



OREGONIANS FOR FOOD & SHELTER

1320 Capitol Street NE • Suite B-50 • Salem, Oregon 97301

ofsonline.org; 503-370-8092

A non-profit coalition to promote the efficient production of quality food and fiber while protecting human health, personal property and the environment, through the integrated, responsible use of pest management products, soil nutrients and biotechnology.

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Chair Witt and Members of the Committee,

My name is Katie Murray, and I am executive director of Oregonians for Food and Shelter. I'm representing thousands of agriculture, forestry, and urban pest managers from around the state who are directly impacted by pesticide regulatory decisions. I'm pleased to testify in support of HB 3249, which initiates needed investments in pest management solutions for Oregon specialty crops impacted by ODA's rulemaking. So thanks to Rep Boshart-Davis for bringing this bill forward, to Chair Witt for hearing the bill, and to Representatives Sollman, Owens, Lewis, Cate, and Williams for their sponsorship.

Oregon has a number of crops which currently lack viable alternatives to chlorpyrifos, including some of our top agricultural commodities, which contribute tens of millions of dollars of production value to our state. Because of the absence of detailed impact data from the Oregon Department of Agriculture related to this ruling, I will highlight a couple of examples from EPA's document, [benefits summary of agricultural uses of chlorpyrifos](#), conducted as part of registration review:

- 1) The first is mint, which is among Oregon's top 20 agricultural commodities, with a \$40 million production value to our state, and accounting for 30% of US production. Chlorpyrifos is used in mint to control cutworms, mint root borer, and symphylans. For alternatives to control these pests, the EPA estimates the cost to be at least \$170 more per acre than chlorpyrifos. With more than 20,000 acres of mint across the state, EPA estimates this to be between a \$1.5 to \$3 million impact in terms of replacement costs, and this doesn't even account for possible yield loss impacts.
- 2) Oregon is also known for its strawberry production, which brings over \$11.5 million in production value to our state. Like mint, chlorpyrifos is also considered critical in Oregon strawberry production for controlling symphylans, among other pests. The EPA confirms there are no effective alternatives for controlling symphylans in strawberries, and without chlorpyrifos, they estimate yield losses in infested fields at 100%. This translates to a \$4.3 million impact based on expected infestation levels across Oregon acreage.

With any changes to pesticide regulations, it is imperative that we document usage, and transparently acknowledge, and also attempt to address, the economic impacts of these decisions. This is particularly important when a restriction is inconsistent with federal regulation, leaving our growers at a disadvantage. In Oregon, we have failed our growers so far on all three of

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these counts. Research is urgently needed to identify safe, effective, and affordable alternatives to chlorpyrifos for a large number of Oregon crops. Other states like California have not only invested in this research, but also begun to address the equally urgent needs for infrastructure and capacity that can enable issues like this to be addressed more proactively, with over \$5 million in investments, and counting.

It takes a well-functioning system and significant resources to ensure that growers have access to effective and affordable replacement products when critical tools are restricted or removed. For Oregon growers, this bill signifies a critical first step for sustainability, and we thank you for your support.

A handwritten signature in black ink, appearing to read "Katie Murray".

Katie Murray
Executive Director
Oregonians for Food & Shelter