

# Pesticide Management Plan Revisions – MDA Response to Comments

March 2026

This document summarizes the Minnesota Department of Agriculture's (MDA's) responses to public comments received on proposed revisions to the Minnesota Pesticide Management Plan (PMP).

On July 21, 2025, the MDA published a request for comments on proposed revisions to the PMP ([50 SR 58](#)) and opened a 60-day public comment period. The MDA specified that comments should focus on the proposed revisions and noted that comments regarding the core content of the PMP are considered outside the scope of the notice.

The MDA carefully reviewed the six comments received. Full copies of submitted comments are available on the [MDA's Pesticide Management Plan webpage](#). The MDA's responses to relevant comments are provided below. Additional comments that were outside the scope of the MDA's request are summarized but responses are not provided.

## Comments Received and MDA Responses

### Gretchen Sabel

*Comment 1:* The PMP does not address the impacts of pesticides on non-target insects, nor do your proposed revisions. This is an area of pesticide management that must be addressed.

*MDA Response:* The PMP was developed to address the impacts of pesticides on water quality ([MINN. STAT. 18B.045](#)). Efforts to protect water quality can indirectly help protect non-target insects that may be exposed to pesticides from contaminated water; however, the plan is not intended to directly address insects. The MDA has separate efforts to address the impact of pesticides on non-target insects including pollinators.

### Minnesota Corn Growers Association

*Comment 1:* MCGA supports the addition of the subsections outlining the process for removal from both the Common Detection Status and the Surface Water Pesticide of Concern Status. This provides clarity and is consistent with the goal of the mitigation efforts to reduce the concentrations of the pesticide below the applicable standards and reference values.

*MDA Response:* The MDA appreciates the support on this revision.

*Comment 2:* The Minnesota Corn Growers Association (MCGA) doesn't understand the rationale for providing registrants and other groups the opportunity to propose BMPs as optional when developing pesticide-specific Best Management Practices (BMP). This change is not consistent with the emphasis on engaging with stakeholders and technical experts throughout the document particularly when these same groups are relied on to promote the BMP adopted by the commissioner.

**MDA Response:** The MDA values ideas and feedback from registrants and other groups when developing BMPs. The revision in question was made to streamline the process of developing pesticide-specific BMPs, not to restrict external involvement in the process.

The MDA revised the PMP to make it optional to provide registrants and other groups the opportunity to *initially* propose BMPs. This change provides the MDA the flexibility to prepare an initial draft of BMPs instead of requiring the MDA to consult registrants and respective commodity and user groups as the first step in the pesticide-specific BMP development process. The MDA plans to continue providing registrants and others the opportunity to propose BMPs; however, depending on the circumstances, these opportunities may come after an initial draft is developed or be part of the broader public comment period.

**Comment 3:** MDA is also proposing to only seek comments on the proposed pesticide-specific BMPs from primary companies that register or manufacture the pesticide for use in Minnesota. Again, it seems the likelihood of meeting the goals would be improved by receiving input from all the companies.

**MDA Response:** As with the edit noted in Comment 2, the MDA's revision to seek comments on the proposed BMPs from *primary* companies that register or manufacture the pesticide was made to streamline the process of developing pesticide-specific BMPs. A large number of companies may be associated with products containing a specific active ingredient, many of which may be distributor companies.

The MDA may still contact all companies that register or manufacture products containing the active ingredient; however, the proposed edit provides additional flexibility in cases where many secondary registrants/manufacturers exist.

## Minnesota Farm Bureau

**Comment 1:** The PMP was last updated in 2007. It is notable that MDA preserved the core content and intent of the plan, demonstrating its durability. We agree that the core content as it currently stands provides a comprehensive approach to prevent, evaluate, and mitigate potential pesticide impacts to groundwater and surface water. We also recognize the need for technical updates and added clarity, including adjustments to agency processes that have changed since the last update.

**MDA Response:** The MDA appreciates the support of the PMPs core content and updates.

**Comment 2:** We also want to recognize the PMP's new inclusion of the Minnesota Agricultural Water Quality Certification Program.

**MDA Response:** The MDA appreciates the recognition and support of the program.

## Sierra Club - North Star Chapter

**Comment 1:** The PMP update now includes working with the tribes in Minnesota who have authority over environmental protection of their lands and waters as sovereign nations. This is implemented through consultation and collaboration with the tribes on water quality and in particular, on protections for wild rice. This is a positive and significant aspect of the PMP update.

**MDA Response:** The MDA appreciates the feedback in support of these revisions.

## Additional Comments Received

The MDA considers the following comments outside the scope of the public comment request; therefore, no responses are provided. The MDA has separate efforts to address many of the concerns raised in these comments. For example, the MDA promotes [pollinator-focused BMPs for neonicotinoids](#) and is continuing to implement response plans to address water quality impairments in the state. The MDA also has taken measures to address label changes and mitigations related to Endangered Species Act (ESA) requirements (see [MDA's ESA](#)

[webpages](#)). However, ESA requirements do not alter the MDA's approach to pesticides and water quality and are, therefore, not explicitly addressed in the plan. The PMP outlines the framework and process for protecting groundwater and surface water in Minnesota from pesticide contamination, and the guidance within is based largely on pre-existing rules and statutes. It is important to note that the PMP itself cannot restrict the use of pesticides, change pesticide labeling requirements, or create new legal requirements for pesticide applicators.

## **Colleen Werdien**

*Comment 1:* Neonics should be banned in Minnesota and seeds should not be coated with pesticides.

*Comment 2:* Pesticides should be banned if they cause cancer or also if they have a negative impact on cardiac, neurological, respiratory, kidney, reproductive health or urinary function, or if they impact fetus development or children's health.

*Comment 3:* All information about pesticides should be very transparent and understandable. For example, pesticide containers should have a human stick figure and say this pesticide may cause problems with your kidneys with a x in the appropriate area.

*Comment 4:* The MDA should develop a mandatory online system to record weather conditions, type of pesticides used, where and how pesticides were applied for over 10 acres of land. In conjunction the MDA needs a system where people can document where pesticides had drift and produced damage to land not intended to be serviced. Fines should be assessed for not following rules about pesticide application and be increased for each offense.

*Comment 5:* Education should also focus on alternative methods to combating pests and weeds like diversifying and rotating crops.

*Comment 6:* The plan needs to address the damage pesticides do to plant life in the area surrounding the serviced crop land and proposals to address this issue.

*Comment 7:* Minnesota Department of Health and the Minnesota Department of Agriculture need to examine the data on pesticides with health data and see if there is any correlation.

## **Katherine Slama**

*Comment 1:* Neonicotinoids should be banned from use in Minnesota, because of their negative impact on humans, wild pollinators, and honey bees, which pollinate a large proportion of plants, as well as their negative effect on other helpful insects and butterflies. Also of concern is their long-term contamination of the soil and water. Seeds coated with pesticides should not be allowed to be planted in Minnesota.

*Comment 2:* Pesticides should be banned if they cause cancer and if they have a negative impact on cardiac, neurological, respiratory, kidney, reproductive health or urinary function. If they impact fetus development or children's health they should be eliminated from use.

*Comment 3:* All information about pesticides should be very transparent and very understandable. For example, on pesticide containers you would have a human stick figure and say this pesticide may cause problems with your kidneys with a x in the appropriate area. A butterfly with a heavy black X over it, a bee with an X, and a human baby with an X over it would be other examples. Education should focus on alternative methods to combating pests and weeds like diversifying and rotating crops.

*Comment 4:* The Department of Agriculture should develop a mandatory online permit system to record weather conditions, type of pesticides used, where and how pesticides were applied for over 10 acres of land. In conjunction the Department of Agriculture needs a system where people can document where pesticides had drift and produced damage to land not intended to be serviced. The existing DNR burn permit system would be a good example.

*Comment 5:* The Department of Agriculture needs to indicate where pesticides may not be applied such as waterways, wetlands, public lands, schools, commercial buildings, homes, and on animals. To prevent drift, croplands should have a 200 foot buffer between them and neighboring lands, and 500 feet if application is by air.

Significant fines should be assessed for not following rules about pesticide application and be increased for each offense.

*Comment 6:* The plan needs to address the damage pesticides do to plant life in the area surrounding the serviced crop land and proposals to address this issue and reimburse landowners for such damage.

*Comment 7:* Minnesota Department of Health and the Minnesota Department of Agriculture need to correlate the data on pesticides with health data and see what connections there are. We need adequate research.

### **Sierra Club - North Star Chapter**

*Comment 1:* The North Star Sierra Club is concerned that once a pesticide is registered and allowed to be used, the substance can be re-evaluated, and if found to be detrimental to the environment or human health, will go through a “special registration review” (PMP, p. 25). This applies when new uses are found for an already registered pesticide, if new uses or new detrimental environmental impacts are found. There is no information provided in the PMP on how a special registration review can be initiated, and these are limited to the interest and authority of state agencies. Citizens should have the option to petition for a special registration review of pesticides of concern, and the MDA should include this as part of the special registration process.

*Comment 2:* The continued implementation of the TMDL process for the impaired water bodies due to chlorpyrifos and acetochlor should be expeditiously implemented to prevent any further degradation affecting aquatic biota and humans.

*Comment 3:* Pesticide drift, the unplanned movement of pesticides in the air as particles, droplets or vapor, from the intended location of the pesticide application, is not directly addressed in the Pesticide Management Plan.

*Comment 4:* Additional efforts to manage pesticide drift should include a regulation limiting application based on wind speed. Pesticide drift can be mitigated by better communication through the online registries such as Driftwatch, Fieldwatch, and Beecheck, which assist beekeepers and those producing sensitive crops to share their locations and allow those applying pesticides to avoid these areas.

*Comment 5:* MDA traditionally emphasizes the use of education, technical assistance, and voluntary compliance in the implementation of BMPs for pesticide compliance with some use of enforcement when violations are egregious... More effective enforcement of regulations and requirements for pesticide safety and mitigation is recommended at this time and includes:

- Consider increasing transparency of pesticide use and application by making them public and providing the public with more information on violations and how these are being handled
- Develop regulations to designate pesticides of concern when found in surface waters above Water Quality Standards or EPA Guidelines. This should generate mandatory action such as determining and implementing BMPs specifically for that situation, especially in cases of significant degradation. Coordinate this locally and with the applicable watershed entities.

### **Minnesota Corn Growers Association**

*Comment 1:* As the federally delegated state agency for products registered and reviewed under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), we were surprised there was no discussion or acknowledgement in the PMP revisions on ESA compliance, future changes to pesticide product labels, or mitigation practices farmers will need to incorporate for compliance with the federal label. The mitigation practices required under ESA compliance have relevance to preventing pesticide transport to both surface and groundwater and are consistent with the PMP section on BMP education and promotion program. This is also consistent with MINN.STAT.103H.151, subd. 3.