

**From:** [Oliver Neher](#)  
**To:** [HHC Exhibits](#)  
**Subject:** Oppose HB 4109  
**Date:** Tuesday, February 11, 2020 2:50:08 PM

---

Dear Chair Salinas,

February 11, 2020

To Whom It May Concern,

The Amalgamated Sugar Company LLC is a grower-owned Cooperative located in Southern Idaho with cash receipts of \$917 million in 2019. In addition, the processing industry, Amalgamated Sugar employed 2,986 people in 2019 with compensations of \$108 million and an overall additional value to the Idaho economy of \$135 million. This does not take into consideration the economic impact of the agricultural production and its growers. Amalgamated's Agriculture Department services over 700 sugar beet growers throughout Idaho, Oregon and Washington. The concerns of these growers/owners are representative of the comments outlined by Mr. Pat Laubacher, Vice President of Agriculture; Mr. Greg Dean, Agricultural District Manager, Nampa, Nyssa, Elwyhee & Washington Districts; and Dr. Oliver T. Neher, Sugar Beet Quality Improvement and Plant Health Manager.

Mr. Laubacher was raised growing sugar beets and has 32 years of experience in the onion and garlic dehydration industry. He joined The Amalgamated Sugar Company LLC in the Spring of 2015.

Mr. Dean has served for 24 years in the sugar beet industry, starting as a crop consultant and followed by many years as an area agronomist. In 2015 when he was promoted to the position of Manager of Sugar Beet Quality Improvement, since 2019 Mr. Dean is serving as the Agricultural District Manager for the Nampa, Nyssa, Elwyhee & Washington Districts which includes part of eastern Oregon.

Dr. Neher obtained his PhD at Montana State University, extensively working on sugar beets and potatoes. In 2009 he was hired by the University of Idaho as a sugar beet extension specialist tasked with plant pathology related outreach and research activities. He joined The Amalgamated Sugar Company LLC in 2013 as the Manager of Plant Health, dealing with research and plant pathology related problems. In 2019, he was appointed as Mr. Dean's successor and serves now a dual roll as Manager of Sugar Beet Improvement and Manager of Plant Health.

Sugar beets (178,000 acres planted in 2019) are the fourth most important crop grown for human consumption in Idaho only exceeded by wheat (1,196,000 acres), barley (550,000 acres), and potatoes (320,000 acres). The Amalgamated Sugar Company LLC and its growers/owners annually plant approximately 178,000 acres of sugar beets ranging from eastern Idaho to eastern Oregon and Washington. The 2019 Crop Year resulted in approximately 6,921,000 tons of sugar beets being harvested which will produce an estimated 1,173,000 tons of pure sugar. However, to grow a healthy and productive sugar beet crop, growers have to rely on cultural practices and the supportive action of pesticides. Considering the availability of products labeled for the use in growing sugar beets and the potential for new chemistries, the sugar beet industry in Idaho is facing ever increasing challenges. A more limited selection of insecticides (products are only available in insecticide groups 1, 3, 5 and 11) will make resistance management difficult for growers especially when products are only labeled for or active against a limited number of insect pests.

Chlorpyrifos, among others is sold as Lorsban 15G Granular Insecticide and Lorsban -4E emulsifiable concentrate for the application in sugar beets, can be widely used against pests in alfalfa, bean, corn, onion, peppermint, and wheat which are all crops regularly grown in rotation with sugar beets. In addition to the wide crop spectrum, Chlorpyrifos can be used for the control of seven different insect pests affecting sugar beets including beet leaf miners, two-spotted spider mites, lygus bugs, aphids, army and webworms, cut and wire worms and root maggots. Depending on the target organism, Chlorpyrifos can be applied as a granular at planting or foliar applied product during the growing season. Chlorpyrifos is used at both the low and high labeled rates dependent upon the pest targeted and the level and severity of infestation. Independent of the rate, Chlorpyrifos is both reliable and can controls pests for up to two weeks which helps to reduce insecticide applications.

We would like to express our strong support for Chlorpyrifos. This insecticide is an important part of the integrated pest management tool box and essential for a functioning resistance management program. If the decision by the EPA is to revoke the crop tolerance, Idaho growers would lose an important chemical for the production of not only sugar beets but many other crops. Idaho growers would be required to apply less effective chemicals which would result in higher application rates and frequencies, as well as reduced crop quality and an overall reduction in grower income.

Respectfully,

Pat Laubacher, Vice President of Agriculture  
Greg Dean, Ag District Manager  
Oliver T. Neher, PhD, Manager of Plant Health

Sincerely,

Oliver Neher  
11260 Coyote COVE  
Nampa, ID 83686  
[oneher@amalsugar.com](mailto:oneher@amalsugar.com)