



March 22, 2021

House Agriculture Finance and Policy Committee
Chair Mike Sundin
417 State Office Building
100 Rev. Dr. Martin Luther King Blvd
St. Paul, MN 551155

Dear Chair Sundin and committee members,

The Minnesota Corn Growers Association (MCGA) appreciates the opportunity to submit written testimony on HF 670 (Morrison) and HF 766 (Hansen). MCGA represents nearly 6,500 dues-paying corn farmer members and the research and education activities of 24,000 Minnesota corn farmers who contribute to the corn checkoff program.

HF 670

Chlorpyrifos is a critical crop protection tool for Minnesota farmers and it remains vital that growers have access to this tool through pesticide registration. Access to this tool is important for growers because there is a lack of reliable and effective alternatives to manage arthropod pests thus continued access to chlorpyrifos is essential from an insect resistance management perspective. MCGA opposes HF 670 because it would prohibit the sale and use of chlorpyrifos in Minnesota before reviews are completed at the federal level, and MCGA supports federal registration and regulation of pesticides.

Chlorpyrifos is currently registered through the federal Environmental Protection Agency (EPA). The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) requires a Pesticide Registration Review every 15 years. Chlorpyrifos is currently undergoing a registration review by EPA and the agency intends to complete the review by October 1, 2022. Additionally, the Minnesota Department of Agriculture recently finalized a scoping document for a special registration review of chlorpyrifos. Once the review is complete, the Commissioner of Agriculture (MDA) will issue a determination of the review's findings with opportunities for action. Given the regulatory reviews at both the federal and state level, legislation to prohibit the sale and use of chlorpyrifos circumvents the federal review and registration process.

HF 766

MCGA comments on HF 766 are specific to sections one, two and three. Seed treatments provide farmers with an economical level of risk management and a means of protecting seeds and seedlings against early-season insect pests and diseases. This is a critical crop protection tool as farmers reduce the number of seeds planted per acre in order to manage their expenses. The use of a seed treatment helps to reduce the need for rescue treatments or to replant a failed crop.

MCGA supports following federally approved directions on treated seed container labeling for handling, storage, planting and disposal practices. MCGA supports the label regulation of pesticides at the federal level. Further, MCGA conducts proactive communications to our membership and all Minnesota corn

farmers about the importance of seed treatment stewardship. We regularly share in our communications educational resources for farmers on seed treatment stewardship at www.seed-treatment-guide.com. We have also partnered with the University of Minnesota Bee Lab to share important information and resources for farmers on pollinator friendly practices.

Language in sections one and three of the bill propose new language for treated seed labels that give the impression treated seed is used to produce ethanol in Minnesota. The only ethanol plant in the country that has used treated seed to produce ethanol is in Mead, Nebraska. The only state-specific, site-specific example of this practice in the country is in Mead, Nebraska. Minnesota ethanol plants produce ethanol from harvested field corn. Currently, approved state air and water permits are unlikely to allow any Minnesota ethanol plant to produce ethanol from treated seed without incurring a permit violation. Adding this language to a seed label or as a miscellaneous violation, gives members of the public the impression this a practice in Minnesota, when that is not the case and therefore is unnecessary.

General comments

MCGA would also like to highlight the work at the MDA in executing its statutory authority related to all aspects of pesticide environmental and regulatory functions. Efficient and strong execution of the MDA Pesticide Management Plan by agency staff, industry partners and stakeholders has been effective. Voluntary best management practice education, execution and promotion by MDA, University of Minnesota Extension, pesticide registrants and the entire agriculture industry has led to declining concentrations of pesticides relative to environmental standards.

MCGA, our members and all Minnesota corn farmers take seriously our role in the safe and effective use of crop protection tools to minimize environmental impact while still providing the necessary tools for farmers to produce a successful corn crop each year. MCGA has invested in research, development of best management practices, education and outreach to produce a sustainable corn crop for the farm economy, the environment and the public. We would be happy to provide further information on specific efforts by MCGA related to pesticide education and research to members of the committee.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Waibel', with a large, sweeping flourish at the end.

Tim Waibel
President
Minnesota Corn Growers Association