

**Written Testimony of the Council of Producers & Distributors of Agrotechnology
on Senate Bill 0158
Pesticide Registration – PFAS Testing – Requirements
Before the Energy, Education and the Environment Committee
February 2, 2023**

The Council of Producers & Distributors of Agrotechnology (CPDA), based in Washington DC, is the premier advocate for agricultural adjuvant and inert ingredient suppliers. CPDA members produce and sell tank-mix adjuvants, inert ingredients, pesticides and other agrotechnology products across the United States and range in size from small businesses to large, publicly traded companies. Approximately 80% of the adjuvant and inert ingredients used in agricultural production products throughout the U.S. are provided by CPDA members.

We appreciate the opportunity to comment on Senate Bill 0158: “Pesticide Registration – PFAS Testing – Requirements.”

SB 158 raises a number of critical questions that the public needs to have answers to before this proceeds to any legislative vote.

Public Health Pesticides: The new law would prohibit the Maryland Secretary of Agriculture from registering a pesticide for use in the State unless the distributor of the pesticide submits data that proves that the product has “passed the Per- and Polyfluoroalkyl Substances (PFAS) test,” which means that the sum of the concentrations of analytes in a pesticide total less than 100 parts per trillion. Testing would be required for pesticides used against mosquitoes beginning on January 1, 2024.

Has analysis been done to determine:

- Which vector control products would be affected?
- How this new requirement affects the incidence of vector spread diseases like encephalitis as well as other viral, bacterial, and parasitic infections?
- The severity of potential outbreaks and their effect on various subpopulations and disadvantaged communities?

Agricultural Pesticides and Other Products: Testing for all other pesticides, including agricultural pesticides, homeowner products like termiticides, and surface disinfectants would be required beginning on January 1, 2026.

Has analysis been done to determine:

- Which agricultural products would be affected and how this would impact Maryland’s farmers? How many farms will be affected? Are some crops affected more than others? If so, where are the greatest impacts?
- Will biopesticides used in organic farming be affected? If so, what will be the impact?
- Can consumers expect that prices for Maryland-grown products will rise? If so, how much or will consumers substitute Maryland products for food grown in other states and countries?
- Surface disinfectants used by hospitals and in homes are registered and regulated by the U.S. Environmental Protection Agency as pesticides. Which disinfectants will be affected by the new law? How will this impact public health?

Until there are answers to these questions, CPDA urges Senators to vote “no” on SB 0158.