

January 11, 2026



Honorable Judy Aron
Honorable Liz Barbour
Standing Committee on Environment and Agriculture
107 North Main Street
Concord, NH 03301

Re: HB 1431, Restricting the use of neonicotinoid pesticides

Dear Chair Aron, Vice Chair Barbour, and Members of the Standing Committee on Environment and Agriculture:

The Household & Commercial Products Association (HCPA) appreciates the opportunity to provide comments on HB 1431, which seeks to restrict the use of neonicotinoid pesticides in nonagricultural applications. HCPA is a voluntary, non-profit U.S. trade association representing approximately 240 companies engaged in the manufacture, formulation, distribution, and sale of products for the household, institutional, commercial, and industrial use. HCPA member companies manufacture and/or market products that will be impacted by this bill.

Neonicotinoids are a class of neuro-active insecticides (acetamiprid, clothianidin, dinotefuran, imidacloprid, nitenpyram, nithiazine, thiamethoxam) available commercially for use in crop and animal agriculture, urban landscapes, and domestic structures and settings. Neonicotinoid-based products are used for common indoor pest management applications, including addressing bed bugs, flies, stink bugs, cockroaches, grubs, and certain invasive species. Additionally, neonicotinoids-derived products are used for controlling pet (dog and cat) insects and in personal care products (e.g., lice shampoo). **These applications have been evaluated by the U.S. Environmental Protection Agency (EPA) and are known as safe and unlikely to affect pollinator colonies when used per label instructions.** In fact, neonicotinoids were developed in large part because they are both more effective and a safer alternative to previously used organophosphate and carbamate insecticides.

Restrictions on Important Pest Management Options

HB 1491 would broadly restrict access to a wide range of commonly used consumer products, imposing significant economic and practical burdens on New Hampshire residents across all communities. Reclassifying neonicotinoids as a restricted substance would limit access to safe, affordable pest control options that many households rely on to protect their homes and outdoor spaces from public health pests. Consumer-available products are substantially more cost-effective than professional pest control services, which can be prohibitively expensive and often inaccessible for lower-income households. As a result, the bill would disproportionately impact residents with limited financial resources while reducing the availability of effective, budget-friendly pest management tools statewide.

Support for Integrated Pest Management System

Our organization supports Integrated Pest Management (IPM) as a foundational element of chemical management. Under IPM, pesticide use is an exercise in managing risk, both from the pests of concern and from the pesticidal products necessary to control them. Implicit in any IPM program is that the lowest-risk pesticide will be used whenever possible; however, higher-risk pesticides need to be available if required. An effective pest management program will utilize the proper pesticide at the right time, in the appropriate environment, under optimal circumstances. Arbitrarily removing pesticide tools via reclassification or use prohibitions undermines this holistic approach.

Sound Public Policy

As written, the bill does not adhere to public policy based on objective criteria and the application of generally accepted scientific risk-assessment practice. Most neonicotinoid regulatory decisions at the state level rely on risk assessments, labeling and health and environmental decisions developed at the federal level by the EPA. Specifically, under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), the EPA reviews all pesticide registrations to ensure they continue to meet the protective FIFRA risk standard in light of new information and evolving science, and neonicotinoids are no exception.

Furthermore, pesticides are rigorously reviewed, evaluated, and approved for sale and use by the Division of Pesticide Control (DPC) within the Department of Agriculture, Markets, and Food (DAMF). The EPA and the state regulatory agencies are in strong positions to determine appropriate pesticide use through continued evaluation of the latest scientific findings on the environment and public health. HB 1491 simply does not meet the standard and decisions established by regulatory agencies and instead undermines this existing regulatory process, expertise, and authority of DAMF and EPA. It is for that reason the HCPA opposes this measure and respectfully requests an unfavorable vote.

Thank you for your consideration of our input. I welcome any opportunity to discuss these concerns and can be reached at mkopa@thehcpa.org.

Respectfully submitted,

Michelle L. Kopa

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Director, State Government Relations & Public Policy - Eastern Region

Cc:

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