

WVSSA

Willamette Valley Specialty Seed Association

Public Comment

State Board of Agriculture November 29, 2018

The Willamette Valley Specialty Seed Association appreciates the opportunity to give comment on the recent canola report by the Department of Agriculture. WVSSA represents vegetable and specialty seed growers whose mission is to promote quality Oregon seed production. To accomplish this goal, WVSSA members use an electronic map to denote field locations and species data to ensure adequate isolation distances between wind pollinated crops, assuring buyers that Oregon seed is true to type. Membership in the WVSSA is required in order to participate in mapping.

As you have heard, in November, the Oregon Department of Agriculture released a report to the legislature as directed by HB 3382 (2015). The report was based in part on a study released in 2017 by Oregon State University. In official proceedings for HB 3382, Chair Chris Edwards was very specific about the legislative intent of the bill, which was to facilitate canola interest in the Willamette Valley *while protecting specialty seed growers*. He clearly articulated the state's desire to protect the specialty seed industry. Senator Edwards also specified that the final word on protecting specialty seeds should fall to the legislature because the legislature is better suited in making policy decisions that science alone cannot answer.

In the November 2018 Canola Report, ODA has presented four options with the pros and cons of each. Alternatives proposed by WVSSA during multiple stakeholder meetings were not included in ODA's list. One option set forth by WVSSA was an affiliate membership that would allow canola growers mapping privileges to ensure proper isolations are enforced. Another suggestion was to limit the number of distinct "isolations" on a permitted basis rather than total acreage.

Because we believe that both the report by Oregon State University and the subsequent report by the Department of Agriculture fall short of the legislative intent as described in HB 3382, we will be taking our concerns to the 2019 legislature to protect the attributes of our specialty seed industry. WVSSA strongly supports the coexistence of canola and specialty seed crops, provided it is done in a manner that is conducive to the success of both.

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