



March 26, 2019

RE: Senate Bill 853
Senate Environment & Natural Resources Committee

Dear Chair Sen. Dembrow, Vice Chair Sen. Olsen and Committee Members:

According to Senate Bill 853, the Oregon Department of Agriculture must list a pesticide that contains a neonicotinoid as a restricted-use pesticide under ORS 634.316. Essentially, this would restrict the use of neonicotinoid products to only licensed pesticide applicators.

This concerns us for a couple of reasons:

- Veterinarians and other employees of a practice are currently exempt from having to obtain a license as a pesticide applicator, yet language in SB 853 might override this exemption. We don't have a clear answer on this.
- We believe the exemption for veterinarians and employees of a clinic is appropriate. In their scope of practice, veterinarians and their employees administer a limited number of flea products on patients and also sell such products to clients for treatment of animal patients in the home. However, the percentage of neonicotinoids in these flea products are miniscule and don't raise to the level of concerns noted by proponents of SB 853 and which led to the introduction of the legislation. It appears as if veterinarians and these safe and effective flea products are caught in the middle.

We have indicated our concerns to the lobbyist for the group behind SB 853, and he informed us that it is unintentional that veterinarians and their employees and related pet health products like flea treatments and collars are included – even if by implication. He assured us that at this afternoon's hearing he would be proposing an amendment to exempt us and such products from the legislation.

If the proposed amendment is adopted into SB 853, the OVMA will be neutral on the bill. If the amendment is not accepted, however, we will be opposed to the legislation.

Sincerely,

Glenn M. Kolb
Executive Director



Senate Bill 853 & House Bill 3058 (Application of Flea Products in Veterinary Medicine)

SB 853 directs the Oregon Department of Agriculture to list a pesticide product that contains a neonicotinoid as a restricted-use pesticide under ORS 634.316.

Neonicotinoids are active ingredients in a variety of approved products for cats and dogs to treat fleas, ticks and other parasites. When properly applied and used appropriately, these products have proven to be safe and effective.

There are three neonicotinoid products on the market. These are available through the veterinarian, but also accessible in pet stores, farm stores, supermarkets, and outlets such as Target. A great percentage of these products can also be purchased online through websites like Amazon, 1-800-Pet-Meds and Chewy.com.

Imidacloprid is a topical product that is combined with permethrins. K-9 Advantix and Advantage Plus (Bayer Animal Health) are two such products that are widely available for flea treatment in dogs only. With Advantage Plus, the amount of imidacloprid in one spot-on treatment for dogs weighing between 11 – 20 pounds is 0.034 fluid ounces of the product.

Dinotefuran is the neonicotinoid in Vectra D (CEVA Animal Health). This product is for use in dogs only and treats fleas, ticks, mosquitoes and mites. The amount of dinotefuran in this topical product is between 4.0% and 8.0% by volume by weight.

Nitenpryam is the active ingredient in Capstar (Elanco Animal Health). This product is an orally-administered tablet that provides fast relief from flea infestation on cats and dogs. The size of the tablet is equivalent to that of an M 'n M. (Nitenpryam comprises about 11.0% of the tablet).