



April 6, 2021

To: Members of the Minnesota House Agriculture Finance and Policy Committee  
Regarding: *HF 1524 - relating to agriculture; requiring additional seed label information*

The American Seed Trade Association (ASTA) is writing this letter to oppose and request removal of Article 2, Sec. 8 and Sec. 9 of HF 1524, which is currently pending before the Minnesota legislature. This bill seeks to require an additional label statement on corn and soybean seed coated or treated with a neonicotinoid pesticide. It would enact a state-specific requirement that is essentially the same as federal laws, making the regulation difficult to manage because of its redundancy.

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 all 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.

The section in this bill referenced above raises several legal concerns. Depending on the circumstances in which it is applied, the language in the bill may be preempted by federal law. In essence, the bill would impose an additional burden on the users of the currently federally regulated pesticide and seed treatments.

This language would impact the seed industry in Minnesota and unduly impact interstate commerce and is anticompetitive and potentially discriminatory among different agricultural sectors. The cost of the seed for farmers will increase and/or the availability of seed will decrease. Both effects would penalize unnecessarily the many Minnesota farmers producing high quality crops from such seed. It would also penalize all others in the seed supply chain, including dealers, as well as small and large companies. It also would reduce the size, offering and competitiveness of the Minnesota seed industry compared to other states. To the extent that increases in input and production costs are passed through the food chain, the bill would penalize Minnesota consumers, as well.

In summary, the use of seeds improved through modern technologies, such as seed applied technology, continues to grow around the world because of its 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 1524 as it is now drafted raises several serious legal and practical concerns. Of significance, it would add unnecessarily to the cost of doing business in Minnesota and penalize Minnesota farmers and consumers. Affecting seed companies large and small including farmer dealers, HF 1524 would also reduce the size, offerings, and competitiveness of the seed industry in Minnesota compared to other states.

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

Sincerely,

Pat T. Miller  
Director, State Affairs  
American Seed Trade Association  
[pmiller@betterseed.org](mailto:pmiller@betterseed.org)

**first-the seed®**

1701 Duke Street • Suite 275 • Alexandria, VA 22314 • Phone: (703) 837-8140 • Fax: (703) 837-9365