

Pacific Northwest **Christmas Tree**

Association

Date: February 11, 2020
To: Oregon House Health Care Chair – Representative Andrea Salinas
Re: House Bill 4109

On behalf of the Pacific Northwest Christmas Tree Association and Christmas tree producers in Oregon banning Chlorpyrifos would have an extreme economic impact on our industry.

Oregon continues to be the largest supplier of Christmas trees in the U.S.

In 2019, the ODA issued over 1,000 Federal Phytosanitary Certificates for containers of trees going to Mexico. Mexican regulatory officials reported that approximately 600,000 Christmas trees were shipped to Mexico. This is roughly 18 percent of the Oregon produced Christmas trees that were harvested in 2019.

Mexico has regulatory requirements that must be met for Christmas trees to be exported into Mexico called **NOM-013-SEMARNAT-2010** (NOM). Just as Mexico has NOM, most other countries have rules in place which regulate the importation of plant products. These regulations are designed to protect the importing country's agricultural and natural environment from the introduction of dangerous pests and diseases not already found in that country. International rules require that the adoption of regulations and quarantines related to the importation of plant products be based on valid scientific pest risk assessments (PRA).

One of the provisions in the NOM requires Oregon Christmas tree producers to spray fields that will be exported into Mexico 3-6 weeks prior to harvesting to control pests such as budworms, twig weevils, and needle midge. Christmas trees shipped to Mexico must be free (zero tolerance) of quarantined pests.

Chlorpyrifos are the most effective chemistries we have to control such pests. If Chlorpyrifos are banned or removed, it would leave our Christmas trees vulnerable to pests because other available chemistries don't effectively control the regulated pests. We would lose this entire market segment for the Christmas tree industry. This would have an extreme economic impact on our industry.

Domestically, chemical application is not our first line of defense when harmful pest populations begin to emerge. In fact, it is the last line of defense. Chemical application is conducted after we have exhausted the other integrated pest management countermeasures that did not adequately keep pests from infesting our agricultural products. Having the ability to select effective chemistries is paramount.

The Christmas tree industry, as well as agriculture producers at large, need to have the necessary tools in the toolbox to adequately manage our crops. This ensures we have the ability to meet regulatory requirements to export into all our various sales regions.

Please help ensure the Oregon Christmas tree industry is a healthy and important part of the Oregon economy.



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