



Delaware Maryland Agribusiness Association
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HB 91 Agriculture - Neonicotinoid Pesticides – Prohibitions

DMAA Position: **OPPOSED**

Committee: E&T

Date: February 4, 2026

Chairman Korman, members of the Environment and Transportation Committee, I am writing on behalf of the Delaware Maryland Agribusiness Association to request an unfavorable report on House Bill 91.

This legislation would ban the use of neonicotinoid treated seed for corn, soybeans and wheat and all applications for turf and ornamental uses.

Neonicotinoids were developed in the 1980's and 1990's as alternatives to previously used pesticides because of their low toxicity to humans and non-target species. Neonicotinoids are primarily used in agriculture as seed treatments applied to seed prior to sale. These treatments help to protect the seed and the resulting crop from harmful pests including rootworms, flea beetles, and white grubs. Pests such as these have the potential to completely destroy a crop of corn or soybeans before the plant ever emerges from the soil. Using seed treatment reduces the need for spray application of pesticides after the crop has been planted thus reducing the overall risk of exposure.

Seed treatments are a core component of Integrated Pest Management (IPM) because they provide targeted, preventive protection at the most vulnerable stage of crop development while minimizing broader environmental exposure. IPM is a science-based framework that combines multiple tools including cultural practices, biological controls, monitoring, thresholds, and judicious pesticide use to manage pests economically and sustainably. Treating seed allows a very small, precise amount of insecticide to be placed directly on or near the seed, protecting it from early-season soil and seedling pests when the plant cannot defend itself. This approach often reduces or eliminates the need for foliar or soil-applied insecticides later in the season, which aligns with IPM principles of using the least-disruptive and lowest-volume control methods first. The U.S. Environmental Protection Agency recognizes IPM as a cornerstone of pesticide regulation under FIFRA, and seed treatments fit within that framework by lowering overall pesticide use, reducing worker and non-target exposure, and supporting complementary IPM practices such as no-till, cover crops, and field scouting.

The U.S. EPA regulate pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). FIFRA dictates that EPA is required to determine that a pesticide can be used without causing unreasonable adverse effects on human health or the environment before it can be registered or remain on the market. As part of this process, EPA conducts periodic registration reviews using the best available science. For neonicotinoid insecticides, EPA undertook a pollinator-focused special review, issuing updated pollinator risk assessments and issued a new Proposed Interim Decision in 2020. These evaluations specifically examined potential exposure pathways for bees, including residues in pollen and nectar and dust from treated seed planting. While EPA identified certain scenarios where risk mitigation may be appropriate, the Proposed Interim Decisions did not impose new limitations or prohibitions on neonicotinoid-treated seed for pollinator protection, and instead continued to allow their use under existing labels.

Our farmer customers rely on seed treatments to allow them to protect their crop while planting in often difficult conditions, especially in the early Spring. Seed is grown, inventoried and distributed on a national scale. Maryland row-crop acreage, while economically significant to the state, is very small in the national market. Seed companies will likely be unable to continue to provide the variety of seed genetics un-treated for such a small market segment leaving Maryland farmers at a disadvantage.

Neonicotinoids have been extensively tested by both the companies that developed them and the Environmental Protection Agency to ensure their safety for both humans, wildlife and the environment. They are an important part of controlling pests in a way they minimizes environmental and airborne exposure while helping to ensure food security.

DMAA urges your unfavorable report on House Bill 91

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