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OREGONIANS FOR FOOD & SHELTER

1320 Capitol Street NE • Suite B-50 • Salem, Oregon 97301

ofsonline.org; 503-370-8092

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.

April 14, 2025

Senate Committee on Education

Re: Concerns with HB 2684

Chair Frederick, Vice-Chair Weber, and Committee Members:

Thank you for the opportunity to share concerns regarding HB 2684 on behalf of Oregonians for Food & Shelter. OFS represents a diverse coalition with members from various industries within Oregon's natural resource sector, including pest management companies that sometimes contract with school districts. We advocate for science-based policy, innovation, and stewardship related to the tools and technologies essential for producing food and fiber: pesticides, fertilizers, and biotechnology.

OFS is neutral on the idea of having school districts update their IPM plans every 5 years (this is likely already the case for most districts). However, we want to flag our concerns with the language in Section 1, (5) (b), which would make school bodies responsible for updating and keeping current the low-impact pesticide list. "Low-Impact Pesticide" is a statutory definition created over a decade ago to limit the types of pesticides that are allowed to be used in and around schools.

However, the "low-impact" list is defined in state statute only in broad terms and is based on label language and EPA's carcinogenicity classification [ORS 634.705 (5)]. The statute does not reference specific products or specific active ingredients. Instead, since this statute went into effect, faculty at Oregon State University have created and [kept current](#) a list that interprets the statute and assists school districts in complying with the state law. However, this work has been done as a courtesy, and there is no statutory obligation or associated funding for OSU to continue providing this service. We also note that OSU's School IPM Program relies significantly on federal grant funds to operate.

The "low-impact list" requires regular updates in order to ensure compliance with state law. This involves checking state registrations, labels, and EPA's classifications for carcinogenicity for upwards of 120 individual products. There is no one central repository for this information and, particularly for checking EPA's carcinogenicity classification, this often involves having to search through various published documents by EPA and others for every single active ingredient. Keeping this list updated is not only very time-consuming, but it requires a level of expertise that school district staff are not likely to have. Given that adherence to the list is enforceable by law and mistakes can and have been met with hefty fines for school districts, we are very concerned with having school districts be statutorily obligated to update this list, without any reference to either OSU or ODA doing the initial work of interpreting the statutory definition and providing a master list for them to work from.

We appreciate Rep Hudson drafting HB 3915 in response to these concerns. However, because that bill did not move out of Committee, the proposed language from HB 3915 regarding ODA updating the list should now be added to HB 2684:



(6)(a) The State Department of Agriculture shall develop and maintain a model list of low-impact pesticides. The purpose of the model list is to provide a resource to governing bodies with examples of low-impact pesticides that governing bodies may use to satisfy the requirements of ORS 634.700 to 634.750.

(b) A governing body may consult the model list and, at the discretion of the governing body, include some or all of the pesticides included on the model list on the list of low-impact pesticides adopted by the governing body under subsection (5) of this section.

Our goal in making this request is to ensure that we are not putting statutory obligations onto school districts that are out of line with their expertise, resources, and capacity. We do not want to end up in a situation where districts are inadvertently misinterpreting state pesticide laws. Districts need a supportive approach to compliance that provides them with guidance and expertise on this issue, and ensures that every school district has *equal access* to a list that is regularly updated by one central authority.

Respectfully,

A handwritten signature in black ink, appearing to read "Katie Murray". The signature is fluid and cursive, with the first name "Katie" and last name "Murray" clearly distinguishable.

Katie Murray
Executive Director