

Dear Chair Holvey,

I would like to comment on the proposed ban for Chlorpyrifos. Being a farmer in Oregon with nearly 50 years of farming experience provides me with a broad understanding of the issue. I rarely provide comments, but Chlorpyrifos is an extremely important product for us. Please note that we are involved with both organic and conventional crop production. We consider all other options in the IPM management program that we adhere to, before carefully handling and applying Chlorpyrifos.

Within our operation we apply Chlorpyrifos on 10 or more crops. Many of these crops we have no alternatives. Two examples of these are cabbage and Christmas trees. There are NO substitutes for controlling Cabbage Root Maggot and Symphylans. Without Chlorpyrifos, production of cabbage and other brassica crops would be effectively eliminated from production in our operation. With the cancellation of Thionex several years ago only Chlorpyrifos remained effective against Douglas Fir Twig Weevil. While there are other registered products for Douglas Fir, they do not control this pest. In addition, the alternatives greatly reduce good insect predator populations. When the good predator population is reduced, our experience is that yet more spray applications are needed to control other destructive insect population explosions that these predators would normally control. The Douglas Fir Twig Weevil has become more widespread and aggressive in recent years. Loss of Chlorpyrifos would be especially devastating as we are entering the low inventory phase of the Christmas tree production cycle. Shortages started to appear in the 2017 marketing season and will likely persist for another six plus years. Trees infected with Douglas Fir Twig Weevil quickly become unmarketable. If light infestations prevent exporting. Mexico has a zero tolerance for this pest and they inspect every load at the border.

If an insect pest must be controlled by Chlorpyrifos and there are no alternatives, then we will be forced to drop that crop from production. This would be most disruptive to our crop rotation resulting in other negative consequences for erosion control, soil health, salmon habitat and the promotion of other wildlife. Several crops that we now produce conventionally we are unable to grow organically because they generally require an application of Chlorpyrifos to control an insect pest. We must have replacements available before losing Chlorpyrifos. Please do not vote to ban Chlorpyrifos, especially before alternatives are available in the marketplace.

Sincerely,

Dennis K. Hopper

HB 2619 attempts to unnecessarily ban chlorpyrifos, which would remove this valuable pest management tool from Oregon's farmers. Chlorpyrifos has been used in cropping systems for over 4 decades, is authorized for use in nearly 100 countries and is labelled for use on more than 50 agricultural crops. These bills put Oregon growers, who must compete in the interstate and international markets, at a significant disadvantage.

Oregon farmers grow over 225 different crops, and chlorpyrifos is a vital tool on specialty crops when there is no alternative pesticide available. Keeping this tool available is critical to controlling crop-damaging insects in Oregon's Christmas trees, vegetables, mint, and many of our crops grown for seed such as clover, radish, and perennial grass.

There are federal actions taking place on the product. On April 19, 2019, the 9th Circuit mandated EPA to provide justification of decisions on chlorpyrifos. EPA has 90 days to respond to this court demand. Additionally, EPA is conducting an ongoing registration review and will complete their assessment by the deadline of October 1, 2022. The supporting science of chlorpyrifos covers over 45 years of research and EPA has produced a vast collection of science-related documents to support national and international pesticide registration decisions.

Please allow the federal legal and regulatory to progress and not make an uninformed decision at the state level to ban this much needed pesticide.

Sincerely,

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