



New York Farm Bureau  
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## MEMORANDUM OF OPPOSITION

**Senate Bill 2156A (Kaminsky) / Assembly Bill 2477A (Englebright)**

### **AN ACT TO AMEND THE ENVIRONMENTAL CONSERVATION LAW, IN RELATION TO PROHIBITING THE USE OF CHLORPYRIFOS**

**Date: 4/8/2019**

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New York Farm Bureau, the state's largest agricultural advocacy organization, respectfully opposes this legislation. The legislation would have a negative impact on the agricultural industry in New York, by unnecessarily restricting the use of a duly studied and registered pesticide product.

New York is one of the very few states that reviews pesticide product for environmental and health impacts prior to registration in the state. The vast majority of states simply accept the federal Environmental Protection Agency's (EPA) review and registration decision to allow use in their states. Thus, New York has a rigorous dual certification system for pesticides.

This legislation would statutorily restrict the use of a needed pesticide product in the state for important farm commodities, such as apples, berries and onions. This thereby would subvert the EPA and Department of Environmental Conservation's (DEC) extensive scientific product review process and make such decisions in the political realm, rather than by experts in the technical field. This is a dangerous precedent that we believe should be avoided at all costs.

In most recent numbers, the apple industry in New York represents 343 million dollars in cash receipts. Apple orchards in New York rely on pesticides like chlorpyrifos to combat against pests like American plum and black stem borers that bore holes into the trunks of fruit trees and ultimately shuts down the vascular system of the trees. Cornell's Integrated Pest Management Program found that the use of chlorpyrifos is crucial in Hudson Valley where a number of orchards are located as well as on Long Island, where other pesticides are not available. The loss of effective tools such as Chlorpyrifos will likely increase agricultural risk given the pending losses of our newer, highly effective insecticides placing greater risk on food production systems.

Given these reasons with regard to the use of a critical agricultural input, New York Farm Bureau respectfully requests your opposition to this legislation.