



To: House Committee on Climate, Energy and Environment

Date: 3/4/2025

Support for House Bill 2679

Dear Chair John Lively, Vice Chair Gamba, Vice Chair Levy, and Members of the Committee,

We appreciate the opportunity to submit this testimony in support of HB 2679. Beyond Toxics is a grassroots statewide environmental justice advocacy organization representing thousands of Oregonians. We work to protect public health and our state's wildlife and natural resources from harms of toxic pesticides and chemical pollutants.

We urge strong support for HB 2679 as originally filed to align Oregon with other states that have already taken action to restrict the use of neonicotinoid pesticides to licensed applicators only. This bill as introduced removes neonicotinoids from consumer-oriented grocery, garden, and hardware stores and prohibits use by untrained users. The bill would prohibit the application of these pesticides on residential landscapes, except in emergency cases, such as treating an invasive pest. Neonicotinoids would remain available for sale to certified applicators, and for use by farmers, veterinarians for use on pets and livestock, and for use in human lice treatments, other indoor uses, and structural uses.

We oppose the HB 2679 Introduced v. -1 Amendment

The HB 2679 -1 amendment will create additional regulatory burden.

The designation "*controlled neonicotinoid pesticide*" in the amendment does not currently exist in OR state statute, meaning **there is no framework for regulatory oversight. Establishing such a designation in statute would require extensive rulemaking which would place unnecessary burdens on ODA to create new infrastructure for regulatory oversight.** In contrast, restricted use pesticides, as written in the base bill, are well established in state statute, as is their regulatory oversight. Oregon already has over 500 dangerous pesticide products on the State's restricted use pesticide list.

The -1 amended language would allow unlicensed, untrained residential users to purchase neonicotinoid pesticides so long as they did so from a licensed dealer. There is no way to prevent the general consumer from buying neonicotinoids under the "*controlled neonicotinoid pesticide*" framework. In contrast, RUPs can only be purchased by licensed pesticide applicators.

The -1 amended language states that "A person may not apply a restricted neonicotinoid pesticide to a residential landscape" with exceptions. The amendment does not designate ANY

product as a restricted neonicotinoid pesticide. Thus, the result would be that NO PRODUCTS would be banned in residential landscapes as a result of this amendment.

For these reasons, we do not support the –1 Amendment however we would be supportive of further amendments to the original bill to and are extremely appreciative of the opportunity to work with Representative Hudson to find solutions.

HB 2679 will not incentivize substitution for riskier products.

Stakeholders' testimony provided at the Committee hearing stated, “this bill will inevitably lead to older and more toxic chemistries being substituted for newer and safer ones – a concept known as Risk Substitution,” by those who are concerned neonicotinoid restrictions will force homeowners and growers to switch to more hazardous chemicals. Despite concerns, there is no evidence for risk substitution in places that have restricted neonicotinoids – including twelve US states and the European Union. In fact, many of these more dangerous chemistries already appear on Oregon’s list of Restricted Use Pesticides.¹ This includes many pyrethroids and organophosphates. In order to switch to these dangerous chemistries, users would also need to obtain Pesticide Applicator licensing to use a Restricted Use Pesticide. As such, this bill will not incentivize users to substitute more dangerous products.

Additional stakeholder testimony given at the Committee hearing suggested that neonicotinoid pesticides are “widely used pesticides globally because of their very low toxicity to mammals.” This argument is challenged by the fact that the European Union banned all outdoor uses of three neonicotinoids in 2018. Furthermore, currently published research contradicts the initial belief in the “low toxicity of neonicotinoids,” with recent **evidence suggesting a variety of adverse effects in bees, wildlife and humans, such as neurotoxicity, immunotoxicity, and organ damage.**²

Protecting Oregon’s Pollinators and Wildlife

Significant harm to biodiversity and species survival is not always as immediately shocking and observable as the massive bee-die offs that took place in Wilsonville or Eugene. **Peer-reviewed research confirms that chronic exposure to very low levels of neonicotinoids can cause sublethal effects** capable of decimating populations of beneficial pollinators include reproductive disorders, the ability to feed and forage, and cumulative neurological effects.³ Bees and other pollinators are vital to our environment, supporting more than 80% of wild plants and crops like apples, cherries, and blueberries. However, one in four bee species is at risk of extinction and over 100 bird and fish species need conservation in Oregon. The stakes are high for the future of our ecosystems.

¹ Oregon Department of Agriculture. 2024. “List of Restricted Use Pesticides in Oregon”. Oregon Open Data Portal (website). https://data.oregon.gov/Natural-Resources/Restricted-Use-Pesticides-RUP-List/m7wv-66z6/about_data

² Wang, X.; Anadón, A.; Wu, Q.; Qiao, F.; Ares, I.; Martínez-Larrañaga, M.R.; Yuan, Z.; Martínez, M.A. Mechanism of Neonicotinoid Toxicity: Impact on Oxidative Stress and Metabolism. *Annu. Rev. Pharmacol. Toxicol.* 2018, 58, 471–507.

³ Van der Sluijs, J. P., Simon-Delso, N., Goulson, D., Maxim, L., Bonmatin, J. M., & Belzunces, L. P. (2013). Neonicotinoids, bee disorders and the sustainability of pollinator services. *Current opinion in environmental sustainability*, 5(3-4), 293-305.

In addition to pollinators, neonicotinoids are also perilous for other wildlife, including aquatic species. Neonics are water soluble. As such, they leach into waterways and have been readily found in wetlands, surface waters, rivers, streams, puddles, and ditches in the US. Observed levels of contamination are frequently high enough to harm aquatic life and degrade aquatic ecosystems.⁴ The overuse of neonicotinoids is also harming birds. In fact, neonics have been linked to reduced bird diversity across the US. A body of scientific literature demonstrates that neonics can be directly lethal to birds. Neonics can also harm birds indirectly by reducing the supply of insects available for them to eat. Further, neonics alter bird behavior and reduce reproduction and survival.⁵ In agriculture, there are concerns about neonic overuse leading to crop pest resistance and counterproductive losses of insect predators that provide natural pest control.⁶

We urge House Climate, Energy, and Environment committee members to take a decisive stance to support HB 2679 with a “do pass” vote. By taking action, Oregon will join twelve other states that have passed legislation to restrict neonicotinoid pesticides and provide leadership to protect pollinators, wildlife, our environment, and the biodiversity heritage of future generations.

Sincerely,

Lisa Arkin, Executive Director
Beyond Toxics

⁴ Kuechle, Kyle J., et al. "Seed treatments containing neonicotinoids and fungicides reduce aquatic insect richness and abundance in midwestern USA-managed floodplain wetlands." *Environmental Science and Pollution Research* 29.30 (2022): 45261-45275.

⁵ Kaplan, G. (2025). Human-Caused High Direct Mortality in Birds: Unsustainable Trends and Ameliorative Actions. *Animals*, 15(1), 73. <https://doi.org/10.3390/ani15010073>

⁶ Matsuda K, Ihara M, Sattelle DB. Neonicotinoid Insecticides: Molecular Targets, Resistance, and Toxicity. *Annu Rev Pharmacol Toxicol*. 2020 Jan 6;60:241-255. doi: 10.1146/annurev-pharmtox-010818-021747. PMID: 31914891.