



Maryland Farm Bureau

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February 4, 2026

To: House Environment and Transportation Committee

From: Maryland Farm Bureau, Inc.

RE: **Opposition of HB91 Agriculture - Neonicotinoid Pesticides - Prohibitions**

On behalf of the over 7,000 member families of the Maryland Farm Bureau, I submit written testimony in opposition to HB91 Agriculture - Neonicotinoid Pesticides - Prohibitions. Maryland farmers rely on neonicotinoid seed treatments as an essential tool to protect crops from early-season pest pressures and to support the implementation of climate-smart production practices such as cover crops and no-till farming. Neonicotinoids, often referred to as “neonics”, provide safe, effective, and highly targeted protection against pests that attack seeds and seedlings before they emerge. The evidence is clear that these seed treatments significantly reduce the total volume of pesticide needed throughout the growing season by placing the product precisely where it is needed, on the seed itself, rather than requiring broad-acre spray applications after damage has already occurred.

Maryland’s grain sector does not operate in isolation; it is part of a highly integrated regional and national seed market. Hybrid and treated seeds are not custom-produced for individual states, and seed companies have been explicit that they will not formulate special seed treatment runs for Maryland’s fewer than one million acres of corn, soybeans, and small grains. A prohibition on selling or using neonic-treated seed will therefore severely restrict Maryland farmers’ access to competitively priced and agronomically appropriate seed varieties. Seed for the 2026 fall planting season has already been purchased, and without access to treated seed, farmers will face severe supply shortages for the 2027 growing season and beyond.

The practical realities of pest pressures further underscore the risks of HB 91. Soil-dwelling pests are seldom visible until after crop injury has occurred, and farmers across the state have reported pre-emergent stand losses of 30 to 50 percent on untreated seed. Non-treated soybeans account for the majority of replanted acres in Maryland today, costing growers an additional \$30 to \$50 per acre in seed expenses alone. For corn, a 50 percent stand loss translates to an estimated \$360 per acre in lost revenue—losses that many operations simply cannot absorb. Neonicotinoid seed treatments prevent these losses by protecting the seed during the brief but highly vulnerable germination window.

The economic and agronomic value of neonicotinoids is well-established. A 2020 Cornell University study concluded that neonics “consistently increase net income, reduce crop damage, or provide superior pest control compared to likely substitutes” for farmers. Removing access to neonic seed treatments would force farmers to rely on older, less effective pest



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control options that undermine integrated pest management principles and threaten their ability to maintain conservation practices, including reduced tillage and cover cropping.

Seed treatments themselves are a risk-mitigating technology. By applying a small amount of pesticide directly to the seed, farmers reduce the likelihood of pollinator exposure compared to foliar or soil-applied alternatives. Eliminating this precise and environmentally responsible application method would increase the use of antiquated chemistries, often requiring multiple broadcast applications at significantly higher volumes. For every pound of neonics removed from use, nearly five pounds of organophosphates would be required to achieve similar control. This not only increases overall pesticide use but also accelerates the development of resistance in pest populations—an outcome that harms both agriculture and the environment.

Finally, neonicotinoids remain fully approved for use by the U.S. Environmental Protection Agency, which is engaged in a multi-year, science-based registration review that includes extensive biological evaluations on endangered species, pollinators, and sensitive habitats. EPA released updated pollinator risk assessments and proposed interim decisions in January 2020 as part of this rigorous federal review. Any changes to allowed uses should be grounded in that scientific process rather than through state-level prohibitions that preempt ongoing federal evaluations.

For these reasons, and to avoid significant economic, environmental, and operational harm to Maryland agriculture, I respectfully urge the Committee to issue an unfavorable report on HB 91.

A handwritten signature in black ink, appearing to read 'Tyler Hough', with a horizontal line above it.

Tyler Hough
Director of Government Relations

Please contact Tyler Hough, though@marylandfb.org, with any questions