



March 7, 2023

To: Members of the Minnesota House Agriculture Finance and Policy Committee
Regarding: *HF 1317 - Terms defined; Use, storage, disposal, and sale of pesticide-treated seed regulated; label statements for pesticide-treated seed required; consumer guidance required; rulemaking required; and money appropriated.*

The American Seed Trade Association (ASTA) is writing this letter to comment on HF 1317, which is currently pending before the Minnesota legislature, and set for hearing by the House Agriculture Finance and Policy Committee on March 9, 2023. This bill proposes to regulate the use, storage, disposal, and sale of pesticide-treated seed; would require label statements for certain pesticide-treated seed; and would require rulemaking by the Minnesota Pollution Control Agency.. Most of those initiatives are already in place on a voluntary basis by the seed industry and promoted with growers using “bag tags” affixed to all bags of treated seed.

Founded in 1883, ASTA is one of the oldest trade organizations in the United States. Its membership consists of over 700 companies involved in seed production and distribution, plant breeding, and related industries. ASTA is a diverse organization. It represents all types of seed companies and technologies – seed from alfalfa to zucchini, technologies from organic to biotechnology, and companies from “mom and pop” to multinationals. It works on behalf of its members at the state, national, and international levels. In other words, ASTA represents every seed company that would be affected by the proposed legislation, and it works in cooperation with the rest of agribusiness and consumers, whom the proposed legislation would also impact.

In general, seed treatments enable earlier and faster planting; stronger, more uniform stands; optimal plant populations; and healthier plants that help increase productivity. Because some pests can damage the seed or seedling to the extent that there are no rescue treatment options available and the plants may either die or not produce a harvestable yield, seed treatments give farmers confidence that they are proactively managing early-season risk and minimizing the expense and environmental impact of replanting.

Handling, disposal and general user guidance has been addressed by the seed industry through training for farmers about proper use of seed treatments and publishes user labels on every bag of seed. To learn more about the industry’s efforts, go to seed-treatment-guide.com. That document, currently being updated (due April 1, 2023) is referenced and acknowledged in multiple places within US EPA rules. More information and resources about treated seed are available at betterseed.org/treated-seeds. Both documents address pollinator protection, which is extremely important for agriculture production.

In summary, the use of seeds improved through modern technologies, such as seed treatments, continues to grow around the world as a result of their economic, environmental, and human health benefits. Farmers’ use of these seeds in Minnesota is no exception to this pattern of growth. In our view, HF 1317 as it is now drafted raises several serious practical concerns, including requiring disruptions of the supply chain and labeling of treated seed destined for Minnesota. In addition, it would add unnecessarily to the cost of doing business in Minnesota and penalize Minnesota farmers and ultimately, consumers.

Please do not hesitate to contact us if you have any questions. Thank you for your consideration.

Sincerely,

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