



March 7, 2023

Senate Committee on Environment and Natural Resources  
Oregon Legislature

Comments submitted electronically via [Oregon Legislative Information System \(oregonlegislature.gov\)](https://oregonlegislature.gov)

**RE: SB 789: Makes permanent certain restrictions on growing canola within Willamette Valley Protected District.**

The Pacific Northwest Canola Association **opposes** SB 789 and would like to submit the following comments in response to the SB 789 “Makes permanent certain restrictions on growing canola within Willamette Valley Protected District.” More specifically, we would like to offer our comments about the report “Potential Economic Impacts of Lifting the Canola Ban in the Willamette Valley on Brassica Seed Producers” prepared by Highland Economics (Feb. 12, 2023). After reading through the report, we found several instances of incorrect or misleading conclusions that we believe should be either corrected or removed from the report.

The Pacific Northwest Canola Association (PNWCA) is a non-profit, membership-based organization representing canola farmers, crop advisors, processors, and the entire canola supply chain in Oregon, Idaho, Montana, and Washington. Canola acreage in the 4-state PNW region has more than tripled since 2016. Local processing facilities, a strong and steady market, and growers realizing the many benefits of including canola in their crop rotation (e.g. soil health, crop diversity, weed control) are the main drivers behind the rapid increase in acreage and production. Harvested canola seed is processed regionally into food-grade oil and livestock meal, all of which is sold to vendors within the northwest U.S. See [“Canola in the Pacific Northwest: From Farm to Table”](#) for more information.

Comments specific to the report referenced:

**P. 5, Sec. 2.2, paragraph 2:** *“Another major problem with cross-pollination comes from the fact that the majority of canola grown for oil is genetically engineered (GE) for herbicide resistance.”*

This statement is far too broad in scope to liken it to canola production in the Willamette Valley. Every year, *winter* canola is the majority, if not all, of the 500 acres planted, and the majority is non-GMO. There are very few exceptions when spring canola is planted, i.e. when fall seeding conditions are too dry to plant, or a winter or spring hard freeze kills the winter canola. Additionally, we estimate that **90% of the winter canola grown in all of OR, ID, and WA is non-GMO, including in the Valley.** Winter canola acreage the last three years, based on USDA-FSA data is as follows:

**Total winter canola acres in ID, OR, and WA:**

2022: **33,529**

2021: **37,247**

2021: **44,189**

\* winter canola acreage has been down the last 2 years due to very dry seedbed moisture in the fall in many areas

**P. 5, Sec. 2.2, paragraph 3:** *“If canola *rapa* was more widely grown, other Brassicas in the *B. rapa* family (*bok choy*, *mizuna*, *mustard*, and *turnips*) would be at the greatest risk of cross-pollination.”*

In the 16 years I have worked with canola, I have only seen one field of *Brassica rapa*, in eastern Washington state, and that was 10 years ago. It is extremely doubtful that *B. rapa* will return as a viable option to grow commercially as breeding programs are focused on *B. napus*.

**Pacific Northwest Canola Association**

*Growing the canola industry in the Pacific Northwest through education, advocacy, and marketing*

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**P. 5, Sec. 2.2, paragraph 4:** *“Other major risks posed by canola include diseases and pests... Any increase in canola is likely to further spread these diseases and pests.”*

Increasing the acreage of **any** given crop provides the potential for increased diseases and pests, yet there are tools to manage both. The statement implies more canola automatically equals a vector for diseases and pests. Are there science-based research results specific to canola production to back up this claim?

**P. 6, Sec. 2.2, paragraph 3:** *“There is strong concern among Brassica seed growers that canola cultivation lacks the economic incentives to contain pests and diseases...”*

I have worked with canola growers, university researchers, and industry advisors for more than 15 years, and I have **never** experienced a situation when the above statement would be true. **No** canola grower will forego scouting, and treatment of a pest or disease when it comes to facing the consequence of yield loss without taking action when pest or disease pressure is at a treatment threshold. This entire paragraph is lacking in accuracy, from the gross revenue per acre from canola (estimated at \$767/acre when it is actually at least \$1200/acre with average yield and market price) to the repetitive, and incorrect, claim of ‘limited interest’ and ‘little incentive’ to control pests and diseases. A large scale farmer is every bit as concerned about protecting a valuable end product as one who has 5 acres of a given crop.

**P. 7, Sec. 2.2, paragraph 2:** *“Studies have shown that oilseed crops can have positive impacts on subsequent crops through reducing pests, weeds, and improving soil conditions, which ultimately can improve crop yields for the other crops in the rotation..”*

**YES**, this has been proven to be true, with science, research-based studies! A *major* benefit of canola production is improved soil health, including

- reducing the need for tillage
- living roots in the soil as long as possible
- crop diversity
- taproot structure that promotes increased infiltration, increased uptake of nutrients from deeper in the soil profile, and reduced soil erosion. This is all detailed and documented in the video [“Building Soil Health with Canola Production.”](#)

While the idea of substituting other oilseed crops in favor of canola may seem logical, the lack of infrastructure, markets, and a proven production record all stand in the way of the success of those other oilseeds compared to canola.

**P. 13, Sec 3.14. paragraph 4:** *“We estimated that canola in the Willamette Valley produces between 2,273 and 4,000 pounds per acre (with a most likely value of 3,100) and fetches a likely price of \$0.24 per pound”*

From my communication the last 10+ years with WV canola growers, the ‘most likely value’ of yield is closer to 4,000 pounds per acre, and the ‘likely’ price is closer to \$0.30 per pound (that has been the minimum price for well over a year), for a gross profit of \$1,200 per acre, not \$766 per acre.

The value of canola as a crop that is grown, processed, and sold **all** within the PNW cannot be overstated. Similarly, canola as a rotation crop for Willamette Valley farmers is invaluable; for soil health, weed control in subsequent grass seed crops, crop diversity, and economic diversity. The PNWCA opposes SB789, and urges the Committee to oppose it as well.

Respectfully yours,

A handwritten signature in cursive script that reads "Karen Sowers".

Karen Sowers, Executive Director

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