

Pesticide Management Plan Revisions – Comments Received

On July 21, 2025, the Minnesota Department of Agriculture (MDA) published a request for comments on proposed revisions to the Pesticide Management Plan (PMP) ([50 SR 58](#)) and opened a 60-day public comment period. The MDA received a total of six comments on the proposed revisions.

Revisions on Pesticides

From: Colleen Werdien [REDACTED]

Date: Fri 9/19/2025 9:56 AM

To: Hall, Kathleen (MDA)

1 attachment (16 KB) Recommendations to Minnesota Department of Agriculture for revisions to pesticides rules.docx

Dear Kathleen, I have attached the following recommendations for revisions for rules for pesticides use in Minnesota.

Thank you

Colleen Werdien MPH

Minnesota Department of Agriculture for revisions to pesticides rules.

Neonicotinoids should be banned from use in Minnesota, because of their negative impact on humans, wild 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. In conjunction to protect the water and soil seeds should also not be coated with pesticides.

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.

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

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. Also, if they impact fetus development or children's health they should be eliminated from use.

The Department of Agriculture 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 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 Department of Agriculture needs to indicate where pesticides may not be applied such as waterways, wetlands, public lands, schools, commercial builds, homes, on animals and crop lands should have a 200 foot buffer between them and neighboring lands.

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.

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

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.

Comments on Pesticide Management Plan

From Gretchen Sabel <[REDACTED]>

Date Fri 9/19/2025 8:37 PM

To Hall, Kathleen (MDA)

Thank you for opening up the PMP for comments. It's been quite a while since the current version was approved. Pesticide use has changed since that time, and it's good to be updating the PMP.

One key area that 's seen changes is the use of neonicotinoids as a prophylactic treatment on soybean and corn seeds. While seed treatments with neonicotinoids were not broadly used in 2007, they are now almost universal. 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.

Thank you for this opportunity to comment.

Gretchen Sabel
[REDACTED]

FW: Comments for Revisions to the MDA's Pesticide Management Plan

From: Katherine Slama <[REDACTED]>

Date: Fri 9/19/2025 4:07 PM

To: Hall, Kathleen (MDA)

I hope you are the correct person to receive my Comments for Revisions to the MDA's Pesticide Management Plan, as you are listed on the MDA website for this purpose. No one is at the MDA to answer my phone questions, and my email (below) bounced back.

From: Katherine Slama [REDACTED]

Sent: Friday, September 19, 2025 3:57 PM

To: MNagriculture@public.govdelivery.com

Subject: Comments for Revisions to the MDA's Pesticide Management Plan

I recommend the following Minnesota Department of Agriculture revisions to pesticides rules:

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.

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.

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.

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.

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.

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.

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.

Katherine M. Slama

[REDACTED]

[REDACTED]

[REDACTED]



Kathleen Hall
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
625 Robert Street North, Saint Paul, MN, 55155

Re: Proposed revisions to the Pesticide Management Plan (PMP)

Dear Ms. Hall,

The Minnesota Corn Growers Association (MCGA) appreciates the opportunity to provide input to the Minnesota Department of Agriculture (MDA) on proposed revisions to the Pesticide Management Plan (PMP). MCGA represents nearly 7,000 dues-paying family farmer members in our public policy advocacy efforts and all of Minnesota's 24,000 corn farmers who contribute to the corn checkoff program for research and education activities.

MCGA appreciates the effort by MDA to keep the PMP current based on the latest research and tools designed to manage pesticides. Efficient and deliberate execution of the PMP by agency staff, industry partners and stakeholders has been effective. Voluntary BMP education, execution and promotion by MDA, University of Minnesota Extension, pesticide registrants and the entire agriculture industry has contributed to most pesticides remaining well below applicable standards and reference values.

MCGA also supports the approach to designating pesticides as either Common Detection in Groundwater or Surface Water Pesticide of Concern—specifically, the inclusion of guidelines for evaluation such as accounting for unique events that may impact observed pesticide concentrations in both groundwater and surface water. MDA is commended for its mitigation approach that emphasizes targeted voluntary efforts that consider cost versus benefit and technical feasibility. This approach has built trust and credibility with the PMP Committee and stakeholders within the agriculture sector.

Regarding the proposed changes to the PMP, MCGA offers the following comments for consideration as the plan is finalized:

- 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. The process **should** begin by soliciting BMPs from the users of the product to increase the likelihood of meeting the goals. It is in the best interest of the

users to maintain access to the product. Furthermore, the commissioner is not compelled to adopt the BMPs offered by these stakeholders.

- 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.
- 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. Pesticides should not have those designations indefinitely if the pesticide users have adopted the BMPs and met the desired outcomes as reflected in the monitoring data.

Though the notice indicates that comments on the core content of the PMP fall outside the scope of the comment notice, we believe it is important to highlight that the Environmental Protection Agency (EPA) has been developing and finalizing strategies for herbicide and insecticide products that would bring the agency into compliance with the Endangered Species Act (ESA). These final strategies will have an impact on labels for pesticide products. 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.

MCGA appreciates the opportunity to provide input on proposed revisions to the PMP. If you or your staff have further questions, please contact MCGA's Public Policy Manager Alex Trunnell at 952-460-3612 or atrunnell@mncorn.org.

Sincerely,



Jim Kanten
President
Minnesota Corn Growers Association



September 19, 2025

Kathleen Hall
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
625 Robert St N
Saint Paul, MN 55155

RE: Pesticide Management Plan 2025 update

Dear Ms. Hall,

Minnesota Farm Bureau Federation (MFBBF) is a nonpartisan, grassroots general farm organization representing 31,000 family farm and ranch members statewide. Thank you for the opportunity to provide comments on updates to the Minnesota Department of Agriculture's (MDA) Pesticide Management Plan (PMP).

MFBBF supports the responsible use of pesticides as well as the effective enforcement of pesticide regulations. We appreciate the guidance provided by the PMP and its role in protecting Minnesota's water resources, which farmers care about deeply.

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.

We also want to recognize the PMP's new inclusion of the Minnesota Agricultural Water Quality Certification Program (MAWQCP). For participating farmers, the whole-farm assessment identifies an array of options to increase water quality and soil health, among other environmental benefits. Regarding the PMP, this process means reviewing pest management options for a farm to implement while helping them minimize any potential for pesticide leaching, runoff, or drift. Environmental stewardship is a top priority for farmers, and this program has helped many farmers carry out that mission.

MFBBF is grateful for the opportunity to provide comments on updates to the Pesticide Management Plan. We thank the Department of Agriculture for their collaboration and

partnership with farmers and ranchers to take care of our environment and natural resources, a goal we all share.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Glessing". The signature is written in a cursive style with a large initial "D" and "G".

Dan Glessing
President, Minnesota Farm Bureau Federation



SIERRA CLUB

NORTH STAR CHAPTER

2300 Myrtle Avenue, Suite 260
Saint Paul, MN 55114

Kathleen Hall
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
625 Robert Street North, Saint Paul, MN, 55155
Kathleen.Hall@state.mn.us

September 19, 2025

Dear Ms. Hall:

This letter is to provide North Star Sierra Club comments on the draft update Pesticide Management Plan (PMP) as requested by the Minnesota Department of Agriculture (MDA). Sierra Club's Minnesota North Star Chapter represents 50,000 members and supporters working to help our state's communities flourish through environmental protection. Our response and concerns on the PMP include the following issues.

Collaboration with Tribes

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.

Need for Citizen Petition for Special Pesticide Registration Review

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 DOA should include this as part of the special registration process. This would provide an opportunity in cases such as the public's concern for seeds coated with neonicotinoid pesticides, the majority of seeds, and evaluating the environmental impact of their use, including impacts on pollinators such as bees, escape of dust from seeds to air and water, environmental persistence, and seed resistance.

Impaired Waterbody Concerns

Water bodies have been listed as impaired in the 303(d) list of impaired waters in Minnesota in the past. Most recently, the pesticides that caused the impairment include chlorpyrifos and acetochlor. In 2020, thirteen water bodies were placed on the MPCA

303(d) list as impaired due to chlorpyrifos, and 11 water bodies continued to demonstrate impairment in 2024. The Department of Agriculture previously developed the Chlorpyrifos Response Plan in 2012; MPCA and MDA have cooperated on implementing the Total Maximum Daily Load (TMDL) process to determine the cause and approach to mitigation and recovery in these water bodies. EPA revoked the use of this pesticide for food and feed due to chlorpyrifos tolerances under a court order in 2022, so the sale of the pesticide for these uses was not permitted in Minnesota. These were reinstated in 2024 after a court challenge, and Minnesota conditionally registered the pesticide for these uses (EPA, 2024). 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.

Specifically Address Pesticide Drift and Water Quality

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. Particles become airborne and can be deposited in nearby surface waters. It also affects humans, livestock, wildlife, and crops it is not intended for, reducing the effectiveness of pesticide application, is illegal, and a financial drain.

Pesticide drift has the potential to significantly impact surface waters, even with current efforts on licensing pesticide applicators, educating farmers, use of best management practices, MDA and county surveillance in the community, and response to complaints. Surveillance and investigation of complaints can result in financial penalties. 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.

Enforcement Recommendations

The PMP provides an overview of the enforcement process for pesticide violations in Minnesota. 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. The article by Arag On Correa, et al, (2020), states,

“The mandatory powers of government are the most effective lever that society has to alter firm environmental strategies and performance” and “that voluntary programs have arisen to supplement mandatory regulation; however, research has found that the results of these programs are disappointing.”

These findings indicate that both voluntary and mandatory enforcement tools have a place in promoting regulatory compliance, but more understanding is needed to find the best mix of these tools for effective BMP implementation. More effective enforcement of

regulations and requirements for pesticide safety and mitigation is recommended at this time and includes:

1. 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
2. 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.
3. Increase surveillance via routine and unannounced inspections for facilities that store, use, or handle pesticides and provide for consistent follow-up to assess compliance
4. While voluntary compliance and technical assistance can be effective, they have been shown to have limited effectiveness on BMP implementation and compliance with regulations., increase enforcement intensity when pesticide violations are detected, and use appropriate penalties.

Thank you for the opportunity to submit these comments. Please feel free to contact us for questions or further information needed.

Sincerely,

Margaret Levin
State Director
Sierra Club North Star Chapter

References

Arag, J.A., Marcus A.A. & D. Vogel, (2020). The effects of mandatory and voluntary regulatory pressures on firm's environmental strategies: A review and recommendations for future research. *Academy of Management Annals*, vol. 14, no. 1, 339-365.

<https://carlsonschool.umn.edu/sites/carlsonschool.umn.edu/files/2020-01/annals.2018.0014.pdf>

EPA, 2024. EPA Update on the Use of the Pesticide Chlorpyrifos on Food. <https://www.epa.gov/pesticide-worker-safety/epa-update-use-pesticide-chlorpyrifos-food>

Minnesota Department of Agriculture (July 2025). Draft Updated Pesticide Management Plan. <https://www.mda.state.mn.us/sites/default/files/docs/2025-07/revisedpmpjuly2025.pdf>