March 8, 2022

Dear Chair Sundin and Members of the Committee:

On behalf of the members of the Minnesota Agri-Growth Council (AgriGrowth), I am writing today in opposition to HF 3751 and ask that you vote in opposition to the bill.

The brevity of language in HF 3751 **should not indicate** that this is simple, non-controversial, or limited in scope. If implemented, HF 3751 would directly impact the productivity of Minnesota growers and have negative consequences for plant health and environmental sustainability.

HF 3751 targets the materials used in the common industry practice known 'seed treatment', whereby seed is coated with products to safeguard against insects, fungal diseases, and soil-borne pathogens. Whether nematicides, insecticides, fungicides, or biological agents, these materials provide targeted and sometimes non-chemical protection of seeds from germination through early growth. If any of these materials are applied to the seed, a dye is added so that the seed does not enter the food or feed chain, and the materials are then bound to the seed using a polymer through a film coating process.

The 'binding' of these active ingredients to the seed has several distinct benefits:

1. Less active ingredients are needed to grow a healthy crop. As opposed to broadcast pesticide application, a farmer can use up to 8 times less of the material per acre, which can aid in preventing runoff and protecting Minnesota's waters.
2. Seed and plant health are improved in a targeted fashion. Because the active ingredients used to protect the seed are bound to the seed and therefore directly targeted in the seed's growth area, it is more efficient than being applied next to or on top of the seed.
3. Farmers are not required to make additional trips over the field. By not having to land apply or apply over-the-top during early growth, farmers are able to reduce their carbon footprint and increase the long-term sustainability of Minnesota agriculture.
4. Protects non-targeted organisms. The binding agents keep the ingredients on the seed and reduce dust. This helps protect non-targeted species such as earthworms and pollinators.
5. Cover crop adoption can be enhanced. Treated seeds are protected against the soil pests and microbes that are enhanced by cover cropping practices.
6. Lessens reliance on favorable weather conditions. Active ingredients on the seed means farmers don't have to worry about wind conditions, heat, or what their neighbor has planted.
7. It is safe for producers. Having the active ingredients bound to the seed reduces the need to handle chemicals, package them, and ultimately dispose of that packaging.

Seed and the treatment of seeds are thoroughly regulated by USDA, EPA, and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). If passed, HF 3751 ignores the tight fabric of existing regulation and would establish Minnesota as the only state with this *additional* regulatory burden. It would require seed companies to segregate their products, and not ship or sell their treated seeds to Minnesota farmers. HF 3751 would deny Minnesota growers the latest technology, impact their productivity, and threaten many of the gains they've made to make agriculture more sustainable.

Sincerely,

Tamara G. Nelsen

Tamara A. Nelsen
Executive Director