



April 16, 2024

**Testimony on Vermont H.706 — “An act relating to banning the use of neonicotinoid pesticides”**

Dear Chairman and Members of the Senate Committee on Agriculture,

As Consumer Choice Center, we believe that Bill H.706 – which plans to ban the use of neonicotinoid treated seeds starting 2029, – should not be passed. Our organization stands up for available, affordable, innovative and sustainable food. We oppose bills that we think makes food more expensive for consumers -- but the entire conversation on neonic bans isn't just about food affordability, the bill itself, we believe, is based on faulty premises. In short:

- This legislation would adversely impact consumers, with reduced food security and higher prices
- This bill would negatively impact farmers
- This bill would increase the overall use of pesticides and its associated costs
- Jurisdictions that have implemented a similar ban have experienced higher costs
- This bill lacks a proper impact assessment
- This bill is not backed by sufficient evidence on the effects of pollinators

Pesticides come at an expense to farmers and their business – this spend is made out of the necessity of protecting their crops. This applies as a general rule to crop protection. As an example, Vermont dairy farmers, who fertilize their corn with cow manure: this is a sustainable practice, but it attracts seedcorn maggots, which can cause total crop loss.<sup>1</sup> This is why farmers use neonic-treated seeds, because they are effective in repelling against all sorts of pests. These chemicals have been effectively used since the 1990s, and they ensure that consumers get a reliable food supply.

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<sup>1</sup> University of Vermont:

[https://www.uvm.edu/sites/default/files/Northwest-Crops-and-Soils-Program/Articles\\_and\\_Factsheets/Neonicotinoids\\_Risk\\_Management.pdf](https://www.uvm.edu/sites/default/files/Northwest-Crops-and-Soils-Program/Articles_and_Factsheets/Neonicotinoids_Risk_Management.pdf)



## ***Economic impacts***

What if the state were to ban the use of neonicotinoids? Farmers would have difficulties finding those non-treated seeds, because Vermont only accounts for 1 in 1,000 corn seeds in the United States<sup>2</sup>. Also, any seeds that would be available, could be bought up by farmers in New York, which has voted through a similar ban to H.706. All of this will increase costs for farmers, who will pass those costs on to consumers. Bill H.706 does make reference to jurisdictions that have also banned neonicotinoids, namely the European Union and Québec. Those jurisdictions have banned neonics, but not without repercussions. It is important to note that household spending on food in Québec is higher than it is in Vermont. In Europe, it is considerably higher. That goes on top of the fact that American agriculture is less subsidized than the European farm system.

People in Vermont spend 7.3% of their income on food<sup>3</sup>. In Québec it's 12.1%<sup>4</sup>. The European Union average is 14.3%<sup>5</sup>, and in Romania the 2021 consumer household spending was almost 25%. In fact, Vermont has been one of the states that saw the lowest amount of increase in consumer spending on food between 2019 and 2022. That is good news. Food spending should not eat up a quarter of your household spending – we didn't innovate farming with seed breeding, mechanization, and modern crop protection only to live precariously as consumers.

Our question to the committee is: do you feel confident that the House has provided sufficient data that proves that consumer prices for food would not increase, that this would not jeopardize the state's ability to export, and that it would not adversely impact farmers?

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<sup>2</sup> USDA:

<https://downloads.usda.library.cornell.edu/usda-esmis/files/j098zb09z/0z70b374s/w9506686w/acrg0622.pdf>

<sup>3</sup> New England Feeding New England State Report 2023:

<https://nefoodsystemplanners.org/wp-content/uploads/NEFNE-VERMONT-State-Brief.pdf>

<sup>4</sup> Statistics Canada, 2021 data: <https://www150.statcan.gc.ca/t1/tbl1/en/cv.action?pid=1110022201>

<sup>5</sup> EUROSTAT 2021 data: <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20230201-1>



## ***Substitution***

If a ban on neonic-treated seeds would mean that no more insecticides were to be used in Vermont agriculture, that would be a significant innovation, since both conventional and organic farm systems require crop protection. The promoted substitute for neonics in Vermont is diamide.

It would be short-sighted to believe that substitution products will be immune from criticism, as anthrillid diamides are most dangerous to monarch butterfly larvae, according to researchers at Iowa State University<sup>6</sup>. Anthrillid diamides come at triple the cost of neonicotinoids<sup>7</sup>, at a lower efficiency, which means farmers would pay more for crop protection and also lose out on crop yield. We fear that this would directly impact prices for consumers. The federal annual cost benefit of neonicotinoid insecticides is \$848 million.<sup>8</sup> Without them, corn would be up over \$7 per acre and sorghum over \$4 per acre.

## ***Bee health***

The most important factors for consumers when they buy food is taste and price, but that does not mean that sustainability has no role in consumer behavior. That is why it is an opportune question to know whether neonicotinoids are a concern for pollinators.

Neonicotinoid-treated corn, by far Vermont's largest vegetable crop, is especially unlikely to come in contact with bees, because bees do not pollinate corn. It's pollinated by wind, like most other grain crops.

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<sup>6</sup> Krishnan N, Zhang Y, Bidne KG, Hellmich RL, Coats JR, Bradbury SP. Assessing Field-Scale Risks of Foliar Insecticide Applications to Monarch Butterfly (*Danaus plexippus*) Larvae. *Environ Toxicol Chem*. 2020 Apr;39(4):923-941. doi: 10.1002/etc.4672. Epub 2020 Mar 4. PMID: 31965612.

<sup>7</sup> Elson Shields, Cornell University, 2022:

[https://agriculture.vermont.gov/sites/agriculture/files/doc\\_library/2023\\_0626%20Seed%20Corn%20Maggot%20in%20Northeast%20US%20Need%20for%20Insecticide%20Seed%20Trt\\_Elson%20Shields.pdf](https://agriculture.vermont.gov/sites/agriculture/files/doc_library/2023_0626%20Seed%20Corn%20Maggot%20in%20Northeast%20US%20Need%20for%20Insecticide%20Seed%20Trt_Elson%20Shields.pdf)

<sup>8</sup> AgInformatics:

[https://www.aginformatics.com/uploads/3/4/2/2/34223974/estimated\\_impact\\_neonicotinoid\\_insecticides.pdf](https://www.aginformatics.com/uploads/3/4/2/2/34223974/estimated_impact_neonicotinoid_insecticides.pdf)



Varroa mites, along with the highly infectious diseases they transmit, pose the most significant threat to bee colony decline presently<sup>9</sup>, rather than neonicotinoids. This aligns with the findings in Vermont, where the Agency of Agriculture, Food & Markets (AFM) documented extensive honeybee colony losses in 2020 attributed to varroa mite infestations and subsequent American Foulbrood disease outbreaks.<sup>10</sup>

There is another factor in the bee health angle that is important to consider: bee colony numbers are up. The Washington Post reported<sup>11</sup> that bee colonies are the fastest-growing livestock in the U.S, with a 31% increase in the past 15 years. Bee populations live in a complicated ecosystem, where the increase of managed bees threatens the livelihood of feral bees, yet it is hard to understand why chemicals that are not reliably shown to have this effect, with bee populations on the rise and bees not even pollinating those crops, should be banned, and be substituted with chemicals that will increase costs to farmers and consumers.

Consumers seek out products by taste and price, but also a significant decision factor is based on whether food is local or not. Vermont and the rest of New England want to produce 30% of its food supply locally by 2030, but a reduction in productivity of those farms could severely jeopardize this target.

### ***Farmer inclusion***

Lastly, we also worry about the inclusion of farmers in this process. For the past weeks and months, Europeans have had the largest farmer protests that we've ever seen. Tens of thousands of farmers have protested in Poland, Germany, France, the Netherlands, and many other countries — and while some of the concerns are specifically local ones, there is a uniting concern for farmers: the regulatory burden on farmers is too stringent. The European Union prides itself in high food standards, but the precautionary approach to chemicals regulations

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<sup>9</sup> USDA: <https://www.ars.usda.gov/oc/br/ccd/index/>

<sup>10</sup> AFM:

<https://agriculture.vermont.gov/sites/agriculture/files/documents/2023%2520Apiary%2520Status%2520Report%2520121923.pdf>

<sup>11</sup> Washington Post: <https://www.washingtonpost.com/business/2024/03/29/bees-boom-colony-collapse/>



that has been taken in Brussels has not served farmers or consumers. It makes it so that Europeans pay twice as much for food as people in Vermont, and that many farmers have to give up a profession that was in their family for generations, because their businesses are not financially sustainable.

In 2020, France passed an exemption of the EU neonic ban, because sugar beet farmers were at the verge of collapse because of insect attacks.<sup>12</sup> France, a country that until then was self-sufficient on the crop, now imported from abroad, and needed to provide millions in subsidies to farmers to survive their crop losses. We can solve harvest losses with subsidies – Canada does that also, but is this the future we see for farmers? Being dependent on subsidization schemes to successfully run a business? Farmers would rather not be dependent on direct government payments, and for consumers, it is hard to understand the real price of food. On the one hand they pay increasing amounts to eat, and simultaneously, they pay for the food system as taxpayers.

The farmer protests in Europe are an expression of this frustration, because farmer representatives and those who want to protect consumer purchasing power have been neglected, and people see no solution but to voice their concerns more loudly.

There are good reasons to investigate the issue of bee health in detail, and fortunately the EPA is soon going to finish its assessment of neonicotinoids.

From our perspective, Bill H.706 should be rejected, because there is no conclusive evidence that neonics harm bees and because it will increase costs to consumers.

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<sup>12</sup> Reuters: <https://www.reuters.com/article/us-france-sugar-pesticides-idUSKCN2521OF/>