



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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March 3, 2025

House Committee on Climate, Energy, and Environment
Re: Opposition to HB 2679

Chair Lively, Vice-Chairs Gamba and Levy, and Committee Members:

Thank you for the opportunity to testify on HB 2679. 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, as well as manufacturers of the tools our producers use to grow food and fiber. Our members come together around the importance of pesticides, fertilizers, and biotechnology in producing and protecting natural resources. OFS advocates for science-based policy, innovation, and stewardship related to these tools.

We want to first thank Representative Hudson for his willingness to amend this bill to protect professional uses of neonicotinoids. This is an important class of chemistry for managing insects in various settings, from crops to households and facilities. However, even with the amendments, OFS opposes this measure.

With our primary objective being to ensure science-based policy, we cannot support restricting an entire class of chemistry, which ignores the wide variation in chemical properties between different products. Neonics were originally introduced as alternatives to older and more hazardous chemistries. A blanket approach like this will restrict many products that are not only effective, but also the safest choice for human, bird, and aquatic health, as well as beneficial insects *including pollinators*.

This bill will inevitably lead to older and more toxic chemistries being substituted for newer and safer ones. This concept is called 'risk substitution' by those engaged in pesticide stewardship and pesticide risk reduction efforts. With pesticide regulation, active steps are taken to avoid this occurring. With this proposal, avoiding risk substitution would mean, rather than restricting access to an entire class of chemistry, allowing all of EPA's work on risk management for individual neonicotinoids to continue, in concert with other ongoing activities that we point out here.

In the many years since concerns were first raised regarding neonics and impacts to pollinators and colonies, EPA has performed extensive risk assessments for individual products within this class and implemented a number of mitigations based on those findings. To address pollinator and other risks, EPA has



imposed new rate and use restrictions, as well as cancelled some neonicotinoid products, including certain residential uses.

Additionally, following an incident of misapplication resulting in negative impacts to pollinators in Oregon over a decade ago, ODA implemented state-level restrictions that include prohibitions on certain uses. Since that time, we are not aware of any major incidents involving pollinators and pesticides in the state.

Similarly, a 2021 report prepared for the Washington legislature by the WA Department of Agriculture states that no pollinator deaths resulting from neonicotinoid use occurred in the previous seven years in Washington: "...WSDA has not found significant regulatory evidence that current neonicotinoid use patterns harm bees or pollinators in Washington" (p 5 of [this report](#)).

While we understand and share concerns regarding pollinator protection and pesticide stewardship, a restriction on this class of pesticides is more likely to pose a greater threat to pollinators in the end. While we know that pesticides play a role in pollinator health, our state and federal agencies and university system have done extensive work to mitigate those risks at both local and national levels. Other risks to pollinator health, including parasites and pathogens, require similar attention and investments.

I want to finally emphasize that Oregon is a leader in the nation on pollinator stewardship efforts through unique partnerships including the [Oregon Bee Project](#) and its associated research and outreach efforts. Much of this work was initiated in partnership with industry and continues to be funded by industry, including many OFS members, through pesticide registration fee dollars. Our members and organization serve in active advisory roles to this work and collaborate to ensure targeted education and outreach to the professional applicator community as well as homeowners. We do not need to invest state resources into an unnecessary restriction when we already have regulatory, research, and education approaches fully engaged on this issue.

Thank you again for the opportunity to testify.

Respectfully,

A handwritten signature in black ink that reads "Katie Murray".

Katie Murray
Executive Director
Oregonians for Food & Shelter