John P. Lenczewski, Executive Director
Minnesota Trout Unlimited
PO Box 845
Chanhassen, MN 55317
612.670.1629
John.lenczewski@mntu.org

March 10, 2026

House Agriculture Finance and Policy Committee
75 Rev Dr Martin Luther King Jr Boulevard
St. Paul, MN 55155

Sent via Email

Re: Support of HF 3704

Dear Co-Chair Hansen, Co-Chair Anderson, and members of the Committee:

I write today on behalf of Minnesota Trout Unlimited's thousands of members around the state to express support of HF 3704 which would reduce harmful and unnecessary uses of neonicotinoids. Neonicotinoids are highly toxic to the aquatic insects that form the base of food webs that support valuable 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 around the state 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 regularly work with agricultural producers to improve streams flowing through their land. They care deeply about the land and water. Several have indicated that they share our concerns about the impacts neonicotinoids are having on our public trout streams.

Aquatic insects provide the essential food which supports trout fisheries. Aquatic insects form the base of food webs that support trout fisheries. Neonicotinoid chemicals ("neonics") are engineered to kill insects indiscriminately. They continue to kill insects after they wash into public waters. The concentrations of two neonics – clothianidin and imidacloprid - are routinely found in Minnesota streams at levels harmful and lethal to aquatic insects. The MDA has determined that seeds coated with neonics are the leading source of these highly toxic, persistent neonics in Minnesota waters. Yet the MDA is not regulating neonic-treated seeds. Protecting and improving trout fisheries requires the State act to protect the aquatic insect populations that trout depend on.

Neonics decimate aquatic ecosystems. Neonics are highly toxic to the aquatic insects that form the base of aquatic food webs. MDA's own data show "elevated and concerning" neonic concentrations in Minnesota's surface waters. Levels routinely exceed the U.S. Environmental Protection Agency's chronic aquatic life benchmark (ALB) for harm to aquatic invertebrates. MDA concluded that its analysis strongly suggests that clothianidin and imidacloprid concentrations over the EPA's chronic ALB are sustained for periods more than 21 days in rivers and streams across western and southern Minnesota." These elevated neonic concentrations 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."

Neonics are pervasive. Neonics are "systemic," meaning they are water soluble, and long lasting. This allows them to rapidly contaminate surface and groundwater and stick around for up to three years. Recent research in Minnesota showed neonics in 97% of water samples from rivers and streams, and 74% of groundwater samples, including at levels above that kill aquatic insects. Data collected by MDA confirms that neonic-treated seeds are the leading source of harmful neonic contamination in Minnesota waters. Highest levels are detected in May, June and July and following the agricultural crop planting season.

Most Neonic use is unregulated. Neonics are used in several ways, including as coatings on seeds. Although neonics are regulated as a pesticide, treated seeds are exempt from regulation by EPA under its "treated article exemption." The MDA does not regulate treated seeds either. Most of the corn and soybean seeds sold in Minnesota are treated with neonics but escape regulation. When neonics are applied to seeds, a small percentage of the insecticide is absorbed by the plant as it grows, providing systemic protection against insect pests. However, most of these chemicals are not absorbed by the plants. Typically less than 10% is absorbed, leaving over 90% on the surface of the seeds or in the surrounding soil. When it rains or when irrigation water is applied, these surface residues can be washed off the treated seeds and soil and into nearby aquifers, streams, and public water bodies. MDA water samples have shown spikes in neonics following rainfall-runoff events.

Neonics do not make economic sense. Neonic treated seeds have not been shown to offer any overall economic benefit to farmers compared to untreated seeds. The increased cost of treated seeds is greater than any marginal increase in yield. **In contrast, trout fishing in southeast Minnesota contributes nearly 1 billion dollars per year to the State's economy.** It makes no sense to needlessly destroy this part of the economy by using a practice that has not been shown to provide increased economic benefits to local farmers.

HF 3704 would protect people, pollinators, public fisheries, and producers by reining in unnecessary uses of neonics in both urban and rural settings. Section 5 directs the Minnesota Department of Agriculture (MDA) to develop a regulatory program restricting the use of treated seeds to locations where the necessity for using these persistent insect killers is demonstrated. Implementation is delayed for more the two and a half years, which is ample time for MDA to undertake public rulemaking in which farmers will have a voice. MDA can ensure that pesticide-treated seeds are used only where needed and design the program in a way that works for Minnesota farmers. This could eliminate most of the neonic contamination by reining in high-cost, low-benefit coated seed uses.

On behalf of trout anglers across the state, I urge your support for this important bill, which takes a common-sense approach to tackling the neonicotinoid contamination crisis.

Respectfully,

John Lenczewski

Attachment: “Detection Patterns of Neonicotinoid Insecticides in Minnesota Rivers and Streams, 2018 through 2022”, MDA