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March 16, 2015

The Honorable Brad Witt, Chair  
House Committee on Agriculture and Natural Resources  
Oregon State Legislature  
900 Court St. NE  
Salem, Oregon 97301

RE: HB 2589 – Related to Prohibiting Application of Neonicotinoids

Dear Representative Witt:

On behalf of the Consumer Specialty Products Association, I respectfully oppose House Bill 2589 which requires the Oregon Department of Agriculture to adopt rules prohibiting application of pesticide products containing the nitro-group neonicotinoids. While we appreciate concerns about protecting pollinators and other animal and insect species, we do not think there is adequate science to support prohibitions of applications of neonicotinoids. HB 2589 is scheduled for hearing in the Committee on Agriculture and Natural Resources on March 26.

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$80 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers, and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care<sup>®</sup>, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products.

Neonicotinoids are a class of neuro-active insecticides chemically related to nicotine. The neonicotinoids were developed in large part because they show reduced toxicity compared to previously used organophosphate and carbamate insecticides. Most neonicotinoids show much lower toxicity in mammals than insects. Under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency (EPA) reviews all current

pesticide registrations every 15 years to ensure they continue to meet the protective FIFRA standard in light of new information and evolving science. US EPA is in the process of reviewing the safety of neonicotinoids.

The weight of scientific evidence shows no correlation between bee health and the use of neonicotinoids. For example, in Australia, where neonicotinoids are widely used, bees are thriving; yet in Switzerland, where there is little use of these products, bee health is generally poor. The UK Department for Environment, Food and Rural Affairs decided to reevaluate existing research over concerns about a problem with data used in a recent study noting, “Laboratory-based studies demonstrating sub-lethal effects on bees from neonics did not replicate realistic conditions, but extreme scenarios . . . While this assessment cannot exclude rare effects of neonicotinoids on bees in the field, it suggests that effects on bees do not occur under normal circumstances. Consequently, it supports the view that the risk to bee populations from neonicotinoids, as they are currently used, is low.” In addition, the U.S. Department of Agriculture and the US EPA recently released a comprehensive scientific report on honey bee health. The report states that there are multiple factors playing a role in honey bee colony declines, including parasites and disease, genetics, poor nutrition and pesticide exposure. One of the key findings of the report is that the parasitic *Varroa* mite is recognized as the major factor underlying colony loss in the U.S. and other countries.

The federal government, at the direction of the White House<sup>1</sup> has created a pollinator task force to study the stressors leading to bee decline and strategies for addressing them. In addition, the National Academy of Sciences has begun a study on the health of pollinators ordered by the White House.

We support continued research on the risks to bee health and readily acknowledge the critical importance of pollinators to the agricultural economy, however, in recognition of the review underway at US EPA and lacking adequate science to support the measure, CSPA respectfully asks for your no vote on the measure.

Sincerely,



Kristin Power  
Vice President, State Affairs

cc: CSPA State Government Affairs Advisory Committee

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<sup>1</sup> <https://www.whitehouse.gov/the-press-office/2014/06/20/presidential-memorandum-creating-federal-strategy-promote-health-honey-b>