

February 12, 2025

**Committee: Health and Government Operations**

**Testimony on: HB386 Pesticides - PFAS Chemicals - Prohibitions**

**Position: Support**

Dear Chair Pena-Melnyk and Members of the Committee,

My name is Robin Todd. I am a retired board-certified entomologist. I spent seven years working for the Mosquito Research & Control Unit in Grand Cayman before moving to the US in 1979. For the next 36 years I tested insect control products for their efficacy and registered such products with EPA for clients, the companies that manufactured and/or marketed them. Then for 3 years I consulted for companies seeking to register such products. I write as a member of the Smart on Pesticides Coalition in strong support of HB386 due to the harmful impacts of PFAS pesticides. I recently had my own blood analyzed for its PFAS content by Eurofins and learnt that it is 9.845 ng/ml, a moderate level. I am now trying to minimize my exposure to PFAS.

My testimony focuses on the availability of alternative products, which are already registered in Maryland, to replace the PFAS pesticides which HB386 would address and no longer allow for use.

One concern about HB386 is that it might deprive Maryland's farmers, pest control operators and homeowners of vital tools from their pest control 'toolbox'. Data from the Maryland Department of Agriculture's excellent website shows that there will still be plenty of tools left in that toolbox if HB386 is signed into law. There are approximately 14,000 pesticide products available to Marylanders; HB386 would remove just under 8% of these, leaving approximately 13,000 products to choose from.

The top 10 PFAS pesticides, in terms of quantities used in Maryland (based on MDA data for 2022) are listed below from greatest to least. The top PFAS pesticides are clearly the herbicide Prodiamine, with 634,508 lbs applied, followed by the insecticides Fipronil and Lambda-cyhalothrin as distant second and third, with about 55,000 lbs of each applied.

PFAS Pesticide Active Ingredient	Pounds Used (2022)	Category
Prodiamine	634,508	Herbicide
Fipronil	57,646	Insecticide
Lambda-cyhalothrin	54,937	Insecticide
Dithiopyr	8,892	Herbicide
Bifenthrin	7,690	Insecticide
Trifluralin	5,353	Herbicide
Pyroxasulfone	4,531	Herbicide
Fluazinam	3,489	Fungicide, Miticide
Chlorfenapyr	2,273	Insecticide
Mefentrifluconazole	1,401	Fungicide

There follows a summary of how many non-PFAS pesticides products would be available in Maryland for each pest group (shown in parentheses below) that the PFAS products are used for, if HB386 is passed into law. The use sites are also given. Hyperlinks display actual products in Maryland Registered Pesticides database. *Product numbers, from Oct, 2024, may vary due to 2025 renewals in flux while system updates product renewals.*

**Top 10 PFAS Pesticides, with Numbers of Alternative Products by Pest Group, #number shows ranking in MDA 2022 Pesticide Use Survey.**

1) **#2. Prodiamine** - Herbicide – preemergence

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Annual Bluegrass ([330](#)), Carpetweed ([410](#)), Common Chickweed ([307](#)), Foxtail ([188](#)), Lovegrass ([121](#)), Witchgrass ([295](#))

**Sites:** Nursery, Fruit, Industrial, Regulatory, Forest, Turf, Rights of Way

2) **#10. Fipronil** - Insecticide

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Ants ([1158](#)), Bees ([368](#)), Beetles ([374](#)), Black Widow Spiders ([204](#)), Spiders ([816](#)), Crawling Insects ([138](#)), Crickets ([1013](#)), Earwigs ([696](#)), Fleas ([1,243](#)), Cockroaches ([773](#)), House Fly ([623](#)), Termites ([301](#)), Ticks ([1262](#)), Wasps ([553](#)), Yellowjackets ([339](#))

**Sites:** Industrial, Rights-of-Way

3) **#11. Lambda-cyhalothrin** – Insecticide

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Ants ([1158](#)), Beetles ([374](#)), Black spiders ([204](#)), Cockroaches ([773](#)), Earwigs ([696](#)), Fleas ([1,243](#)), Mites ([758](#)), Moths ([310](#)), Spiders ([816](#)), Termites ([231](#)), Ticks ([1262](#)), Wasps ([553](#)), Yellowjackets ([339](#))

**Sites:** Domestic outdoor and indoor, ornamentals, turf and vegetables

4) **#27. Dithiopyr** – Herbicide

**Pests/Numbers of alternative products** registered to control the common Maryland pests/groups: Grasses ([292](#)), Mustard ([464](#)), Thistle ([241](#)), Weeds ([146](#))

**Sites:** Nursery, Forest, Turf, Ornamental, Field, Industrial

5) **#31. Bifenthrin** - Insecticide (7,690 lbs)

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Worms ([47](#)), Mites ([758](#)), Moths ([310](#)), Ants ([1,158](#)), Beetles ([374](#)), Thrips ([922](#)), Caterpillars ([347](#)), Termites ([231](#))

**Sites:** Field, Forest, Fruit, Vegetables, Nursery, Industrial

6) **#39. Trifluralin** – Herbicide

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Annual bluegrass ([266](#)), Carpetweed ([311](#)), Common chickweed ([243](#)), Foxtail ([158](#)), Lovegrass ([93](#)), Pigweed ([147](#)), Thistle ([153](#)) and Witchgrass ([229](#)).

**Sites:** Crops, Turf, Vegetables

7) **#42. Pyroxasulfone** – Herbicide

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Annual Bluegrass ([266](#)), Annual grasses ([90](#)), Carpetweed ([311](#)), Common chickweed ([243](#)), Crabgrass ([258](#)) and Witchgrass ([229](#)).

**Sites:** Crops, Rights-of-Way and Roadsides

8) **#51 Fluazinam** - Fungicide, Miticide

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Fruit Rot ([69](#)), Mildew ([273](#)), Mites ([758](#)), Red Thread ([169](#)), Leaf Spot ([282](#))

**Sites:** Turf, Fruit, Vegetables

9) **#64 Chlorfenapyr** – Insecticide

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Alfalfa Looper ([201](#)), Worms ([47](#)), Mites ([758](#)), Fungus Gnats ([286](#))

**Sites:** Greenhouse, Industrial, Ornamental, Fruit, Vegetables, Field

10) **#76 Mefentrifluconazole** – Fungicide

**Pests/Numbers of alternative products** registered to control common Maryland pests/groups: Black Mold ([53](#)), Fruit Rot ([69](#)), Mildew ([273](#)), Mites ([758](#)), Red Thread ([169](#)), Leaf Spot ([282](#))

**Sites:** Fruit, Vegetables, Field

It is clear from the above that the loss of the top 10 PFAS pesticides should not be an obstacle to Maryland's farmers, pest control operators or homeowners for controlling pests. Accordingly, I ask that the Committee for Health and Government Operations give a favorable report on HB386.

Sincerely,



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