

Submitter: Annelisa Zander
On Behalf Of:
Committee: Senate Committee On Natural Resources and
Wildfire
Measure, Appointment or Topic: SB747

Written Testimony in Opposition to SB 747 – Fertilizer Restrictions
Submitted by: Annelisa Zander, Berger International LLC
Date: February 3, 2025

Chair Golden and Members of the Senate Committee on Natural Resources & Wildfire:

My name is Annelisa Zander, and I work for Berger International LLC, a farm and seed company operating in several counties within Oregon. I am writing to express my strong opposition to SB 747, which would impose mandatory registration and annual reporting on every landowner with more than 200 acres of irrigated agricultural land regarding their fertilizer use. As a stakeholder deeply involved in the agricultural sector, I believe this proposed legislation is fundamentally flawed and not supported by sound agronomic science or economic rationale.

Key Concerns with SB 747:

Economic Impact on Producers:

Fertilizer represents one of the most expensive inputs for growers, and its costs have skyrocketed in recent years. Producers are already cautious and disincentivized from applying more than necessary, driven by both economic pressures and the need for sustainable practices. Mandating additional reporting and oversight imposes an unnecessary administrative burden on a sector already managing significant financial constraints.

Complexity of Fertilizer Application:

Fertilizer rates are not one-size-fits-all; they vary widely based on crop type, soil conditions, weather, and a host of other factors. Even among the same crop varieties, agronomic needs differ. The assumption that a fixed reporting standard can accurately capture “overapplication” of fertilizer oversimplifies complex agricultural science. Without standardized guidance that accounts for these variables, the proposed system is likely to misinterpret data and penalize producers unjustly.

Lack of Scientific and Practical Understanding:

The language and structure of SB 747 reveal a concerning lack of understanding of both crop nutrition science and the nuanced impacts of fertilizer on groundwater quality. A more informed approach—developed in close consultation with producers

and experts in the field—is necessary to address these critical issues without imposing impractical measures on the agricultural community.

Arbitrary Criteria and Questionable Efficacy:

The requirement applies to landowners with more than 200 acres of irrigated land—a figure that appears arbitrary and lacks any substantive backing from data or scientific evidence. This threshold does not reflect the diversity of agricultural operations across Oregon. Additionally, the creation of what would essentially be a multi-million dollar regulatory program promises to yield little of the actionable information that its language suggests, thereby misallocating valuable resources.

Need for Robust Discussion and Engagement:

It is particularly concerning that key agricultural groups, including those directly affected by this legislation, have not been engaged in its formulation. The lack of advance notice and consultation has not only sidelined expert input but has also precluded a robust dialogue with the producers who understand these issues best. A more collaborative process is essential to craft policies that are both effective and practical.

In summary, SB 747, as drafted, imposes an unwarranted regulatory burden on agricultural producers, risks penalizing sound agronomic practices, and diverts resources into a program that is unlikely to yield the intended benefits. I respectfully urge the Committee to reconsider this approach and instead engage directly with the agricultural community to develop solutions grounded in scientific evidence and real-world experience.

Thank you for your consideration.

Sincerely,
Annelisa Zander
Berger International LLC