is our radish for seed. This crop is planted in the spring, we actually just put ours in the ground last week. We use chlorpyrifos 15G, granular in the row with the seed as we plant. The granular material goes into the furrow and is then covered with dirt. It then protects the seed as it grows from root maggots. This is a necessary treatment because it is hard, once a seed is in the ground, to protect it from pests. We also use it as a pre-plant application in some instances when planting vegetable seeds. This would be an application where it is sprayed onto the soil, then worked into the soil using a cultivator or harrow mix it into the soil. We do this only in the fields where symphylans are present or have been in the past.

We have no good alternatives to use.

The alternatives (if you can call them that, are not very comparable in quality or cost). There is only maybe one labeled that we would sort of consider, it's so expensive, 5 times the cost of chlorpyrifos per acre (\$20 vs \$100). It also is unpredictable if you can't control how much rain hits the soil after application, because that greatly determines how much control you have on root maggot. We also are working with a small industry of seed varieties. Getting a new label or just trying to get the residuals and testing done for a new product or to get your crop listed on an existing chemical is near impossible and takes years to accomplish.

We use this safety and carefully.

Not only am I a licensed applicator, which comes along with many hours of continuing education very year. We also annually train all our employees on our farm, which is a requirement from OR-OSHA under their Worker Protection Standards. We use the correct personal protective equipment that is listed on the label, following cleaning and disposal label information, and only use it on crops that are listed on the label. The label is the law and that is so true when we use this insecticide on our farm.

As a restricted use pesticide it is already heavily tested and regulated.

This chemical is already under federal and state regulation. To even purchase this chemical I have to prove that I have a pesticide license and have continuing education about the correct way to apply chemicals on our farm. It is regulated with our state agencies and at the federal level with the EPA.

This is a tool has been tested in over 4000 studies just around safety to children. It has not shown to cause birth defects or developmental disorders in children. With three small children of my own, this is information that is important to me. It is also a biodegradable compound that does break down in the environment. The chemical compounds are then gone. Two examples of this are microbial activity within the soil and with sunlight. On the radish that we plant, we actually only would have to wait only 7 days before we harvest after application (we wait much longer because it takes 5 months for the crop to produce seed). But this is another example that the insecticide actually does break down in the environment, adding to the story of safety surrounding this chemical.

I am a mom who wants her children to be safe, and I am a farmer who strives for crop and soil health. This is one tool that when used per the label, I can satisfy human and environmental safety at the same time.

As far as the neonicotinoids all being classified as restricted use, I think this is a gross overreach by the legislature. These products range from farmer applied all the way down to someone putting a flea collar on their dog. To force everyone who uses these products to be licensed is ridiculous and quite frankly unnecessary. The bee kills that happened were off label applications, and there was a cost to that. Both as a penalty and to bees that died. It is sad to see that happen, but it is also why we have regulations in place to stop that from happening. Thank you for your consideration on this important issue.

Brenda Frketich

Sincerely,

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