



January 31, 2023

House Committee on Agriculture, Land Use, Natural Resources, and Water  
Oregon State Legislature  
900 Court St. NE  
Salem, Oregon

RE: Support for HB2610 to provide funding for Oregon State University's IR-4 Program

Dear Chair Helm and Committee Members,

I am submitting these comments to you on behalf of Oregon's grass seed industry and as a member of the IR-4 Commodity Liaison Committee (CLC). The CLC is a coalition of commodity associations, grower groups, food processors and individuals across the United States who represent agriculture that feeds Americans healthy fruits, vegetables, herbs or enhances our environment with ornamental crops and flowers. These organizations collectively represent specialty crop growers and allied industries with operations in almost every state and whose operations are a huge driver of American agriculture; the farm gate value of specialty crops is over \$65 billion annually. Oregon is a significant contributor to our nation's production of specialty crops.

Oregon is known for its crop diversity producing over 200 different specialty crops. Of these specialty crops Oregon is the nation's leader in grass seed, hazelnuts, blueberries and Christmas trees. Additionally, Oregon remains the world's leader in grass seed production. IR-4 has been critical to the grass seed industry's ability to secure registrations for new plant protection products for use on grasses grown for seed. For all specialty crops that are so important to Oregon agriculture, IR-4 has been our primary avenue to secure the use of new reduced-risk pesticides and improve impacts on the environment, worker safety, and more sustainable production systems.

As background, most crop protection products are regulated by the US EPA as conventional pesticides or biopesticides. The crop protection industry concentrates their efforts and resources on large-acreage major crops such as corn and soybeans where business plans offer an acceptable return on investment. Unfortunately, specialty crops do not present a feasible return on investment for the crop protection industry, thus leaving producers with a significant challenge of addressing crop losses due to pests, while still needing to address EPA regulatory demands. Recognizing this dilemma, the IR-4 Project was created in 1963 to help America's specialty crop growers and food processors while promoting public wellbeing. Since its inception, the IR-4 Project has facilitated over 75,000 national registrations of pest



management uses that have benefitted agriculture in all states and provided value to the public.

One of the duties of the Oregon Seed Council is to ensure that the grass seed industry obtains and maintains key crop protection product registrations so that Oregon production is economically sustainable. A significant majority of the crop protection product registrations available to grass seed producers were made possible because of the IR-4 Project. Without the research and efforts of the IR-4 Project the grass seed industry would not be able to address pest management needs, compete in the global market and would not be economically sustainable. Furthermore, the residue research conducted by the IR-4 creates the straw export and feed pellet market opportunities that are important sectors of the grass seed industry. Today the grass seed producers are still challenged with new and evolving pests as well as new regulatory demands on pest management. The IR-4 plays a vital role in achieving solutions for the grass seed industry.

IR-4 Project remains critical today and Oregon's legislature has a tremendous opportunity to provide additional support for Oregon specialty crop growers. IR-4 has been on the front line to facilitate new registrations and solutions to manage pests and to ensure that Oregon farmers of fruits, vegetables, herbs, nuts, flowers, nursery and other specialty crops can continue to grow quality and wholesome products demanded by food processors and consumers. Without the support of IR-4, we would not have significant specialty crop production in Oregon or the United States.

Other factors driving the need for IR-4 and consideration of enhanced funding include:

- IR-4 is leading research efforts with the strategic integration of reduced risk pesticides and biopesticides to address the ever-increasing populations of pests causing economic impact to specialty crops. These efforts also help address the development of pesticide resistance while reducing exposure to pesticides in consumed foods.
- IR-4 has a proven track record of success as a collaborative program with the USDA, land-grant universities, US EPA, and private sector that delivers a needed service to specialty crop producers and industries.
- IR-4 develops data required by our international trading partners and helps facilitate the harmonization of regulatory standards that enhances access for producers to international markets.
- The cost of IR-4 research continues to escalate from factors such as land rental, employee health care cost, increased staff to address the rising demand, and host institution indirect cost recovery. In 2022, the USDA implemented a change in its funding process that now allows universities involved with IR-4 to charge in-direct costs. This has had significant impacts on IR-4's capacity to conduct research and its research infrastructure.



- US EPA efforts to enhance protection of the environment, including protection of pollinators, is also triggering additional studies with additional research costs.
- The IR-4 Project benefits society. Through IR-4's work, the public has access to plentiful fruits and vegetables, reduced food insecurity, jobs, and an enhanced economy. A 2017 study by Michigan State University reported that the IR-4 Project contributes \$9.4 billion to the annual U.S. GDP and supports >95,000 jobs. Oregon's ag industry and economy are certainly benefactors of IR-4 and contributes to a portion of that study's findings.

Oregon has a tremendous opportunity to be a leader in demonstrating the ability to provide enhanced funding directly from the state to its local IR-4 program efforts. The value and contributions of IR-4 to Oregon agriculture, economy and specialty crop producers is substantial. State financial support would be a sound investment into our state's specialty crop industry, research infrastructure, food security, and the continued production of high-quality food into the future. Simply put, this would be an investment into the sustainability of Oregon agriculture and its support of Oregon's economy.

Please do not hesitate to contact me if you need additional information. Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "S.E. Salisbury", with a long, sweeping horizontal stroke extending to the right.

Steven E. Salisbury

Research & Regulatory

Email: [steve@pacificagresources.com](mailto:steve@pacificagresources.com)