

- 1) Full implementation of the **8 recommendations from the Minnesota Department of Agriculture's Neonic Review**, as listed [here](#).

Note: To move this forward, our subcommittee requests more information on how MDA plans to implement "verification of need," to ensure that it's both workable for farmers and rigorous in providing pollinator protection.

- 2) **MDA should designate neonicotinoids as a restricted use pesticide.**
- 3) **The Minnesota Legislature adopt in statute a goal to reduce the use of neonicotinoid seed treatments by 80%, not to be replaced with another neonicotinoid treatment method.**

Proposed steps:

- 1) Minnesota legislature should grant the MN Department of Agriculture regulatory authority over pesticide application through the use of treated seeds. MDA should be directed to begin to track use of pesticide seed treatments immediately.
- 2) Phase out use of neonic seed treatments, or other methods of pre emergent neonic applications, in soybeans, as UMN researchers have found that neonic seed treatments are rarely effective as soybean seed treatments in Minnesota -- and sometimes harmful by accelerating resistance or killing beneficial insects.¹
- 3) Significantly reduce use of neonic seed treatments or other pre emergent neonic treatments in corn. Neonic-treated corn, or other pre emergent neonic application, will be available whenever needed by farmers for planting those acres where a demonstrated pest presence exists that can be addressed by neonicotinoid seed treatments or other pre emergent neonicotinoid application.
- 4) Phase out use of neonic seed treatments, without substituting a different pre emergent neonicotinoid application method, in other Minnesota crops that are highly attractive to pollinators, like canola, sunflower, and other fruit and vegetable crops.
- 5) Explore other strategies to facilitate this reduction, which may include development of new BMP's, new insurance or compensation programs to minimize financial impacts on farmers, increased Extension outreach on non-chemical alternatives, etc.
- 6) After three years, MDA shall assess:

¹https://swroc.cfans.umn.edu/sites/swroc.cfans.umn.edu/files/e-268_the_effectiveness_of_neonicotinoid_seed_treatments_in_soybean_web_15.pdf

- a) The percentage reduction in the use of neonic seed treatments, not replaced by other pre emergent neonicotinoid applications, towards meeting the 80% reduction goal.
- b) The economic impact, positive or negative, on farmer livelihoods in Minnesota resulting from reduced use of neonicotinoids, and
- c) if/how pollinator populations have changed during the same period.

References and resources:

Ontario's approach:

<https://www.ontario.ca/page/neonicotinoid-regulations-growers#section-2>

4) That the Minnesota Legislature adopt in statute a goal to reduce the overall use, public and private, of pesticides harmful to pollinators by 30% within 3 years of state adoption of the goal.

Further, the legislation adopting the overall 30% reduction goal should designate a lead state agency to accomplish this goal and include a charge to every state agency involved in pesticide monitoring and or regulation be directed in statute to prepare an Agency Plan of Action to be submitted to the legislature prior to the next legislative session that includes at least the following: 1) Steps the agency intends to take to reduce the use of pollinator-harming pesticides through regulation, educational outreach, improved reporting requirements, and other steps determined by the agency; 2) new or expanded statutory agency authority needed to implement its Agency Plan of Action; 3) Plans for reduction of pollinator-harming pesticide use by the agency itself, 4) additional resources needed by the agency to fully implement its Agency Plan of Action, including identification of any necessary research on alternatives to pesticides currently in use.

The University of Minnesota shall be charged with identifying the most significant pests and diseases for which pollinator-harming pesticides are used, and identifying non-chemical IPM practices for managing pest and disease issues identified.

And further, the legislature should provide reasonable appropriations to fund the development of the required Agency and University Plans of Action.

Agencies and the University may also explore other strategies to facilitate this reduction, which may include development of new BMP's, new insurance or compensation programs to minimize financial impacts on farmers, increased Extension outreach on non-chemical alternatives, etc.

The goal of this proposal is to decrease overall pesticide use, with no increase in use of products that are toxic to pollinators or to human health, and favoring the use of short residual pesticides (less than 8 hrs) over those with extended residual properties.

The Department of Agriculture and the University of Minnesota should collaborate to create metrics to measure reductions. This includes 1) generating or updating a list of pesticides known to be harmful to pollinators, and 2) creating measurement systems to determine if and how reductions are made. A "reduction" means both a decrease in total volume of pesticides used, *and* no increase in toxicity of products used. (For example, using a lesser volume of a more toxic product does not constitute a successful reduction in pesticide use.)

References and resources:

France's [plan for pesticide reduction](#)

[Pesticide Risk Tool](#)

5) The Minnesota Legislature should provide MDA with the resources and tools to assure that EPA label requirements intended to protect pollinators are followed in Minnesota. MDA should be charged with making pollinator protection EPA label compliance an agency priority.

6) Minnesota ought to require, by statute or administrative rule, seed companies to offer non neonic treated versions of their top corn seed varieties at all levels of maturity.

7) Ban the use of neonics on plants except for food production.

8) Require MN pesticide use reporting data be classified as public data.

Pesticide use reports must be submitted to commissioner (through county offices) within 7 days of application.

