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Date
5 May 2023
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Subject
Canola production Willamette Valley

Dear Madam, Sir,

Recently we got aware of the renewed discussion to allow canola production in the Willamette Valley.
The introduction of canola production into the Willamette Valley is of great concern to us. For our top-quality hybrid vegetable seed productions, the WV is one of the most important regions in the world. The Valley has a unique combination of a very suitable climate, good soils, and small-scaled growers with a high technical level. On average we produce 20% of our cabbage seeds and 60% of our radish seeds here, making best use of the crop rotation schemes of the growers. Together with our competitors the seed industry is of great economical value for the growers in the WV. Allowing to introduce canola as a rotation crop will strongly disrupt their rotation scheme and will put our cabbage and radish seed production in jeopardy. There are three reasons for this:

- Canola is a host for several diseases and insects that can also attack our seed crops. We have experienced this years ago in France where we had to stop producing cabbage and radish seeds due to a high presence of rape pollen beetle. This insect migrates from canola to other seed crops causing severe damage during the flowering stage, resulting is low seed yields and inferior quality.
- Once canola is produced in an area, the seeds will be distributed uncontrolled over the place, not only in fields but also along roadsides. This takes place during transport of the product but also as leftovers in harvesting equipment. As canola seeds hold a lot of oil they can survive for many years in the soil, causing unwanted volunteers in our seed productions. Accidentally harvesting these volunteer seeds can make a seed production worthless as size, shape and color are similar to brassica- and radish seeds, making it impossible to clean them out.

- Our most important concern is the risk on adventitious presence, as (some of) the Canola grown likely carries a gmo-trait for herbicide resistance. The methods used in production of our propagating material include procedures to prevent the presence of gmo's that are regulated in the EU. But notwithstanding these procedures, we consider the risk of introducing these traits in our material extremely high once we would produce in an area where gmo-canola is grown. This can happen either through outcrossing via wild mustard or as a mixture from canola volunteers. For this reason, we have already decided to stop with brassica seed production in the Colombian Basin.

When canola production is allowed in the WV we will on the longer term be forced to stop producing several of our crops in this area. This will strongly reduce the possibilities for the growers to grow high value crops and have a negative effect on their income. Furthermore, it also reduces the options of vegetable seed companies to produce sufficient high-quality seeds to supply the growing world population of healthy vegetable foods. Combined with the climatical changes we experience in other seed production regions we cannot afford us to lose such a valuable seed production area as the WV is at present.

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