

“Representing the Agricultural Producers of Montgomery County”

February 4, 2026

To: The Honorable Delegate Marc Korman

Chair of the Environment and Transportation Committee

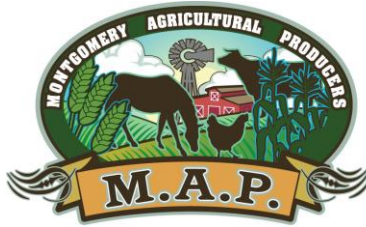
Re: Maryland H.B. 91

Delegate Korman

Montgomery Agricultural Producers would like to share our concerns about HB091. The use of Neonicotinoids in agriculture has long been recognized as a safe way to help farmers protect their crops.

Neonicotinoids are important for grain production when used as a seed treatment applied before planting. Nearly all corn seeds planted in Maryland, and the majority of soybean seed, are treated to protect the crop from rootworms, cutworms, flea beetles, white grubs, and wireworms, all of which can be devastating to seeds before they emerge from the soil. Using seed treatments reduces pesticide use by eliminating the need for post-planting applications.

Seed treatments are important because they protect seeds from soil pests that are often not evident until after the seeds fail to emerge; this is referred to as “pre-emergent loss.” Farmers planting untreated seed report pre-emergent losses of 30–50%. Unfortunately, there is no rescue treatment for pesticides once pre-emergent loss occurs, and the only remedy is to replant. Replanting an acre of corn will cost farmers in Maryland between \$130 and \$170 per acre. If a farmer chooses not to replant, or is unable to due to seed availability or timing, this could result in a loss of \$400 or more per acre for corn farmers.



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All of this is particularly troubling because banning the use of neonicotinoid-treated seed is not supported by the science used in recent regulatory decisions. The U.S. Environmental Protection Agency (EPA) has conducted updated pollinator risk assessments for neonicotinoids (2020) and released the Proposed Interim Registration. Decisions that incorporate new science on how bees and other pollinators can be exposed. These assessments consider exposure routes, including seed treatments. The Proposed Interim Decision did not include any new limitations or mitigations for neonicotinoid-treated seed required for pollinator protection.

We believe that EPA has taken, and continues to take, the necessary steps to protect pollinators from potential impacts of neonicotinoid pesticides. Our farmers strictly follow EPA guidance and believe that science continues to support the correct use of neonicotinoid-treated seeds.

Montgomery Agricultural Producers respectfully ask for your unfavorable report on HB091.

Please feel free to contact me if I can be of any further assistance.

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