



**TESTIMONY OF FOOD NORTHWEST
In Favor Of
SENATE BILL 1541**

**SENATE COMMITTEE on ENVIRONMENT & NATURAL RESOURCES
February 12, 2018**

Good afternoon Chairman Dembrow and members of the committees, my name is Craig Smith and I am the Director of Government Affairs for Food Northwest.

Food Northwest, formerly known as the Northwest Food Processors Association, is an association of the people who prepare and market the amazing diversity of food products you consume each day. If you have eaten today, and I sincerely hope you have, you have likely eaten something prepared by one of our members. We are the people who feed Oregon and the world.

Food Northwest supports SB 1541

Food Northwest companies are nationally recognized for their leadership in developing programs that promote sustainability and environmental stewardship. Food Northwest was the first industry group in the nation in 2009, to adopt aggressive energy reduction goals which also reduce our carbon footprint. We are currently on track to meet our first hurdle, a 25% reduction by 2019. Our reliance on clean air and clean sources of water causes us to make serious investments in environmental controls. We have a decades long history of working successfully with the Oregon DEQ, U.S. EPA and statewide interest groups to develop and implement effective air quality, water quality and solid waste management programs that enhance and protect Oregon's amazing environment. Successful, well designed and balanced regulatory programs are the key to the long-term health and vitality of all Oregonians.

Senate Bill 1541 is a bill that continues that long tradition of enacting effective and tough regulation within a balanced, well designed framework. SB 1541 will authorize and direct the State of Oregon to adopt and implement one of the most stringent health-based air toxics programs in the nation. We are supporting this bill even though it will be a costly program and very complex to administer. Food Northwest believes this bill is the right thing for Oregon.

Why SB 1541 Instead of the DEQ/OHA Rulemaking

The DEQ/OHA Cleaner Air Oregon rule is unworkable on numerous levels. It is so complex that it will be impossible for DEQ to effectively administer the program. Risk limits are set too low and based on theoretical emissions levels. These are serious flaws that cause many companies to be needlessly dragged into the program even though their emissions are near the de minimis levels. The rule creates serious uncertainty for the regulated entities and this uncertainty will discourage or eliminate investment in plant upgrades and expansion. I have heard from several companies that are either waiting on investment decisions or already making plans to move production to alternate plants sites where permitting is more certain.

SB 1541 offers a risk-based program that is equally protective of human health without the unintended consequences.

Food Northwest is an active member of a coalition of Oregon companies called *Oregonians for Fair Air Regulations*. Our coalition has been working with DEQ and OHA on the Cleaner Air Oregon rules. I will not attempt to outline the numerous serious flaws that are contained in the proposed rule. Rather, I have attached a copy of the coalition's comments on the rule that were submitted to DEQ in January. This testimony is certainly only good for late-night reading... it is very long and very complex. I submit it to help you understand what is at stake and how seriousness of the flaws in the proposed rule. If DEQ/OHA implement the rule they have proposed, it will have serious impacts on the Oregon economy and will overwhelm the agencies already stretched and strained permitting program.

SB 1541 protects public health and establishes a thoughtful, attainable, health-based air toxics program for the State of Oregon. It establishes strong and enforceable standards that will serve the residents of Oregon well while avoiding the costly, unworkable mistakes found in the proposed air toxics rule.

We urge the committee to pass SB 1541.