



OREGONIANS FOR FOOD & SHELTER

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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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January 28, 2025

House Committee on Agriculture, Land Use, Natural Resources, and Water
Re: Opposition to HB 2809

Co-Chairs Helm and Owens, Vice-Chair Finger-McDonald, and Members of the Committee:

Oregonians for Food & Shelter (OFS) is a diverse coalition with members across Oregon's natural resource sector, including many of Oregon's agricultural commodity groups and the forest products industry. Our members come together around the importance of pesticides, fertilizers, and biotechnology in producing food and fiber and protecting natural resources.

Thank you for the opportunity to share our opposition to HB 2809, which raises the allowable cap on pesticide registration fees paid to the Oregon Department of Agriculture by pesticide registrants, from \$400 to \$550. Our broad membership also includes pesticide registrants, who pay fees for each registered pesticide product in the state, on an annual basis. We would like to express our concerns with this cap increase and highlight issues with current fee allocations that should be addressed before any cap or fee increases are imposed.

First, we want to recognize the hard work and collaborative working relationship that OFS and our members have with the Oregon Department of Agriculture (ODA). We also want to acknowledge the real budgetary pressures within ODA's certification, licensing, and registration division. However, we want to point out that the reasons for these budget pressures and the inability to keep pace with demand and workload are not due to Oregon's registration fees being too low, and that the solution to this issue is not to simply raise fees.

Oregon ranks among the top five states for pesticide registration fee levels, and that includes states like California, which has a much larger market for registrations and a much larger agency program conducting risk assessments in conjunction with registration. Oregon has many specialty crops, but unlike California, many Oregon specialty crops represent very small markets for certain pesticides. If fees continue to increase in Oregon, some products may simply not be registered for use here. This prevents Oregon producers from accessing newer, more efficacious and safer materials, which is contrary to many stated goals.

Over the last decade or more, the Oregon Legislature has decided to fund a variety of new and existing programs with pesticide registration fee dollars. These



programs include the Pesticide Stewardship Partnership (PSP) Program, the Pesticide Analytical and Response Center (PARC), the Pesticide Safety Education Program (PSEP) at Oregon State University, and the Oregon Bee Project led by Oregon State University, among others. Some of these programs, such as PARC, began with split fee and general fund support, based on specific negotiated agreements made with multi-stakeholder groups, only to be moved off the general fund in later sessions without mutual agreement.

There has been little legislative discussion of the financial burden that these programs continue to impose on agency services as they consume 50% or more of fee dollars which are primarily intended to support core agency services. Further, rarely, if ever, has the legislature (or even the associated agencies) formally reviewed these programs to document achievements relative to investments. While some of these programs continue to provide high value impacts to the natural resource sector and to the state more broadly, others do not.

As an example, we have ongoing major concerns with the Pesticide Stewardship Partnership, which receives a significant proportion of these fee dollars (over \$900k per biennium from fees). OFS, along with our members and partners, has submitted formal complaints about this program and its handling of data since at least 2021 to agency leadership and program leaders, and most of our concerns remain unaddressed. And given this program's declining direct engagement and education to applicators, it is an ideal time to formally review the program.

Rather than continuing to increase fees on registrants, we would like to see a meaningful discussion about the current programs funded with these fee dollars. Accountability is essential to ensuring that programs are continuing to serve stakeholders, responding to feedback, and delivering impacts and results that are clear and measurable. It is imperative and a basic expectation that these and any other state programs adhere to science and rigor and can respond and improve when valid and significant concerns are raised. When this fails to be the case, there must be a process to make changes.

We also ask the legislature to honor funding commitments made during collaborative processes to establish new programs, and to advocate for general fund investments and long-term sustainability for programs with continued significant deliverables that serve Oregonians broadly. To support the agency's work and remain aligned with other states, we suggest that programs outside of core services should be capped at 25% of these fee dollars.

Thank you for your oversight and attention to ensure that agency funds are utilized as efficiently and effectively as possible *before* fees are increased, and that core agency services are prioritized to avoid wasteful spending and unnecessary staff and budget pressures.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Murray", written in a cursive style.

Katie Murray

Executive Director

Oregonians for Food & Shelter