HB91_Favorable_Cent.Md.Beekeepers.pdf
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Position: FAV

Central Maryland Beekeepers Association

Supporting and promoting beekeepers and the viability of honeybees in central Maryland

Environment and Transportation Committee
Hearing February 4, 2026, 1 pm

Bill No.: HB91 – An Act Concerning Agriculture – Neonicotinoid Pesticides – Prohibitions
Sponsors: Delegates Healey and Ruth
Position: Favorable

Harsh economic costs are crippling Maryland's beekeeping industry and threaten farmers

Pollinators, including honeybees, wild bees and insects, and birds, are crucial to Maryland's agricultural production of fruits and vegetables. One in 3 bites of food we eat requires pollination. According to USDA National Agriculture Survey & Statistics, agricultural producers spent $400 million (2024-2025) to beekeepers providing pollination services.

This figure doesn't include the **significant free pollination services we count on that are provided by Maryland's 400 species of wild bees, other insects, and birds**. US Fish & Wildlife Service totals the economic value of insect pollination over $34 billion.[1] **Pollinators are crucial to Maryland's fruit and vegetable industry, which saw over $106 million in sales in 2022[2], all of which are highly dependent on insect pollination.** Insect pollinators are experiencing high mortality from neonic poisoning and that is why Maryland needs to pass HB91.

One study estimates that since neonics were first introduced, **U.S. agriculture has become 48-times more harmful to insect life. 98% of this increase was attributable to neonics, the number one use of which is on treated seeds.**[3]

Many plants require numerous pollination visits, some by specific pollinators (e.g. tomatoes need bumblebees) for each blossom to produce fruit. When there are fewer visits by pollinators, it causes insufficient pollination resulting in smaller malformed fruit, reduced yields, and less seed for the following year—all of which impact the bottom line for farmers.

For over a decade, U.S. beekeepers have experienced unprecedented honeybee die-offs, averaging 50% mortality annually. No exception, **Maryland beekeepers struggle to keep hives alive with consistent loss numbers from 40% to over 60%.** The U.S Beekeeping survey estimates honeybee colony losses for Maryland at 43.13% in 2024-2025. Losses above 10-15% are considered unsustainable by the beekeeping industry.[4] Older beekeepers recall that until neonics became pervasive, beekeeping was easy – bees

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[1] US Fish & Wildlife Service https://www.fws.gov/initiative/pollinators/pollinators-benefit-agriculture
[2] Maryland Dept. of Agriculture. 2024 Maryland Food Statistics. https://mda.maryland.gov/Documents/2024%20Maryland%20Food%20Statistics%20.docx%20(1).pdf
[3] Michael DiBartolomeis et al., An Assessment of Acute Insecticide Toxicity Loading (AITL) of Chemical Pesticides Used on Agricultural Land in the United States, PLoS ONE (Aug. 6, 2019), https://bit.ly/3hDBraV; Margaret R. Douglas et al., County-Level Analysis Reveals a Rapidly Shifting Landscape of Insecticide Hazard to Honey Bees (Apis Mellifera) on U.S. Farmland, Scientific Reports (Jan. 21, 2020), https://go.nature.com/3nzFYPp.
[4] Apiary Inspectors of America. Preliminary Results from the 2024-2025 US Beekeeping Survey: Honey Bee Colony Loss and Management. https://apiaryinspectors.org/US-beekeeping-survey-24-25. Scroll to Lossed by state for 2024-2025, click the map image, then click on Annual losses for Maryland.

generally thrived, and the beekeeper just harvested honey. Now beekeepers put in much more time nursing a species that is on life support and, despite the beekeepers' best efforts, all too often colonies still die. The toxic effects neonics have on bees, including weakening their immune systems, reducing fertility of queens and drones, damaging navigational ability, cause metabolic abnormalities, and increasing parasitic varroa mite populations in honeybees [5] make beekeeping a losing proposition for beekeepers.

A 2015 study by Central Maryland Beekeepers Association estimated each lost hive costs the beekeeper $1500 in replacement costs and lost revenue – not including the beekeeper's labor. Now ten years later, Stephen McDaniel of McDaniel Honey Farm updated these calculations in his HB91 testimony for 2026 at $2,165 - $2,465 per hive lost for a single year. New replacement hives often do not produce a honey crop until year two – if they survive at all. Imagine if a farmer lost 43% their dairy cattle herd each year.

Maryland Dept. of Agriculture estimates there are 18,700 managed honeybee colonies in the state and Maryland's managed honeybees pollinate crops in excess of $40 million.[6] **A 43% loss rate means Maryland beekeepers lost 8,041 colonies in 2024-2025, with a loss to Maryland beekeepers of almost $17.5 million (USD).**

High honeybee losses, year after year, have subsequently caused a steady churn of attrition as beekeepers quit beekeeping and has caused commercial beekeepers to be unable to fulfill pollination contracts to farms in the state (see Stephen McDaniel's testimony).

Neonicotinoids are toxic, persistent, highly mobile, and pervasive

Neonics are neurotoxic insecticides that kill insects by permanently binding to, overstimulating, and ultimately destroying their nerve cells.[7]

In 2016, Maryland lawmakers wisely enacted a neonic ban on consumer home garden products, however **applications by lawn care companies continue. At EPA-approved rates, a single square foot of lawn treated with a neonic product can contain enough neonic to kill over one million bees.[8]**

Neonicotinoid-coated corn seeds have been identified as a direct cause of honeybee mortality, in the form of exposure to dust from the planting of coated seeds and droplets of water of corn plants germinated from coated seeds.[9] [10]

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[5] Bartlett L. May 2024. Neoncotinoid exposure increases *Varroa Destructor* mite parasitism severity in honey bee colonies and is not mitigated by increased colony genetic diversity. Oxford Academic. Journal of Insect Science. https://academic.oup.com/jinsectscience/article/24/3/20/7683866?login=false

[6] Maryland Dept. of Agriculture. Apiary Inspection webpage. https://mda.maryland.gov/plants-pests/pages/apiary_inspection.aspx

[7] National Pesticide Information Center, "Imidacloprid: Technical Fact Sheet," https://bit.ly/2QEblaW (accessed December 2, 2019).

[8] See, e.g., European Food Safety Authority, Conclusion on the Peer Review of the Pesticide Risk Assessment for Bees for the Active Substance *Thiamethoxam*, March 14, 2013, p. 9, https://bit.ly/2lR7Xfo (listing the acute oral honeybee "LD50"—the dose of imidacloprid expected to kill half a population of exposed honeybees when ingested—as 0.005 µg per bee). U.S. Environmental Protection Agency (hereinafter EPA), "Amended Label to Increase Soybean Rates + Supplemental Label for Soybean Cruiser® Insecticide," amended and approved February 23, 2009, https://bit.ly/2kGCgW3 (allowing up to 1.25 mg of thiamethoxam per corn seed). EPA, "Registration for Imidacloprid (NTN 33893)," March 10, 1994, p. 7, https://bit.ly/2K36Bbl (listing the honeybee LD50 as 0.0039 µg per bee). EPA, pesticide label for Gaucho 600 Flowable, p. 5, https://bit.ly/34FL8x2 (allowing up to 1.34 mg of imidacloprid per corn seed).

[9] Gunderson, D. Feb 10, 2015. Early research links insecticide, monarch butterfly deaths. MPR News. Retrieved from http://www.mprnews.org/story/2015/02/10/butterfly-deaths-neonicotinoids.

[10] Mineau P, Whiteside M. 2013. Pesticide Acute Toxicity Is a Better Correlate of U.S. Grassland Bird Declines than Agricultural Intensification. PLoS ONE 8(2): e57457. https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0057457.

While acute toxicity of neonicotinoids (causing death) has been documented, most worrisome are their sublethal effects, invisible to the casual observer but potent in severely altering the behavior of honeybees. Research on bees documented that sublethal doses of neonicotinoids

- disrupt their sleep and circadian rhythm [11]
- negatively impacts the cognitive and memory functions [12]
- hinder bees from flying back to their hives [13]

These findings, together with growing evidence that long-lasting neonicotinoid residues persist in soils and are taken up by plants far beyond treated agricultural fields, thereby exposing bees[14], demonstrate not only the harmful effects of neonicotinoids on honeybees, but also strongly suggest that these pesticides play a major role in colony collapse disorder.

Honeybees are indicators of devastation to hundreds of beneficial non-target organisms

Neonicotinoid use is the source of chronic exposure for non-target organisms, including wild pollinators and a wide range of aquatic invertebrates. The Worldwide Integrated Assessment of the Impact of Systemic Pesticides on Biodiversity and Ecosystems (2015) published a synthesis of 1,121 published peer-reviewed studies and concluded "...that existing levels of pollution with neonicotinoids ... are thus likely to have large-scale and wide ranging negative biological and ecological impacts on a wide range of non-target invertebrates..." [15]

Over 4,000 native bees play a vital role in functioning ecosystems and provide pollination services. A systematic review of the status of U.S. native bees found:

- Among native bee species with sufficient data to assess declining. (1,437), more than half (749) are declining.
- Nearly 1 in 4 (347 native bee species) is imperiled and at increasing risk of extinction.
- For many of the bee species lacking sufficient population data, it's likely they are also declining or at risk of extinction. Additional research is urgently needed to protect them.
- A primary driver of these declines is agricultural intensification, which includes habitat destruction and pesticide use.

A growing body of research reveals that more than **40 percent of insect pollinators globally are highly threatened, including many of the native bees critical to unprompted crop and wildflower pollination across the United States**. [16]

Given all this strong evidence, Central Maryland Beekeepers Association urges a favorable report from the Committee on HB91.

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[11] Michael C. Tackenberg, Manuel A. Giannoni-Guzmán, Erik Sanchez-Perez, Caleb A. Doll, José L. Agosto-Rivera, Kendal Broadie, Darrell Moore, Douglas G. McMahon. 2020. Neonicotinoids disrupt circadian rhythms and sleep in honey bees. https://doi.org/10.1038/s41598-020-72041-3

[12] Zhu, Ricky, Alexis Carmine, Mehreen Arif, Michael P. Stover, Ryan Gunnison, Kaleabe Abebe, Carly Sherman. Hartmut Doebel. In Prep. Sub-lethal Administrations of Imidacloprid Impact the Cognitive Memory and Associative Learning in Apis mellifera.

[13] Simone Tosi, Giovanni Burgio, James C Nieh. 2017. A common neonicotinoid pesticide, thiamethoxam, impairs honey bee flight ability. https://doi.org/10.1038/s41598-017-01361-8.

[14] Wood, T. Environ Sci Polllut Res Int. June 7, 2017. The environmental risks of neonicotinoid pesticides: a review of the evidence post 2013. https://pmc.ncbi.nlm.nih.gov/articles/PMC5533829/#:~:text=Neonicotinoids%20are%20water%2Dsoluble%2C%20and%20so,providing%20protection%20against%20herbivorous%20insects.

[15] See Giorio, "An Update of the Worldwide Integrated Assessment (WIA) on Systemic Insecticides Part 1: New Molecules, Metabolism, Fate,and Transport," Environmental Science and Pollution Research International (July 15, 2017), https://bit.ly/2qVqciQ.

[16] Center for Biological Diversity. Pollinators in Peril. https://www.biologicaldiversity.org/campaigns/native_pollinators/pdfs/Pollinators_in_Peril.pdf

HB091_Favorable_Cottingham&MasonsFarms.pdf
Uploaded by: Cleo Braver
Position: FAV

House Environment and Transportation Committee

February 4, 2026

Bill No.: HB91 – An Act Concerning Agriculture – Neonicotinoid Pesticides – Prohibitions
Sponsors: Delegate Healey and Delegate Ruth
Position: Favorable
Joint testimony of Cleo Braver, Cottingham Farm and Steve Kraszewski, Mason Farms Produce

Dear Chairman Korman and Members of the Committee,

Steve Kraszewski, Mason Farms Produce:
Mason Farms Produce produces nearly 900 acres of certified organic corn, soybeans and small grains in Queen Anne's County, MD. **The farm has been using untreated, non-neonic seed since 2006 and continues successfully farming to this day without it.**

High quality seed, certified organic seed, including untreated non-GMO hybrids, are easy to source without any added expense nor have they reduced our family farm's profitability in any way. (see Seed Suppliers addenda)

Neonic seed treatments add risk, expense, time, inputs, and harm the farmer's bottom line.
Consider early-planted corn here on the Delmarva: a brief weather window in mid to late April for sowing. The farmer is wrongly given a manufactured confidence that coated seed will avert risk and ensure a successful early planting. While that seed sits and waits for its proper growing conditions, the risks pile up and manifest as poor stands: cold damp soil hampers seedling vigor; pests and disease introduce themselves on susceptible plants; the expense of extra starter nutrients outweighs the benefits of the anticipated early crop.

Neonic seed treatments give a false sense of security by trying to "hack" nature.
Often requires more equipment passes across the field = more cost that squeezes any margins the farmer has left:

1. Added nutrient and pesticide applications to assist a struggling stand = loss
2. Crop insurance replant claims only cover a portion of a second planting = loss
3. Replant costs for portions of fields or entire farms = loss

A battery of treatments to stabilize / save a crop = crop welfare

Industry claims that neonic seed treatments are a farmer's tool in their toolbox simply skirts a very important issue that every farmer should be aware of. Pests and disease at planting are a harbinger of other problems in the field that go unaddressed. And **neonics are a bad hack** to address them. The farmer's trust, awareness and expertise in their own fields is outsourced to a "trustworthy" product from an industry that thinks it can supersede what a farmer already knows.

Our successful organic row crop operation uses the most reliable methods known for planting crops: quality, available seed; timing; environmental cues. We pay close attention to our soils and growing conditions because we know what's best for our ground. You'll find the 'tried and true' methods are posted on any blog, website or grower's resources thread. Neonics, and the promises they offer, are a bad hack.

Cleo Braver, Cottingham Farm:
As a year-round vegetable farmer on Maryland's Eastern Shore, I have experienced firsthand the impact of reduced and imperfect pollination of our food crops over the past almost 20 years.

It can take as many as seven or eight pollination events – visits by a pollinator – to a tomato flower to sufficiently pollinate to grow a marketable tomato. And there are scores of flowers on each of **our up to 4,000 tomato plants,** which **require a half a million pollination events on a regular basis over a six-month season.**

Even a modest reduction in pollinators materially impacts a farmer's yield of marketable tomatoes. Inadequate pollination leads to poor fruit set, smaller fruit (flowers are produced but few successfully develop into tomatoes), more irregular fruit, and less fruit, all of which decrease the grower's yield. **Tomatoes,** one of the larger cash crops on our farm, **are not pollinated by human-managed honey bees, but rather by native bumblebee "buzz" pollinators. There are visibly far fewer bumblebees on our farm than there were 20 years ago**. **My experience with lower pollination rates mirrors studies that show that nationwide many food crop yields are "pollinator limited".**

According to recent research, neonicotinoids are of specific concern [1] because they are systemic and poison every cell in the plant – nectar, pollen and fruit, they are extremely toxic to pollinators, and are carried long distances via irrigation and runoff contaminating non-crop species.

We do not use pesticides on our organic farm, but nearby pesticide use likely has a devastating impact on the native bee populations on which we have historically relied. Nearby crops – corn, soy, wheat and other crops – **grown from neonic-coated seeds are just as dangerous to my pollinators** as are crops grown with field applied neonicotinoids! It is a distinction without a difference.

On a micro level, one neonic-coated corn kernel can kill a small bird. On a macro level, you must understand that **some studies suggest that agriculture is now 48% more harmful to insects than it was before the introduction of neonicotinoid pesticides.[2]** And all this loss is allowed for no good reason: **all the insect pests purportedly targeted by neonics can be controlled by other means**. Worse yet, there is significant evidence that this harm to our pollinators takes place without even providing benefit to the user of these seed treatments.

For all these reasons, we ask the Committee to consider a favorable report on HB 91 and require neonicotinoid seed treatments to be limited in the same way that neonicotinoid consumer products are.

Very truly yours,
Cleo P. Braver, Cottingham Farm, Talbot County Maryland
Steve Kraszewski, Mason Farms Produce, Queen Anne's County

See attached:
1) list of Alternatives to Neonicotinoid Seed Treatments and
2) list of example sources for purchasing non-neonic coated seeds

[1] Janousek, W. M., Douglas, M. R., Cannings, S., Clément, M. A., Delphia, C. M., Everett, J. G., et al. (2023). Recent and future declines of a historically widespread pollinator linked to climate, land cover, and pesticides. *Proceedings of the National Academy of Sciences*, *120*(2). https://doi.org/10.1073/pnas.2211223120

[2] An assessment of acute insecticide toxicity loading (AITL) of chemical pesticides used on agricultural land in the United States Michael DiBartolomeis, Susan Kegley, Pierre Mineau, Rosemarie Radford, Kendra Klein. Published: August 6, 2019n https://doi.org/10.1371/journal.pone.0220029

Non-Neonic Treated Seed Suppliers by Crop

Some of the many seed suppliers offering alternatives to neonic-treated seed (names link to websites):

Corn Seed Suppliers

- **Prairie Hybrids**
  - Specializing exclusively in **non-GMO** and **organic** field corn
- **Albert Lea Seed**
  - Blue River Organic Seeds, Viking Non-GMO Seed
- **Baker Creek Heirloom Seeds:**
- **Clarkson Grain**
  - Non-GMO and organic white, yellow, indigo blue, and waxy dent corn
- **SureFlex Hybrids**
- **High Mowing Organic Seeds**
- **Southern Exposure Seed Exchange**
- **True Leaf Market**
- **Borries Open Pollinated Seed Corn**
- **Pioneer**
- **Axis Seed**
- **Seed Consultants**
- **Dekalb**
- **Revere**
- **Beck's Hybrids**

Soy Seed Suppliers

- **Albert Lea Seed**
  - Blue River Organic Seeds, Viking Non-GMO seed
- **PURIS**
  - Organic soybeans, Non-GMO soybeans, Natto & sprouting soybeans
- **Clarkson Grain**
  - Identity-preserved (traceable to US farms), non-GMO and organic
- **Brushvale Seed**
  - Identity-preserved (traceable to US farms), non-GMO soybeans
- **Pioneer**
- **Axis Seed**
- **Seed Consultants**
- **DeKalb**
- **Revere**
- **Beck's Hybrids**

Wheat Seed Suppliers

- **True Leaf Market**
- **Albert Lea Seed**
- **Baker Creek Heirloom Seeds**
- **Millborn Seeds**
- **Sherck Seeds**
- **Mountain Valley Seed Company**
- **Plant Good Seed**
- **Wood Prairie Farms**
- **King's AgriSeeds**

Alternatives to Neonic Seed Treatments

Moving away from neonicotinoid-treated seeds involves a shift from "preventative poisoning" to a system focused on soil health and targeted biological controls. Since neonicotinoids are systemic—meaning they permeate the entire plant—replacing them requires a multi-layered approach to protect the plant from the roots up.

1. Sourcing Untreated & Organic Seeds

The first step is finding "bare" or untreated seeds. Many commercial seeds are pre-coated by default, so you must specifically look for those labeled **Untreated**, **Organic**, or **Non-GMO**. (for more, see Seed Suppliers list attached)

Seed Category	What to Look For	Trusted Suppliers
Vegetables & Herbs	Certified Organic / Untreated	*High Mowing Organic Seeds, Johnny's Selected Seeds, Baker Creek.*
Field Crops (Corn/Soy)	"Bare" seed (no coating)	*Albert Lea Seed, Fedco, Blue River Organic.*
Native & Wildflowers	Open-pollinated / Wild-harvested	*Prairie Moon Nursery, Native Seeds/SEARCH.*

2. Non-Toxic "Coatings" & Seed Treatments

If you want to give seeds a boost without using neonics, you can apply biological treatments before planting:

- **Microbial Inoculants:** Products containing **Bacillus subtilis** or **Trichoderma** fungi protect the seed from soil-borne pathogens and encourage root growth, making the seedling more resilient to early-season pests.
- **Beneficial Nematodes:** These microscopic worms can be applied to the soil at planting. They seek out and kill soil-dwelling larvae like wireworms and grubs—the primary targets of neonic treatments.
- **Botanical Slurries:** For smaller scales, seeds can be dusted with **Diatomaceous Earth (DE)** or lightly coated in a **Neem oil** solution to deter chewing insects without harming pollinators later in the season.

3. Cultural & Ecological Strategies

In many cases, neonicotinoids are unnecessary if the planting environment is managed to disrupt pest cycles.

- **Delayed Planting:** Neonics are often used to protect seeds sitting in cold, wet soil. By waiting for slightly warmer soil (which speeds up germination), the plant spends less time in its "vulnerable" seedling stage where it is most prone to maggot and wireworm damage.
- **Crop Rotation:** Never plant the same crop family in the same spot two years in a row. This prevents soil-dwelling pests (like corn rootworm) from building up to dangerous levels.
- **Trap Cropping:** Plant a "decoy" crop that pests prefer. For example, planting Hubbard squash on the perimeter of a garden can lure cucumber beetles away from your main crops.
- **Increasing Biodiversity:** Planting floral "refuges" or hedgerows near your crops attracts the "good guys"—ladybugs, lacewings, and parasitic wasps—that provide free, natural pest control.

4. Why it Matters

Research from institutions like **Cornell University** and **Practical Farmers of Iowa** find that in many regions, neonicotinoid seed treatments provide **no significant yield benefit** for corn and soybeans, as the pests they target aren't always present in high enough numbers to justify the cost or the environmental damage to bees and birds and human health.

HB_91_FAV_Healey_Sponsor Testimony

Uploaded by: Delegate Healey Delegate Healey

Position: FAV

Sponsor Testimony – Delegate Anne Healey

In Support of House Bill 91
Environment and Transportation Committee

Chair, Vice Chair, and members of the Committee—thank you for the opportunity to present House Bill 91.

In 2016, this body enacted the Pollinator Protection Act. Maryland chose to lead by acknowledging that certain uses of neonicotinoid pesticides posed serious risks to pollinators and the environment, particularly where those uses provided little or no benefit. House Bill 91 is a direct continuation of that work, grounded in updated science and practical experience.

Since 2016, the agricultural evidence has become increasingly clear. Multiple studies—including research conducted here in Maryland—show that neonicotinoid-treated corn, soybean, and wheat seeds do not increase yields. These seed treatments are typically applied prophylactically, regardless of whether pest pressure is present. As a result, millions of acres are treated annually without demonstrated agronomic benefit.

Because neonicotinoids are systemic and highly persistent, they do not remain confined to the target crop. They accumulate in soil, migrate into surface and groundwater, and move throughout the Chesapeake Bay watershed. This persistence contributes to pollinator decline, affects aquatic invertebrates, and disrupts ecosystems that Maryland has invested decades and billions of dollars to restore.

House Bill 91 responds to this reality by focusing narrowly and intentionally on low-benefit, high-risk uses: neonic-treated commodity seeds and cosmetic applications on outdoor ornamental plants and turf. The bill is carefully designed to avoid harming agricultural production. It includes clear, time-limited waivers for legitimate agricultural or environmental emergencies, requires consultation with the Departments of Agriculture, Environment, and Natural Resources, and mandates written directives and reevaluation to ensure transparency and accountability.

Just as importantly, HB 91 reflects what farmers themselves increasingly recognize—that integrated pest management, pest risk assessments, and targeted treatments are more effective and more economical than routine, blanket applications.

In addition to these agricultural and environmental concerns, there is growing attention to potential human health impacts. Neonicotinoids act on nicotinic acetylcholine receptors, which play a critical role in brain development and neurological function. While the human data are still developing, peer-reviewed studies have associated chronic exposure with developmental and neurological effects, raising particular concern for pregnant women and young children. Because these chemicals contaminate surface and drinking water sources, reducing unnecessary use is also a prudent step to limit population-wide exposure.

House Bill 91 reflects Maryland's longstanding commitment to evidence-based policymaking. It protects pollinators, safeguards the Bay, respects farmers, and responds responsibly to evolving science.

This bill honors the intent of the 2016 law and updates it based on what we now know.

I respectfully ask for a favorable report on House Bill 91.

Thank you.

HB 91 Neonic Pesticides Testimony.pdf
Uploaded by: Dorie Broadman
Position: FAV

WILD ONES
Nation's Capital Region

Promoting native landscapes through education, advocacy and collaborative action.
Contact:wildonesnationscapital@gmail.com

Testimony: HB 91, Agriculture – Neonicotinoid Pesticides – Prohibitions
Committee: Environment and Transportation
Hearing Date: **February 4, 2026**
Position: **FAVORABLE**

Chair, Marc Korman; Vice Chair, Michele Guyton, and honorable members of the Committee:

Wild Ones Nation's Capital Region Chapter[1] requests your support for this bill. Banning neonicotinoid coated seeds, and controlling this pesticide's general use, is a critical step towards preserving an already very stressed environment.

Damaging Impact. Regarding neonicotinoid pesticides, "... research has now shown their devastating ecological impacts. Neonicotinoids are very toxic to pollinators, beneficial insects, and aquatic invertebrates. Their widespread use, combined with their water solubility, means that they are now often found in water and soil samples throughout the country". [2] These seeds are highly damaging to birds causing multiple severe problems even death.[3] Furthermore, it is not clear that neonicotinoids increase crop yield or cash flow in most cases.[4]

Bill Safeguards. This carefully constructed bill contains adequate exceptions by giving authority to the appropriate State agencies under certain circumstances. These circumstances ensure that the agricultural industry can continue functioning without financial burden. The bill could be improved by specifying circumstances that qualify for exemptions and requiring that the exemption be limited to the area that qualifies.

Other Jurisdictions. Although it is too late for our State to be a leader in this area, we still have an opportunity to be an early adopter. The States of NY and VT prohibit use of neonicotinoid pesticides in agriculture, others are considering it (CA, CT, MN, NJ) and others prohibit its personal use.

Sincerely,

Dorothy Broadman
Director, Legislative Affairs

Pru Foster
President

[1] Wild Ones, a nationwide nonprofit organization with local chapters throughout the country,
[2] https://xerces.org/pesticides/understanding-neonicotinoids
[3] https://www.birdlife.org/news/2024/10/10/neonicotinoids-harmful-to-birds-on-all-fronts/
[4] https://www.ehn.org/neonicotinoids-may-not-boost-crop-yields-research-finds

HB91_MPEN-SOPC_Fav.pdf
Uploaded by: Dru Schmidt-Perkins
Position: FAV

Environment and Transportation Committee
Hearing February 4, 2026, 1 pm

Bill No.: HB91 – An Act Concerning Agriculture – Neonicotinoid Pesticides – Prohibitions

Sponsors: Delegates Healey and Ruth

Position: Favorable

The Maryland Pesticide Education Network (MPEN) works for better protections and data to keep our families, waterways, and wildlife safe from toxic pesticides.

The Smart on Pesticide Coalition works to protect Maryland's 'babies, bees and the Bay' from the toxic impacts of pesticides. The Coalition is over 100 communities, farmers, health care providers, scientists, environmentalists, waterkeepers, interfaith congregants, businesses, as well as environmental justice, public health and wildlife advocates – hundreds of thousands of Marylanders – who support stronger pesticide protections in our state.

We are deeply grateful for this committee's leadership in addressing the issue of neonics in 2014, when the committee successfully championed the Pollinator Protection Act that stopped the sale and use of consumer products containing the neonicotinoid class of pesticides (neonics) and became law in 2015. This bill is the next logical step in protecting people, pollinators, our food supply, waterways, drinking water and our fisheries, as well as Maryland's farmers and farmworkers.

HB91 would prohibit the use, distribution and selling of corn, soy and wheat seeds that have been coated or treated with neonic pesticides. It would also prohibit application of neonics on outdoor ornamental plants and turf.

HB91 is modeled on the successful legislation in New York State, passed in 2023 and already being implemented.

HB91 will further protect pollinators that we depend on for our food supply—one in every three bites of food we eat—while also protecting Marylanders from exposures to neonicotinoid pesticides through contaminated drinking water, the air we breathe, lawn care applications, and close proximity to agriculture, which is common in many Maryland communities. There are decades of scientific research, more than a thousand peer-reviewed studies on the harmful effects of neonics on living things – including plants, bees, birds, other animals, and people.

Human Health Imperiled by Neonics: Neonics interfere with the functioning of parts of the brain and nervous systems The effect on children is especially concerning, as these chemicals affect parts of the brain vital to early childhood growth and development. These chemicals even flow through the placenta from the mother to the fetus. This can cause babies to be born with endemic defects and lifelong neurological problems. The Centers for Disease Control and Prevention found that more than 95% of pregnant women have neonics in their bodies. Farmworkers are exposed to these chemicals when they are sprayed on crops and when handling neonic-infused seeds.

Research links neonic exposures to developmental or neurological damage particularly in infants and young children[1] including developing heart and brain malformations, autism spectrum disorder, and a cluster of symptoms including memory loss and tremors.[2]

Declining Pollinators Associated with Neonic Use: For over a decade, Maryland beekeepers have been losing 40-60% of their honeybee colonies every year.

Over 1,000 scientific studies unequivocally have shown that neonics significantly contribute to the catastrophic die-off of the honeybees and native bees that pollinate crops.[3] The pollination service these creatures provide is essential to the production of food.

Neonics Contribute to Mass Losses of Birds: In North America, 30% of bird populations have disappeared with research linking neonics to large losses in bird biodiversity. Neonics harm birds directly too. Ingesting just one neonic-treated crop seed can kill a songbird.[4]

At non-lethal doses, neonics can damage birds' immune and reproductive systems, cause rapid weight loss, and impair navigation and migration ability, reducing their ability to survive and reproduce in the wild.[5] With acres of Maryland farmland sown with neonic-treated seeds, birds are broadly at risk. Additionally, by killing insects, these insecticides eliminate a vital food source for many bird species, in Maryland including migratory birds, further risking their viability.

Chesapeake Bay & Aquatic Life Threatened by Neonics:

- **Neonics cause the death of molting blue crabs**.[7] In 2020, the dockside value of the Maryland blue crab harvest was $33 million and contributed nearly $600 million to Maryland's economy.
- Neonicotinoid insecticides severely degrade aquatic food webs by causing high mortality in aquatic invertebrates (mayflies, midges, zooplankton), which are foundational food sources for fish and birds.
- **High levels of neonics found in wastewater sampling.** A recent study on wastewater treatment plant discharges in the Potomac River basin showed that a common neonicotinoid pesticide, Imidacloprid, "accounted for the largest portion of predicted potential toxicity across sites" The study also found that at 72% of the sites' sampled in the Potomac Basin, aquatic invertebrates were at risk due to the chronic presence of pesticide mixtures, with neonicotinoids being a primary driver.[9]

Neonic-Treated Seeds Show No Benefit to Farmers on Crop Yield

Research has proven that using non-treated seeds results in no difference in crop yield and that the most common uses of neonic-treated seeds – on corn and soybean – often **provide no economic benefit for farmers.** See Grout et al. 2020 (review of over 1000 peer-reviewed studies finding neonics provide "no overall net income benefit" to growers).[10]

Studies from Maryland from Dr. Kelly Hamby's Lab (https://www.hambylab.com/grain-projects.html**), at the University of Maryland, on the lack of utility for farmers:**

1. Dubey 2020: The study finds that "Given the lack of economically damaging pests throughout our study, [the researchers] did not observe any yield benefits that could justify the risks associated with [neonic seed treatment] use." The researchers conclude that "[neonic seed treatments] are not warranted in Maryland grain production, outside of specific instances of high pest pressure."[11]

   The researchers simulated a common crop rotation in Maryland with and without neonic seed treatments and found no yield benefit from using neonics on seeds, given overall low pest pressure. At the same time, they noted impacts to beneficial insects in the field.

2. Cramer and Hamby 2025: The study finds that neonic seed treatments "did not increase yields in Mid-Atlantic corn across multiple locations where the study was conducted" and concludes that "corn production in the Mid-Atlantic generally does not experience sufficient seedling pest pressure to justify routine use of preventative treatments [neonics]."[12]

Cornell University has also identified that in many regions, neonic-treated seeds provide **no significant yield benefit** for corn and soybeans, as the pests they target are not always present in high enough numbers to justify the cost or the environmental damage to bees and birds.[13] In addition, a four-year Purdue University study found "the absence of a neonic seed treatment had no impact on yields."[14]

Treated seed applications are remarkably inefficient while contributing to widespread pollution. In a typical treated seed application on corn or soybean seed, **only 2-5% of the active ingredient is absorbed into the target plant – the other 95% is left in the soil[15] where the chemicals persist for years**.[16] Once in the soil, **neonics are easily carried long distances by rain or irrigation water** to contaminate new soil, the plants in that soil (which absorb the chemicals and become toxic), and water supplies.[17]

Farmers are paying a premium for neonic-treated seeds with little to no benefit. There are non-toxic alternative strategies to neonic-treated seeds that support our farmers. In fact, they would save money. Shifting from "preventative poisoning" to a system focused on soil health and targeted biological controls has been shown to be effective**.**

- **Microbial inoculants including *Bacillus subtilis*** or ***Trichoderma*** fungi protect the seed from soil-borne pathogens and encourage root growth, making the seedling more resilient to early-season pests.
- **Beneficial nematodes:** These microscopic worms can be applied to the soil at planting. They seek out and kill soil-dwelling larvae like wireworms and grubs, the primary targets of neonic treatments.
- **Botanical slurries:** For smaller scales, seeds can be dusted with **diatomaceous earth** or lightly coated in a **neem oil** solution to deter chewing insects without harming pollinators later in the season.

At this time when significant guardrails for pesticides are being eliminated on the federal level by EPA and USDA, who now prioritize corporate wealth over human health, the environment, pollinators, and farmers, it behooves states like ours to ensure crucial common sense pesticide protections such as HB91.

We urge the Committee give HB91 a favorable report. Thank you.

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SMART on PESTICIDES maryland

The Smart on Pesticides Maryland Campaign is a coalition of 110 concerned Maryland citizens, organizations, groups, and businesses working for better protections and data to keep our families, our waterways, and our wildlife safe from toxic pesticides.

A.I.R. Lawncare & Landscaping Services
Alliance of Nurses for a Healthy Environment
American Academy of Pediatrics – Md. Chapter
American Bird Conservancy
American Public Health Association – Md. Chapter
Anacostia Watershed Society
Anne Arundel Beekeepers Association
Arundel Rivers Foundation
Assateague Coastal Trust
Audubon Mid-Atlantic
Baltimore Backyard Beekeepers Network
Baltimore Bird Club
Bee Friendly Apiary
Beyond Pesticides
Big City Farms
Bowie-Upper Marlboro Beekeepers Association
CATA, Farmworkers Support Committee
Carroll County Beekeepers Association
Cecil Bird Club
Center for Biological Diversity
Center for Food Safety
Central Maryland Beekeepers Association
Central Maryland Ecumenical Council/Leaders Group
Centro de los Derechos del Migrante
Charm City Meadworks
Charles Smith Apiaries
Chesapeake Physicians for Social Responsibility
Children's Environmental Health Network
Clean Bread and Cheese Creek
Clean Water Action
Common Market Co-Op
Conservation Community Consulting
Cottingham Farm
Crossroads Community Food Network
Earth Coalition
Earthjustice
Eastern Shore Food Hub
Environment Maryland
Fair Farms
F&D Apiaries
Farmworker Justice
Food and Water Watch
Fox Haven Farm and Learning Center
Frederick County Beekeepers Association
Friends of Briers Mill Run
Friends of Lower Beaverdam Creek
Friends of Quincy Run
Friends of the Earth
Greenbelt Forest Preserve Butterfly Brigade
Heathcote – School of Living
Healthy Campaigns
Hampden Community Council
Hereford Bed & Biscuit
HoneyFlower Foods
Howard County Beekeepers Association
Howard County Bird Club
Interfaith Partners of the Chesapeake
Interfaith Power and Light
Johns Hopkins Center for a Livable Future
Karma.Farm
KW Landscaping
Latino Farmers & Ranchers Association – Md Chapter
League of Women Voters of Maryland
Learning Disabilities Association – Md Chapter
Lower Susquehanna Riverkeeper
Maryland Autism Project
Maryland Bass Nation
Maryland Children's Environmental Health Coalition
Maryland Ethical Cannabis Association
Maryland League of Conservation Voters
Maryland Nurses Association
Maryland Organic Food and Farming Association
Maryland Ornithological Society
Maryland Pesticide Education Network
Maryland Public Interest Research Group
Maryland United for Peace and Justice
Maryland Votes for Animals
McDaniel Honey Farm
Migrant Clinicians Network
Moms Clean Air Force
MOM's Organic Market
Montgomery Countryside Alliance
National Aquarium
Natural Resources Defense Council
Nature Forward
Organic Consumers Association
Pearlstone Conference Center
Perfect Earth Project
Pesticide Action Network – North America
Potomac Riverkeeper
Rachel Carson Council
Really Raw Honey Company
Red Top Farm
Rodale Institute
Rosedale Farm
Ruscombe Community Health Center
SafeGrow Montgomery
Safe Minds
Safe Skies Maryland
Severn River Association
Sierra Club – Maryland Chapter
Spa Creek Conservancy
The Flower Factory
Towson Estates Association
Trout Unlimited
Washington County Beekeepers Association
Waterkeepers Chesapeake
Westport Farmers Market
Westport Neighborhood Association
Wicomico Environmental Trust

Maryland Environmental Health Network

EVALUATING HEALTH & ENVIRONMENTAL SCIENCE

Maryland Pesticide Education Network

A Guide for Legislators

Scientific evidence is the underpinning for policy decisions regarding health. This checklist offers guidance for legislators listening to and assessing scientific testimony and scientific arguments on these often difficult questions, as well as help in questioning witnesses during a hearing.

1. What is the purpose, and what is the source of the research being presented?

The goal of a study may influence the outcomes. For instance, studies that a manufacturer must undertake to submit a chemical or drug for federal registration are different from studies performed by independent scientists seeking to understand impacts of chemicals on humans, animals, or the ecosystem.

What you need to know: Are government findings based on industry-provided research? Are they based on a review of all available sources?

Example: In the debate of e-cigarette / vapor product regulation, research reports by the FDA's Division of Pharmaceutical Research was very credible because it reflected totally independent testing.

2. Have the studies been peer-reviewed?

Independent scientific research is subject to review by a panel of "peers"; these are other scientists with no stake in the findings and no conflicts of interest. Peer review ensures accuracy in methodology and statistical significance, as well as proper interpretation of the results. When a study passes peer review, it is usually published in a scientific journal, such as Environmental Health Perspectives or the Journal of the American Medical Association. This is a transparent process, ensuring that rigorous standards are upheld.

What you need to know: Are the studies being cited peer reviewed? If not, consider the source. Blogs and newspaper articles are not peer-reviewed materials, but may link back to a peer-reviewed source.

Peer Reviewed

A panel of independent experts in the same scientific field, who have no connection to the study and no conflicts of interest, have reviewed it and judged it to be valid and worthy of publication.

3. How certain is "certain enough" to act?

Scientists examine facts and complex information and then look for a preponderance of evidence. While scientists routinely disclose elements of uncertainty in their research, they form their conclusions based on the weight of the evidence.

What you need to know: Is there sufficient evidence regarding possible harms that warrants taking action? Is there sufficient evidence of safety to justify inaction?

Example: Based on the preponderance of evidence of likely harm, we passed seat belt laws and prevented children from drinking alcohol.

4. Are the scientists being too cautious?

Scientists are conservative regarding "certainty." They use a "95% confidence test" in order to conclude that two observations that happen together are more than accidental and probably causal. When it comes to taking action,

however, public and environmental health experts recommend action based on sufficient scientific evidence to warrant concern and not on a specific percentage.

What you need to know: What are the risks and what could be the harm if we wait for more research to be conducted before taking action?

Example: Laws limiting human exposure to DDT, lead, tobacco and alcohol were all passed long before a 95% confidence test was met. These laws were based on a preponderance of evidence rather than 95% certainty.

Weight of the Evidence

This term refers to a judgment in the scientific community that most studies to date confirm a particular conclusion. Scientists are always open to new findings, so they may avoid using terms like "certainty", "100%" or "we are sure."

5. Are the findings influenced by funding source, trade secrets, or suppression of data?

The design of a scientific study may be influenced by the source of its funding. This has been well documented by independent observers. It is therefore reasonable and prudent for legislators to ask all scientists and those who cite scientific research about their sources of funding.

What you need to know: What are the sources of funding for the work being cited? Were any data omitted due to trade secret protections or similar reasons?

Example: 1) The source of funding for a study can influence important findings or cause contrary results to be omitted from the study's report. 2) Important data that an industry provides to a federal agency before marketing will not be in the public domain and may not have been subjected to peer review.

6. Has anyone addressed the economic harm associated with inaction?

Policy-makers must weigh not only the cost of taking action but also the cost of inaction. Science offers insight into the costs of inaction.

What You Need to Know: What public and private costs may be incurred if we do not take action on this proposed policy?

Example: A 2015 peer reviewed study estimated the costs to the EU of human exposure to endocrine disruptors at $209 billion annually in medical care and lost productivity. *(Trasande et al J Clin Endocrinol Metab. 2015 Apr; 100(4): 1245–1255.)*

Note: The fiscal note on a bill will not typically assess the costs of inaction. It addresses only the costs of adopting the policy, and usually only the costs to government.

7. Have long term effects been assessed?

Early life exposures can create high risks in later life. An example is the link between lead poisoning and long-term harms to children, or between tobacco and cancer. Over time, human exposures to multiple chemicals will have interactive effects that may be quite different from the effects of a single chemical.

What you need to know: Does the science presented also address the long-term effects of exposure? If not, is that because the research does not exist?

Note: Federal agency review does not establish absolute safety. The US EPA registers chemicals based on "reasonable certainty of no harm" and has yet to address the synergistic effects of chemicals in real life, such as interactions with other chemicals in the environment, medications, and illness.

HB0091_WrittenTestimony_Favorable_MdPHA.2.4.26.pdf
Uploaded by: Ilona Kabara
Position: FAV

Mission: *To improve public health in Maryland through education and advocacy* ***Vision:*** *Healthy Marylanders living in Healthy Communities*

WRITTEN TESTIMONY IN SUPPORT OF HOUSE BILL 0091
Agriculture - Neonicotinoid Pesticides – Prohibitions
Committee: Environment and Transportation
By: Maryland Public Health Association (MdPHA)
Hearing Date: February 4, 2026

Delegate Healey, Delegate Ruth, and Members of the Committee:

The Maryland Public Health Association supports HB91: Agriculture – Neonicotinoid Pesticides – Prohibitions, and we thank the delegates championing this bill for their leadership on this issue. From a public health perspective, this bill enforces tighter and necessary restrictions on the use of neonicotinoids as pesticides in Maryland agriculture.

Neonicotinoids: Mechanism of Action
Neonicotinoid pesticides are chemicals that largely operate as insecticides. They irreversibly bind to nicotinic acetylcholine receptors (nAChR), an ion channel important for nervous system regulation. By binding to these receptors, the nervous system of targeted insects are unable to function properly[1]. While other pesticides and insecticides may allow for spot treatment or surface level application, neonicotinoids are administered through coating seeds. As the plant from the respective seed grows, its different parts contain 2-20% of the initially applied neonicotinoid. The distributed insecticide then is able to enact its toxic effects on pests that chew or suck on parts of the plant[2].

Negative Effects of Neonicotinoids
While neonicotinoids target the nACHRs of insects over those of vertebrates, there continues to be increasing evidence for the negative effects of this pesticide on the greater ecosystem, including humans. Studies have shown a positive association between maternal imidacloprid exposure, an active component of neonicotinoids, and adverse birth outcomes, such as anencephaly, a major birth defect resulting in deformed portions of the skull[3]. Studies have also shown associations between neonicotinoids and neurologic symptoms, such as memory loss and headaches[4].

Furthermore, neonicotinoids can have unintended negative effects on pollinators, such as honey and bumble bees, essential to maintaining agricultural productivity. Neonicotinoids can have sublethal effects on reproduction and behavior and even lethal toxicity to these pollinator populations, which are already currently dwindling[5].

Pest populations across the world have been starting to show signs of resistance to specific forms

of pesticides. Neonicotinoids, in particular, have a high probability of inferring resistance to their target pests. Since the insecticide is constantly present in low levels and targets a specific receptor, pests are more likely to develop genetic mutations that can lead to resistance. Species, such as the Colorado Potato Beetle, Diaphorina citri, and Whitefly, have already demonstrated this incurred resistance to neonicotinoids.[6,7] When neonicotinoids were first introduced to the market, they were thought to be low resistance. However, evidence after introduction to the agricultural industry now shows the opposite, promoting the need for greater restriction on its current use.

Alternatives to Neonicotinoids

The pace of yield after the introduction of neonicotinoids to agriculture in the US and other parts of the world has not increased, showing support that the state will be able to sustain production with other methods of pest control.[8] A study found that out of 152 authorized uses of neonicotinoids, only six were found to be unsubstitutable. These substitution methods included physical methods, biological control methods, and resistant plant varieties.[9] Therefore, due to the proven ability for the agricultural sector to thrive in the absence of widespread use of neonicotinoids, we believe that restriction of use will promote the health of citizens of Maryland.

For these reasons, we respectfully urge a favorable report on House Bill 91.

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The Maryland Public Health Association (MdPHA) is a nonprofit, statewide organization of public health professionals dedicated to improving the lives of all Marylanders through education, advocacy, and collaboration. We support public policies consistent with our vision of healthy Marylanders living in healthy, equitable, communities. MdPHA is the state affiliate of the American Public Health Association, a nearly 145-year-old professional organization dedicated to improving population health and reducing the health disparities that plague our state and our nation.

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HB91_Maryland Native Plant Society_Hoffman_ENT_FAV
Uploaded by: Kirsten Hoffman
Position: FAV

Maryland Native Plant Society

APPRECIATION CONSERVATION EDUCATION

Testimony: **HB0091, Agriculture - Neonicotinoid Pesticides - Prohibitions**
Committee: **Environment and Transportation**
Hearing Date: **February 4, 2026**
Position: **FAVORABLE**

Chair Korman, Vice Chair Guyton, and Honorable Members of the Committee:

The Maryland Native Plant Society supports HB91, which prohibits the planting of corn, wheat and soybean seeds treated with neonicotinoids and prohibits the application of neonicotinoid pesticides on ornamental plants and turf.

Many native plants, as well as agricultural food crops and home vegetable gardens, depend on pollinators for reproduction.[1] In fact, about one-third of the food we eat and about three-quarters of our flowering plants depend on pollinators to set fruit and reproduce.[2] Further, a recent study documented soybean yield increases of over 20% when native bees and honeybees help to pollinate the crop.[3]

Neonicotinoid insecticides are now the most widely used class of insecticides in the world, and they have had devastating ecological impacts. Neonicotinoids are systemic chemicals absorbed into a plant's vascular system and are present in pollen and nectar, making them toxic to pollinators that feed on them. Most persist in the environment for months after application; so timing applications to avoid bloom periods is not effective to avoid harm to pollinators. The widespread use of neonicotinoid insecticides and the fact that they are water-soluble means we now find neonicotinoids in soil and water samples throughout our country. The use of neonicotinoid-coated seeds for corn, wheat and soy crops releases a toxic dust during the planting process that contaminates the soil at the planting site and nearby water bodies, and can also drift on wind currents to other non-target sites harming honey bees, native bees, butterflies, and other pollinators critical for plant pollination and reproduction.[4]

Pollinator populations continue to decline due to a combination of factors, including habitat loss, climate change, disease, and the use of pesticides. Of these stressors, pesticide use is the most easily controlled. The prophylactic use of pesticides such as neonic-coated seeds should be eliminated, with pesticide-use decisions based instead on the results of pest monitoring.[5]

Neonicotinoid pesticides harm not only pollinators, but also other agriculturally and environmentally important beneficial invertebrates such as predatory lady beetles and parasitoid wasps. These beneficial insects provide natural pest suppression on farms and in landscapes. One study has conservatively valued this "ecosystem service" at more than $4.5 billion annually in the U.S.[6]

We understand that when balancing the need for food production with the conservation of biodiversity, there may always be some impacts on nontarget wildlife. However, if too many pollinators, beneficial insects, and soil invertebrates are lost, we threaten the ecosystem services upon which food production depends. "Uses of neonicotinoids that result in little or no pest management are counter-productive and pose an unacceptable risk to the health of land on which we all depend."[7]

The Maryland Native Plant Society urges a favorable report on HB91.

Respectfully,

Liz McDowell
Board, Maryland Native Plant Society
lmcd.mnps@gmail.com

Kirsten Hoffman
Treasurer, Maryland Native Plant Society
hoffman01@yahoo.com

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HB91 Neonicotinoid Coated Seeds Personal.pdf
Uploaded by: Kurt Schwarz
Position: FAV

February 2, 2025

Committee: Environment and Transportation Committee

Bill: HB91 – An Act Concerning Agriculture – Neonicotinoid Pesticides – Prohibitions

Position: Favorable

Dear Committee Chair, Vice-Chair, and Committee Members:

I request you issue a favorable report on the bill HB91—An Act Concerning Agriculture—Neonicotinoid Pesticides—Prohibition. I am a bird watcher and have been concerned about the effects of neonicotinoids for many years. This bill would ban distribution, sale, and use of corn, soybean, or wheat seeds coated with neonicotinoid pesticides.

Such coated seeds are poisonous to birds. A single coated seed can kill a bird the size of a Blue Jay. Exposed seeds pose a grave danger to any seed-eating bird, with seed spills presenting an aggravated danger. The neonicotinoid on the coating moves into the seedling and will spread to the entire plant. This presents a further danger to birds, and pollinators as well. At sublethal levels, neonicotinoids can cause weight loss, lowered fat reserves, and disorientation among sparrows. They can also lead to nest failure.

Both birds and insect pollinators are in steep decline. A landmark report in 2019 showed that the United States lost nearly 1/3 of its birds since 1970. Insects such as butterflies, moths, bumble bees, and beetles have also been shown to suffer steep declines.

Maryland banned the retail sale of neonicotinoids in 2015. Unfortunately, the use of neonicotinoid coated seeds continue to deposit them in our environment to the detriment of our birds and insect pollinators. It is my hope that we can expand the prohibition on neonicotinoids to agricultural seeds. I urge the committee to issue a favorable report.

Kurt R. Schwarz

Columbia, Maryland

Support_HB91.pdf
Uploaded by: Mark Meyerovich
Position: FAV

SUPPORT HB 91

Neonicotinoid pesticides (“neonics”) are widely used insecticides but are increasingly recognized as a major threat to the ecosystem and humans. Because of this they are banned in Europe. Neonics are systemic and cannot be washed off of food like fruits, vegetables and honey. They also contaminate drinking water and cannot be removed with traditional methods.

Chronic, low-level exposure has been linked to serious reproductive issues, low testosterone, low sperm count and developmental harm to a baby fetus. Neonics are highly toxic to bees and have caused massive loss of honeybees. Because they are water soluble, they have severely harmed water life and birds. Unlike older pesticides, neonics are long lasting and contaminate the soil and water for years.

Up to 90% of US corn and about half of all soybeans are grown from seeds treated with neonics. However, studies have shown that these prophylactic applications provide little to no economic benefit to farmers. Please support HB 91, which prohibits the use of neonics except for special circumstances.

Sincerely,
Mark Meyerovich
District 15

HB091_WildOnesChesapeakeBayChapter_FAV.pdf
Uploaded by: Marlene Smith
Position: FAV

Wild Ones Chesapeake Bay
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Deeply rooted in native plants, promoting native landscapes through education, advocacy and collaborative action.

Testimony: HB091, Agriculture – Neonicotinoid Pesticides – Prohibitions
Committee: Environment and Transportation
Hearing Date: February 4, 2026
Position: FAVORABLE

Chair, Marc Korman; Vice Chair, Michele Guyton, and honorable members of the Committee:

Located in Southern Maryland, Wild Ones Chesapeake Bay, a 71-member chapter of the national organization Wild Ones Natural Landscapers, LTD[1], strongly urges your support for this bill. Banning neonicotinoid coated seeds and controlling neonicotinoids' general use is a critical step towards preserving biodiversity in our local ecosystems to preserve the health of our treasured Chesapeake Bay for future generations.

Neonicotinoids are harmful to wildlife, including birds, bees, and other pollinators. Environment Action warns: "Our environment is more toxic to birds and bees than ever before, and neonic-coated seeds are a big part of the problem. Neonicotinoid pesticides (or neonics) poison birds, bees, and more when they are used on crops. A single pesticide-coated seed is potent enough to kill a songbird."[2]

The Xerces Society warns of the devastating ecological impacts of neonicotinoids and is working to reduce the use of there in both agricultural and urban areas.[2] They "are very toxic to pollinators, beneficial insects, and aquatic invertebrates. Their widespread use, combined with their water solubility, means that they are now often found in water and soil samples throughout the country". [3]

Maryland should take this opportunity to be an early adopter of prohibiting noenicitinoid pesticides by joining New York and Vermont to prohibit their use in agriculture. Other states (CA, CT, MN, NJ) are also considering similar legislation, while others prohibit its personal use.

HB091 has been carefully constructed with adequate exceptions by giving authority to the appropriate State agencies under certain circumstances. These circumstances ensure that the agricultural industry can continue functioning without financial burden.

Wildly appreciative,
Marlene Smith
President, Wild Ones Chesapeake Bay

[1] Wild Ones Natural Landscapers, LTD, a nationwide nonprofit organization with local chapters throughout the country, https://wildones.org/
[2] https://environmental-action.org/articles/pesticide-coated-seeds-are-killing-wildlife/
[3] https://xerces.org/pesticides/understanding-neonicotinoids

HB 91 - CBF - FAV.pdf
Uploaded by: Matt Stegman
Position: FAV

CHESAPEAKE BAY FOUNDATION

House Bill 91
Agriculture – Neonicotinoid Pesticides – Prohibitions

Date: February 4, 2026
To: House Environment & Transportation Committee
Position: **FAVORABLE**
From: Gussie Maguire
MD Staff Scientist

The Chesapeake Bay Foundation (CBF) **SUPPORTS House Bill 91** which would prohibit the use, sale, and distribution of neonicotinoid-coated seeds for corn, wheat, and soybeans in Maryland and prohibit the use of neonicotinoid pesticides on ornamental plants and turf. Neonicotinoid pesticides, in the form of seed coatings or conventional applications, pose serious risk to critical pollinator species, including wild and managed honeybees, and to aquatic organisms, including larval blue crabs.

Maryland has historically led the way on reducing harm from neonicotinoid pesticides by banning the sale of these pesticides for residential use. However, we are now playing catch-up to states like Vermont and New York, which have already passed legislation similar to HB 91. New York's legislation allowed state regulators to waive the ban on coated seeds should the need arise due to pest pressure, a provision also included in HB 91. To date, this authority has not been exercised.

Multiple studies show that neonicotinoid-coated seeds provide few and inconsistent benefits while contributing to declines in beneficial insect species populations, including those that naturally control pest species on farms, and cause cascading impacts to aquatic insects, fish, birds, and other species within the food web[1]. The myriad studied and documented ecological harms stemming from the use of neonicotinoid-coated seeds far outweigh their limited benefits.

CBF urges the Committee's FAVORABLE report on HB 91.

For more information, please contact Matt Stegman, Maryland Staff Attorney, at mstegman@cbf.org.

[1] Perdue University College of Agriculture: Agricultural & Environmental Letters

HB0091_FAVORABLE_NRDC.pdf
Uploaded by: Maya Korb
Position: FAV

Feb 4, 2026

Marc Korman, Chair
Environment and Transportation Committee,
House Office Building, Room 251
6 Bladen St., Annapolis, MD 21401

RE: Testimony of the Natural Resources Defense Council in Favor of HB 0091.

Dear Chair Korman and Members of the Committee:

We write and submit the following testimony on behalf of the Natural Resources Defense Council and its thousands of Maryland members in support of HB 0091, a bill to curb wasteful and unnecessary uses of neonicotinoid insecticides, or "neonics." Our testimony provides the following information:

- **Peer-reviewed research from the University of Maryland** finds that field crops planted in Maryland and across the Mid-Atlantic region saw **no yield benefit from neonic-treated seeds.** Despite this, neonic-coated seeds may now represent the **largest annual deployment of insecticides in U.S. history**, with pollution building up in Maryland's environment.

- Eliminating needless uses of neonics works. Since 2019, **Quebec, Canada, has eliminated virtually all neonic seed treatment use for corn, soybean, and wheat without reducing yields,** and **New York and Vermont adopted a similar model** in 2024. Minnesota, Colorado, New Hampshire, Massachusetts, and Pennsylvania are currently all considering comparable restrictions this year.

- **Lawn and garden neonic uses are also prophylactic and needless** or could be replaced with safer alternatives. New York, New Jersey, Connecticut, and Nevada have also similarly prohibited non-agricultural neonicotinoid lawn and garden use, except in certain cases to treat invasive species.

- The science is now unequivocal that **neonics are a lead cause of dramatic losses of bees and other pollinators** that cut into farmers' bottom lines, harm beneficial insects that naturally control pests, and threaten the viability of our food systems.

- Research **links neonic contamination to mass losses of birds and fish, the hollowing out of ecosystems, and birth defects and stillbirths in white-tailed deer.**

- **Neonics also threaten Marylanders' health.** Neonics appear in the bodies of half the U.S. population at any given time, and other research links neonics to **birth defects of the heart and brain and cognitive impairment** in prenatally exposed children, as well as lower testosterone, sperm count, and sperm quality in adults. More recent research **detected neonics in the bodies of more than 95% of pregnant women tested across the country**, with levels steadily rising, indicating worsening, widespread exposure.

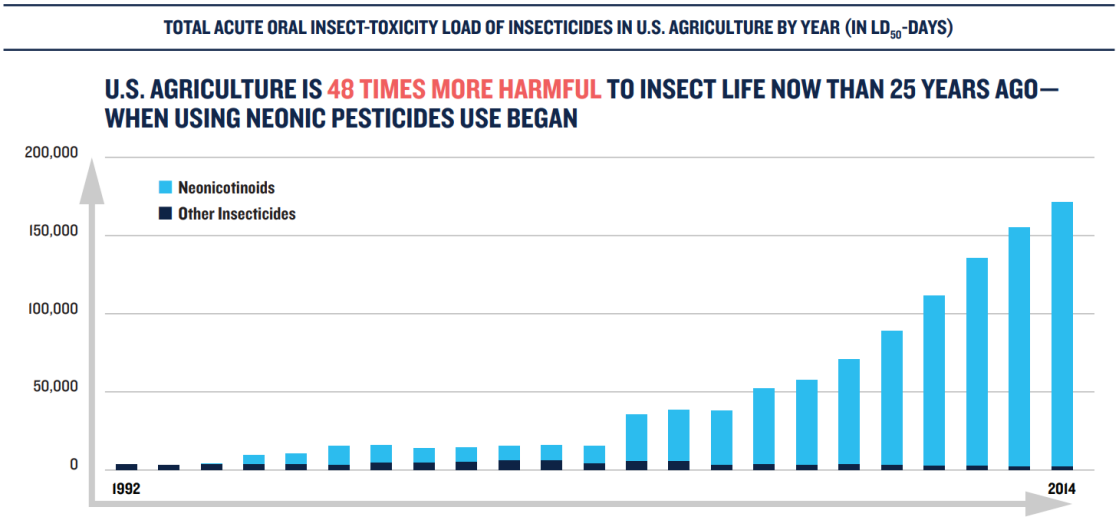
While federal actors have failed to address what many hail as a neonic driven "Second Silent Spring," this Committee has the power to act. NRDC strongly supports HB 0091's purpose to restrict wasteful neonic use. With more damage done every day, Maryland's legislature must act too.

Neonics Are Toxic, Persistent, and All Around

Neonics are neurotoxic pesticides that kill insects by permanently binding to, overstimulating, and ultimately destroying their nerve cells.[1] Insects poisoned with neonics often exhibit twitching, followed by paralysis and then death.[2] There are three factors that make neonics especially problematic for the environment and public health.

First, neonics are extremely toxic to insects and other invertebrates**. Just one square foot of lawn treated with a neonic product at EPA-approved rates can contain enough neonic active ingredient to kill over one million bees.**[3] And even at miniscule, non-lethal doses, neonics weaken critical functions, such as an insect's immune system, navigational ability, stamina, memory, and fertility—making it harder or impossible for them to survive.[4] Recent research has shown that a single exposure to a neonic can reduce population growth rates for multiple generations.[5]

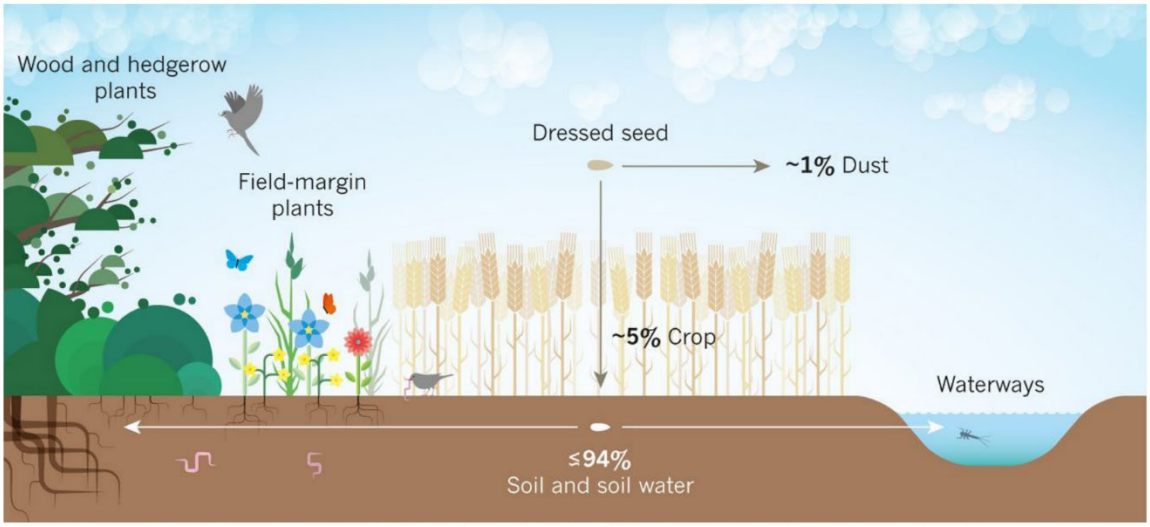
One study estimates that since neonics were first introduced, U.S. agriculture has become 48-times more harmful to insect life.[6] Ninety-eight percent of this increase was attributable to neonics, the number one use of which is on treated seeds.



Data from Michael DiBartolomeis et al., "An Assessment of Acute Insecticide Toxicity Loading (AITL) of Chemical Pesticides Used on Agricultural Land in the United States," *PLoS One* (August 6, 2019).

Second, neonics are exceptionally good at contaminating the entire environment. Unlike older, conventional insecticides, neonics are designed to be "systemic," meaning they are absorbed by plant tissues in order to make the plant itself—including its nectar, pollen, and fruit—toxic. This property allows neonics to be applied as a coating on a plant's seed, which the plant then absorbs as it grows.

Treated seed applications are remarkably inefficient and likely to lead to widespread pollution. Of the typical neonic treatment on a corn or soybean seed, **only 2-5% of the active ingredient is absorbed into the target plant—leaving the other 95+% in the soil,[7] where the chemicals persist for years.[8]** Once in the soil, neonics are easily carried considerable distances by rain or irrigation water to contaminate new soil, the plants in that soil (as they absorb the chemicals and also become toxic), and water supplies.[9]



Reprinted by permission from Springer Nature: Dave Goulson, "Pesticides Linked to Bird Declines," *Nature* 511, no. 7509 (July 2014): 295-96, https://go.nature.com/2rNOZcK.

Third, **neonics are the most widely used insecticides in the United States. Nearly all conventional corn, about two-thirds of conventional soybean seeds, and roughly a quarter of wheat seeds are pretreated with neonics,[10] meaning neonics are used on over 848,000 acres in Maryland—for these three crops alone.[11]** But they are approved for use on over 140 crops, as well as on lawns and gardens nationwide. The five major neonic chemicals approved for outdoor use—acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam—appear in more than a thousand products.

Because neonics build up in areas of year-after-year use[12] and spread out with each rainfall or watering, their extensive and continual use means that there are large portions of the country where neonic contamination of soil, water, and plant life is virtually ubiquitous.

Neonics Drive Pollinator Losses, Threatening Farmers' Bottom Lines and Food Security

Pollinators are critical to agricultural production. Yet, **since the mid-2000s—**when annual losses of honey bee colonies skyrocketed nationwide—**Maryland beekeepers have consistently lost around 40% or more of their colonies each year**.[13] While total bee colony levels remain steady due to the considerable, expensive, and potentially unsustainable efforts of beekeepers to breed and replace lost colonies, the same is not true for disappearing populations of the state's 400+ wild bee species and other pollinators that contribute significantly to crop pollination.

Among all the stressors affecting bees, only the dramatic uptick in the use of neonicotinoid pesticides in the mid-2000s—mainly from increased use on corn and soybean seeds[14]—matches

the dramatic uptick in bee losses witnessed at precisely that time.[15] Since that time, **a large and growing body of research confirms neonics are a leading cause of bee and other pollinator declines, including several comprehensive global literature reviews[16] and the largest neonic field study to date—actually funded by the pesticide industry itself.**[17] In 2020, Cornell University published its own review of over 1,100 studies finding substantial harms from a broad variety of neonic uses, most notably from treated corn, soybean, and wheat seeds, as well as non-agricultural turf and ornamental uses.[18]

These neonic-driven pollinator losses are already harming farmers. A 2023 study estimates that inadequate pollinator populations are reducing production of fruits, vegetables, and nuts by 3-5% worldwide.[19] Reduced production of these healthy foods is, in turn, leading to an estimated 427,000 additional preventable deaths annually.[20] And these deaths are disproportionately in wealthier countries like the United States, where reduced access to healthy foods is more likely to shift people's diets to cheaper, unhealthy alternatives.

These findings are of particular concern to **Maryland, where pollination-depending crops make up a large portion of the agriculture sector and are valued at more than $40 million dollars.[21]** A major 2020 pollination study shows that many top fruit crops are "pollinator limited" across the nation, meaning that **a lack of bees (including wild bees) and other pollinators is currently lowering crop yields.**[22] Aside from the immediate economic impacts to farmers, **Dr. Winfree—a leading pollinator researcher** and one of the study's authors—spoke about the long-term implications of the study's findings for food security:

> Honeybee colonies are weaker than they used to be and wild bees are declining, probably by a lot. . . . Even if honeybees were healthy, it's risky to rely so much on a single bee species. It's predictable that parasites will target the one species we have in these monocultural crop fields.
>
> **The trends we are seeing now are setting us up for food security problems**. . . . We aren't yet in a complete crisis now but the trends aren't going in the right direction. Our study shows **this isn't a problem for 10 or 20 years from now – it's happening right now.[23]**

Accordingly, the current impact to farmers' bottom lines and the cost and availability of fresh, healthy foods—both of which likely disproportionately harm already vulnerable and disadvantaged communities—will likely worsen given current trends.

While statewide pollinator losses affect farmers whether or not they use neonics on their farm, studies show that—by driving pollinator losses—neonics can decrease yields even on the crops to which they are applied.[24] Off the farm, 87.5% of flowering plants require pollination by bees and other pollinators to reproduce, so further losses not only threaten Maryland's food system, but also its ecosystems.[25]

Beyond pollination, neonics harm other beneficial insects essential for farming—such as nematodes,[26] earthworms,[27] and pest predators[28]—and can disrupt other key components of soil health. Pest predators are especially at risk from eating contaminated insects, as the harmful

neonic levels can remain in insect prey,[29] leading to decreased yields as the beneficial predator populations die out.[30] **Research from Penn State found that in no-till systems, which are common throughout the Mid-Atlantic, neonics can indirectly increase slug damage and lower crop yields by poisoning insects that eat slugs.**[31] A study of northern Great Plains farms found that fields using neonics and other conventional insecticide treatments had 10 times the insect pressure and fewer profits compared with those employing regenerative farming methods, likely due to lower input costs, more "good bugs" that keep pest populations under control, and better crop marketability.[32] **Research also shows that neonics may harm soil health directly by changing the composition of soil microbial communities—**harming beneficial bacteria crucial for plant growth and health and soil fertility and quality.[33]

Neonics Contribute to Mass Losses of Birds, Other Pollinators and Entire Ecosystems

Populations of **bees, butterflies, and other beneficial insects across the globe have rapidly declined in the time since neonics were first introduced**—a trend sometimes likened to an "insect apocalypse." **Research increasingly identifies neonics as a leading cause**.[34] In 2024, researchers identified increase neonics use as "a major driver of changes in occupancy across hundreds of wild bee species."[35] Neonic use is also linked to significant declines in butterflies.[36] Indeed, neonic use—especially neonic-treated seed use—was the number one factor associated with the loss of Midwestern butterflies, including monarchs,[37] which can encounter harmful or deadly levels of neonics in farm fields or nearby wild plants that can absorb neonics and stay toxic for years.

As losses of insects multiply, insect-eating animals suffer too. Birds appear particularly vulnerable—96% of land-based birds feed insects to their young, with many species also relying on insect food sources as adults.[38] **In North America, 30% of birds have disappeared in the past fifty years,[39] with research linking neonics to large losses in bird biodiversity**, including annual losses of up to 12% in grassland species and 5% in insect-eating species.[40] Likewise in Europe, Dutch researchers have linked declining populations of insect-eating birds to the introduction of neonics—even in areas with exceptionally low neonic levels (20 parts per *trillion* in water)[41]—and the pesticides are also believed to play a key role in declines of French farmland birds.[42]

Neonics harm birds directly, too. Eating just one neonic-treated crop seed is enough to kill some songbirds.[43] And at nonlethal doses, neonics can damage birds' immune and reproductive systems, cause rapid weight loss, and impair navigation and migration ability—all reducing the likelihood of their surviving and reproducing in the wild.[44] With hundreds of millions of acres of U.S. farmland sown with neonic-treated seeds every year, birds are broadly at risk—particularly when, as commonly occurs, piles of seed are left out in the open or planted shallowly enough for birds to eat.[45] At least one assessment has made the case that bats can also be harmed directly or indirectly.[46]

Neonics are also devastating for aquatic ecosystems because they are highly toxic to aquatic invertebrates that fish and other species rely on for food. One study in Japan found that the introduction of imidacloprid—a neonic commonly used on lawns and gardens—to the area

surrounding a longstanding fishery caused the collapse of that fishery in just one year.[47] Researchers found that after neonics contaminated the water, plankton populations plummeted, along with the valuable fish species that fed on that plankton.

Similar effects may be felt across America. **Surveys by the U.S. Geological Survey have detected neonics in a about half of stream samples nationwide and in 59% of samples in the Chesapeake Bay. [48]**

Neonics Threaten the Health of Maryland's Residents, Especially Children

Neonics are chemically similar to nicotine, **attacking nerve sites** that insects and humans share, and which play a central role in the operations of our brain and nervous systems.[49] More specifically, critical parts of the brain are densely populated with nerves containing the particular nACh receptor area targeted by neonics (the α4β2 subunit), **including: the cortex (responsible for planning, judgment, creativity, inhibition, attention, memory, language); the thalamus (emotion, memory); and the cerebellum (posture, balance, coordination, speech).[50]**

Health experts have long been concerned about the impact of nicotine-like substances on the brain—a reason they have long warned pregnant women to avoid nicotine.[51] Perhaps unsurprisingly, then, a growing body **of research now links neonic exposures to elevated risk of developmental or neurological damage in humans, particularly in infants and young children.**[52] These include malformations of the developing heart and brain, autism spectrum disorder, cognitive impairment, and a cluster of symptoms including memory loss and tremors.[53] Research also finds associations between higher neonic exposure and impairments to metabolic processes like insulin regulation and fat metabolism.[54]

Animal testing shows an even broader range of concerning injuries with implications for human health, including: multiple birth defects and increased rates of death for the fawns of white-tailed deer fed "field realistic" (i.e., "real world") levels of neonics in water;[55] reduced thyroid functioning in deer;[56] and in toxicology experiments with pregnant rats exposed to neonics resulted in offspring with statistically significant deficits such as thinner brain cortexes and other brain abnormalities, altered behavioral reflexes, and decreased sperm and testosterone levels.[57] New research also shows neonics can target mammalian ovaries, resulting in significantly fewer egg follicles, and more unhealthy ones.[58] All of these studies have implications for similar risks to people.

Information and studies collected by the U.S. Environmental Protection Agency (EPA) reaffirm the risks posed by neonics, yet these risks are often undercounted and ignored in regulatory decision-making. EPA poisoning reports reveal that hundreds of people have been poisoned with neonics, with some fatalities reported.[59] **And a recent analysis of pesticide manufacturer-submitted toxicity studies concluded that EPA is ignoring statistically significant harms in those studies, meaning EPA's regulatory standards are likely inadequate to protect Americans from widespread exposure.[60]**

These data likely raise concerns for all Maryland residents. In 2019, the Centers for Disease Control and Prevention (CDC) published the updated results of its national biomonitoring program, which measures pesticides in the urine of thousands of Americans age three and

older.[61] The update included data from 2015-16, and was the first to include neonics. **The results showed that roughly half of the U.S. general population is exposed to neonics on a regular basis, with children having higher levels than adults.[62]**

More recent data suggests that neonic exposures have grown significantly in recent years, with risks of exposure especially acute for pregnant women and young children. **A 2022 multistate study of 171 pregnant women found that over 95% had neonics or neonic degradates in their bodies.[63]** Detection levels generally exceeded previous CDC findings and, alarmingly, detection also steadily increased over the course of the four-year study period (2017-2020) – both in frequency and in magnitude – with the highest levels in Hispanic women.

These widespread and growing exposures are a considerable concern for childhood neurological development, as we now know the pesticides pass readily from pregnant women to unborn fetuses. A 2022 study shows that **neonics flow through the placenta from mothers to their fetus, and then to all the fetal tissues including the developing brain and nervous system.[64]** Previously, Japanese researchers had identified neonics in the urine of newborn babies, further supporting the idea that neonics pass from a pregnant mother to her developing fetus.[65] This is highly concerning given the multitude of studies suggesting developmental risks from neonic exposure.

Emerging research links neonic exposures to elevated risk of developmental and neurological damage in humans, particularly in infants and young children.

People are commonly exposed to neonics through food and water.[66] Conventional chlorination alone, without carbon filtration treatment, generally fails to remove neonics from drinking water.[67] More concerning still, neonics break down in water, forming chemicals that can be several hundred times more toxic to people than the original neonic chemical, which then may be made more toxic still through the chlorination process.[68]

Neonic-Treated Seeds Often Provide No Benefits for Farmers, According to Research from Maryland and Beyond

Peer-reviewed research from the University of Maryland found that field crops planted in Maryland and across the Mid-Atlantic region saw no yield benefit from using neonic treated seeds. *See* Cramer and Hamby 2025 (study finding that neonic seed treatments "did not increase yields in Mid-Atlantic corn" and concludes that the region, including Maryland, does not experience "sufficient seedling pest pressure to justify routine use of [neonic seed treatments]"); Dubey et al. 2020 (Maryland researchers "did not observe any yield benefit" from using neonic seed treatments on corn, soybean, and wheat in common Mid-Atlantic field crop rotations" and determined that "[neonic seed treatments] are not warranted in Maryland grain production, outside of specific instances of high pest pressure.").

Other research from across the United States and Canada likewise demonstrates that the most common uses of neonic-treated seeds—i.e., for corn and soybean—typically provide *no economic benefit for farmers.* *See* Grout et al. 2020 (review of 1,100+ peer-reviewed studies finding neonics provide "no overall net income benefit" to growers); Smith et al. (2020) (4-yr study of 160 corn and soybean fields in Ontario finding "that widespread use of seed-applied insecticides in corn and soybean is unlikely to provide benefit to producers"); Labrie et al. (2020) ("neonicotinoid seed treatments in field crops in Quebec are useful in less than 5% of cases, given the very low level of pest-associated pressure and damage, and [] **they should not be used prophylactically.**"); Pacenka et al. (2021) (4-yr Purdue University study finding "the absence of a neonicotinoid [corn] seed treatment had no impact on yields"). **Despite this lack of efficacy, neonic seed treatments are used on nearly all conventional corn, and more than half of conventional soybean acres.** [69]

Furthermore, research in Quebec, Canada, suggests that *any* insecticide seed treatment is unnecessary in the vast majority of circumstances. Labrie et al. (2020) demonstrated that although targeted pests (like wireworm) were more prevalent in fields without neonic seed treatments, yield was unchanged.[70] In other words, the presence of pests targeted by seed treatments did not reduce crop yields. Insecticide seed treatments were simply not necessary.

Though seed prices vary, farmers are likely paying a premium for seeds that ultimately do not provide an economic return. Using prices provided by Bayer CropScience, one study found that **untreated corn seeds cost $20.15 less per acre than neonic-treated seeds, and fungicide-only seeds cost $6.80 less.**[71] **For soybeans, untreated seeds cost $20.70 less than neonic-treated seeds, and fungicide-only seeds cost $5.10 less** based upon farm-level data from independent research.[72]

HB0091 Follows Successful Models for Restricting Unnecessary Neonic Seed Coatings

If HB 0091 were enacted, Maryland would not be alone in tackling the neonic problem. **Quebec, Canada, provides one model for eliminating the needless use of neonicotinoid seed coatings in field crops. Effective 2019, the province eliminated virtually all** seed treatments in corn, soybean and wheat, in addition to other field crops. **Neonic contamination has since plummeted, while crop yields have been unaffected by the new restrictions**.[73] Quebec is now moving to expand the program to all insecticide seed treatments,[74] consistent with the research showing that insecticide seed treatments in corn and soybeans generally do not benefit farmers.

In 2024, New York and Vermont became the first states to pass bills to limit neonic-treated seed use, following the success in Quebec. The provisions of those bills regarding restrictions on neonic field crop seed coatings will take effect on January 1, 2029.[75]

HB 0091 Helps to Eliminate Other High-Risk, Low Benefit Uses of Neonics

Although treated seeds likely make up the majority of neonic use in Maryland, uses are also common in non-agricultural settings like turf and commercial ornamental uses. **Other states like Nevada,[76] New Jersey,[77] and Maine[78] have already prohibited most nonagricultural uses of neonics. Maryland has as well, but current restrictions are only limited to consumer use.**[79]

Other commercial non-agricultural uses still contribute to neonic contamination in urban and suburban areas where people live, work, and play, at use rates that far exceed those in agriculture, often leading to hotspots of neonic contamination in urban and suburban areas.

These **nonagricultural neonic uses are also unnecessary**. Because of neonics' systemic mode of action, they are nearly always **applied preventatively** before there is any evidence of a pest problem. As a result, neonics are often used where no insecticide is needed.[80] **But even where pest control is desirable, there are numerous organic and minimum risk products available to control pests,** [81] as well as non-chemical practices that effectively reduce pest populations in these highly populated areas.

Conclusion

HB 0091 is a carefully tailored bill which prohibits neonic uses that are both harmful and unnecessary – a win-win for pollinators, pollinator-dependent farmers, Maryland's environment, and all Marylanders who value clean water and a healthy environment. **For these reasons, NRDC is strongly in favor of HB 0091 and urges your support for this bill.**

Respectfully,

Dan Raichel,
Director, Pollinators & Pesticides
Natural Resources Defense Council

Maya Korb,
Fellow, Pollinators & Pesticides
Natural Resources Defense Council

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[1] National Pesticide Information Center, "Imidacloprid: Technical Fact Sheet," https://bit.ly/2QEblaW (accessed December 2, 2019).
[2] Larry P. Sheets, "Imidacloprid: A Neonicotinoid Insecticide," in *Hayes' Handbook of Pesticide Toxicology*, 3rd ed. (Cambridge, MA: Academic Press, 2010), 2055-2064, https://bit.ly/2lBYN6o.
[3] *See, e.g.*, European Food Safety Authority, *Conclusion on the Peer Review of the Pesticide Risk Assessment for Bees for the Active Substance Thiamethoxam*, March 14, 2013, p. 9, https://bit.ly/2lR7Xfo (listing the acute oral honeybee "LD50"—the dose of imidacloprid expected to kill half a population of exposed honeybees when ingested—as 0.005 µg per bee). U.S. Environmental Protection Agency (hereinafter EPA), "Amended Label to Increase Soybean Rates + Supplemental Label for Soybean Cruiser® Insecticide," amended and approved February 23, 2009, https://bit.ly/2kGCgW3 (allowing up to 1.25 mg of thiamethoxam per corn seed). EPA, "Registration for Imidacloprid (NTN 33893)," March 10, 1994, p. 7, https://bit.ly/2K36Bbl (listing the honeybee LD50 as 0.0039 µg per bee). EPA, pesticide label for Gaucho 600 Flowable, p. 5, https://bit.ly/34FL8x2 (allowing up to 1.34 mg of imidacloprid per corn seed).
[4] Lennard Pisa et al., *An Update of the Worldwide Integrated Assessment (WIA) on* Systemic *Insecticides. Part 2: Impacts on Organisms and Ecosystems*, Envtl. Sci. Pollution Research Int'l (Nov. 9, 2017), https://bit.ly/2HqqHwB; Daniel Kenna et al., "Pesticide Exposure Affects Flight Dynamics and Reduces Flight Endurance in Bumblebees," *Ecology and Evolution* 9, no. 10 (May 2019): 5637-5650, https://bit.ly/2XAQpDm.
[5] Stuligross and Williams, *Past insecticide exposure reduces bee reproduction and population growth rate* (Nov. 2021) https://bit.ly/34cQwMU.
[6] Michael DiBartolomeis et al., *An Assessment of Acute Insecticide Toxicity Loading (AITL) of Chemical Pesticides Used on Agricultural Land in the United States*, PLoS ONE (Aug. 6, 2019), https://bit.ly/3hDBraV; Margaret R. Douglas et al., *County-Level Analysis Reveals a Rapidly Shifting Landscape of Insecticide Hazard to Honey Bees (Apis Mellifera) on U.S. Farmland*, Scientific Reports (Jan. 21, 2020), https://go.nature.com/3nzFYPp.
[7] *See Written Testimony Prepared by Christian Krupke, Ph.D, Regarding N.J. Senate Bill 2288 Professor of Entomology, Purdue University* (June 6, 2019), https://on.nrdc.org/38X3bT5.
[8] *See* Giorio, "An Update of the Worldwide Integrated Assessment (WIA) on Systemic Insecticides Part 1: New Molecules, Metabolism, Fate, and Transport," *Environmental Science and Pollution Research International* (July 15, 2017), https://bit.ly/2qVqciQ.
[9] *Id*.
[10] *See* John F. Tooker et al., *Neonicotinoid Seed Treatments: Limitations and Compatibility with Integrated Pest Management*, Agriculture and Environmental Letters (October 1, 2017), https://bit.ly/2YLzEKh; American Soybean Association and United Soybean Board, *ASA/USB Survey*

2024, news release (October 2024), https://soygrowers.com/news-releases/new-survey-highlights-farmer-adoption-of-seed-treatment-applications/.
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HB91_Sierra Club_FAV_4Feb2026_ENT.pdf
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SIERRA CLUB
MARYLAND CHAPTER

P.O. Box 278
Riverdale, MD 20738

Committee: **Environment and Transportation**
Testimony: **HB 91: Agriculture – Neonicotinoid Pesticides – Prohibitions**
Position: **Favorable**
Hearing Date: **February 4, 2026**

The Maryland Chapter of the Sierra Club urges a favorable report on HB 91, a bill to regulate the unnecessary and harmful use of crop seeds coated with neonicotinoid insecticides in Maryland agriculture.

As the Legislature recognized with Maryland's Pollinator Protection Act of 2016 (amended 2021), neonic insecticides are devastating to our bees, butterflies, and other wildlife,[1] including Maryland's iconic blue crabs,[2] while also posing threats to human health.[3] While the 2016 law targeted the use of neonics on residential properties, the current bill addresses a form of neonics in widespread use on our farms: seeds of corn, wheat and soybeans coated with the insecticides.

When neonic-coated seeds germinate, all parts of a plant become infused with the poisons, from roots and shoots to leaves, flowers, fruits, and seeds. As a result, bees ingest significant amounts of neonics when they forage on the protein-rich pollen of soybeans and corn.[4] At the same time, most of the seeds' insecticide coating (up to 95 percent) is washed by rainfall into the soil before the seeds germinate. This process makes the soil deadly for Maryland's many ground-nesting

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bees,[5] as the coating from a single seed contains enough toxin to kill 80,000 bees.[6] The loss of these bees undermines the pollination that is required of numerous Maryland crops, including blueberries, strawberries, cherries, apples, tomatoes, peppers, eggplants, cucumbers, watermelons, squash, and melons.[7] Making matters worse, some of the neonic chemicals drain through the soil into the water table, through which they travel to nearby streams, ponds, and the Chesapeake Bay. Once there, they poison those waters for aquatic insects and the fish that eat them as well as clams, oysters, and mussels[8] that constitute a significant part of the diet for our blue crabs.[9]

Research at the University of Maryland Extension and Cornell University shows that, as a general matter, neonic-coated corn and soy seeds provide no economic benefit to farmers using them. These seeds increase stand (total weight of mature plants) but produce no increase in overall yield (marketable portions) for the farmer, in spite of the fact that these seeds are significantly more expensive than untreated seeds.[10]

While the bill in its pre-filed form addresses the need to reduce use of neonic-coated seeds in Maryland, it lacks specificity in two key respects, which we urge the bill sponsors to consider.

First, the bill should consider how the Secretary of Agriculture will determine if there is a "presence of pests" or "occurrence of any pest" sufficient to declare the "environmental emergency" that allows for a suspension of the prohibition of these seeds. The Secretary could rely, for example, upon (a) farmers self-reporting, (b) site visits by state inspectors or

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SIERRA CLUB
MARYLAND CHAPTER

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contractors, or (c) self-reporting with spot checks by inspectors. Second, the bill may need to specify how the Secretary will determine the size of an area to be covered if the Secretary decides to "suspend the prohibition," and whether, for example, the area is (a) restricted to the farm field where the pest is documented, (b) a certain radius around it, or (c) a whole county, or that this aspect will be left to the discretion of the Secretary through regulation.

Because HB 91 takes an important step in controlling the use of these pesticides, the Maryland Sierra Club recommends a favorable report on HB 91.

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IndivisibleHoCo HB0091_ In favor.docx.pdf
Uploaded by: Michelle Carras
Position: FAV

HB0091

Agriculture - Neonicotinoid Pesticides - Prohibitions

Testimony before Environment and Transportation

Hearing Date: February 2, 2026

Position: Favorable

Dear Honorable Chair Korman, Vice Chair Guyton, and Members of the Committee,

My name is Michelle Carras, and I represent the 1700+ members of Indivisible Howard County. Indivisible Howard County is an active member of the Maryland Legislative Coalition (with 30,000+ members). We are providing written testimony today **in support of HB0091** which would enact certain prohibitions against the use of neonicotinoid pesticides. We thank Delegates Healey and Ruth for introducing this bill.

Neonicotinoid pesticides (neonics) are one of the most toxic pesticides in use today in the U.S. They have already been banned in Europe, and we must now recognize their dangers.

- Neonics don't discriminate: they kill the insects we don't want on our crops, but also the bees and butterflies we need to keep plants pollinated.
- Neonics have been identified as a leading cause of massive bee die-offs and have threatened almost 200 species with extinction.
- They build up in the soil, leading to runoff into our waterways.
- Through this runoff, they make their way into our water supply, where chlorination fails to remove them.
- Neonic exposure is therefore common in humans, with potential harms such as lower cognitive abilities in children, altered hormone regulation in adults, and metabolic changes.

Banning these highly toxic pesticides in Maryland is long overdue and HB0091 gives us the opportunity to do that. Please act now to ban neonics in Maryland.

Thank you for your consideration of this important legislation. **We respectfully urge a favorable report.**

Michelle Carras
Indivisible HoCoMD
Ellicott City, MD

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HB0091_FAV_MDAAP_Pesticide Prohibition.pdf
Uploaded by: Mike Ichniowski
Position: FAV

House Environment and Transportation Committee
February 4, 2026
House Bill 91 – *Agriculture - Neonicotinoid Pesticides - Prohibitions*
POSITION: SUPPORT

The Maryland Chapter of the American Academy of Pediatrics (MDAAP) is a statewide association representing more than 1,100 pediatricians and allied pediatric and adolescent healthcare practitioners in the State and is a strong and established advocate promoting the health and safety of all the children we serve. On behalf of MDAAP, we submit this letter of **support** for House Bill 91.

Children and fetuses are uniquely susceptible to the effects of toxic substances.

Despite being smaller than adults, children ingest and inhale larger amounts of toxic substances relative to their body weight. They eat and drink more per pound, and they breathe at a faster rate. Their hand to mouth behaviors increase ingestion from sources such as soil or house dust which can be contaminated by a variety of toxic chemicals. Because children and fetuses are actively growing, and their organs are forming and developing, substances that interfere with this growth and development can have lasting and potentially irreversible impacts. It's the vulnerability of growing and developing fetuses and children that puts them at greater risk from toxic exposures, not the dose of the poison to which they are exposed.

Neonics have been shown to cross the placenta to enter the fetal circulation[1] and have also been found in human breastmilk, with one study demonstrating the presence of at least one neonic in >94% of samples.[2]

Frequent exposure to the neonic imidacloprid during pregnancy was associated with a 2x risk of Autism Spectrum Disorder (ASD).[3] Prenatal exposures to neonics as a group and imidacloprid individually was associated with a 2.4x increased risk of Tetralogy of Fallot, a cardiac malformation.[4] Imidacloprid exposure was also associated with a 2.9x increased risk of anencephaly, a condition in which the brain and skull do not fully form.[5] A study of the effects agricultural exposures to pesticides on the IQ of 7-year-old children showed modest but significant decreases of Full-Scale IQ (-1.7), Perceptual Reasoning (-1.9), and Verbal Comprehension (-1.9) in association with neonic exposure.[6] Very limited research into chronic exposure to neonics over time has been conducted, particularly in light of the widespread use of this class of insecticides.

Children and fetuses are increasingly exposed to neonics.

In a sample of pregnant women from across the US from 2017-2020, neonics and their metabolites were highly detected, with two detected in over 90% of samples (thiomethoxam-92%; NDMA-96%). Several neonics were found in increasing concentrations over the four-year study period,[7] and neonics were also detected more frequently than in an earlier survey from 2015-2016.[8]

Neonics contaminate food and drinking water, which are among the main sources of human exposure. Neonics are systemic pesticides, becoming incorporated into the entire plant, including its leaves and fruits. Because neonics become part of the edible portions of plants, they cannot be removed by washing or peeling. Plants absorb these neonics from soils where neonics have been used previously and from direct applications to seeds. A study of neonic residues from 1999-2015 identified neonic residues in >20% of samples of cherries, apples,

pears, strawberries, grapes, cauliflower, celery, lettuce, spinach, greens and potatoes (range 20.9-57.5%). At least one neonic was found in 25% of pears, 35.9% of peaches and 51.5% of applesauce sold as baby foods.[9]

Neonics are highly water-soluble and readily contaminate groundwater, streams, and other surface waters through runoff from agricultural, lawncare and garden usage. They are not removed from drinking water sources by conventional treatment processes,[10] and chlorination can result in compounds with increased toxicity.[11] Exposures to neonics can also occur from proximity to agricultural fields, from in-home pest treatments, and from contact with flea and tick treatments for household pets.[12]

Additional Neonic Toxicity Studies in Humans

Neonics act by targeting receptors on nerve cells and, along with their metabolites, have demonstrated symptoms of neurotoxicity in humans.[13,14] A review of 842 neonic-associated poisonings from 2018-2022 reported symptoms of headache, dizziness, lethargy, muscle weakness, and tremor in moderate poisonings, and seizures and death in major poisonings.[12]

Additional studies in adults have linked neonic exposures to memory loss and tremors;[13] reproductive toxicity in women[15] and men, including decreased testosterone,[16] semen quality,[17] and sperm count;[18] and altered insulin and glucose regulation.[19]

One additional concern, particularly in light of the above evidence, is the failure of EPA to apply the 10-fold child safety factor, as required by the Food Quality Protection Act,[20] to neonic pesticides. The EPA also failed to take into account potential harms from cumulative exposure to multiple neonics and their metabolites, which appear to have particular potential for human harm.

Exposures to neonic pesticides are increasing, and a growing body of evidence suggests that exposure to these chemicals and their metabolites has the potential for human harm, particularly to the most vulnerable, children and fetuses. Because HB 0091 would reduce such exposures, children in our state would benefit from protection from the harmful effects of these chemicals. MDAAP requests a favorable report on this proposed legislation.

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HB91_Favorable_RobinTodd.pdf
Uploaded by: Robin Todd
Position: FAV

February 4, 2026

Environment and Transportation Committee
Hearing February 4, 2026, 1 pm
Bill No.: HB91 – An Act Concerning Agriculture – Neonicotinoid Pesticides – Prohibitions
Sponsors: Delegates Healey and Ruth
Position: Favorable

Dear Chairman Korman and Members of the Committee,

The Maryland Ornithological Society (MOS) requests a favorable report on HB91 from the Committee. MOS was founded in 1945 and is an all-volunteer non-profit organization with about 2200 members organized around 15 chapters throughout the state. Our mission is to study, conserve and enjoy wild birds and their habitats, with special emphasis on birds which spend at least part of their lives in Maryland.

The Advent of Neonic Seeds

When neonicotinoid insecticides (henceforth 'neonics') were first registered in this country, they were seen as replacements for the organophosphate and carbamate insecticides that were less toxic to birds and mammals and which did not bioaccumulate in the manner of DDT.

In 1994 the first neonic products were applied as liquid sprays. In the early 2000's the use neonic-treated seeds (henceforth 'neonic seeds') began. Seed treatments protect the seeds and, since neonics are water-soluble, also protect the resulting seedlings and plants from insect attacks. The use of these seeds has grown enormously since then with the result that neonics are now the most heavily used group of insecticides in the US and worldwide; as early as 2011, 79-100% of U corn was planted as neonic seeds (Douglas and Tooker, 2015). In 2014, 2 million pounds of imidacloprid and 3.5 million pounds of clothinianidin were applied nationwide (USGS, 2024)

Toxicity of Neonics to Birds
Neonics are toxic to birds and neonic-treated seeds ('henceforth 'neonic seeds') are a major source of mortality. Birds feed upon neonic seeds after they are planted, with accidental seed spills being especially important sources of exposure (Roy & Coy 2020). Neonics do not remain on the treated seeds; they move into the resulting seedling and then the plant. They leach into the surrounding soil and ground water (Hladik et l 2017) and are blown away as dust (Schaafsma et al 2019, and Alford & Krupke, 2017). **One or two grains of imidacloprid-treated corn can kill a bird the size of a Blue Jay or a Red-winged Blackbird.** Smaller species tend to be more sensitive **(**Mineau & Kern 2013).

Sublethal doses cause behavioral and physiological changes. Thus, in the spring, Eng et al (2017) fed wild-caught White-crowned Sparrows (which are close relatives of the White-throated Sparrows that are busy at Marylanders feeders right now). This study found that, after dosing with imidacloprid, these birds suffered weight losses, diminished fat reserves and could not orient to the north, as needed to migrate to their breeding grounds. At two weeks after dosing, the treated birds had recovered, but the temporary ill effects would hamper their ability to nest successfully. In the Netherlands**,** Hallman et al (2014) found a strong correlation between declines in insectivorous birds and imidacloprid levels in surface water.

Despite chemical industry claims, neonics are not particularly repellent to birds so that they readily feed upon treated seeds (Mineau & Parson 2013). The widespread use of these seeds means that much of the nation's arable land is now sprinkled with neonic seeds every growing season. Birds can feed upon these seeds shortly after planting and when the seedlings germinate.

There are multiple records of neonic-induced bird kills in the wild, as documented by Millot et al 2016 (Gray Partridge and Wood Pigeon in France), Lovy and Pietsch 2016 (several hundred Red-winged Blackbirds, and at least one Mourning Dove and one European Starling in New Jersey) Botha et al 2018 (Cape Spurfowl in South Africa), Barnett et al. 2002 (12 racing pigeons (i.e. Rock Doves) killed in the UK). It is important to note that poisoned birds are rarely noticed since they usually hide or are picked up by scavengers. Thus the true magnitudes of bird kills are almost always underestimated, if not missed entirely in the case of small ones (Mineau & Kern, 2023)

One Third Fewer Birds in North America Than in 1970

From about 1970 up to 2019 we have lost one third of the birds of North America (Rosenberg at al 2019). The 2025 "State of the Birds in the U.S. A. by the North America Conservation Initiative" (NABCI 2025) shows that bird populations continue to fall. The causes of this alarming decline are almost certainly many, including habitat loss, free-ranging domestic cats and collision with window glass, but **insecticides certainly play a major part**.

Major Declines in Insect Populations

Recent reports have emerged documenting a profound drop in the populations of many species of insects over the last 50 years (Sánchez-Bayo & Wyckhuys, 2019) in North America and Europe, including butterflies and moths, bumble bees, various beetles, damselflies and dragonflies, with many species disappearing altogether from locations where they were previously common. Many of us recall the 'bug splatter' on our windshields after driving on hot August nights, but these are things of the past; our windshields are now relatively splatter-free after night time drives. Insects are vital food sources for numerous groups of birds, such as swifts, swallows, flycatchers, vireos, warblers, kinglets, gnatcatchers and whip-poor-wills. A pair of chickadees require 6,000 to 9,000 insects (mostly caterpillars) to rear a brood of nestlings (2015). Even **birds that normally eat seeds or berries often require protein and fat rich insects to feed their growing young. These dramatic declines of so many groups of insects mean that a vital food source for many birds have dwindled.** This loss of insect biomass is almost certainly a major contributing factor to the loss of so many of our birds since 1970.

The Role of Neonic Seeds in the Insect Declines

Neonics are designed to kill insects; they do not distinguish between pest and beneficial insect species. The very widespread and liberal use of neonic seeds has almost certainly contributed to the declines in beneficial (i.e. non-target) insects noted above. **Thus**, **the impacts of neonic seeds on birds**

are direct toxicity (from consuming the seeds) and indirect (largely due to the greatly diminished populations of their insect prey).

USEPA's Role in Regulating Neonic Seeds: Exempted
USEPA does not require treated seeds to be registered because it classifies them as 'treated articles'. According to the 2023 edition of 50 CFR §152.25(a), 'treated articles' are items which contains pesticides solely to protect the article, such a treated lumber or paints. EPA registrations are not required for treated articles.

With no requirement for registration, there is no requirement for data confirming that treated seeds are effective against insect attacks. The treated article exemption (actually a loop hole) has allowed the surge in neonic treated seeds throughout the country without accompanying data confirming that they are effective.

Many reports shows that neonic seeds do not consistently result in increased crop yields, the primary function of such treatments and there are few studies showing any crop yield increases from using them. Several reports note that neonic seeds are prophylactic treatments which result in increased insecticide (neonics) use, which defeats the worthy goal of IPM (Integrated Pest Management) where pesticide treatments are minimized by only applying them when the pest pressure reaches a pre-determined threshold. With neonic seeds, treatments are always made, regardless of pest pressure, leading to heavier use of neonics. See Hokkanen et al 2017, Krupke et al 2017 and Rowen et al 2022.

Despite two voluminous petitions from groups such as the American Bird Conservancy, (Coalition of 65+ Groups Urge EPA to Reform Bee- and Bird-Killing Pesticides 2023), EPA still declined to require efficacy data for treated seeds. If EPA were to require efficacy data, it is very likely that the resulting studies would show them to be ineffective in boosting crop yields and therefore unnecessary. Any neonic seeds failing to show efficacy would be taken off the market. This would help save our birds, our beneficial insects, and would save our farmers the unnecessary cost of neonic treatment of seed.

Since USEPA declines to regulate neonic seeds, it is up to the states to do so. Maryland has already shown itself ready to step ahead of the pack when it comes to neonics in its successful passage of the 2015 Pollinator Protection Act that has terminated the sales of neonic- containing consumer products in our state. HB 91 is an opportunity for Maryland to take a needed next step on this matter.
Owing to the forgoing, we urge you to support HB 91.

In closing, I thank you and your committee for taking the time to consider our position.

Sincerely,

Robin G. Todd PhD, Board Certified Entomologist (Emeritus)
MOS Conservation Chair
Robin.todd@mdbirds.org

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MD HB91- ABC Written Testimony in Support.pdf
Uploaded by: Serena Chenery
Position: FAV

February 2, 2026

Committee: House Environment and Transportation Committee

Bill: HB 0091 – Agriculture - Neonicotinoid Pesticides - Prohibitions

Position: Support

Testimony of American Bird Conservancy in Support of HB 0091

On behalf of American Bird Conservancy (ABC) and our members across Maryland, I am writing to express our strong support for **HB 0091**, which seeks to protect Maryland's birds, pollinators, and aquatic ecosystems by prohibiting the use of neonicotinoid-treated seeds and the cosmetic application of these pesticides on outdoor ornamental plants and turf.

The Avian Crisis and Neonicotinoids

North America has lost nearly **3 billion birds** since 1970, a staggering 29% decline in our bird populations. Neonicotinoids, a class of neurotoxic insecticides, are a primary driver of this loss. These chemicals are not only lethal to the bees that pollinate our crops but are devastating to the birds that form the backbone of Maryland's natural heritage.

A single corn seed treated with a neonicotinoid is enough to kill a songbird. Even at sub-lethal doses, these pesticides cause significant harm:

- **Migration Disruption:** Exposed birds suffer from rapid weight loss and disorientation, delaying their ability to migrate and decreasing their chances of survival.
- **Reproductive Failure:** Neonicotinoids interfere with the development of healthy chicks and the ability of adult birds to reproduce effectively.
- **Food Source Depletion:** By decimating insect populations, these pesticides eliminate the primary food source for 96% of North American land birds during the nesting season.

Treated Seeds: A Massive Source of Contamination

Treated seeds are one of the most significant sources of neonicotinoid contamination in our environment. When these seeds are planted, only a small fraction of the pesticide is absorbed by the plant; the remaining **90-95%** stays in the soil or leaches into Maryland's waterways, including the Chesapeake Bay. This persistent contamination poisons the entire food web, from soil invertebrates to aquatic insects and the birds that rely on them.

Economic and Ecological Benefits of Birds

Birds are not just beautiful; they are an economic engine for Maryland. Bird watching and wildlife tourism generate over **$450 million** in annual economic activity for the state.

Furthermore, birds provide essential ecosystem services, including natural pest control for our farmers and pollination for our native flora.

The Myth of Necessity: Yield vs. Environment

Critical to the discussion of this bill is the mounting evidence that these treatments are often unnecessary. **Extensive independent research, including studies from the EPA, has consistently shown that neonicotinoid seed treatments provide no significant increase in crop yields compared to non-treated seeds.** We are essentially poisoning our landscape and our avian populations for a perceived benefit that does not materialize in the harvest.

HB 0091 is a common-sense measure that aligns Maryland with leading scientific recommendations. By removing neonicotinoids from non-essential ornamental use and addressing the massive scale of treated seed use, Maryland will take a critical step toward reversing bird population declines and protecting the health of the Chesapeake Bay and ourselves.

American Bird Conservancy respectfully urges a FAVORABLE report on HB 0091.

Sincerely,

Serena Chenery
Advocacy Coordinator
schenery@abcbirds.org
240-750-4772

E. Hardy Kern III
Director of Government Relations
ehardykern@abcbirds.org
202-750-1412

HB91_Favorable_McDanielHoneyFarm.pdf
Uploaded by: Steve McDaniel
Position: FAV

McDaniel Honey Farm

Manchester, Maryland

Environment and Transportation Committee
Hearing February 4, 2026, 1 pm

Bill No.: HB91 – An Act Concerning Agriculture – Neonicotinoid Pesticides – Prohibitions

Sponsors: Delegates Healey and Ruth

Position: Favorable

My name is Stephen McDaniel. My wife, Angie, and I own McDaniel Honey Farm in Manchester, Maryland. I have been keeping bees since 1979 and am a certified EAS Master Beekeeper.

We are witnessing the wholesale slaughter of pollinators, including honeybees, wild bees, butterflies, moths, and other insects. Last year, there was a massive die-off of honeybee colonies in the U.S., over a million colonies of honeybees, more than half of all the bees in the country.

Other insects are also dying, in an event called the Insect Apocalypse. Worldwide, some 70% of all insects are just gone. Something in the environment has made it too toxic for them to survive.

The word went out last January (2025) that **commercial beekeepers reported astronomical 70% die-offs of their bees (normal loss would be 10%), and some lost 100%.** Many of the colonies lost were being prepared to pollinate the California almond bloom in February, and there were not enough bees left to do the job adequately.[1] Honeybees pollinate some 90 crops in the U.S., about 1/3 of our food supply, and other crops face a similar shortfall in pollination. One beekeeper I spoke with who pollinates watermelons on the Eastern Shore expects that many of his current colonies will not survive the winter, and he will not have enough bees to fulfill the need for bees. The total monetary loss to beekeepers and farmers is incalculable, surely in the billions of dollars.

Most Maryland beekeepers are small-scale producers with fewer than 10 colonies, far less than the 2,000 colonies typical of commercial pollinators. My business, McDaniel Honey Farm, used to keep about 20 colonies year after year, but that has not been possible since 2011, when new insecticides came on the consumer market. In 2012, half of my colonies died mysteriously, many in the summer, with symptoms of pesticide poisoning. Since then, **I have not been able to keep my bees alive, losing 50%, 70%, 90% of my bees**. In 2020, I built up to 26 colonies, hoping to have 20 left in the spring. Only three colonies survived. In 2024, they all died. Last year, by April of 2025, I had two left, and they were weak and unable to produce any honey. Every year, I have to buy bees from a commercial producer to replace dead colonies, and they do not make as much honey as full-sized ones would.[2]

Pesticides are everywhere, and they affect everything, all insects, all living things, even us. Neonicotinoids (neonics) such as the ones used to coat seeds are synthetic chemicals designed in labs to be highly toxic to insects, and honeybees are insects. They are deadly to bees, even in microscopic doses. If they do not kill a bee immediately, they affect its immune system, so it succumbs to viruses, weeks or months after exposure. Queens and drones can be sterilized by even minute exposure, leading to the death of the colony, which can no longer raise baby bees.

Neonics are “systemic,” that is, they are coated onto the seeds that farmers plant, absorbed by the roots of the plants and spread throughout the entire plant, including the parts that we or pollinators eat. Imidacloprid is the most widely used neonic. If the seed germinates, **only 20% of the seed coating is absorbed, leaving 80% in the soil, to be absorbed by non-crop plants, where it poisons pollinators**, or to wash away into waterways, where it poisons aquatic organisms such as fish and crabs.

A researcher I know studied another bee die-off a few years ago. When all the test results were in and when he accounted for the toxicity of Imidacloprid, he determined that of **all the hazards affecting bees, Imidacloprid was responsible for over 90% of the risk to bees**.[3]

As a Master Beekeeper, certified by the Eastern Apicultural Society, and one of about 150 in the U.S., I know how to care for bees successfully, but I cannot keep my bees alive due to the toxic environment. **Over the past 13 years, dying bees have cost me several hundred thousand dollars.** I could have bought a nice house with that!

These toxic neonic seed coatings should be banned now. Please vote favorably on HB 91.

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[1]2025 almond yields have dropped (2.1-2.3 billion pounds, far less than the 3.0 billion pounds USDA forecast), and prices will rise dramatically, from $2.20/lb. in July to $3.00/lb. or more by spring.

[2]McDaniel Honey Farm is a small business that sells honey at festivals, by mail, and at a few local stores. As a result of bees dying, most of our honey is purchased from other beekeepers. In a good year, an overwintered colony can produce two or three “splits,” nucleus colonies which can be sold for about $200 each, and 90 lb. of honey, which retails for $17/lb. or more. Some specialty honeys go for $20-30/lb.

> A perennial colony, then, can produce $400-600 worth of bees and $1500-1700 worth of honey, or a total of about $2000-$2300 or more, year after year, with little annual expense of less than $100/colony. Twenty such colonies can make a modest income of $40,000.
>
> A new colony, under ideal conditions, can make about 50 lb. of honey, no splits, and cost $165 wholesale. That’s $850 - $165 - $100 = $585, a far cry from $2000+. If it rains during the honey flow in May, as happened last year, there may be little honey produced, resulting in a loss.
>
> Rather than having perennial, thriving colonies as I did until 2011, I now have to treat bees as an annual crop to be replaced every year.

[3]Unpublished results, told to me in confidence with permission to mention it here.

Opposition to HB 0091 Banning agricultural neonico

Uploaded by: Barb Glenn

Position: UNF

Glenn Family Farm
Scott and Barb Glenn
12940 Clarksville Pike, Highland, MD 20777
Glennbarb6@gmail.com, Cell 202-577-6660

February 2, 2026

RE: Opposition to HB0091 Agriculture - Neonicotinoid Pesticides - Prohibitions

TO: Environment & Transportation Committee Chairperson Delegate Korman,
E&T Vice Chair Delegate Guyton,
E&T Members Howard County Delegate Ziegler
Delegates Healey and Ruth, co-sponsors
Other Members of the E&T Committee

Thank you for the opportunity to provide comments on HB0091. As constituents, 40-year Ph.D. experts in agricultural sciences, including weed science/pesticides and agricultural policy, supporters of local agriculture, members of Howard County Farm Bureau, and members of the Maryland Farm Bureau, we respectfully ask you to oppose HB 0091.

HB 0091 seeks to prohibit distribution, selling or using seeds treated with a neonicotinoid pesticide. It also seeks to allow for exceptions under various circumstances to be led by the Secretary of Agriculture.

Farming and agriculture are the largest commercial industry in Maryland. It is disheartening to our legislators propose a bill that will undermine farming in Maryland.

KEY: Neonicotinoids are approved for use in the United States (US). This bill ignores the current regulatory and statutory expertise and work of the U.S. Environmental Protection Agency (US EPA) and Maryland Department of Agriculture (MDA). Neonicotinoids are registered by US EPA in the United States and approved for use according to the label in Maryland by MDA.

KEY: Neonicotinoids are used on greater than 90% of commodity crops in the US. The bill ignores the essential economic importance to FARMERS, including the agronomic and environmental benefits of these approved products. There are no alternatives to seed treatment with neonics. Crop losses will be dramatic, greater than 505. Farmers during these challenging times with high input prices, uncertainty in trade, and no Farm Bill, NEED THESE CROP PROTECTION PRODUCTS, now more than ever.

KEY: There is no justification for this bill and it will cost taxpayers. The bill provides NO justification based on ANY factors, for this ban on neonics, but will require new funding to execute. And curiously the bill says (paraphrasing), 'Oh No you can Still Use

them under certain circumstances,' requiring more work by staff of the MDA to back-track and re-state their current approval of safe use in Maryland. A waste of staff time and tax-payer funding.

IN SUMMARY: The actions of the bill will cost farmers and other taxpayers significant expense, with NO benefits in terms of food security, health, safety, and welfare to the citizens of Maryland, animals nor the environment.

Detailed points:

1. **Neonicotinoids are beneficial for farmers and crops.**
    a. There is no doubt about these benefits and that is why these pesticides are used across about 90% of all commodity crop production as well as with ornamental plants and turf.
2. **The biggest benefit is that** the crop germinates, stand is healthy, and they give early protection from plant pests such as soil-borne fungi, insects (like wireworms, seed corn maggot), and pathogens (like Pythium, Fusarium) for several weeks. AND healthier plants increase yield.
3. **Importantly, there are huge environmental & economic advantages**, such as
    a. Reduced Pesticide Use: By precisely placing chemicals on the seed means less product is needed overall, decreasing field-wide spray applications, fuel use, and labor.
    b. Lower Environmental Impact: Minimizes exposure to non-target organisms, including beneficial insects, pollinators, and groundwater.
    c. Cost-Effective: Protects high-value seed and offers a strong return on investment by preventing losses, according to the **American Seed Trade Association.**
    d. Supports Integrated Pest Management (IPM) because treated seed fits into IPM strategies, reducing overall pesticide reliance.
4. **FURTHERMORE, the neonicotinoids listed are registered by the US EPA and MDA to be safe if used according to the label, under FIFRA,** the Federal Insecticide, Fungicide, and Rodenticide Act, a U.S. federal law administered by the EPA that regulates the sale, distribution, and use of pesticides to protect human health and the environment, requiring all pesticides to be registered and labeled by the EPA before they can be sold or used in the United States.
5. **Federal Registration means that there are no issues of safety** to humans, nor the environment, when used according to the label, either as foliar spray or in seed treatment.

Bottomline, this bill is unnecessary because 1) there is no sound premise for the actions proposed, 2) it is unwarranted due to the large fiscal cost to taxpayers, 3) the safe use of neonics is approved due to current expertise and oversight by MDA, AND 4) this ban will reduce farm economic viability, by severely reducing the sustainability of farming in Maryland. **Thank you for the opportunity to provide you with facts, not fear. Please let us know if we can be of further assistance to you.**

HB0091.pdf
Uploaded by: Brent Johnson
Position: UNF

February 4, 2026
House Bill 0091 – Agriculture – Neonicotinoid Pesticides – Prohibitions
Environment & Transportation Committee
Position: Opposed

Brent Johnson
Lyons Johnson Farms
Talbot County, Maryland

Thank you for the opportunity to submit written testimony in opposition to House Bill 91.

My name is Brent Johnson, and I farm in Talbot County at Lyons Johnson Farms, where we grow corn, soybeans, and small grains. The proposed ban on neonicotinoid-treated seed for corn, soybeans, and wheat would directly and negatively impact my ability to manage risk, protect my crops, and remain economically viable.

Neonicotinoid seed treatments are a critical tool on my farm. They protect seeds from early-season soil-borne pests at the most vulnerable stage of crop development. These pests are often not apparent until after damage has occurred, and farmers across Maryland have experienced **30–50% pre-emergent stand loss** in untreated fields. In soybeans, the majority of replanted acres in Maryland are from non-treated seed. Replanting alone costs **$30–50 per acre in seed**, not including labor, fuel, and lost time. In corn, a **50% pre-emergent loss can result in approximately $360 per acre in lost revenue**, which is a significant economic hit.

House Bill 91 would also severely limit my access to seed. Maryland's grain sector operates within a regional and national seed market. Seed companies do not custom treat seed for a single small state, and we have been explicitly told they will not special-treat and distribute seed for Maryland's **less than one million acres of grain and soybeans**. A prohibition on neonic-treated seed would significantly reduce the availability of competitively priced seed options and limit farmers' ability to select hybrids and varieties that meet specific field conditions. Additionally, seed for fall 2026 has already been purchased, and alternative untreated seed will not be readily available for spring 2027 and beyond.

Neonicotinoid seed treatments also support conservation practices on my farm. They allow me to implement **cover crops, reduced tillage, and no-till systems**, which are key components of climate-smart agriculture. Seed treatments are a targeted, preventative application method that reduces the need for later foliar spraying. Removing these tools would erode integrated pest management (IPM) systems and force farmers to rely on older, less precise chemistries that require more frequent applications and greater overall pesticide use.

In fact, banning neonicotinoid seed treatments would not reduce pesticide use. For every pound of neonicotinoids removed, nearly **five pounds of older organophosphate insecticides** would be required to achieve similar pest control.

These products are less effective, require additional spraying, and accelerate the development of pest resistance.

A **2020 Cornell University study** concluded that neonicotinoid seed treatments consistently increase net farm income, reduce crop damage, or provide superior pest control compared to likely alternatives. These products are also approved for use at the federal level by the **U.S. Environmental Protection Agency**, which is actively conducting a multi-year scientific review of neonicotinoids, including impacts to pollinators and endangered species. Any changes to allowed use should align with that federal, science-based process rather than preempt it at the state level and place Maryland farmers at a competitive disadvantage.

House Bill 91 would increase my costs, reduce yields, limit seed availability, and undermine conservation practices that are essential to my operation. For these reasons, I respectfully urge the committee to oppose House Bill 91 and allow Maryland farmers to continue using proven, science-based tools to protect their crops and livelihoods.

Thank you for your time and consideration.

Respectfully submitted,

Brent Johnson
Lyons Johnson Farms
Talbot County, Maryland

MD Neonicotinoid Statement.pdf
Uploaded by: Brian McNeil
Position: UNF

Neonicotinoid pesticides are an important component of our integrated pest management practices. Imidacloprid is applied via targeted soil injection to protect ornamental plants from economically and aesthetically damaging insect pests. When compared to alternative insecticides, imidacloprid provides effective systemic, long-lasting control of both sucking and chewing insects, including aphids, lace bugs, and Japanese beetles. Its uptake and translocation within the plant allow for targeted pest control with minimal surface residue. A single soil application can provide season-long control of multiple difficult-to-manage pests that would otherwise require repeated foliar insecticide applications. Reducing the number of foliar treatments helps minimize overall pesticide use and lowers the potential for non-target exposure, including beneficial insects such as pollinators.

HB91_MASA_UNFAV.pdf
Uploaded by: Danielle Bauer
Position: UNF

Mid-Atlantic SOYBEAN Association

An affiliate of the American Soybean Assn.

***

We represent the industry in Maryland, Delaware, Pennsylvania & New Jersey

February 2, 2026

Subject: HB0091 - Agriculture - Neonicotinoid Pesticides - Prohibitions

To: Environment & Transportation Committee

Position: Opposed

On behalf of the Mid-Atlantic Soybean Association (MASA), I am sharing opposition to HB0091 – Agriculture – Neonicotinoid Pesticides – Prohibitions.

Banning neonicotinoid seed treatments for soybeans and other commodities would be taking away a vital tool allowing Maryland farmers to protect crops from pests and while establishing climate smart practices to protect Maryland's land and waters. Neonicotinoids, often called "neonics", provide safe, targeted protection from pests that target seeds and seedlings pre-emergence. Such seed treatments have proven to safely reduce the total volume of pesticides throughout the growing season by protecting the crop in such a vulnerable stage of growth rather than broad spraying after damage has already occurred.

Maryland's grain sector for soybeans, corn, and small grains operates within a regional seed market. Most hybrid and treated seeds are distributed at the regional and national level, not tailor-made for a small state market. A recent survey conducted by the American Soybean Association found that 90% of soybean acres in the survey were planted with treated seed, 66% of which was treated with insecticide. A prohibition on selling or using neonic-treated seed will severely limit availability of competitively priced seed options for Maryland producers. Seed has already been purchased for the fall of 2026 and will not be readily available for spring of 2027 and beyond.

The reality of pest pressures that farmers face expose the risk of HB91. Seed treatments are meant to be applied during the early stages of the soybean's life cycle for a couple of reasons. First, the early application helps to protect seeds and young plants when they are the most susceptible to pest damage. Pest pressure can typically be higher early in the growing season as soil and air temperatures warm, triggering life cycles for not only freshly planted soybeans in the ground, but also insects that feed on newly germinated seedlings. Neonicotinoid seed treatments protect seeds from pests in the soil that farmers do not know are present until it is too late and have reported experiencing 30-50% pre-emergent loss. Non-treated soybeans account for most of the replanted acres in Maryland which can cost farmers $30-50 per acre in seed cost alone. A 2020 Cornell study concluded that neonics "consistently increase net income, reduce crop damage, or provide superior pest control compared to likely substitutes" for farmers. Removing neonic seed treatments would force farmers to rely on antiquated pest control options and potentially threaten their ability to implement conservation practices.

Second, the early use of seed treatment applications helps minimize the ecological impacts of pesticides on surrounding environments and species. Seed treatments reduce the volume and frequency of total pesticide applications while providing the timeliest protection for soybean seedlings at their most vulnerable stage of development. Furthermore, subsoil applications generally have reduced ecological effects relative to other application types. Inherently, seed treatments are a mitigating application method to reducing pollinator exposure. If you remove these technologies, you erode integrated pest management (IPM) protocols, which could leave applicators to address pest pressures with more antiquated chemistries that require other application methods, or greater application frequency and amounts. Banning the use of neonics forces the use of older classes of insecticides, and every pound of neonics would be replaced with nearly 5 pounds of organophosphates. Less effective products require more spraying of insecticides. In addition to significantly increased spraying, loss of neonics in the pest management rotation accelerates the development of resistance - harming our agriculture industry and environment.

Neonics remain approved for use at the federal level by the U.S. Environmental Protection Agency (EPA). The EPA has been engaged in multi-year biological evaluations of neonicotinoids, including their effects on endangered species, pollinators and critical habitats as part of the Endangered Species Act process. EPA released updated pollinator risk assessments and proposed interim decisions in January 2020 as part of its ongoing neonicotinoid registration review any changes to allowed use should respect and align with that federal process rather than preempt it.

Respectfully submitted,

Danielle Bauer
Executive Director
Mid-Atlantic Soybean Association

2026_MaGIC_HB91_Neonics_UNF.pdf
Uploaded by: Dina Giurfa
Position: UNF

Date: February 4, 2026

HB 91 Agriculture - Neonicotinoid Pesticides – Prohibitions

MaGIC Position: **OPPOSED** Committee: E&T

The Maryland Green Industries Council represents the Maryland Nursery, Landscape, Greenhouse Association, Maryland Arborist Association, The Frederick Area Landscape Contractors and Nurserymen and the Maryland Association of Green Industries. Council members provide landscape and lawn care services, tree care services, and pest control services. Members service clients in all Maryland counties and Baltimore City.

The Maryland Green Industries Council (MaGIC) respectfully opposes House Bill 91, which would ban the use of neonicotinoid pesticides for outdoor applications to turf and ornamentals. Neonicotinoids are an important and highly regulated tool used by green industry professionals as part of an integrated pest management (IPM) approach. These products are not used indiscriminately; rather, they are applied judiciously, according to pest thresholds, label requirements, and timing restrictions. Specific pests treated with neonicotinoids include grubs, borers, scale insects, and other damaging species that threaten turfgrass, ornamental plants, and trees. Eliminating this class of products removes an effective, targeted option and will likely force applicators to rely on less selective, more frequently applied alternatives that may increase overall pesticide use.

All pesticides used by MaGIC members are regulated by the U.S. Environmental Protection Agency (EPA) under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). Neonicotinoids have undergone extensive scientific review, including a pollinator-focused evaluation by EPA. As part of this process, EPA issued updated pollinator risk assessments and proposed interim registration decisions. Importantly, these proposed decisions did not impose new bans or prohibitions on labeled neonicotinoid uses for pollinator protection, reflecting EPA's determination that these products can continue to be used safely when applied according to label directions.

Maryland's green industry professionals already operate under strict state and federal requirements, including licensing, training, recordkeeping, and enforcement by the Maryland Department of Agriculture. HB91 would override this science-based regulatory framework with a broad prohibition that does not distinguish between responsible professional use and misuse, nor does it account for differences among application methods, timing, or pest targets. Since 2016, only Certified Pesticide Applicators have been authorized to apply neonicotinoid pesticides to turf and ornamentals and to our knowledge, there have not been reports of misuse or pollinator injury in Maryland.

The consequences of HB91 extend beyond the green industry. Turf and ornamental plants provide environmental benefits including erosion control, stormwater management, urban heat reduction, and improved air quality. Trees and landscapes weakened by unmanaged pests are more susceptible to disease, decline, and removal, increasing costs for homeowners, municipalities, and businesses while reducing environmental benefits across communities.

MaGIC strongly supports pollinator health and responsible pesticide stewardship. Our members routinely implement best management practices to minimize pollinator exposure, including proper timing, targeted applications, and adherence to label restrictions. However, policy decisions must be grounded in sound science and existing regulatory findings. HB91 does not reflect the conclusions of EPA's review process and would impose unnecessary harm on Maryland's green industry without delivering measurable environmental benefit.

We respectfully request your unfavorable report on House Bill 91.

118 Dundee Ave ■ Chester, MD 21619 ■ Phone: 443-262-8491 ■ E-mail: lindsay.mdag@gmail.com

Frederick Area Landscape Contractors and Nurserymen ■ Landscape Contractors' Association, Inc. MD, DC, VA ■ Maryland Arborist Association ■ Maryland Association of Green Industries ■ Maryland Nursery, Landscape, and Greenhouse Association
Executive Director, Lindsay Thompson

HB 0091 - TPM opposition statement.pdf
Uploaded by: DOUG LECHLIDER
Position: UNF

February 1, 2026

House Bill 0091 – Agriculture – Neonicotinoid Pesticides – Prohibitions

Environment and Transportation Committee

Opposed

Turfgrass Producers of Maryland

Jonathan Middleton, President

This letter is submitted on behalf of **Turfgrass Producers of Maryland**, representing approximately 20,000 acres of actively farmed turfgrass production across the state. We respectfully provide this statement **in opposition to House Bill 0091**, which proposes restrictions on the sale and use of neonicotinoid insecticides in Maryland agriculture.

We support efforts to protect pollinators and promote environmental health, and Maryland turfgrass producers remain committed to responsible pesticide stewardship and integrated pest management practices.

However, we are concerned that the broad restrictions proposed under House Bill 0091 will create serious unintended impacts on sod and turfgrass production, while offering limited benefit in our specific agricultural system.

Turfgrass is not a pollinator-dependent crop, and commercial sod fields do not serve as a forage environment for honeybees. Neonicotinoids in turf production are primarily used to control destructive below-ground pests such as white grubs and root-feeding insects. These products must be watered directly into the soil immediately after application, greatly reducing the potential for pollinator exposure. This use pattern differs significantly from applications made to flowering crops.

Neonicotinoids remain one of the most effective and targeted tools available for pest management in turfgrass. Without them, producers will be forced toward alternative insecticides that are significantly more expensive, may require additional applications, and could increase overall chemical use rather than reduce it. These added costs place further strain on already narrow farm margins and threaten the viability of Maryland specialty crop producers.

For these reasons, **Turfgrass Producers of Maryland strongly opposes House Bill 0091** and urges that neonicotinoid products remain available for responsible agricultural use in turfgrass production.

Thank you for the opportunity to provide comment on this important issue. Turfgrass Producers of Maryland remain committed to environmental responsibility and compliance with all applicable U.S. Environmental Protection Agency rules and regulations.

HB 0091 - TPM opposition statement.pdf
Uploaded by: DOUG LECHLIDER
Position: UNF

February 1, 2026

House Bill 0091 – Agriculture – Neonicotinoid Pesticides – Prohibitions

Environment and Transportation Committee

Opposed

Turfgrass Producers of Maryland

Jonathan Middleton, President

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Thank you for the opportunity to provide comment on this important issue. Turfgrass Producers of Maryland remain committed to environmental responsibility and compliance with all applicable U.S. Environmental Protection Agency rules and regulations.

HB 91 - Neonicotinoid Prohibitions - OPPOSE.pdf
Uploaded by: Grayson Middleton
Position: UNF

Educate. Advocate. Innovate.

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.

Educate. Advocate. Innovate.

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

HB 91 MDA LOO.pdf
Uploaded by: Harrison Palmer
Position: UNF

Maryland
Department of Agriculture
Office of the Secretary

Wes Moore, Governor
Aruna Miller, Lt. Governor
Kevin Atticks, Secretary
Steven A. Connelly, Deputy Secretary

Agriculture | Maryland's Leading Industry

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Maryland Department of Agriculture
Legislative Comment
Date: February 4th, 2026

BILL NUMBER: HB 91
BILL TITLE: Agriculture - Neonicotinoid Pesticides - Prohibitions
MDA POSITION: **OPPOSE**

The Maryland Department of Agriculture (MDA) respectfully submits this letter in opposition of *House Bill 91 – Agriculture – Neonicotinoid Pesticides - Prohibitions*.

HB 91 prohibits the distribution, sale, and use of corn, wheat, and soybean seeds that have been treated with neonicotinoid pesticides, and prohibits the use of neonicotinoid pesticides for outdoor ornamental plants and turf. While the Department shares the goal of protecting pollinators and promoting environmental health, this legislation as drafted poses significant threats to the economic viability of Maryland's grain sector and undermines the very conservation practices that make Maryland a national leader in climate-smart agriculture.

Maryland is a pioneer in no-till farming and cover crop implementation. These practices are essential for soil health and water quality, and provide farmers an edge in early-season planting while the soil still retains moisture. However, these environments are high-risk for soil-borne pests. Neonicotinoid seed treatments provide targeted, pre-emergent protection that allows these crops to survive the early season while significantly reducing the need for broad-scale foliar insecticide sprays later in the year.

Maryland's grain sector operates within a regional and national seed market but only accounts for less than 1% of national grain acreage. A prohibition would effectively sever Maryland farmers from the regional seed supply, limiting their access to competitively priced, high-performing hybrids.

HB 91 authorizes the Maryland Secretary of Agriculture the discretion to temporarily suspend the prohibition for neonicotinoid treated agricultural seeds after consultation with the Department of the Environment and Department of Natural Resources under certain

circumstances, including insufficient non-treated supply, financial hardship from compliance. The Secretary of Agriculture could also temporarily suspend the prohibition for outdoor ornamental plants and turf if, after consultation with the Department of the Environment and Department of Natural Resources, a valid environmental emergency exists and there are no other pesticides to address the emergency. While HB 91 provides the Secretary of Agriculture with the discretion to temporarily suspend prohibitions under certain emergencies, this suspension is limited to one year. Agriculture requires multi-year planning. Reevaluating seed legality on an annual basis introduces an additional layer of uncertainty for farmers already struggling with volatile commodity prices and a changing climate.

Neonicotinoids remain approved for use by the U.S. Environmental Protection Agency (EPA), which is currently conducting a comprehensive registration review and pollinator risk assessment. Furthermore, seed treatments are a cornerstone of Integrated Pest Management (IPM). They offer precise, targeted control that reduces the overall chemical footprint by preserving beneficial insects that would otherwise be harmed by repeated foliar applications.

For these reasons, the Maryland Department of Agriculture urges an **unfavorable report** on HB 91. MDA appreciates the consideration of the above information in the Committee's deliberations.

If you have additional questions, please contact Harrison Palmer, MDA Chief of Staff at Harrisonb.palmer@maryland.gov or (410) 980-9887.

HB91 Neonicotinoid - Jason Scott .pdf
Uploaded by: Jason Scott
Position: UNF

February 4, 2026

House Bill 91 - Agriculture - Neonicotinoid Pesticides - Prohibitions

Environment & Transportation Committee

Opposed

Jason Scott

Diamondback Farms, LLC

Dorchester County, MD

Thank you for the opportunity to submit written testimony in opposition to **House Bill 91**.

I am a farmer in Dorchester County, growing corn, soybeans, and small grains. I am also a seed salesman and utilize neonicotinoid products to treat my customer's corn and soybean seed. The ban on neonicotinoid treated seed for corn, soybeans and wheat in House Bill 91 would directly and negatively impact my ability to operate my farm, mitigate risk, and remain economically viable.

Neonicotinoid seed treatments are an important tool on my farm. I use neonicotinoid seed treatments on approximately 75% of my acres to protect my crops from insect pests. The only time I do not use them is when I am planting double crop soybeans because the later planting allows the crops to sprout and emerge without having to worry as much about insect pests.

Utilizing a neonicotinoid seed treatment is much like getting a vaccine. It is a preventative practice that cuts down on crop injury and the likelihood of replanting. In the event of insect feeding we can use foliar pesticides, but they are expensive and are much more likely to impact pollinators and the surrounding environment. Using foliar applications of neonicotinoids or other pesticides after the crops are out of the ground would cost me $20-$30 per acre compared to $2-$4 per acre as a seed treatment depending on the crop. These are not hypothetical impacts; they are real losses farmers in this state will experience.

House Bill 91 would also severely limit my access to seed. Maryland grain farmers rely on a regional and national seed market. Last year, I planted 10 different varieties of seed to meet the specific needs of each of my fields conditions. Seed companies have clearly stated they will not custom treat and distribute seed for a state with less a half a percent of the nationwide grain acres. As a seed salesman I know that if neonicotinoids are banned that the only option we would have is completely untreated seed which doesn't even have a fungicide treatment. Lack of a fungicide would result in even more replanting and losses for farmers. As a result, this bill would reduce the availability of competitively priced seed options and force me to accept

whatever untreated seed happens to be available. This would put Maryland farmers at an extreme disadvantage compared to the rest of our region.

Neonicotinoid seed treatments also support my conservation implementation. They allow me to plant over 1,200 acres of cover crops, and implement 1,500 acres of reduced tillage, and no-till by protecting vulnerable seedlings without repeated insecticide applications. Seed treatments are a targeted, preventative tool that reduce the need for later spraying. Taking away our preventative measures would push people away from the conservation tillage that Maryland farmers lead the nation in. This bill would undoubtedly cause more runoff and be detrimental to the quality of water in the Chesapeake Bay because we would be forced into more tillage to combat insect pests.

Neonicotinoids remain approved for use by the U.S. Environmental Protection Agency, which is actively engaged in a multi-year scientific review of these products. Preempting that process at the state level places me as a farmer at a disadvantage to farmers in surrounding states.

House Bill 91 would increase my costs, reduce my yields, limit my seed choices, and undermine conservation practices I and our local environment rely on. I respectfully urge the committee to oppose House Bill 91 and allow Maryland farmers to continue using proven, science-based tools to protect their crops and livelihoods.

Thank you for your time and consideration.

Respectfully submitted,

Jason Scott

Diamondback Farms, LLC

Dorchester County, MD

House Bill 91 - MASCD - Oppose.pdf
Uploaded by: Jen Nelson
Position: UNF

February 4, 2025

The Honorable Marc Korman, Chair
House Environment and Transportation Committee

Re: House Bill 91 – Agriculture – Neonicotinoid Pesticides – Prohibitions

Position: ***Oppose***

Chair Korman & Committee Members:

On behalf of the Maryland Association of Soil Conservation Districts (MASCD) I am writing to express our ***opposition*** to **House Bill 91 Agriculture – Neonicotinoid Pesticides – Prohibitions.** MASCD, incorporated in 1956, promotes practical and effective soil, water, and natural resource related programs to all Marylanders. Through individual conservation districts MASCD provides leadership, education, cooperation, and local direction, on a voluntary basis.

House Bill 91 would prohibit the distribution, sale and use of corn, wheat and soybean seed treated with neonicotinoid pesticides. Neonicotinoid seed treatments are a critical tool for enabling conservation tillage and no-till and, including cover crops in row crop systems. Both cover crops and conservation tillage are integral practices in Maryland's Watershed Implementation Plan and essential in meeting our Chesapeake Bay Total Maximum Daily Load (TMDL) goals. Maryland farmers plant between 300,000 and 500,000 acres of cover crops on an annual basis and according to the last Agricultural Census, as many as one million acres use conservation tillage.

Both no-till and cover-crop systems rely on leaving residue on the soil surface. While these practices deliver well-documented benefits such as reduced erosion, improved water infiltration, and increased soil carbon, they also increase early-season insect pressure from pests such as seed-corn maggot, wireworms, white grubs, and other soil-dwelling insects that thrive in these environments. Neonicotinoid seed treatments protect the seed and emerging plant during the most vulnerable growth stages, allowing crops to establish successfully without tillage or additional insecticide applications. Seed treatments allow farmers to plant directly into living or recently terminated cover crops often referred to as "planting green" without significantly increasing the risk of stand failure. Without this protection, many farmers would be forced to terminate cover crops earlier or abandon them altogether, reducing nitrogen scavenging, erosion control, and soil-carbon benefits.

Neonicotinoid seed treatments are a foundational tool that allows farmers to adopt and maintain conservation practices without increasing risk of agronomic loss. Restricting their use would push farmers away from no-till and cover crops and toward more disruptive practices that increase soil disturbance and carbon loss and for these reasons we respectfully request an ***unfavorable*** committee report. Thank you for your kind consideration and attention to this legislation.

Respectfully Submitted,

J Nelson

Jen Nelson, Executive Director
Maryland Association of Soil Conservation Districts

SchmidtFarms HB91 2Feb2026.pdf
Uploaded by: JENNIE SCHMIDT
Position: UNF

Schmidt Farms Inc
1010 Sudlersville Cemetery Rd
Sudlersville, MD 21668

To: Maryland House Environment and Transportation Committee, 2 February 2026

RE: HB 91 – Agriculture – Neonicotinoid Pesticides Prohibitions

On our Queen Anne's County family farm, seed treatment technologies, including neonicotinoid insecticide treatments, are an important tool we use to give our crops a strong, healthy start. Each season, we evaluate our fields, cropping history, and pest pressure before selecting seed treatments that protect against the insects and diseases present in our soils during early growth. That early protection is critical, because a strong root system established in the first weeks of growth is the foundation for a healthy, productive plant throughout the season. For our farm, seed treatments help ensure consistent emergence and uniform stands, reducing the risk of very expensive replanting, and giving every seed the best chance to grow under real-world field conditions.

Seed treatments also allow us to farm more responsibly. By protecting the seed directly, we reduce the need for additional in-season spray applications and limit exposure to non-target species, including people and pollinators. Compared with broadcast applications, seed treatments reduce potential soil surface exposure by more than 90 percent, helping us use crop protection products only where they are needed and at the lowest effective rates.

For our family, farming is about stewardship as much as productivity. Seed treatments help us maximize yield and quality while minimizing environmental impact by using targeted, uniform, low-dose applications. This approach reduces overall chemical use and lowers the risk of resistance, allowing us to protect both our crops and the land we depend on for future generations.

Thank you for your consideration of the impact this bill will have on Maryland family farms.

Sincerely,

Jennifer H Schmidt

HB91 Neonicotinoid - Gannon Testimony.docx.pdf
Uploaded by: Jennifer Gannon
Position: UNF

February 4, 2026

House Bill 91 - Agriculture - Neonicotinoid Pesticides - Prohibitions

Environment & Transportation Committee

Opposed

Jennifer Gannon
Gannon Family Farms
Queen Anne's County, Maryland

Thank you for the opportunity to submit written testimony in opposition to **House Bill 91**.

I am a farmer in Queen Anne's County, growing corn, soybeans, wheat, and raising hogs. The ban on neonicotinoid treated seed for corn, soybeans and wheat in House Bill 91 would directly and negatively impact my ability to operate my farm, mitigate risk, and remain economically viable.

Neonicotinoid seed treatments are an important tool on my farm. I use neonicotinoid seed treatments on 75% of my acres to protect my crops from wireworms, grubs, aphids and certain beetles. Without neonicotinoid seed treatments, I would expect to experience losses of tens of thousands of dollars.

House Bill 91 would also severely limit my access to seed. Maryland grain farmers rely on a regional and national seed market. Last year, I planted 4 different varieties of seed to meet the specific needs of each of my fields conditions. Seed companies have clearly stated they will not custom treat and distribute seed for a state with less than a half a percent of the nationwide grain acres. As a result, this bill would reduce the availability of competitively priced seed options and force me to accept whatever untreated seed happens to be available.

Neonicotinoid seed treatments also support my conservation implementation. They allow me to plant 600 acres of cover crops, and implement 800 acres of reduced tillage, and no-till by protecting vulnerable seedlings without repeated insecticide applications. Seed treatments are a targeted, preventative tool that reduces the need for later spraying. Removing them would push farmers toward older, less precise insecticides that require more frequent and higher-volume applications.

In fact, every pound of neonicotinoids removed from use would be replaced by nearly five pounds of older chemistries, increasing pesticide use rather than reducing it and accelerating pest resistance.

Neonicotinoids remain approved for use by the U.S. Environmental Protection Agency, which is actively engaged in a multi-year scientific review of these products. Preempting that process places me as a farmer at a disadvantage to farmers in surrounding states.

House Bill 91 would increase my costs, reduce my yields, limit my seed choices, and undermine conservation practices that I rely on. **I respectfully urge the committee to oppose House Bill 91 and allow Maryland farmers to continue using proven, science-based tools to protect their crops and livelihoods.**

Thank you for your time and consideration.

Respectfully submitted,

Jennifer Gannon
Gannon Family Farms
Queen Anne's County, Maryland

SCPA MD HB0091 .pdf
Uploaded by: John Campbell
Position: UNF

February 2, 2026

Chairman Marc Kornan,

Thank you for the opportunity to submit written testimony regarding HB0091. On behalf of the Southern Crop Production Association (SCPA), we respectfully oppose this legislation and urge the Committee to issue an unfavorable report.

SCPA is a regional, non-profit trade association representing pesticide registrants, agricultural retailers, and distributors who supply essential crop production tools to farmers and ranchers. Our more than 50 member companies span the research, development, manufacturing, and distribution of agricultural inputs—including crop protection products, seeds, traits, seed treatments, and biologics. Serving sixteen states across the South, including Maryland. SCPA is widely recognized by industry stakeholders and state and federal regulators as the primary regional voice for the crop production industry, providing trusted advocacy and leadership on issues affecting Southern agriculture.

HB0091 would restrict or prohibit the sale and use of certain agricultural inputs that Maryland farmers rely on to manage early-season pest pressure and protect seeds and seedlings. If enacted, this bill would remove critical tools from growers' integrated pest management (IPM) programs and undermine science-based regulatory systems already in place at both the federal and state levels.

Maryland agriculture is diverse, with significant specialty crop production and growers operating within narrow planting and harvest windows. For many of these crops, there are limited—or no—effective alternatives available to replace the products targeted by this legislation. Early-season pest damage cannot always be remedied after planting, and in many cases replanting is not feasible. The loss of these tools would directly threaten crop viability, farm income, and ultimately food availability and affordability for consumers.

SCPA is particularly concerned that HB0091 fails to acknowledge the robust regulatory framework governing pesticide products in the United States. Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency (EPA) conducts extensive, science-based evaluations of pesticides before approving them for sale and use. These reviews assess potential impacts on human health, wildlife, pollinators, and the environment, and registrations are revisited regularly to reflect the best available science.

In addition to EPA oversight, states maintain their own registration, compliance, and enforcement programs, creating a dual layer of protection that ensures pesticides are used safely and responsibly. This system is specifically designed to manage risk while preserving farmers' access to effective pest control tools. Legislative bans that preempt this process disregard decades of scientific investment and regulatory expertise.

Many of the products implicated by bills like HB0091 were initially approved as “reduced risk” alternatives, offering improved environmental and safety profiles compared to older chemistries. These tools are an important part of modern, climate-resilient agriculture, enabling farmers to use more targeted, lower-volume applications and reduce the need for multiple broadcast treatments.

Seed treatments, in particular, provide a precise and efficient means of protecting crops during their most vulnerable growth stages. These products undergo the same rigorous evaluation as other pesticides, including assessments of potential impacts on non-target organisms. They also come with strict labeling, handling, and stewardship requirements designed to minimize environmental exposure.

If seed treatment options are eliminated, growers may be forced to rely on increased applications of alternative products, often at higher use rates and with greater environmental footprints. This outcome runs counter to the stated goals of sustainability, pollinator protection, and responsible land stewardship.

It is unclear what specific regulatory gap or safety concern HB0091 is intended to address, given the extensive oversight already in place. Farmers have a direct stake in protecting pollinators, soil health, and surrounding ecosystems, and they depend on science-based regulation—not blanket prohibitions—to do so effectively.

SCPA believes that policy decisions affecting agriculture should be grounded in sound science, real-world data, and meaningful engagement with growers. Removing proven tools without viable alternatives does not eliminate pest pressure—it simply shifts risk, cost, and uncertainty onto farmers and rural communities.

For these reasons, we respectfully oppose HB0091 and urge the Committee to reject this legislation. Maryland farmers deserve access to the full range of federally approved, scientifically evaluated tools necessary to remain productive, competitive, and environmentally responsible.

Sincerely,

Bucky Kennedy

Executive Vice-President

RISE Opposition Testimony HB 91 .pdf
Uploaded by: Jon Gaeta
Position: UNF

To: Members of the House Environment and Transportation Committee

From: Jon Gaeta, RISE (Responsible Industry for a Sound Environment)

Date: February 4, 2026

RE: HB 91: Agriculture – Neonicotinoid Pesticides - Prohibitions

Position: OPPOSE

Chair Korman, Vice Chair Guyton, and Members of the Committee:

On behalf of Responsible Industry for a Sound Environment (RISE), thank you for the opportunity to submit testimony in opposition to **HB 91**. RISE represents manufacturers, formulators, distributors, and other stakeholders involved in specialty pesticide and fertilizer products. Our organization advocates for policies grounded in sound science, risk-based decision-making, and responsible stewardship of pest management tools that protect public health, food security, and the environment.

RISE shares the Committee's interest in protecting pollinators and beneficial insects. However, HB 91 would move Maryland away from established, science-based regulatory frameworks and toward broad, hazard-based restrictions that do not adequately consider real-world exposure, use patterns, or unintended consequences. Policies of this nature risk undermining public health protections and small business viability without clear evidence of corresponding environmental benefits.

Neonicotinoid pesticides are already subject to extensive regulation under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The U.S. Environmental Protection Agency conducts rigorous risk assessments to ensure registered products do not pose unreasonable risks to human health or the environment, and those reviews are ongoing. In addition, Maryland's Department of Agriculture oversees the administration of pesticide laws and ensures the safe handling, use, and application of pesticides in the state. This layered regulatory system is designed to be science-driven, adaptive, and protective. HB 91 would override this framework with statutory restrictions that reduce regulatory flexibility and create inconsistency without improving safety outcomes.

Neonicotinoids also play an important role in protecting public health. These products are used to manage pests that spread serious diseases, including mosquitoes and ticks. Tick-borne illnesses remain a significant concern in Maryland, and limiting access to effective pest control tools—particularly for non-agricultural and structural uses—could reduce the ability of trained professionals to manage these risks. When effective tools are removed, pest pressures persist, often leading to increased reliance on older chemistries that may require more frequent applications and pose greater risks to humans and the environment.

Critically, there is no conclusive Maryland-specific data demonstrating that neonicotinoid use within the state is causing localized ecological harm sufficient to justify sweeping restrictions like those proposed in

HB 91. Pollinator declines and insect population changes in Maryland and across the East Coast are widely understood to be driven by multiple interacting factors, including habitat loss, climate change, disease, and parasites. Singularly focusing on one class of pesticides risks oversimplifying a complex issue and diverting attention from conservation strategies that would deliver more meaningful ecological benefits.

RISE strongly supports integrated pest management and pollinator-friendly practices, including education, habitat enhancement, and responsible product stewardship. These approaches work best when professionals retain access to a diverse pest management toolbox and can apply science-based judgment. Eliminating entire classes of products through legislation runs counter to integrated pest management principles and may ultimately increase environmental impacts rather than reduce them.

For these reasons, Responsible Industry for a Sound Environment respectfully urges the Committee on Environment and Transportation to **oppose HB 91**. A more balanced and effective approach would strengthen habitat conservation efforts while continuing to rely on science-based regulatory systems that protect public health, agriculture, and environmental resources.

Sincerely,

Jon Gaeta
Senior Director, Government Affairs
RISE, Responsible Industry for a Sound Environment
JGaeta@pestfacts.org
202-695-5725

RISE (Responsible Industry for a Sound Environment) is the national trade association representing manufacturers, formulators, distributors and other industry leaders engaged with specialty pesticides and fertilizers used by professionals and consumers.

02.04.26_MD HB91_ASTA Testimony.pdf
Uploaded by: Jordan Gregory
Position: UNF

February 4, 2026

To: The Honorable Delegate Marc Korman
Chair of the Environment and Transportation Committee
Re: Maryland H.B. 91

The American Seed Trade Association (ASTA) is writing this letter to submit comment for the public hearing called for February 4, 2026, in opposition of H.B. 91, which would ban the use of neonicotinoid pesticides, an important component and critical seed treatment tool for agriculture production.

Founded in 1883, ASTA represents nearly 700 companies involved in seed production and distribution, plant breeding, and related industries in North America. ASTA members research, develop, produce and distribute all varieties of seeds – including grasses, forages, flowers, vegetables, row crops, and cereals. Quality seed products from ASTA members support farmers of conventional, genetically engineered, and organic crops to produce food and farm commodities in the U.S. and around the world.

Seeds treated with neonicotinoid applications provide an important first line of defense from soil born pests and disease through germination and emergence. By helping protect the developing seedling during its most vulnerable time, innovative seed treatments allow farmers to do more with less. For the environment, this means less impact on natural resources and non-target organisms. For farmers, it means less production costs, and higher, more consistent yields. For residents of Maryland, it means access to high-quality, affordable food.

In addition to the effectiveness of the technology, it is important to note that treated seeds are highly regulated, just as foliar- and soil-applied pesticides are. The Federal Seed Act regulates the labeling, sale, and movement of seed in the U.S. It's important to note that federally approved labels must reflect the risk assessment and mitigation processes. These products must also undergo thorough evaluation by the U.S. Environmental Protection Agency (EPA) and applicable state agencies prior to commercialization and periodically thereafter.

Seed treatments allow for the precise application of biological organisms, products and/or chemical ingredients to suppress, control, or repel plant pathogens, insects, or other pests that attack seeds, seedlings, or plants. In a very efficient manner, they help a developing seedling during its most vulnerable time and allow today's farmers to do more with less, and to meet new and emerging challenges. Without seed treatments, like neonicotinoids, farmers would be forced to rely on a few older classes of chemistry that are less selective.

That is why ASTA continues to place a high priority on educating the public and policymakers about the safety and efficacy of treated seed. It's critical that we continue to do our part to communicate along the entire seed treatment value chain, around the importance, and necessity of proper stewardship. ASTA, in collaboration with industry and grower partners, developed the *Guide to Seed Treatment Stewardship* — a comprehensive set of best practices, for applicators and farmers, around the handling of treated seed. Along with the guide is a set of outreach and education tools, including handouts, videos and FAQs, available for use and download. Each spring and fall, ASTA engages in a targeted communications campaign to help remind industry and growers to follow all applicable laws and regulations around the safe planting, harvesting and disposal of treated seed.

Is neonic-treated seed necessary?

- Seed treatments enable earlier and faster planting; stronger, more uniform stands; optimal plant populations; and healthier plants that help increase productivity. Because some pests can damage the seed or seedling to the extent that there are no rescue treatment options available and the plants may either die or not produce a harvestable yield, seed treatments give farmers confidence that they are proactively managing early-season risk and minimizing the expense and environmental impact of replanting.

Do treated seeds impact the surrounding environment?

- Technology is used to protect pollinators, including enhanced coatings and application processes to increase pesticide adherence to seeds, as well as new flowability agents that help minimize seed dust-off during planting.
- After regulatory authorities approve a pesticide for use, they continue to consider new information to assess the safety of registered products. No pesticide's regulatory approval is permanent. In the U.S., the EPA routinely reviews registered products to determine if they should be renewed.
- The EPA carefully considers effects on many non-pest organisms when they approve new insecticides for use. Following the directions for use on the registered pesticide product labels, as well as the precautionary and instructional information provided on treated seed labels, mitigates exposure of the pesticide to non-pest organisms, including honeybees.

Do farmers have options to buy non-neonicotinoid treated seed?

- Farmers have options for buying non-neonicotinoid treated seed. Growers make these decisions with their seed supplier, and companies plan their production and offerings accordingly.
- For certain crops, farmers who wish to purchase non-neonicotinoid treated seed will need to discuss their order in advance because seed companies begin production 9-12 months prior to planting.

Seed treatment is an important practice of Integrated Pest Management (IPM) & Sustainability

- IPM as defined by the EPA is "a sustainable approach to managing pests by combining biological, cultural, physical, and chemical tools in a way that minimizes economic, health, and environmental risks."
- There are no rescue treatments for soil dwelling insects which is why farmers view neonicotinoid seed treatments as an important part of their pest management plan.
- Neonicotinoid seed treatments play a critical role in IPM programs, including less potential impact on beneficial insects in the field and decreased potential worker exposure. Such an IPM plan can be developed through monitoring fall crop yields, inspection for insect damage on harvested crops, sampling for soil born pests, and reviewing weather data from the previous growing season.
- Neonicotinoid seed treatments selectively control insect pests, while helping ensure beneficial insects remain available to help keep other potential insect pests in check. This tool also provides a unique mode of action, necessary to managing pests resistant to other insecticides. Without neonicotinoids, farmers would be forced to rely on a few, older classes of chemistry that are less selective and more toxic.
- From a pest spectrum and resistance management perspective, having multiple tools for farmers' pest management programs is important both for the farmer as well as for the longevity of the tools.

In summary, the use of seeds improved through modern technologies, such as seed treatments, is important as an Integrated Pest Management tool and input directly affecting sustainability. Farmers need access to every tool available, including the newest seed treatments to safeguard the long-term reliability of our food supply, the strength of our farms, and health of our planet. Please do not hesitate to contact us if you have any questions. Thank you for your consideration.

Sincerely,

Jordan Gregory
Director, State Government Affairs
American Seed Trade Association
jgregory@betterseed.org

HB91 Neonicotinoid - Testimony. Shortall Farms LLC

Uploaded by: Keith Shortall

Position: UNF

February 4, 2026

House Bill 91 - Agriculture - Neonicotinoid Pesticides - Prohibitions

Environment & Transportation Committee

Opposed

Keith Shortall
Shortall Farms LLC
Easton, Maryland

Thank you for the opportunity to submit written testimony in opposition to **House Bill 91**.

I am a farmer in Talbot County, growing corn, soybeans, and small grains. The ban on neonicotinoid treated seed for corn, soybeans and wheat in House Bill 91 would negatively impact my ability to operate my farm, mitigate risk, and remain economically viable.

Neonicotinoid seed treatments are an important tool on my farm. I use neonicotinoid seed treatments on 100% of my acres to protect my crops. Without neonicotinoid seed treatments, I would expect to experience significant losses.

Replanting an acre of corn costs me $150/ac. Replanting an acre of soybeans costs $95/ac. Having to replant my grain acres due to pre-emergent loss would cost my family farm over $30,000 per year and be economically devastating to our small business. Using foliar applications of neonicotinoids or other pesticides after the crops are out of the ground would cost me $40 per acre. These are not hypothetical impacts, they are real losses farmers in this state will experience.

House Bill 91 would also severely limit my access to seed. Maryland grain farmers rely on a regional and national seed market. Last year, I planted 4 different varieties of seed to meet the specific needs of each of my fields conditions. Seed companies have clearly stated they will not custom treat and distribute seed for a state with less a half a percent of the nationwide grain acres. As a result, this bill would reduce the availability of competitively priced seed options and force me to accept whatever untreated seed happens to be available.

Neonicotinoid seed treatments also support my conservation practices. They allow me to plant 300 acres of cover crops, and implement 300 acres of no-till by protecting vulnerable seedlings without repeated insecticide applications. Seed treatments are a targeted, preventative tool that

reduce the need for later spraying. Removing them would push farmers toward older, less precise insecticides that require more frequent and higher-volume applications.

Neonicotinoids remain approved for use by the U.S. Environmental Protection Agency, which is actively engaged in a multi-year scientific review of these products. Preempting that process at places me as a farmer at a disadvantage to farmers in surrounding states.

House Bill 91 would increase my costs, reduce my yields, limit my seed choices, and undermine conservation practices I rely on. I respectfully urge the committee to **oppose House Bill 91** and allow Maryland farmers to continue using proven, science-based tools to protect their crops and livelihoods.

Thank you for your time and consideration.

Respectfully submitted,

Keith Shortall
Shortall Farms LLC
Talbot County, Maryland

2026_DMAA_HB91_Neonics_UNF.pdf
Uploaded by: Lindsay Thompson
Position: UNF

Delaware Maryland Agribusiness Association
118 Dundee Ave, Chester, MD 21619
443-262-8491

HB 91 Agriculture - Neonicotinoid Pesticides – Prohibitions

MGPA 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

For more information, please contact Lindsay Thompson:, lindsay@providence.llc

2026_DMAA_HB91_Neonics_UNF.pdf
Uploaded by: Lindsay Thompson
Position: UNF

Delaware Maryland Agribusiness Association
118 Dundee Ave, Chester, MD 21619
443-262-8491

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.

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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

For more information, please contact Lindsay Thompson:, lindsay@providence.llc

2026_MGPA_HB91_Neonics_Opposed.pdf
Uploaded by: Lindsay Thompson
Position: UNF

Maryland Grain Producers Association

118 Dundee Ave • Chester • Maryland 21619
443-262-8491 • www.marylandgrain.com

HB 91 Agriculture - Neonicotinoid Pesticides – Prohibitions

MGPA Position: **OPPOSED** Committee: E&T Date: February 4, 2026

The Maryland Grain Producers Association represents the farmers in Maryland who grow the nearly one million acres of corn, wheat, barley, sorghum, triticale, and soybeans across the state, contributing nearly $1 billion in direct sales to the Maryland economy.

MGPA opposes HB91, which would ban the sale, distribution, and use of corn, soybeans, and wheat seeds treated with neonicotinoid pesticides.

Neonicotinoids are important to grain production as a seed treatment applied before planting. Nearly all corn seed planted in Maryland and the majority of soybean seed is treated and helps to protect the crop from rootworm, cutworms, flea beetles, white grubs, and wireworm, all of which can be devastating to seeds before they emerge from the soil. The use of seed treatments translates to less pesticide use because it reduces the need for application after the seed is planted.

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

The corn, soybean, and wheat seed markets are national markets, not regional or even state-based markets. Over 90% of corn seed sold in the U.S. is treated with neonicotinoids. While seed companies may be willing to special treat seeds for large volume markets, Maryland is a very small market representing less than 1% of the total row-crop acreage. Seed companies will not special inventory non-treated seed for the Maryland market. This will result in reduced availability of seed options for Maryland growers and potentially not enough untreated seed at all. While we appreciate the allowance for the Secretary of Agriculture to extend the ban if seed is not available or creates a financial hardship, this is not how the seed procurement timeline works. Many farmers have already ordered their seed for the fall 2026 planting season, and seed companies are on five-year planting cycles to ensure sufficient inventory. This creates uncertainty for both farmers and their agribusiness partners.

Many of our farmers are diversifying their operations to not only grow grain but also grow and sell seed. Having insufficient varieties and stock to sell will also impact their income from this second stream.

Maryland farmers are leaders in conservation implementation, with higher percentages of cover crops and no-till acres than any other state in the nation. Neonicotinoid seed treatments aid farmers in conservation implementation by protecting seeds from soil pests that are encouraged by the right organic matter environment that these conservation practices create. Peer-reviewed research shows that early-season seed protection is especially important in no-till and high-residue systems (van der Werf et al., 2018; Douglas & Tooker, 2015). If neonicotinoid seed treatments are not available, you may see farmers decreasing their acres of cover crop and no-till implementation in order to mitigate the additional pest risk they create and now cannot protect their crop from.

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 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 and continues to take the necessary steps to protect pollinators from any potential impact of neonicotinoid pesticides. Our farmers strictly follow EPA guidance, and the science continues to support the correct use of neonicotinoid treated seed.

MGPA respectfully asks for your unfavorable report on House Bill 91.

For more information, please contact:
Lindsay Thompson - Lindsay.mdag@gmail.com

HB 91 Testimony 2026.pdf
Uploaded by: Mark Schlossberg
Position: UNF

M.A.G.I. Maryland Association of Green Industries, Inc.

February 4th, 2026

Chairman Marc Korman
House Environment and Transportation Committee
250 Taylor House Office Building
Annapolis, MD 21401

Ref: HB91 - Agriculture - Neonicotinoid Pesticides – Prohibitions - **OPPOSED**

Chairman Korman and Members of the Committee,

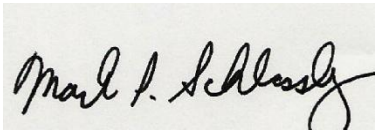
On behalf of the Maryland Association of Green Industries, Inc., I am submitting this testimony in opposition to HB 91. Our group represents lawn care companies, golf course superintendents, pest control operators and others involved in applying nutrients and/or pest control products professionally to lawns, landscapes and around residential and commercial properties here in Maryland.

This bill would virtually eliminate the use of neonicotinoid products that are very cost-effective in controlling many turf and ornamental pests and structural pests as well. The beauty of neonicotinoids is that they are systemic and can be taken up by plant roots. They can be applied through root injections and soils drenches thus reducing the need for spraying that could drift and cause more damage to pollinators. They have all been approved by EPA after years of testing and most of the products in use now have been available to the public for many years. The replacement products that are available now are much more expensive.

At least keeping neonicotinoids available to Maryland Certified Applicators like our member organizations makes the most sense as we are trained to apply the products at the proper rates and this reduces the risk to the public and the environment.

We respectfully ask the committee to give an **UNFAVORABLE** report on HB 91.

Thank you,



Mark I. Schlossberg
President

1406 Shoemaker Road, Baltimore, MD 21209 * 410-825-8873

HB0091 written testimony.pdf
Uploaded by: matthew cline
Position: UNF

HillSide
LAWN SERVICE

Churchville, MD 21028
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Dear Chairman Korman and Members of the House Environment and Transportation Committee

We have used Neonics in our turfgrass programs for years specifically as a grub prevention application. We also use it in some tree and shrub applications as well on a much smaller scale.

Other products are available on the market to accomplish the same goal of grub prevention but at a much higher cost. Trade names of Accelepyrn and Durentis are both commonly available to our industry but at a much higher price point. These price points are around $120 and $100 per acre while Bandit (Neonic) is around $15 per acre. We treat about 1000 acres with grub control products so that would cost us an additional $105,000 or $85,000 to make a change at the current pricing. This would be very challenging for us to overcome this financially if it were mandated.

I know one of the major concerns is pollinator safety with these products. We are training our technicians to avoid bee hives and things of that nature but because people are buying lawn care services and we are providing them with a weed free lawn, we typically do not see pollinators in the actual lawns we treat.

- Neonicotinoids provide long-lasting, systemic protection that alternatives often cannot replicate. For example, trunk or soil soaks for ornamental plants and trees provide long lasting control with little to no pollinator exposure.
- Taking an entire class of pesticides out of the toolbox for pest control in lawn care is not consistent with Integrated Pest Management and may result in resistance and loss of efficacy.
- Neonics remain approved for use at the federal level by the U.S. Environmental Protection Agency (EPA). The EPA has been engaged in multi-year biological evaluations of neonicotinoids, including their effects on endangered species, pollinators and critical habitats as part of the Endangered Species Act process. EPA released updated pollinator risk assessments and proposed interim decisions in January 2020 as part of its ongoing neonicotinoid registration review any changes to allowed use should respect and align with that federal process rather than preempt it.
- Certified applicators are trained professionals able to apply pesticides according to the labeled directions mitigating risks to non-target species and the environment.

Thanks.

Matt Cline

Chief Operating Officer

MCFB Testimony HB91 020426.pdf
Uploaded by: Paula Linthicum
Position: UNF

Montgomery County Farm Bureau

PO Box 217, Damascus, MD 20872
mcfarmbureausecretary@gmail.com
www.marylandfb.org

February 4, 2026

HB 91 - Agriculture - Neonicotinoid Pesticides - Prohibitions
Environment & Transportation Committee
Opposed

Environment & Transportation Committee Members:

Thank you for the opportunity to submit written testimony. Montgomery County Farm Bureau **opposes HB 91**.

A ban on selling or using neonicotinoid (neonic) treated corn, wheat and soybean seeds and prohibiting the use of neonic pesticides on turf grass will negatively impact the economic viability of Montgomery County farmers.

County farmers grow over 45,000 acres of corn, wheat, soybeans and barley that go to support Maryland's poultry industry on the Eastern Shore and other livestock production. They also grow over 1,000 acres of turfgrass for the region.

Seed treatment is an essential component of modern agriculture. A critical preventative crop protection tool in a grain farmer's toolbox. Crop protection is managing weeds, pests, diseases and environmental stress using science and practices to safeguard crops, achieve maximum yield, quality and food security. Seed treatment technology utilizes targeted, precise application that coats the seed for protection against diseases and pests during vulnerable early plant growth stages. Effectively reducing the need to apply insecticides over entire fields. An environmentally safer approach to managing crop health.

Seed treatment products are highly regulated by the U.S. Environmental Protection Agency (EPA). They undergo thorough evaluation and rigorous testing. Neonics remain approved for use by the EPA, which is actively engaged in a multi-year scientific review of these products.

HB 91 will:

- Create undue financial hardship for farmers in already challenging times.
- Require farmers to address pest pressures with older, less efficient insecticides using other application methods with increased frequency and amounts. Replacing nearly five pounds of older chemistries for every pound of neonics removed from use. Products that are 8-10 times more expensive.
- Restrict corn, wheat and soybean production in the county and statewide due to the unavailability of non-treated seed from regional and national seed companies that will not specialize seed for a state with less than half a percent of nationwide grain acres.
- Severely limit the availability of competitively priced seed options in the region forcing farmers to purchase whatever seed is available increasing input costs. Possibly seed with lower yield potential.
- Undermine existing critical conservation practices like reduced tillage or no-till as farmers are forced to revert back to more conventional tillage for pest management increasing the risk of soil erosion.
- Put Maryland farmers at a disadvantage to farmers in surrounding states by preempting the EPA multi-year scientific review process.

Farmers use proven, science-based tools to protect their crops, the environment and their livelihoods. Not having those tools threatens the future of Maryland agriculture.

On behalf of Montgomery County Farm Bureau, I respectfully urge the Committee to **oppose HB 91**.

Sincerely,

Doug Lechlider

Doug Lechlider, President

Testimony HB091 2026.pdf
Uploaded by: Robert Cissel
Position: UNF

"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.

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.

Bob Cissel

Director, Montgomery Agricultural Producers, Inc

Bobcissel50@gmail.com

301-775-8978

MDFB - Oppose - HB91 Agriculture - Neonicotinoid P
Uploaded by: Tyler Hough
Position: UNF

Maryland Farm Bureau

3358 Davidsonville Road | Davidsonville, MD 21035
410-922-3426 | www.mdfarmbureau.com

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

Maryland Farm Bureau
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410-922-3426 | www.mdfarmbureau.com

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.

Tyler Hough
Director of Government Relations
Please contact Tyler Hough, though@marylandfb.org, with any questions

RJR-(MTC.MASFMA) HB91 Letter of Information (2026)

Uploaded by: Logan Freeman

Position: INFO

Delegate Marc Korman, Chairman
Delegate Michele Guyton, Vice-Chair
House Environment & Transportation Committee
250 Taylor House Office Building
Annapolis, Maryland 21401

Re: ***House Bill 91: Agriculture - Neonicotinoid Pesticides – Prohibitions – Letter of Information***

February 4, 2026

Dear Chairman Korman and Committee Members:

On behalf of the Mid-Atlantic Sports Field Management Association (MASFMA) and the Maryland Turfgrass Council (MTC), we write this letter of information pertaining to the introduction of House Bill 91: *Agriculture - Neonicotinoid Pesticides – Prohibitions*.

MTC represents all areas of the turf industry including golf, sports turf, sod producers, landscape, lawncare and commercial vendors and suppliers. The Mid-Atlantic Sports Field Management Association (MASFMA) is a non-profit organization that is composed of sports turf field managers and workers from Maryland, Delaware, Washington D.C., and Northern Virginia. Once again, MASFMA has partnered with Maryland Turfgrass Council (MTC) this year to bring a more unified front from all aspects of our industry.

As written, House Bill 91 would amend the current law to prohibit an individual from applying neonicotinoid pesticides to treat outdoor ornamental plants and turf.

Over the past decade, restrictions on neonicotinoids in Maryland have been debated by state lawmakers. In 2016, the Maryland General Assembly passed the Pollinator Protection Act which aimed to protect pollinators from the harmful effects of neonicotinoid pesticides. This law took effect on January 1, 2018, which included restrictions on use so that only neonicotinoid pesticides could be applied only by certified pesticide applicators or farmers. Five years later, state lawmakers passed additional legislation to close loopholes ensuring stricter enforcement of the restrictions to prevent retailers from selling neonicotinoid products to consumers.

By restricting their use and ensuring that only trained professionals can apply them, Maryland has laudably managed to mitigate environmental risks associated with these chemicals while also supporting agricultural practices that are safer for the ecosystem. Ten years since the original legislation was passed, House Bill 91 is now before this committee placing additional application restrictions targeting the turfgrass industries (and others).

For the purposes of this letter, MTC and MASFMA would like to share some of our concerns should this legislation become new law. Without neonicotinoids in turfgrass will result in increases of nuisance insects, such as ants and chinch bugs, which can severely damage turf, especially during

warmer seasons. In addition, the potential loss of low-cost neonicotinoids creates a challenge to control ornamental pests like miners and boring insects. For turfgrass, the risk to pollinators is minimal, especially if flowering heads of weeds, like clover are routinely mowed down – which is common practice. Finally, turfgrass management facilities (and golf courses) have pollinator habitats which have established great results with regards to safe and effective use of neonicotinoids.

We hope this letter of information (and our concerns) is beneficial to this committee when making its consideration on this legislation. Should you have any questions, please do not hesitate to contact our associations for further information, education, or assistance on this issue.

Thank you,

Clint Steele

_____

Clint Steele
President, MASFMA

Logan Freeman

_____

Logan Freeman
President. MTC