Chair Dembrow and members of the committee:

I am a 5th generation farmer in Polk County. We raise 11 different crops including grass seed, wine grapes, hazelnuts and other specialty seed crops. We are diversified for many reasons and are fortunate in the ability to do that. We also run a seed cleaning warehouse where we process ~10M pounds of seed annually for 5 area family farmers and 10 different seed companies.

First of all, I am very disappointed that HB4109 moved through the House via the committee on Health Care, and not the House Ag & Natural Resources Committee. In addition, it was evident by the debate on the House floor that neither the committee Chair nor the carrier of the bill wanted to address the real questions; the questions that the committee did not take the time to address nor seek out expertise from the Department of Agriculture on. Unlike the same situation in 2019 (HB3058) where the House Ag committee took many hours of testimony and ultimately determined that ODA needed to form a workgroup comprised of ALL stakeholders and commence upon the Administrative Rule making process around many of the concerns raised in this bill and HB3058. That workgroup has not had an adequate amount of time to do that work. 2019 session ended in June.

The random, non-scientific banning of this chemical will put a major strain on the Ag industry of this state. An industry that is responsible for hundreds of millions of dollars in annual sales and global exports as well as providing thousands of jobs.

I have attached a photo to my letter showing a silage corn field that I planted in 2014. It is the somewhat green field at the bottom of the photo. Parts of this field were decimated by symphylan. They are really only controlled by one chemistry that we now have available, chlorpyrifos. While many other products *may* temporarily suppress numbers, chlorpyrifos is the only one that consistently knocks them back for an extended period of time.

Another concern I have is the seemingly arbitrary restrictions being placed on the product in the interim before its outright banning. Things such as re-entry times are put in place by the EPA through years long processes of testing for each pesticide. Not only is the proposed 8 day re-entry period far longer than the current labeled REI, it is frankly unworkable. Chlorpyrifos generally requires soil incorporation, either through mechanical means, or irrigation, which is necessary if there is insufficient rainfall. In the case of irrigation (used for all post emergence applications), it would be impossible to do due to the 8 day REI.

In conclusion, banning chlorpyrifos would have potentially catastrophic consequences for Willamette Valley farmers. Many currently highly productive fields would become quite unproductive due to one pest alone without any other alternative control.

Thank you for your time

Jason Scharf

Scharf Farms, Inc.

