



Maryland Grain Producers Association
123 Clay Drive, Queenstown, MD 21658
Lindsay.mdag@gmail.com (p) 443-262-8491
www.marylandgrain.com

SB 300 - Pesticides - Use of Chlorpyrifos - Prohibition

Committee: EHEA

Date: February 11, 2020

MGPA Position: OPPOSED

The Maryland Grain Producers Association serves as the voice of grain farmers growing corn, wheat, barley and sorghum across the state. Senate Bill 300 - Pesticides - Use of Chlorpyrifos – Prohibition would deeply impact our farmers' ability to adequately and responsibly control for insects with the potential to devastate entire crops. This bill seeks to ban Chlorpyrifos, products containing Chlorpyrifos, and seeds treated with Chlorpyrifos as of October 1, 2020.

In grain production, Chlorpyrifos is primarily used to control for corn root worm and grubs but can also control for other pests such as spider mites, beetles, and fire ants if necessary. The use of Chlorpyrifos has significantly declined in grain production since the inception of genetically modified (GMO) corn because the GMO corn is modified with *Bacillus thuringiensis* (Bt) which is unappealing to corn root worm. Chlorpyrifos is an essential tool for farmers who choose to grow non-GMO crops. It is also a tool that farmers experiencing Bt resistance in their GMO crops can use in emergencies to control for pests.

According to the Maryland Department of Agriculture, the use in Maryland across all crops is less than four thousand pounds annually. This is a very low use pesticide but when farmers use Chlorpyrifos, it is because they really need it.

Having Chlorpyrifos as a tool in the toolbox for farmers to protect their crops allows them to practice responsible, integrated pest management (IPM) and use only the products and amounts necessary. If Chlorpyrifos were to be banned in Maryland, it would cause hardship for Maryland farmers. While there are alternatives such as neonicotinoids and pyrethroids, they are not always as effective and often have to be used in either greater quantities and/or more applications. Additionally, farmers cannot use the same products over and over again without risking the pests building resistance, that is not responsible IPM.

Chlorpyrifos is a federally restricted pesticide which means that only those with training and certification can apply the products containing it. The pesticide label, which is the law, instructs applicators to take the necessary precautions to avoid exposure. Farmers with a pesticide applicators license have the training and knowledge to apply Chlorpyrifos in a safe manner.

You will hear from proponents of the bill that “there is no safe use of Chlorpyrifos,” according to EPA. This is in regards to the previously proposed rule where EPA proposed to revoke all tolerances for Chlorpyrifos. An EPA Scientific Advisory Panel tasked with reviewing the Risk Assessment that informed this proposed rule found several troubling issues with the use of the Columbia Center for Children’s Environmental Health (CCCEH) cord blood data on chlorpyrifos concentrations and “majority of the Panel considers the Agency’s use of the results from a single longitudinal study to make a decision with immense ramifications based on the use of cord blood measures of chlorpyrifos as a PoD for risk assessment as **premature and possibly inappropriate**.” (“A set of Scientific Issues Being Considered by the EPA Regarding Chlorpyrifos: Analysis and Biomonitoring Date” April 2016)

MGPA is confident that Chlorpyrifos is safe when used correctly and knows it to be a necessary tool for farmers to have as an option when needed. Banning Chlorpyrifos in Maryland would cause financial hardship for those who rely on it as well as put Maryland grain farmers at a competitive disadvantage to those in surrounding states who can use this federally approved product. Many grain producers also grow other crops including canning vegetables

such as peas, lima beans and green beans. Currently, these seeds are treated with Chlorpyrifos to protect against soil pest before the seed germinates and the plant comes out of the soil. Producers under contract with the canning companies do not have a choice as to what seeds and treatments are used. **If Maryland bans this product while it can still be used in all the surrounding states, the canning companies have indicated they would just “move those acres elsewhere” meaning the farmers would lose their contracts and that source of income.**

There is a rigorous process at the federal level for pesticide review, approval and registration. There are experts and scientists that are dedicated to this process and have the knowledge to make sound decisions. We ask that you allow EPA to continue the FIFRA process and not take action at the state level.

MGPA respectfully requests your unfavorable report on SB 300.