



601 Carlson Parkway, Suite 450 | Minnetonka, MN 55305 | P: 763.235.6466

www.mcpr-cca.org

March 8, 2023

Chair Samantha Vang
House Agriculture Finance and Policy Committee
100 Rev. Dr. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

Re: **Opposition to House File 1130, House File 1317 and House File 2472**

Chair Vang and Members of the House Agriculture Finance & Policy Committee:

The Minnesota Crop Production Retailers (MCPR) is a nonprofit organization representing agricultural retailers and distributors, crop input suppliers, crop advisors, certified crop advisors, and registrants who supply Minnesota's farmers with a host of products and services.

We thank you for the opportunity to provide comments in **opposition** to the following bills that will be up for consideration in the House Agriculture Finance & Policy Committee on Thursday, March 9, 2023:

- **H.F. 1130** which would authorize cities to adopt certain pesticide control ordinances.
- **H.F. 1317** which would regulate the use, storage, disposal, and sale of pesticide treated seed, requires label statements for certain pesticide-treated seed, and requires the creation of consumer guidance regarding the proper use and disposal of treated seed.
- **H.F. 2472** which would establish a new program for systemic pesticide-treated seed.

MCPR opposes **H.F. 1130** as it would eliminate existing state authority that ensures safe and consistent regulatory standards for pesticide use in the state. This language would weaken the state's ability to effectively regulate pesticides that are registered and regulated by the Minnesota Department of Agriculture (MDA). These current regulations enforced by MDA ensure safe and proper pesticide use in the state through registration of pesticides, licensing of pesticide applicators, and through research and enforcement activities.

Uniform state law comprehensively regulates virtually every other aspect of labeling, distribution, sale, storage, transportation, use and application, and disposal of pesticides in the state. State regulation of pesticides also ensures uniformity with federal regulation, and between states and their municipalities to avoid confusion that may endanger public health or the environment from differing requirements.

In addition to making it more difficult for farmers to produce the food we all depend on, this legislation would also put our communities at risk, leading to more disease caused by more pests roaming around our homes, schools, daycare centers, hospitals, public transportation, and restaurants throughout the state.

Pesticides play an important role in agriculture Integrated Pest Management (IMP). Crop protection tools and technologies are vital to protect farmers' crops and enable farmers to grow more food using less land and resources, therein protecting farmers investments, and making food more affordable as consumers continue to see their food prices increase.

MCPR also opposes **H.F. 1317** which would regulate the use, storage, disposal, and sale of pesticide treated seed, require label statements for certain pesticide-treated seed, and require the creation of consumer guidance regarding the proper use and disposal of treated seed.

For background, a seed treatment is the application of biological organisms/products and chemical ingredients to a seed with the intent to suppress, control, or repel plant pathogens, insects, or other pests that attack seed, seedlings, or plants. They are used to help protect the developing seed during its most vulnerable time—planting through germination and emergence – from early-season insect and disease damage that can severely impact crop establishment and yields. Treated seeds provide a sustainable solution to farmers in a highly targeted and precise approach that also means less impact on the surrounding environment.

Minnesota's agricultural sector is fully committed to following all laws, regulations, and guidelines for the safe use of seed and management of surplus seed. Companies who produce treated seeds work closely with grower partners to communicate the importance of following proper guidelines at every step of the process. Seed treatment pesticide products are highly regulated and it is absolutely essential that anyone who treats, handles, transports, plants, recycles, re-uses or disposes of treated seeds manage them properly and in accordance with label instructions to minimize the risk of pesticide exposure to humans and the environment.

Sections of this legislative proposal would also be redundant and unnecessary as existing cautionary statements are already regulated by the U.S. Environmental Protection Agency (EPA) per the Federal Insecticide Fungicide and Rodenticide Act (FIFRA). Treated seeds undergo a thorough evaluation by the EPA, and applicable state agencies, prior to commercialization and periodically thereafter. Only after a product is approved by the relevant federal and state agencies, can the seed treatment product be used in accordance with the EPA-approved label. Labels for commercial seed treatment products carry language that must be placed on the seed tags accompanying treated seed packages regarding permitted & prohibited practices.

Lastly, MCPR opposes **H.F. 2472** which would establish a new program for systemic pesticide-treated seed as well as a systemic pesticide-treated seed alternatives account. MCPR believes this proposed legislation is also unnecessary and duplicative as these safe and effective technologies our members utilize are already regulated by current federal law.

The proposed legislation would add additional burdensome layers of regulation for pesticide and seed treatments that are thoroughly covered by federal law which would in turn burden users without benefit. This proposed program would also lead to increased costs for a host of affected parties including seed manufacturers, distributors, farmers, and to all consumers.

In closing, we thank you for the opportunity to provide these comments in opposition to the above-referenced pieces of legislation. MCPR's members take their jobs very seriously which is memorialized in our "Mission Statement" that states the organization "exists to promote the proper use, storage, and application of crop production inputs in an environmentally safe and agronomically sound manner".

In addition, MCPR is proud to collaborate with our partners at MDA and the University of Minnesota Extension in hosting the annual Crop Pest Management Short Course. The purpose of the Short Course is to provide continuing education for key crop production decision makers with research based educational programs that include a wealth of pest and crop management topics including those dealing with pesticides and seed treatments. MCPR members who benefit from these educational offerings include agronomists, crop consultants, crop production specialists, and certified crop advisors.

For these reasons above, the Minnesota Crop Production Retailers respectfully urges **opposition to H.F. 1130, H.F. 1317, and H.F. 2472**. We appreciate the opportunity to provide this input to you and your fellow committee members.

Sincerely,

A handwritten signature in black ink that reads "Patrick Young". The signature is written in a cursive, flowing style with a long, sweeping underline.

Executive Director
Minnesota Crop Production Retailers