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Date: February 4, 2026
To: Members of the House Committee on Environment and Transportation
From: Grayson Middleton, Government Affairs Manager
Re: HB 91 – Neonicotinoid Prohibitions – **Oppose**

Delmarva Chicken Association (DCA) is the trade association representing the meat-chicken growers, companies, and allied business members on the Eastern Shore of Maryland, Delaware, and the Eastern Shore of Virginia. Collectively, we contribute more than \$5.4 billion to Maryland’s economy and pay more than \$254 million in state and local taxes. HB 91 would have immediate, severe, and far-reaching negative impacts on Maryland grain production and thus the entire agricultural economy. Therefore, we oppose HB 91 and respectfully ask for an unfavorable committee report.

The Eastern Shore’s agrarian economy is often referred to as a “three-legged stool,” consisting of grain producers, chicken growers, and allied businesses. The vast majority (90%+) of grain grown on the Eastern Shore is converted to chicken feed, and it is purchased by our chicken companies at premium rates. Naturally, this codependence is such that when local grain production suffers, inputs must be purchased elsewhere, most often at higher costs, which are passed to the consumer. The prohibitions as outlined in HB 91 would so drastically complicate the local production of grain that the long-term viability of our chicken industry would be jeopardized.

The vast majority of soybean and corn seed planted in our region is treated with neonicotinoids. They are an essential, efficient tool for the prevention of many “pre-emergent” diseases, including wireworm, cutworms, flea beetles, and rootworm. Farmers planting *untreated* seed often see 30-50% pre-emergent loss. There is no remedy for pre-emergent loss, and therefore, the only solution is to replant the crops that have been lost. Aside from the exorbitant cost to the farmer, this also contributes further nutrient runoff due to (preventable) ground disturbances.

Grain seeds are part of a global commodities market. Any additional regulation should take into consideration the availability of alternatives and the market’s adaptability. Currently, over 90% of corn seed sold in the U.S. is treated with neonicotinoids. Nationally, Maryland is a very small market (>1%), and seed companies will not stock a special inventory of untreated seed for our farmers. This will not only reduce the availability of seed (if there is enough at all), but will likely also lead to prices higher than most farmers can justify. While the law does allow for certain discretion on the part of the Secretary, the legislation does not account for the advanced planning required for plantings, nor the inventory processes of seed companies.

The research on neonicotinoids' effect on pollinators, particularly through pre-treated seed, could be described as inconclusive at best. This is why the EPA, after considering the most comprehensive collection of data on the subject as part of an ongoing review, decided in 2020 not to go forward with any limitations of neonicotinoid treated seed. We can say with certainty that the data is not conclusive enough to jeopardize one of Maryland’s largest industries; an industry on which thousands of families depend for their livelihood, and many thousands more depend on for their sustenance.



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Given the broad and potentially dire impacts of House Bill 91, we respectfully ask for an **unfavorable** report.

Should you have any additional questions, please do not hesitate to contact me at middleton@dcachicken.com or 410-490-3329.

Sincerely,

Grayson S. Middleton
Government Affairs Manager