

WILLAMETTE VALLEY SPECIALTY SEED ASSOCIATION (WVSSA)

Opposition to canola in the Willamette Valley

1. Membership has voted for no change to the last Oregon Department of Agriculture (ODA) administrative rule limiting canola (see sections 603-052-0850 through 603-052-0880). That rule protected the seed industry and was founded in well-rounded and inclusive discussions over the years. The ODA has adopted a destructive rule change without offering new evidence that would support the reversal of past decisions that were based on a scientific determination. By its own admission, the ODA is not allowed to make a decision to re-write its rules on a market basis.
2. Oregon law initiated a process through the ODA in 1989 that began a period of regulating canola that by 2005 in essence disallowed commercial production of canola in the Willamette Valley. It is not a coincidence that in the last 20-some years the Willamette Valley has taken full advantage of the unwise, unmanaged expansion of canola in Europe. Seed companies built strong businesses that grew remarkably while capturing the displaced production in Europe. It is thievery for the state of Oregon to reverse a policy of protecting specialty seed.
3. ODA has known all along that it is without evidence to support the reversal of past decisions based on science. ODA sent a letter on November 5, 2012, to the State Emergency Board in which the department requested \$446,040 to research five issues. In summary, the research would investigate the potential for cross-pollination to damage related seed crops, assess canola volunteer persistence, study off-field movement of canola seed in waterways, evaluate baseline “feral” Brassicas in the area, and conduct a science-based policy, with market and risk analysis for coexistence of specialty seeds and canola. Clearly, the ODA has revised an existing, successful rule for which many substantial questions remain unanswered.
4. The economic impact of canola to the Willamette Valley is negative.
 - a. The WVSSA is being asked to support or accommodate a low value commodity crop that will displace a portion of high value specialty seed crops, as well as putting at risk clover and grass seed shipped out of the state or overseas. Growing canola in the Willamette Valley will not add jobs to the Oregon economy. To the contrary, displacing jobs in high value seed crops will result in a net loss of jobs and income. Meanwhile, canola can be sourced from Oregon in production areas that are without specialty seed production.
 - b. The farmgate value in recent years for seed interests negatively affected by a proliferation of canola is estimated as follows:
 - i. Specialty seed: \$50,000,000 in 2012.
 - ii. Clover seed: \$30,000,000 in 2012.
 - iii. Grass seed over the last few years has declined, but still exceeded \$228,000,000 in 2010. Over the last 10 years grass seed peaked at about \$480,000,000 and is generally considered to have a value of about \$300,000,000.

5. In order for the early proposals to the rule to function, the WVSSA would have had to modify seed production rules and guidelines and revise association Bylaws. This is excessive government intervention in a very successful business model that is world renowned. In essence, the WVSSA would have been forced to accommodate a non-seed crop in what is entirely a seed organization. Those proposals were unacceptable.
6. Canola proponents cite that this crop is needed in grass seed rotations, when in fact grass seed growers have testified that several other alternative crops exist. These alternatives typically require higher management or other input levels compared to canola, though this is hardly a reason to disqualify them.
7. The WVSSA contends that canola is damaging as a crop, weedy volunteer, and host to insect and disease pests negatively impacting specialty, clover, and grass seed producers and related interests, such as fresh market vegetables. Evidence is available. For example, Crucifer (Brassica species and radish) seed production areas in Europe have been ruined and lost indefinitely, particularly in Denmark, the UK, and France. This is long term damage that is not easily reversed or negated. Depending on the specific crop, canola variously affects seed or food quality. Examples include, but are not limited to, unwanted cross pollination, undesirable weed seed content, insect pests such as pollen beetles and cabbage root maggots, and plant diseases such as those caused by the *Sclerotinia* fungus.
8. The adopted rule seeks to balance the interest in canola not on a state-wide basis, but specifically in the Willamette Valley. This is a short-sighted form of coexistence, when a better form of coexistence is readily available by utilizing vast small grain growing areas to achieve balance. Certainly, Oregon grown canola can be produced in the state and supply oilseed processors without jeopardizing an existing industry.