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Protection Products

Serving the Global Farm & Forest Industry with Total Protection Solutions

April 4, 2019

Mr. Ken Helm
Chair, House Energy and Environment Committee
900 Court Street St NE, H-490,
Salem, OR 97301
Hee.exhibits@oregonlegislature.gov

Re: HB2619, 2019 Oregon Legislative Session

Dear Representative Helm,

Thank you in advance for any time you spend reading this letter. I would like to introduce the company I represent.

Kop-Coat Protection Products is a Global Leader in specialty chemical programs and application equipment to protect building materials, forest products, and farm products from biological and weathering damage. Most importantly to this introduction is that we make State-Of-the-Art Wood Preservatives used by over 30 Forest Product companies in Oregon.

As I am sure you aware, wood is the most versatile, practical, and sustainable building material in the world. As a building material, wood has numerous positive environmental attributes that includes low embodied energy, low carbon impact, and sustainability. In modern countries, wood is a well-managed renewable resource that has a small carbon footprint. Wood does suffer from a lack of durability against invasive organisms such as insects and fungi. Steel, aluminum and composites have emerged as viable alternative building materials. These sectors market the deficiencies of wood to better position their products. As these materials continue to take market share away from wood, the need to cost-effectively and safely increase the durability of wood remains an always present target within the forest products industry. The use of preservative treatments to impart fungal and insect resistance into wood has been successfully utilized for over a century. Without such preservatives, wood will be replaced with these alternative building materials. Through their manufacture, the use of these alternative building materials is much more environmentally impactful than the harvesting and processing of timber. Based on life-cycle assessment and embodied energies, the net carbon emissions in producing a ton of various materials, including framing lumber, recycled steel, virgin steel and plastic were calculated by the EPA (EPA, 2006). The values for plastic, recycled steel and virgin steel were approximately 76, 7 and 21 times, respectively, more net carbon emissions prohibitive than that of lumber.

Even with the type of data illustrating the negative environmental ramifications of the manufacture of alternative building materials, consumers are buying them thinking they will not

suffer from biological destruction. Rot, decay, and insect damage to untreated or improperly treated wood is the best marketing tool that these alternative building materials can have. Simply put, the Forest Products Industry cannot tolerate negative press from wood destruction from biological sources. Wood will suffer. The North American Forest Products industry will suffer. Oregon Forest product companies will suffer.

It has come to the attention of Kop-Coat Protection Products that HB2619 seeks to impose a wide-sweeping ban on the use of Neonicotinoids. As the proposed legislation is currently being understood, this would include the use of neonicotinoids, namely Imidacloprid, for Wood Preservation.

On behalf of Kop-Coat Protection Products, I would implore the key stakeholders in this legislative process to better understand the importance of this insecticide to the Wood Preservative and larger Forest Products Industry within Oregon. I would further implore the esteemed legislators and stake holders to consider that the use of noenicitinoids in Wood Preservation is nothing like its use in Agriculture.

Below is a list of key points toward the use of Imidacloprid in Wood Preservation that are important to understand before any blanket wide ban on noenicitinoids is considered.

1. Imidacloprid, a neonicotinoid, is widely utilized in wood preservation for its ability to prevent Wood Destroying Insects from damaging wood. This material is safely and effectively utilized as a wood preservative in countries where Imidacloprid may be restricted within agriculture.
2. There is NO data to support that wood treated with Imidacloprid has any impact on pollinator insect life cycle.
3. There must be a logical segregation between Agricultural use and Wood Preservation regarding Noenicitinoids. Industrial Wood Preservation facilities do not SPRAY in the open like Agricultural users. They apply to wood in closed-loop vacuum impregnation systems.
4. Solutions of Imidacloprid are delivered to industrial wood treatments facilities where they are diluted in water and stored in closed-loop systems. Solutions are handled by trained pesticide applicators as there is no Consumer use of these Industrial Wood Preservatives.
5. The Imidacloprid solutions are impregnated throughout the wood in closed-loop pressure cylinders and/or application systems. All excess/residual solutions are reclaimed and reused. All activities are completed by highly trained pesticide applicator licensed facilities. Wood treated with Imidacloprid solutions is required to be held under storage until it is dry.
6. Once dry, the Imidacloprid is held within the wood due to chemical attractions between the molecule and the cellulose of the wood fiber.

   a. It is essential to note the United States Environmental Protection Agency (US EPA) requires Wood Preservation End Use labels to collect and provide leaching data to show that the Imidacloprid will not prohibitively leach from the wood when wetted (i.e. rain).
   b. In addition, the US EPA requires surface "wipe data" to ensure that no prohibitive residues of Imidacloprid remain on the wood after treatment. This data is required to obtain a Wood Preservative Use Pattern Pesticide label.
7. If there is a non-selective ban or restriction on the use of Imidacloprid for Wood Preservation, there would be an immediate gap in the available treated wood options for wood users. Most users would have to rely on HEAVY METAL based wood preservatives or move to alternative building materials. Both outcomes have negative consequences to the state of OR, its environment, and its Forest Products Economy.
8. Solutions of Imidacloprid have been shown to penetrate Douglas fir, the dominate species that the Forest Products Industry in Oregon relies upon. Should this use pattern be removed, non-durable, insect-susceptible, untreated wood be all that remains with local fiber. The forest product companies in OR would have to rely on the import of Southern Yellow Pine from the Eastern US that would be treated with insecticides that could not be used with OR Douglas fir.
9. Regardless of why temperatures in the world are climbing, the warmer temperatures are allowing invasive insects to move into regions of the US they normally could not flourish. For example, there is an approximate $3B/year crisis due to the Formosan termite in the contiguous U.S. Historically, the insect was locked in the Gulf states as they relied on the warm temperatures and humid environment.
   a. There is evidence of the Formosan termite migration as far north as Virginia and west as Indiana. This insect will continue to move north and west. In most states, the use of insecticides such as Imidacloprid is helping to effectively protect wood in these areas.
   b. Secondary repellent insecticides, such as Synthetic Pyrethroids are not robust enough to protect wooden articles from the Formosan. Eventually these termites will reach the Pacific Northwest. Imidacloprid is needed to protect wood in the state.

As a proud member of the Forest Products Industry, Kop-Coat Protection Products implores the esteemed legislators of Oregon to hold off on a hasty vote and seek further information to justify the logical removal of the use of Noenicitinoids in Wood Preservation from this proposed ban.

At the very least, please consider a scientific review to remove wood preservation from this proposed ban.

Again, thank you for your time with this communication. I would be grateful if this letter would be considered for circulation among the key stakeholders around HB 2619.

Please contact me directly should there be any questions.

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