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Dear Chair Putnam and Members of the Senate Agriculture Committee,

I write today on behalf of Minnesota Trout Unlimited's thousands of members around the state to express strong support of SF 3083 which will eliminate harmful and unnecessary uses of neonicotinoid treated seeds. Neonicotinoids are highly toxic to the aquatic insects that form the base of food webs that support trout fisheries in Minnesota. The Minnesota Department of Agriculture's own data shows that concentrations of these pesticides in Minnesota streams routinely exceed safe levels for aquatic invertebrates.

Minnesota Trout Unlimited is a grassroots conservation organization working to protect, restore and sustain coldwater fisheries and their watersheds across Minnesota. Our several thousand members living and working in communities across Minnesota understand that activities on the land determine the quality of the water in streams and lakes, and the health of trout and aquatic organisms that live in these waters. We are very concerned about the impacts of neonicotinoids on our precious trout streams for a number of reasons.

Aquatic insects support trout fisheries. Neonicotinoids are insecticides that are designed for one thing - killing insects. When they leach or wash into streams they indiscriminately kill the beneficial aquatic insects which trout depend on for survival. Minnesota Department of Agriculture (MDA) testing routinely found concentrations of two neonicotinoids in Minnesota streams at levels harmful and lethal to aquatic insects. The MDA has determined that seeds coated with neonicotinoids are the leading source of these toxins in Minnesota waters. To protect and improve the valuable public trout fisheries we must protect the aquatic insects trout depend on.

Chronically harmful levels of neonicotinoids. U.S. Environmental Protection Agency scientists have determined the concentrations of neonicotinoids that aquatic insects can be regularly exposed to without harm, called chronic aquatic life benchmarks (ALB). When chemical concentrations exceed the chronic ALB for more than 21 days insects and other aquatic life die. MDA's testing found concentrations of two neonicotinoids, clothianidin and imidacloprid, regularly exceed chronic ALB levels in rivers and streams across western and southern Minnesota. MDA also determined that these high concentrations of

neonicotinoids are correlated with corn and soybean planting season, which “strongly suggests that neonicotinoids from seed treatments are the primary source of detections and are rapidly transported to rivers and streams after planting.”

Neonicotinoids are pervasive. Neonicotinoids are water soluble and long lasting. This allows them to rapidly contaminate surface waters and groundwater and stick around for several years. Recent research in Minnesota found neonicotinoids in 97% of water samples from rivers and streams, and 74% of groundwater samples, including at levels harmful to aquatic insects. Data collected by MDA confirms that neonicotinoid-treated seeds are the leading source of contamination in Minnesota waters. The highest levels are detected in May, June and July, following the planting season.

Most neonicotinoid use is not regulated. Most neonicotinoid use is as coatings on seeds. While neonicotinoids are regulated as pesticides, the EPA exempts treated seeds from federal regulation under its “treated article exemption.” The MDA does not regulate treated seeds, although it has authority to do so. Thus most of the corn and soybean seeds sold in Minnesota are treated with neonicotinoids but escape regulation. Less than 10% of neonicotinoids applied to seeds are absorbed by young plants. The remaining 90% eventually washes or leaches through the soil to nearby streams and groundwater. MDA water samples have shown spikes in neonicotinoids following rainfall-runoff events.

Neonicotinoids make no economic sense. Neonicotinoid-treated seeds have not been shown to offer an overall economic benefit to farmers compared to untreated seeds. The increased cost of treated seeds is greater than marginal increase in yield. **In contrast, trout fishing is an economic boon to southeast Minnesota and contributes nearly 1 billion dollars per year to the State’s economy.**

SF 3083 directs the Minnesota Department of Agriculture to develop a regulatory program for treated seeds and ensure that neonicotinoid-treated seeds are used only where needed, while granting the agency broad discretion to implement a regulatory program in a way that works for Minnesota farmers. This will eliminate most neonicotinoid contamination, while reining in high-cost, low-benefit coated seed uses.

The bill takes a common-sense approach to reducing neonicotinoid contamination. On behalf of trout anglers across the state, I urge your support for SF 3083.

Respectfully,

John Lenczewski