North Willamette Research and Extension Center
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Re: HB 2619, Ban on Chlorpyrifos

To Whom It May Concern,

As former Director of the IR-4 Field Research Center and Specialty Crops Research and Registration Program at Oregon State University, I do not support the ban on pesticide products containing the active ingredient chlorpyrifos, as its elimination from the marketplace would have serious negative impacts on the viability and profitability of many minor/specialty crops in Oregon. A ban would also eliminate an effective and essential tool used by many growers in their Integrated Pest Management (IPM) program.

Minor crops in Oregon generally have limited pesticide options for pest management. In many cases, chlorpyrifos fills a niche, providing low-risk, effective, critical uses for which there are no alternatives or where alternatives are less efficacious and more expensive. Chlorpyrifos also plays an important role as a rotation partner with other pesticides to reduce the likelihood of pesticide resistance.

For example, in strawberry production, chlorpyrifos is critical for control of garden symphylans when it is used pre-plant. There are currently no other alternatives for controlling this pest, which resides in the soil. Strawberry fruit yields would be diminished, and plant death can occur without effective management. Chlorpyrifos is also used post-harvest for control of the strawberry crown moth, which can also cause reduced yields and complete plant death if left uncontrolled. The economic impacts to the strawberry industry based on the loss of chlorpyrifos would be considerable.

In the brassica crops, such as broccoli and cabbage, chlorpyrifos is critical in controlling cabbage maggot. It is effective as a soil-active insecticide that prevents the entry of larvae into root tissue, where they are very difficult to manage once present. There is currently one other pesticide alternative that growers can use but it does not achieve the same level of control as does chlorpyrifos. Both products are needed for effective pest management and pesticide resistance. Cabbage maggot has the potential to cause complete crop loss if not effectively controlled.

Chlorpyrifos is used in many other vegetable crops. It is uniquely suited to prevent damage from seed maggots in snap beans grown in the Willamette Valley. Seed maggots feed on bean seeds as they begin to germinate and, thus, kill the seed. In snap beans, chlorpyrifos is used as a seed treatment prior to planting; stand loss can be as high as 75% if seed is not treated. In sweet corn production, chlorpyrifos is used at planting (in the seed furrow or banded over the row) to control seed corn maggot and other insects, such as cutworms, cucumber beetles, and

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cabbage maggot. Pyrethroid and neonicotinoid products are alternatives to chlorpyrifos but neither are as effective, nor as broad spectrum, as chlorpyrifos.

In non-food crops, such as grass grown for seed and clover grown for seed, chlorpyrifos is an important and effective tool for control of a wide range of pests, including symphylans, billbugs, sod webworm, cutworms, aphids, and weevils, where alternatives are not as effective or has other issues, such as negative impacts on non-target organisms like pollinators and beneficial insects.

Chlorpyrifos is safe to humans, has little impact on water quality, and is highly efficacious. A "blanket ban" on all chlorpyrifos uses would eliminate many of the low-risk, unique uses described above. As such, I hope the Oregon legislature will reconsider the chlorpyrifos ban and consider the economic viability of the many minor crop industries that operate in Oregon. The diversity of crops grown in Oregon make our state a leader in agriculture production. Banning the sale and use of all products containing chlorpyrifos has the real potential of jeopardizing the viability of Oregon's many minor crop industries.

Thank you for the opportunity to comment.

Sincerely,

Joe Defrancesco

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The Specialty Crops Research and Registration Program at NWREC IR-4 Field Research Center

Providing Oregon's Specialty Crop Growers with Safe and Effective Pest Control Options

What is SCRR?

The Specialty Crops Research and Registration program is conducted at OSU' s North Willamette Research and Extension Center (NWREC), located in Aurora, OR, in collaboration with OSU researchers and extension personnel, growers, agrochemical representatives, crop consultants, and the Interregional Research Project No. 4 (IR-4). The SCRR program is part of a network of field research centers throughout the USA that cooperate with the national **IR-4** program, conducting field research trials and laboratory analyses to determine safe levels of pesticides in agricultural crops. It is the only such center located in Oregon.

In any given year, the SCRR program conducts between 25 and 35 field residue trials in a wide variety of crops such as strawberries, blackberries, raspberries, blueberries, cranberries, grapes, apples, pears, cherries, plums, hazelnuts, grass seed, clover seed, hops, peas, beans, corn, broccoli, cabbage, cauliflower, Swiss chard, rhubarb, celery, spinach, lettuce, mustard greens, onions, radish, beets, carrots, potatoes, squash, chives, parsley, and cilantro.

The main goal of the SCRR program is to provide Oregon growers with the pest control options they need in order to effectively manage crop pests, ensure a stable and safe food supply, and maintain a healthy environment, while ensuring the success and profitability of Oregon farmers.

IR-What?

The IR-4 program is a unique partnership between the United States Department of Agriculture (USDA) and land grant universities, such as OSU. Data and information from the field trials and laboratory analyses that IR-4 coordinate are required by the United States Environmental Protection Agency (US-EPA) for the registration of safe and effective pest control products.

And More...

In addition to conducting field research for IR-4, the SCRR program at NWREC also hosts the State Liaison Representative to the National IR-4 program. In this capacity, SCRR personnel liaison with specialty crop growers in Oregon to:

- Identify pest problems and pest management needs.

- Evaluate alternative control measures.
- Develop pest management strategic plans and IPM guidelines.
- Assist agrochemical manufacturers and regulatory agencies in completing the registration process.

The SCRR program also coordinates and conducts field research trials to generate product efficacy and crop safety data.

Protecting Food and Environment: Testing the pesticide residue levels in our food provides assurance that:

Pesticides used by farmers are registered by the US-EPA at safe application rates, which protects not only our food, but also our farmers and farm workers.

Environmental health is protected by testing reduced-risk pesticides that have minimum impact on beneficial organisms and water resources.

About 80% of the field research in the SCRR program involves reduced-risk products, !PM-compatible alternatives, and biologically-based products.

Enhancing Oregon's Economy: The SCRR program provides considerable economic value to Oregon, where there are over 200 specialty crops (also known as "minor crops") with an annual farm-gate value of about $900 million, accounting for nearly 65% of Oregon's total agricultural commodity sales.

The data and information generated in the SCRR program contributes to a potential economic loss avoidance of about $30 to $50 million per year for specialty food crops in Oregon.

Without Specialty Crops Research? Without some of these newly registered pest control products for specialty crop growers, yield and quality would be reduced, plant vigor would decline, or crops would be lost entirely.

The SCRR program at NWREC has helped Oregon's specialty crop growers obtain safe pesticide registrations over the years, enabling them to safely and effectively manage pests in their crops, increase yield, quality and crop vigor, and remain economically viable in the national and international marketplace, while protecting human health and reducing environmental impacts.

For more information:
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