



March 8, 2023

Rep. Samantha Vang
Chair, House Agriculture, Finance, and Policy Committee
545 State Office Building
St. Paul, MN 55155

Re: Opposition to HF 1130

Members of the House Agriculture Committee,

On behalf of the Minnesota Golf Course Superintendents Association and our 636 members representing 250 golf courses, we write to you respectfully in opposition to HF 1130 which, unfortunately, seeks to replace years of reliable regulation of pesticide products currently under the jurisdiction of the Minnesota Department of Agriculture (MDA), with an unpredictable patchwork of local regulations throughout our state.

For decades, pesticide applicators, including golf course superintendents, have relied upon the foundational regulatory principles found within the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) which governs the way in which all pesticide products are developed, registered, sold, distributed, and ultimately, applied in the United States. Put simply, FIFRA is a comprehensive regulatory law. Still, these pesticide regulations also allow for and encourage input by state agencies, such as the MDA. This time-tested partnership between federal and state regulatory agencies ensures that each pesticide product registered in the state can be used without adverse effects to human health and the environment when used according to the label.

One important element of conducting and administering pesticide regulations from a single state agency is the process of certification and training of pesticide applicators. Currently, in order to gain a Noncommercial Pesticide Applicator license in the state, golf course superintendents must pass at least two certification exams, first the Core Exam (category A) for core competencies, and typically Category E for turf and ornamental plants. This license must then be renewed every two years. Continuing education conducted jointly by the MDA and Univ. of Minnesota Extension ensures applicators statewide, regardless of employment location, are aware of the latest data and research related to the use of all pesticide products.

If this bill passes as written, a patchwork of differing regulations and ordinances would create logistical difficulties for the MDA and the UMN Extension staff to effectively implement pesticide licensing training. The additional requirements would put an unnecessary and unequal burden on existing staff to develop additional testing requirements for specific locales, whereas current regulations allow for uniform and consistent testing and licensing procedures. If this legislation is adopted, eligible cities could continually amend their rules and regulations, thus forcing MDA and Extension staff to create and implement excessive programs and opportunities above those that already provide thorough training and education. Altered testing requirements would not allow professional applicators to be properly tested and trained on revolving rules and regulations within neighboring cities, complicating an applicator's ability to clearly understand and comply with all laws and regulations.



Under this confusing scenario of differing ordinances, pesticide applicator education conducted by the state could become conflicting and disjointed for those seeking professional.

Beyond certification and training, the reality is that invasive pests don't recognize municipal borders and effectively controlling the spread of damaging pests requires uniform laws from one city to the next, and one neighborhood to the next. This is especially true for superintendents who manage golf courses that happen to cross municipal jurisdictions, which is not uncommon. Put simply, the zip code you live or work in should not determine the level of pest control you experience. Differing local regulations creates a lower standard of living in those communities without access to modern, reliable pest control products.

Managing, maintaining, and preserving healthy and thriving green spaces in communities throughout our state is at the heart of what golf courses superintendents do. Published in 2018, Minnesota's Best Management Practices for golf courses demonstrates our commitment to environmental stewardship. Developed in a collaborative effort with the Minnesota Dept. of Natural Resources, the MDA, UMN, and allied golf associations throughout the state, this document focuses on key areas such as efficient irrigation, proper nutrition and fertilization, aquatic plant management, and turfgrass pest management. Integrated Pest Management (IPM), which is "a method of combining proper plant selection, correct cultural practices, the monitoring of pest and environmental conditions, the use of biological controls, and the judicious use of pesticides to manage pest problems," is a featured core concept within the document. Implementing concepts such as IPM require superintendents to gain a full understanding of pest threats they may encounter, and identifying the right solution to such pest problems requires predictable and consistent laws and regulations within the state.

For the reasons stated here, we respectfully ask you to oppose HF 1130. We appreciate the opportunity to voice our concerns on this critically important topic and we welcome any questions and comments you may have. For further information, please contact Chris Aumock, Executive Director of the Minnesota Golf Course Superintendents Association at 651-324-8873, or by email at chris@mgcsa.org.

Sincerely,

A handwritten signature in black ink that reads "Matt Cavanaugh".

Matt Cavanaugh
MGCSA President
Rush Creek Golf Course