

March 3, 2025

The Honorable Representative John Lively, Chair
House Committee On Climate, Energy, and Environment
Oregon State Capitol
900 Court St. NE
Salem, OR 97301

RE: HB 2679 (Hudson): Neonicotinoids – Oppose Unless Amended

Chair Lively, Vice-Chairs Gamba & Levy, and Members of the Senate Committee on Agriculture and Environment:

On behalf of the Household & Commercial Products Association (HCPA)¹, I respectfully write to oppose House Bill 2679, which seeks to adopt restrictions on common and important pest management options using the neonicotinoid class of pesticides. HB 2679 should be amended to allow common consumer applications.

Consumer pest products allow Oregon residents in all communities the ability to clean and protect their homes with safe and affordable products against a variety of public health pests. Without access to such products, consumers must choose between taking no action against these pests or paying someone to perform services.

Neonicotinoids are a class of neuro-active insecticides (acetamiprid, clothianidin, dinotefuran, imidacloprid, nitenpyram, nithiazine, thiamethoxam) available commercially for use in crop and animal agriculture, urban landscapes, domestic settings, and around structures. Neonicotinoids were developed in large part because they are both effective and a safer alternative to previously used organophosphate and carbamate insecticides.

Restricted Use Approach Creates Broad Prohibition

HCPA appreciates the recognition that neonicotinoids have useful applications by allowing professional applicators to continue to use these products. However, by applying a *restricted use* status to all consumer uses and applications of neonicotinoids, common uses would be banned, even if they have no interaction with pollinators.

While we'd prefer new scientific findings through existing evaluation processes to initiate any restriction of pest management products or class of products, if it is the Legislature's prerogative to adopt HB 2679, certain consumer applications need to be excluded from restricted use status, including:

¹ HCPA is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution, and sale of more than \$180 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. HCPA member companies employ hundreds of thousands of people globally. Products HCPA represents include disinfectants that kill germs in homes, hospitals, and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day.

- Indoor pest products
- Bait stations and insect strips
- Consumer baits for roaches, flies and ants such as granular scatter bait;
- Pet products and uses for animal husbandry;
- Perimeter treatment to stop pests from entering homes and structures;

As written, the prohibition of sales would become law without substantial evidence that any of the uses cited above would result in significant interactions with pollinators (let alone the US EPA's broader evaluation). It should be incumbent upon the legislature to identify in the law what specific insecticide uses it believes are contributing to the stated problem(s). Other states such as California and Washington took this approach when regulating this issue.

Follow the Science

HCPA member companies manufacture neonicotinoid-based products which are used for several common insect pest management applications, including addressing bed bugs, flies, stink bugs, cockroaches, grubs, and certain invasive species. Additionally, neonicotinoid products are used for controlling pet (dog and cat) insect pests. All of these applications have been evaluated by the U.S. Environmental Protection Agency (EPA). EPA risk assessments focus on both ecological and human health effects – a process guided by scientific advisory panels.

Specifically, under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the EPA reviews all current pesticide registrations to ensure they continue to meet the protective FIFRA risk standard in light of new information and evolving science. EPA is currently undertaking review of the class of neonicotinoids with planned completion for each category this year. HCPA believes the nuanced scientific evaluations of various applications and uses of these pesticides is best left to the rigorous process at the US EPA and Oregon Department of Agriculture.

A comprehensive report by U.S. Department of Agriculture (USDA) and the USDA National Agricultural Statistics Service (NASS) describe a broad range of issues or “stressors” negatively affecting bees, including habitat loss, parasites and diseases, lack of genetic diversity, climate change, pesticides, reduced forage options and pathogens. The research and data collected shows the leading stressor to honeybee colonies is overwhelmingly varroa mites. Any legislation seeking to protect pollinator populations that ignores the most influential stressors will not be successful.

EPA's Pollinator Protection Plan sets forth methods of using neonicotinoids and other products to further reduce the risk of exposure to pollinators. We urge lawmakers to recognize the EPA Pollinator Protection Plan and allow the federal and state regulatory system to continue to regulate the use of pesticides. The U.S. EPA and the state regulatory agencies are in strong positions to determine appropriate pesticide use through continued evaluation of the latest scientific findings on pollinators, the environment and public health. We believe members of the legislature should avoid undermining this process by prejudging outcomes in proposed legislation.

Conclusion

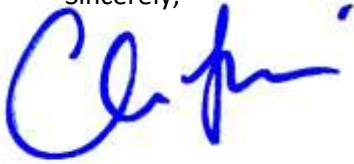
The safety of consumers is the highest priority for HCPA members. HCPA member companies manufacture products that are safe when used according to the directions on the label. Manufacturers are continuously focusing on the safety of products and packaging, as well as helping to prevent improper use of their products. Users are encouraged to determine the most appropriate product for the need, and to read and follow all label directions.

We support initiatives to promote pollinator health and believe its complexity calls for thoughtful,

stakeholder-engaged solutions. We support continued research on the risks to bee health and readily acknowledge the critical importance of pollinators to our ecosystem and economy, however, in recognition of the work by the US EPA and lack of adequate science to support the measure, HCPA respectfully opposes HB 2679.

I welcome any opportunity to discuss these concerns and can be reached at cfinarelli@thehcpa.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Finarelli', with a stylized flourish at the end.

Christopher Finarelli
Sr. Director, State Government Relations & Public Policy