



**Date: February 8, 2020**  
**Re: Letter in Support of HB 4109**  
**To: Oregon House Committee on Health Care**  
**From: Portland Audubon Society**

Dear Members of the House Committee on Health Care

I am writing on behalf of Audubon Society of Portland in strong **support of HB 4109**.

A growing body of scientific study is unequivocally clear that threats from organophosphate pesticides pose high risks to human health, birds, aquatic species, pollinators, and the biodiversity upon which we all depend.<sup>i</sup> We urge the Oregon Legislature to take action based on science to ban chlorpyrifos, a common organophosphate pesticide. Hawaii banned chlorpyrifos in 2018 and several other states are seeking to eliminate the sale and use of chlorpyrifos as necessary to protect wildlife diversity and water quality. The United States Environmental Protection Agency proposed to ban chlorpyrifos use on food crops in 2015, then reversed itself in 2017 under heavy pressure from the manufacturer, Dow Chemical Company. Under the direction of Scott Pruitt the Agency refused to finalize a court ordered national ban on chlorpyrifos, necessitating action at the state level.<sup>ii</sup> It is time for Oregon to take action to protect people and wildlife.

### **Chlorpyrifos and Birds**

Chlorpyrifos is a highly toxic organophosphate insecticide related to nerve gas that is used on a wide variety of crops, which puts birds, fish, wildlife and invertebrates at extreme risk. It is also tied to development disorders in children and is harmful for humans to touch, inhale or eat.<sup>iii</sup> It acts as a nerve agent, attacking chemical pathways in all living things creating a breakdown in the ability of nerves to communicate and function.<sup>iv</sup>

Portland Audubon is concerned about the documented threat chlorpyrifos poses to birds. A biological evaluation produced by the EPA in cooperation with the US Fish and Wildlife Service and the National Marine Fisheries Service found that chlorpyrifos was “likely to adversely affect” 1778 out of 1835 federally listed fish, bird, mammal, reptile, amphibian, invertebrate and plant species reviewed. This included 91 out of 108 bird species. Chlorpyrifos can also decimate the food base for birds that eat fish and insects, because it is one of the most toxic pesticides for aquatic ecosystems.

In 2014 a US District Court mandated no-spray buffer zones for certain pesticides, including chlorpyrifos, around waterways to protect endangered or threatened Pacific salmon and steelhead in Oregon, Washington and California. The mandatory no-spray buffer zones for specific salmon or steelhead-bearing streams are 60 feet for ground applications, and 300 feet for aerial applications. However, these buffers for some streams merely indicate the toxicity of chlorpyrifos, but are inadequate to address the full spectrum of harm it causes throughout environmental systems, particularly to birds and the fish and insects they depend on for survival.

Of particular danger to birds are the highly concentrated doses of chlorpyrifos found in seed treatments and granular applications (dried pellets applied to fields and gardens). These can be deadly to the birds that eat them. According to the American Bird Conservancy, granular applications of chlorpyrifos on golf-course turf, ornamental plants, utilities, and vegetable crops are ingested by the birds as grit.<sup>v</sup>

Public health and wildlife conservation groups have been calling for a ban on the use of chlorpyrifos for years. To protect the health of birds and fish, to safeguard our food supply, and to protect our environment, we urge Oregon to join Hawaii in passing the statewide ban on Chlorpyrifos found in HB 4109. It is well past the time for Oregon to ban chlorpyrifos, an outdated and extremely hazardous neurotoxin, to eliminate its deleterious effects on birds and their habitats and food sources.

Thank you for your consideration of these comments.



Bob Sallinger  
Conservation Director  
Audubon Society of Portland

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<sup>i</sup> The Xerces Society. "Scientists Urge Action to Protect Waters from Neonicotinoid Insecticides". 3/13/18.

Lipton, Eric. *New York Times*. "Court Orders E.P.A. to Ban Chlorpyrifos, Pesticide Tied to Children's Health Problems". 8/9/18.

<sup>ii</sup> National Resources Defense Council. "Hawaii Bans Use of Toxic Pesticide Chlorpyrifos" 6/13/18.

<sup>iii</sup> National Pesticide Information Center. Chlorpyrifos General Fact Sheet. 4/10.

<sup>iv</sup> Cuthbert, Lori. *National Geographic*. "EPA Must Ban Dangerous Insecticide". 8/10/2018

<sup>v</sup> American Bird Conservancy Publication accessed at <https://abcbirds.org/dangerous-chemical-ban/>