

Unintended Consequences of HF 718

Potential Solution and Alternative to HF 718 to Protect Pollinators: State-wide restriction of certain uses of neonicotinoid pesticides to professionals only would be a better solution and alternative to HF 718. States that have done this: Connecticut, Maryland, Massachusetts, and Vermont. We applaud Representative Vang's commitment to protecting pollinators. MPMA prefers state-wide protections compared to a patchwork of local government regulation.

HF 718 Will Harm the Minnesota Real Estate Market & Working and Middle-Class Homebuyers: HF 718 will ban most, if not all pesticides used in termite treatments. This is a problem because termite treatments are required for FHA loans for new construction in most of Minnesota. Most conventional lenders require termite inspections too. If termites are found upon inspection, then treatment is required for loan approval in many cases. For ALL new construction, termite treatments are required in 64 of Minnesota's 87 counties by the Federal Government's Housing and Urban Development. If HF 718 is passed, and a city enacts a ban on these pesticides treatment options for termites will be exponentially more expensive or impossible. HF 718 will severely hinder the Minnesota real estate market.

HF 718 Would Eliminate Our Industry's Ability to Apply Pesticides Around Building Foundations, Even Though Structural Pest Control Uses are Unlikely to Impact Pollinators: It is known that structural pest control uses of pesticides and neonicotinoid pesticides, which is one of the main classes of pesticides impacted by HF 718, are unlikely to pose a threat to pollinators, as a recent Cornell University study on neonicotinoid pesticides illustrates: "Negligible risk to pollinators from household pest control and antiparasitic uses... Such applications are unlikely to lead to substantial exposure for insect pollinators." MPMA stresses the impact that the structural pest management industry has on pollinators is nominal. The content in HF 718 does not currently reflect this reality. Please amend the bill so it does or find a state-wide solution. Pesticide risks to pollinators are not only focused on the toxicity of a chemical but also the potential for exposure. Structural pest control is very unlikely to lead to exposure. Similarly, exterior treatments applied to the structure and other areas around the structure are also unlikely to result in significant exposure. MPMA members support, teach, and implement Best Management Practices (BMPs) developed by the National Pest Management Association, which greatly increases the ability of our members to safely use pesticides in a manner that doesn't impact pollinators.

HF 718 Would Hinder Our Industry's Ability to Manage Pests Around the Structure – Causing MORE Pesticides to Be Applied Indoors: Bed bugs can be brought into the home from people traveling or cockroaches from groceries or takeout food, but in the majority of cases, pests enter the structure from the outside (ants, carpenter ants, flies, silverfish, termites etc.,). Our industry's uses of pesticides do not impact pollinators and HF 718 would prohibit our ability from applying pesticides around the foundation or to the exterior of the structure to prevent pests from entering. HF 718 would only allow our industry

to apply pesticides indoors, instead of allowing us to defend the home from the outside which is an unintended consequence—more pesticide applications indoors.

HF 718 Empowers Uninsured, Unlicensed, and Illegal Pest Control Companies: ALL MPMA member companies are insured, licensed, and thoroughly regulated. Our members comply with the law and would comply with city ordinances, if HF 718 is passed. However, unlicensed homeowners and illegal pest control companies would fill the pest control needs in the market. The unintended consequences of this are extremely concerning.

HF 718 Will Make it Harder to Adapt to Climate Change and Protect Public Health: As mentioned in the Fourth National Climate Assessment and the Senate Democrats Special Committee on Climate Crisis, climate change is increasing and will further increase the prevalence of mosquitoes and mosquito-borne diseases and ticks and tick-borne diseases (e.g., Lyme disease). Unfortunately, we also recognize the pattern of low-income residents being disproportionately impacted by mosquito-borne diseases. Ultimately, residential mosquito and tick control will be an inevitable part of life in adapting to climate change to protect public health.

MPMA is not alone in sharing this view, as Katherine Dykes, the Commissioner of the Connecticut Department of Energy and Environmental Protection testified on a similar bill to HF 718, in 2019, in Connecticut and conveyed her alarm for the negative public health implications with:

"The unintended consequences that could result from unfettered municipal pesticide bans include an inability to control disease vector pests such as ticks and mosquitoes that pose human health threats..."

Other Mosquito/Tick Control Concerns: While the bill does not apply to the Metropolitan Mosquito Control District, the MMCD only services 6 out of 87 counties. This leaves the remainder of the state less able to control mosquitoes, therefore mosquito borne diseases will increase. Similarly, with ticks carrying Lyme Disease - it is already bad and will get worse. The bill should include over the counter products and products sold on the Internet and exclude all applications by trained, licensed professionals.