



*Bringing back the birds*

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

8 March, 2023

**Subject:** American Bird Conservancy Strongly Supports HF 2472 and HF 1317

Dear Chairwoman Vang,

American Bird Conservancy and our 5,800 members and supporters in Minnesota strongly support HF 2472 and HF 1317. Every year, as many as 67 million birds are killed by pesticides.<sup>1</sup> Minnesota is the only state in the country which has three of the major migratory pathways, the Atlantic, Mississippi, and Central Flyways, passing through it, making it uniquely positioned as absolutely vital for birds.

These landmark pieces of legislation will not only provide definition for harmful systemic insecticides used as seed treatments, they will protect wildlife, ecosystem, and human health from the devastating effects of neonicotinoids.

- **A single seed coated with a neonicotinoid is enough to kill a songbird.**  
Though they may be applied in a “less wasteful” manner as a seed treatment, the incredibly high toxicity of neonicotinoids means that even a small amount is highly toxic.<sup>2</sup> 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.<sup>3</sup>
- **Neonicotinoids indiscriminately kill non-target invertebrates, depleting necessary food resources for birds and other wildlife.**  
Neonicotinoids on seeds are highly water soluble; less than 5% of the active ingredient remains on the seed while the rest contaminates soil and water.<sup>4</sup> The resulting loss of available insect prey leads to smaller brood sizes, increased chick mortality, and population declines.<sup>5</sup>
- **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. Many growers are unaware that the seeds they are planting contain neonicotinoids, making it difficult to mitigate their impact or take necessary precautions.
- **Neonicotinoids provide little to no benefit to growers.**  
A study performed by the US Environmental Protection Agency recommended that neonicotinoid seed treatments provide no economic benefit to soybean growers.<sup>6</sup> Many studies have found no change in yield to corn grown with or without neonicotinoid seed coatings, yet coated seeds cost significantly more than uncoated seeds.



# AMERICAN BIRD CONSERVANCY

*Bringing back the birds*

- **HF 1317 and HF 2472 close regulatory loopholes, protect wildlife, and empower growers to make more informed decisions about what products to use.**  
HF 2472 would mandate that before systemic pesticide-treated seeds are used, they are actually needed. When they are, they will be tracked, evaluated, and subjected to best management practices like all other chemicals.

HF 1317 provides much needed definitions, safety provisions, and protections for wildlife and human health. It requires safe disposal measures be put in place, a necessary but not federally mandated clause. Improper disposal of treated seed may lead to waterway contamination and wildlife mortality, while use of treated seed for other purposes has killed bees, birds, and other wildlife.

We thank you for your consideration of these issues and ask for your strong support of HF 2472 and HF 1317.

If we can ever be of assistance please do not hesitate to reach out.

Sincerely,

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Pesticides and Birds Campaign  
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<sup>1</sup> [https://www.fs.usda.gov/psw/publications/documents/psw\\_gtr191/psw\\_gtr191\\_1065-1070\\_mineau.pdf](https://www.fs.usda.gov/psw/publications/documents/psw_gtr191/psw_gtr191_1065-1070_mineau.pdf)

<sup>2</sup> [https://abcbirds.org/wp-content/uploads/2015/05/Neonic\\_FINAL.pdf](https://abcbirds.org/wp-content/uploads/2015/05/Neonic_FINAL.pdf)

<sup>3</sup> Margaret Eng et al., A Neonicotinoid Insecticide Reduces Fueling and Delays Migration in Songbirds, *Science* (Sep. 13, 2019), <https://bit.ly/3GAwBpL>.

<sup>4</sup> Krupke, C., and Tooker, J. (2020). Beyond the Headlines: The Influence of Insurance Pest Management on an Unseen, Silent Entomological Majority. *Sustainable Food Systems*. <https://doi.org/10.3389/fsufs.2020.595855>

<sup>5</sup> Tallamy, D., and Shriver, G. (2021). Are declines in insects and insectivorous birds related? *Ornithological Applications* (123). <https://doi.org/10.1093/ornithapp/duaa059>

<sup>6</sup> [https://www.epa.gov/sites/default/files/2014-10/documents/benefits\\_of\\_neonicotinoid\\_seed\\_treatments\\_to\\_soybean\\_production\\_2.pdf](https://www.epa.gov/sites/default/files/2014-10/documents/benefits_of_neonicotinoid_seed_treatments_to_soybean_production_2.pdf)