



17 December, 2025
RE: Comments on SB 732

Chair Goeben and the members of the Assembly Environment Committee,

Thank you for holding a hearing on AB 732 regarding a prohibition on noncommercial uses of neonicotinoid pesticides. My name is Michael Tiboris, and I am the Agriculture and Water Policy Director for River Alliance of Wisconsin. River Alliance is a statewide nonprofit, nonpartisan advocacy organization that empowers people to protect and restore Wisconsin's water. Much of our work focuses on helping people at a local level identify and respond to water quality and quantity hazards that affect them, their communities, and aquatic ecosystems. Our supporters include more than 5,000 individuals and businesses, and nearly a hundred local watershed organizations.

Neonicotinoid pesticides are among the most commonly used pesticides. In Wisconsin, they are estimated to be used as a treatment on 95% of corn seeds and more than half of soybean seeds. They are very water soluble and move readily through the environment, especially in sandy soils. Only 10 percent of neonicotinoid pesticides are taken up by the plant, leaving nearly all of the remainder to wash off into the soil and eventually into our waterways where it threatens aquatic ecosystems. These pesticides persist in soil and are even found in the pollen and nectar of treated plants. Because they are broad spectrum pesticides, they pose a grave threat to insects that are not pests. By harming pollinators, neonicotinoids damage fertilization rates for crops that depend on them. By harming insects that are primary food sources for fish, neonicotinoids harm the stability of our river fisheries. They directly harm Wisconsin honey production by killing honeybees. Many native Wisconsin wild plants depend on pollinators that are unintended casualties of mass commercial application of neonicotinoids.

While we support the idea of restricting the use of neonicotinoid pesticides, the bill under consideration only affects a small percentage of pesticide applications because it is limited to non-commercial use. We appreciate it, however, as a step toward a more robust conversation about the significant drawbacks of neonicotinoid use and more significant restrictions on their overuse. We are confident that a full examination of restricting commercial use will reveal that neonicotinoids have limited efficacy, they are an unnecessary expense and danger to the

invertebrate population that agriculture depends upon. Studies have shown that neonicotinoid seed treatments do not provide significant benefits to farmers.¹

River Alliance has been co-leading a collaborative working group to educate a wide range of stakeholder groups on the nontarget impacts of neonicotinoid pesticides, alternatives that exist and appropriate measures that protect pollinators and our environment more broadly. This effort began with a 2024 statewide forum and has continued with a multi-stakeholder working group. Recordings of the forum presentations are available to the public (https://www.youtube.com/watch?v=v0upQ3Abj_Y) and the members of this committee would be welcome to engage with the workgroup on this important issue.

Thank you for raising this topic and beginning the conversation and helping Wisconsin catch up to the work that other states are doing to reduce the impacts of neonicotinoid pesticides.

Thank you for your time and attention, and please reach out if you would like to participate in the Wisconsin Neonicotinoid Workgroup,



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¹ Mourtzinis S., et al., Neonicotinoid seed treatments of soybean provide negligible benefits to US farmers. Sci Rep. 2019 Sep 9;9(1):11207. <https://pmc.ncbi.nlm.nih.gov/articles/PMC6733863/>