Submitter:	Jess Tyler
On Behalf Of:	
Committee:	House Committee On Climate, Energy, and Environment
Measure, Appointment or Topic:	HB2679

I am an environmental scientist at the Center for Biological Diversity. The Center and I support HB 2679.

In my work at the Center, I have reviewed and have provided in-depth comments on the Environmental Protection Agency's risk assessment for the registration the neonicotinoid insecticides. EPA's risk assessment of the impacts to non-target species already describe that these insecticides are very highly toxic to terrestrial invertebrates, yet EPA has approved their use with significant gaps in their analysis. With these gaps, EPA has severely underestimated the risk of these insecticides while also over estimating their benefits. Independent, peer-reviewed literature demonstrate harms from neonicotinoids that are not considered in the EPA's risk assessments such as: harm to pest natural enemies such as lady bugs or parasitoid wasps, toxicity increasing over time, unconsidered routes of exposure to ground-nesting bees and other insects, impacts to bee navigation and behavior, reduced reproduction, and other non-lethal effects. Because of their impacts to beneficial insects, neonicotinoids are not compatible with Integrated Pest Management. Misuse and off-label use is also not considered in EPA's risk assessment.

According the EPA's own Biological Evaluation of imidacloprid, a commonly used neonicotinoid, neonicotinoids likely adversely affect 1364 species and likely jeopardize the continued existence of 200 species protected under the Endangered Species Act further demonstrating their broad potential for harm.

A large portion of neonicotinoid use is for use on treated seeds. The risk from this use is underestimated while there is evidence that seed treatment use has little to no benefit for farmers. Seed treatment usage is most beneficial in southern states with high pest pressure and these conditions are unlikely to occur in Oregon.

Furthermore, urban areas also can provide habitat for a greater variety of pollinating insect life compared to agricultural areas, but this diversity can be degraded when neonicotinoids are used.

For these reasons, neonicotinoid insecticides are too dangerous to be used by someone without adequate training and knowledge of potential non-target harms.

Many organizations including the Center and the Xerces Society for Invertebrates Conservation have been advocating for greater awareness of the harms from

neonicotinoids and for limiting their use. This bill is a positive step towards reducing their impact to the environment by ensuring that everyone who uses them has adequate training for their use and are aware of non-target impacts.