The Honorable Samantha Vang Chair Agriculture Finance and Policy Committee Minnesota House of Representatives

27 March, 2023

Subject: American Bird Conservancy Strongly Supports HF 2472

Dear Chairwoman Vang,

American Bird Conservancy and our 5,800 members and supporters in Minnesota strongly support HF 2472, the systemic pesticide-coated seed program bill. Systemic pesticide seed coatings present a unique threat to people and wildlife; not only do they experience dust-off and coat nearby fields, but the active ingredients can leach off into soil and water where they kill non-target invertebrates. In most, if not all, cases, less than 5% of the active ingredient remains on the seed and finds its way into the plant as intended.

A single seed coated with a neonicotinoid is enough to kill a songbird. Birds which ingest coated seeds that are planted or improperly disposed of on farms experience organ failure, disorientation, weight loss (which impairs their ability to migrate), ataxia, and death. There is enough active ingredient on one seed to kill 80,000 bees, and the dust created during planting is harmful to farmworker health. However, despite their documented threats, there is no federal regulatory oversight of systemic pesticide-coated seeds.

Neonicotinoid treated seeds fall through a federal loophole and are not regulated like other pesticides, rendering them *more* harmful than other insecticides. The Treated Article Exemption creates a loophole in federal law which classifies neonicotinoid-coated seeds as "exempt pesticides," meaning their use, efficacy, and impact is not reported. Therefore, to curb the effects of these devastating pesticide uses, state-level action is the most effective way to mitigate them.

Both federal and private studies have found neonicotinoids to provide little to no benefit to growers. While legitimate uses do certainly exist, their widespread employment is largely unnecessary and come as a markup to growers and with excessive environmental degradation.

HF 2472 closes regulatory loopholes, protects wildlife, and empowers growers to make more informed decisions about what products to use. We thank you for your consideration of these issues and ask for your strong support of HF 2472.

Sincerely,

E. Hardy Kern III

Director of Government Relations, Pesticides and Birds Campaign

Harry Kenn III

ehardykern@abcbirds.org