



April 15, 2025

To: The Honorable Senator Reachel Talbot Ross
The Honorable Representative Bill Pluecker
Co-Chairs of the Joint Committee on Agriculture, Conservation, and Forestry
Re: Maine LD 1323

The American Seed Trade Association (ASTA) is writing this letter to submit comment for the public hearing called for April 15, 2025, on LD 1323, 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 Maine, 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 seeds. 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 seeds. 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 seeds?

- 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