



New York Farm Bureau
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MEMORANDUM OF OPPOSITION

Senate Bill 2002 (Hoylman)

AN ACT TO AMEND THE ENVIRONMENTAL CONSERVATION LAW, IN RELATION TO EXPANDING THE DEFINITION OF "PESTICIDE" TO INCLUDE SEEDS THAT HAVE BEEN COATED OR TREATED WITH INSECTICIDE

Date: 2/28/2019

New York Farm Bureau, the state's largest agricultural advocacy organization, respectfully opposes this legislation. The legislation would have a negative impact on the agricultural industry in New York, by unnecessarily further regulation of treated seeds.

New York is one of the very few states that reviews pesticide product for environmental and health impacts prior to registration in the state. The vast majority of states simply accept the federal Environmental Protection Agency's (EPA) review and registration decision to allow use in their states. Thus, New York has a rigorous dual certification system for pesticides. The EPA carefully considers effects on many non-pest organisms, including honey bees, when they approve new insecticides for use. EPA data has shown low risk to pollinators from treated seed in recent assessments.

Seed treatments are critical in the agriculture industry and the production of healthy crops. Due to their targeted accuracy, they selectively control pests, while ensuring beneficial insects remain. Their safe and targeted use provides a beneficial use of pesticides and reduces the amount of chemicals used on large areas of farmland. Because they are planted below the soil surface, treated seeds help minimize the exposure of pesticides to off-target plants and animals. Seed is regulated by United States Department of Agriculture (USDA) and further regulating treated seeds would put an unnecessary burden on growers.

Given these reasons with regard to the use of a critical agricultural input, New York Farm Bureau respectfully requests your opposition to this legislation.