

Honorable Val Hoyle, Chairwoman  
House Committee on Rules  
State of Oregon

12 February 2014

Subject: HB 4100

Chairwoman Hoyle and Members of the Committee,

My name is Kevin Richards. I operate a family farm in the Central Oregon high desert. We grow hybrid carrot seed, Kentucky bluegrass seed, peppermint oil, hay and wheat on 600 irrigated acres. In addition to our specialty seed, grain and oil crops, we added genetically engineered, herbicide-tolerant alfalfa to our crop rotation in 2006; the result has been significantly improved weed control, reduced environmental impact and improved safety on our farm.

Today, I offer my testimony as both a grower of GE crops and an Oregon specialty crop farmer, as well as an Oregon businessman and a consumer. I encourage you to consider the deeper, unintended consequences that mandatory labeling of genetically engineered food would have on the agriculture economy and agriculture and food marketplace in Oregon. ***I urge you to oppose HB 4100, and other mandatory labeling initiatives in the future***, for four reasons:

- Unilaterally enacting and enforcing mandatory GE labeling in Oregon will increase costs and put Oregon agriculture at a significant competitive disadvantage;
- Mandatory GE labeling will reduce research, investment and innovation in agriculture products that could benefit Oregon farmers, consumers and the environment in the future;
- Mandatory GE labeling will hurt small, niche agriculture—such as, local, organic and alternative markets—by diluting the marketplace and eroding the profitability of specialty and differentiated products that are voluntarily labeled;
- Mandatory labels would mislead consumers about the safety of GE crops, erode the credibility of food safety regulators and discourage consumer acceptance of new, beneficial technologies.

***Unilaterally enacting and enforcing mandatory GE labeling in Oregon will increase costs and put Oregon agriculture at a significant competitive disadvantage.*** Labeling will significantly increase the cost of production in Oregon due to:

- On-farm segregation and the subsequent increase in risk;
- Increased downstream infrastructure and additional handling complexities to manage segregation;
- Reduction in choice and profitability of highest quality, most productive seeds and agricultural inputs;
- Conversion to, on average, less efficient means of production;
- Testing and compliance, as well as risk of litigation.

Requiring a label on every product will erode this profit opportunity by diluting the marketplace and diminishing demand and willingness-to-pay for voluntarily labeled products. The unintended consequence of mandatory labeling will likely be a reduction in choice and innovation in the marketplace by competing with voluntary initiatives and shrinking the opportunity for farmers to provide the most discerning consumers with high-value products.

***Mandatory labels would mislead consumers about the safety of GE crops, erode the credibility of food safety regulators and discourage consumer acceptance of new, beneficial technologies.*** The authority to require labeling should be reserved for when there is valid information about the composition of a product and science-based evidence on the safety or nutritional content of food. Mandatory labeling will reduce consumer confidence in food safety regulations, creating a more confusing and unpredictable food marketplace for consumers to navigate. In addition, state-by-state labeling requirements will further confuse consumers by imposing arbitrary differences in labels across state borders.

Thank you for the opportunity to submit this testimony.

Kevin L. Richards