



POLLINATOR FRIENDLY ALLIANCE
PO BOX 934, STILLWATER, MN 55082
WWW.POLLINATORFRIENDLY.ORG

**RE: Support safer disposal and handling of pesticide coated seed HF766
(Environment and Natural Resources omnibus HF4492 Section 6.17-6.24)**

Date: April 5, 2022

To: Minnesota House of Representatives, Environment and Natural Resources Finance Policy Committee

Currently, there are not adequate federal or Minnesota state safeguards for the health of people and the environment from pesticide contamination from coated seed nor is insecticide-coated seed currently regulated as a pesticide in Minnesota. The following no-nonsense provisions are necessary to protect us, pollinators and the environment from contamination disasters and chronic pesticide contamination.

Thank you for your support of the treated seed provisions in HF766 calling to prohibit insecticide-treated seed to be used for food, feed, oil, or ethanol feedstock and deals with proper disposal of insecticide-treated seed.

[Pollinator Friendly Alliance](#) is a Minnesota conservation organization with a membership of individuals, scientists, businesses and ecologists from around Minnesota and beyond. We urge state legislators to step up in the absence of a fail-safe system to protect our waters, land and people from pesticide seed contamination. This is not a big ask - to simply strengthen the existing system for better stewardship and the rewards for health are great. Some countries have banned neonicotinoid pesticides entirely and communities around the U.S. are further restricting use. Almost fifty Minnesota communities have adopted resolutions to cease neonicotinoid pesticide use.

The wealthy pesticide industry can sell more insecticide coated seed using a loophole in federal pesticide law - **“treated article exemption” which permits seeds to be coated with toxic pesticides without assessment by the EPA for health or environmental effects.** This allows insecticide coated seeds to be used without proper oversight. The result of this negligence is evidenced by water contamination in Minnesota and an entire community in [Nebraska taking ill from pesticide coated seed contamination](#). Labels do not always protect us from improper handling, storage or mis-use either. Labels are very difficult to enforce because they are often impossible to interpret, the meaning is unclear and often not defined – for example what is a “measurable residue”? The label does not explain if the seed can be burned or re-used such was the case in the Nebraska catastrophe.

I come from a farm family and live in a rural area, so I know first-hand corn and soybean farmers often drill 1,000’s of acres of pesticide coated seed at a time. The pesticide dust floats and moves through the air, and afterward piles of seed are leftover laying in fields where birds and wildlife eat them, and ground water is contaminated. “Suggested” best practices are not going to protect us or

wildlife and the environment. A law is needed to require proper stewarding of insecticide-coated seed.

Neonicotinoid contamination has been studied repeatedly and reported on for years – it is no secret that neonicotinoid insecticides on coated seeds are toxic. Recent science shows neonics have [human health effects](#), pesticides kill pollinators outright and sicken them at sublethal doses, neonics contaminate water ([Five surface water pesticides of concern, Minnesota MDA 2020](#)), birds are effected ([Neonic reduces migration in songbirds, Eng 2019](#)) and most recently large mammals such as deer ([Effects of neonics on physiology and reproduction of white-tailed deer, Berheim 2019](#)). Two flagship species- monarch butterfly and rusty patched bumble bee (Minnesota state bee) - are under the watchful eyes of pollinator researchers and declining numbers of monarchs tell us that pollinators are at a critical point for extinction requiring immediate action.

These small steps to steward pesticide coated seed will help keep Minnesota communities safe.

Thank you,
POLLINATOR FRIENDLY ALLIANCE
www.pollinatorfriendly.org

Selected support references:

HUMAN HEALTH EFFECTS OF NEONICS National toxicology report from US Dept. of Health and Human Services ISSN: 2473-4756 https://ntp.niehs.nih.gov/ntp/results/pubs/rr/reports/rr15_508.pdf

NRDC BRIEFING TO CONGRESS on Neonic Pesticide Human Health Harms, October 2019.
<https://www.nrdc.org/experts/jennifer-sass/nrdc-briefs-congress-neonic-pesticide-human-health-harms>

PESTICIDES IN MINNESOTA WATERS: Minnesota Department of Agriculture, *surface water pesticides of concern* (2020)
<https://www.mda.state.mn.us/surface-water-pesticides-concern>

INSECTICIDE COATED SEED CONTAMINATES NEBRASKA COMMUNITY AT ETHANOL PLANT
January 2021: <https://www.theguardian.com/us-news/2021/jan/10/mead-nebraska-ethanol-plant-pollution-danger>

POLLINATOR DECLINE: Xerces Society: *The science behind the role neonics play in harming bees*. Jennifer Hopwood, Aimee Code, Mace Vaughan et al. (2016)
https://xerces.org/sites/default/files/2018-05/16-023_01_XercesSoc_ExecSummary_How-Neonicotinoids-Can-Kill-Bees_web.pdf

NEONIC EFFECTS ON LARGE MAMMALS: Scientific Reports: *Effects of Neonicotinoid Insecticides on Physiology and Reproductive Characteristics of Captive Female and Fawn White-tailed Deer*. Elise Hughes Berheim, Jonathan A. Jenks, Jonathan G. Lundgren, et al. volume 9, Article number: 4534 (2019)
<https://www.nature.com/articles/s41598-019-40994-9>

RESULTS OF PESTICIDE STUDY OF NEONIC EXPOSURE TO WHITE-TAILED DEER IN MINNESOTA
March 1, 201, Minnesota Department of Natural Resources

<https://www.dnr.state.mn.us/news/2021/03/01/preliminary-results-pesticide-study-show-widespread-neonicotinoid-exposure-minnesota-white-tailed-deer>

NEONIC EFFECTS ON SONGBIRDS: Science: *A neonicotinoid insecticide reduces fueling and delays migration in songbirds.* Margaret L. Eng, LeBridget, J. M. Stutchbury, Christy A. Morrissey. Issue 13 Sep 2019: Vol. 365, Issue 6458, pp. 1177-1180.

<https://science.sciencemag.org/content/365/6458/1177>

POLLINATOR PROTECTION RESOLUTION: *Model resolution for cities, counties, state agencies, school districts.* Pollinator Friendly Alliance, Humming for Bees, Pesticide Action Network, Pollinator Minnesota 2020.

<https://static1.squarespace.com/static/59fcf40ab1ffb6ee9911ad2a/t/5f8fb7dcac3e6348089291a2/1603254237712/MODEL+resolution+2020.pdf>