

April 8, 2019

Representative Ken Helm,  
Chair House Energy & Environment Committee

Dear Chairman Helm:

Subject: Non-Traditional Pesticides Users Opposition to Oregon HB 2619

Viance, LLC is a North Carolina- based supplier of wood protection technologies in the United States, Canada, and parts of Asia. In addition to copper based wood preservative systems (ACQ and CA-C) we manufacture and formulate two environmentally advanced systems that contain the neonicotinoid insecticide Imidacloprid that are registered by the State of Oregon and used by pressure treating plants located in the State. One of our copper based preservative formulations (ACQ) was awarded the U.S. EPA Presidential Green Chemistry Challenge Award in 2002.

Viance, LLC opposes HB 2619 as it would result in the cancellation of any pesticide product containing a neonicotinoid in the State of Oregon.

HB 2619 would revoke the Oregon registrations of Clearwood MW1 (EPA # 83997- 6) and Clearwood MW2 (EPA # 83997-7) that contain Imidacloprid as a co-biocide for the protection of treated wood used as millwork against termites and other wood destroying insects. Imidacloprid has proven to be a safe and effective component of millwork and other wood preservative formulations. Since beginning use of the Clearwood formulations in 2003, users have experienced significantly reduced incidence of premature failure due to rot and termites in millwork, compared to previous preservatives used. The images below clearly illustrate the effectiveness of Clearwood MW2 treated wood containing imidacloprid against termites in Hilo, HI.

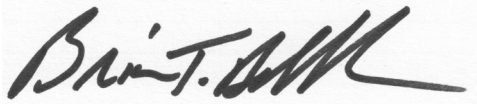


Replacement of Imidacloprid with another insecticide would be difficult and time consuming. It would require reformulating the preservative system and a new registration with the US EPA. The process would require the development of product chemistry and toxicology data as well as termite efficacy data that would take up to 2 years. There are no currently registered products that contain an insecticide that can provide the same level of protection as Imidacloprid as used the Clearwood formulation.

Clearwood MW1 or Clearwood MW2 formulations present no risk to pollinating insects in use. They are applied in computer-controlled, pressure treating plants by trained applicators under closed conditions protected from the weather. Concentrates and the let-down solutions are contained in tanks and enclosed piping inside a building, and are unavailable to pollinating insects.

Wood components treated with Clearwood MW1 or Clearwood MW2 are incorporated into door and window assemblies that are either clad with vinyl or other material, or coated with weather resistant paints and stains, further encapsulating the preserved wood. The finished treated wood product presents no impact to pollinators.

Sincerely,



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