

**HB1318**  
**Senate Agriculture and Veteran Affairs Committee**  
**3/14/25**  
**Sarah E Hall Lovas, Agronomist**  
**Director, North Dakota Grain Growers Association**  
**Hillsboro, ND**

Chairman Luick and members of the Senate Agriculture and Veteran Affairs Committee,  
My name is Sarah Lovas and I am an agronomist from Hillsboro, ND. I submit this testimony in support of HB 1318 and ask for a DO PASS recommendation.

I have been involved in agriculture for my entire life. Agronomy and farming have been at the center of it all. As an agronomist, I have worked with farmers and applicators to help them make the best decisions with pesticides and other agronomic inputs for their farming operations. Also, during my career, I have spent a significant amount of time working on environmental impact issues in agriculture. Specifically, I have had the opportunity to work directly with the EPA on a number of issues including pesticide labeling and also education with EPA, so they understand modern agricultural practices.

HB1318 is NOT about whether glyphosate is carcinogenic and/or safe to use. The EPA has already done that work and has allowed for it's sale and use within the parameters of the label. Rather, HB1318 is about whether the label is sufficient in warning the public about it's hazards. However, I am aware of opposing testimony that will try to make this bill about safety concerns with glyphosate specifically. The LD-50 stands for Lethal Dose 50. LD-50 is a measure of toxicity of a substance. Specifically, the dose at which 50% of a test population is killed. The greater the LD-50 the more of that substance can be tolerated before half of the population is killed. In other words, a substance with a greater LD-50 is safer as opposed to a substance with a lower LD-50. According to the chart below, which is compiled from data from

reputable sources like the World Health Organization and the EPA, glyphosate has a greater LD-50 than caffeine for both acute and chronic toxicity.

However, HB1318 is about the EPA pesticide labeling being effective for ascertaining the health and environmental impacts of various pesticides. The EPA has rigorous, scientific process of evaluating the impacts of pesticides to human health and also the environment. The EPA also

### Acute toxicity

Life-threatening one-time doses

SUBSTANCE	FOUND IN	Lethal dose (LD50 mg/kg)	CATEGORY
Water	... Water	90000	Practically non-toxic
Sucrose	Table sugar	30000	
Monosodium glutamate	Flavor enhancer, soy, cheese	16000	
Ethanol	Alcoholic beverages	7000	
Glyphosate	Herbicide (RoundUp)	5600	
Aluminum hydroxide	Antacid, vaccine adjuvant	>5000	Slightly toxic
Fructose	Fruits, component of sucrose	4000	
Spinosad	Organic insecticide	3700	
Sodium chloride	Table salt	3000	
Eugenol	Clove oil, organic pesticide	2700	
Paracetamol (acetaminophen)	Tylenol, Panadol	2400	Moderately toxic
Vanillin	Vanilla bean, vanilla sugar	1600	
Hydrogen peroxide 70%	Bleach, disinfectant	1000	
Theobromine	Chocolate, tea, guarana	950	
Copper sulfate	Organic fungicide	300	
Chlorpyrifos	Organophosphate insecticide	230	Highly toxic
Caffeine	Natural pesticide, coffee plant	190	
Lead	Batteries, cables, paints	155*	
DDT	Restricted insecticide	100	
Rotenone	Restricted organic pesticide	60	
Vitamin D3	Supplements, fish, mushrooms	37	
Nicotine	Natural pesticide, tobacco	10	
Mycotoxin T2	Plant pathogen, moldy grain	5	
Aflatoxin	Soil fungus, moldy foods	5	
Hydrogen cyanide	Fruit pits, bitter cassava	4	
Botulinum toxin	Botox, Clostridium botulinum	0.001	

LD50: Generally rat oral. Botulinum: mouse and human, nicotine: human, cyanide: mouse.  
 \*Lead: no LD50, lowest human lethal dose included. Colours: EPA toxicity categories.

Sources: EFSA, WHO, EPA, NIH, NHS

### Chronic toxicity

Acceptable daily intakes of minimal concern

SUBSTANCE	FOUND IN	Limit mg/kg
Water	You know this one	50000
Sucrose	Table sugar	800
Ethanol	Alcoholic beverages	170
Monosodium glutamate	Cheese, soy, flavor enhancer	120
Sodium chloride	Table salt	60
Vanillin	Vanilla bean, vanilla sugar	10
Eugenol	Clove oil, organic pesticide	1
Glyphosate	Herbicide (RoundUp)	0.5
Copper sulfate	Organic fungicide	0.5
Aluminum hydroxide	Antacid, vaccine adjuvant	0.14
Paracetamol	Tylenol, Panadol	0.093
Spinosad	Organic insecticide	0.024
Hydrogen cyanide	Fruit pits, bitter cassava	0.012
DDT	Restricted insecticide	0.010
Lead	Batteries, cables, paints	0.007
Caffeine	Coffee, tea, chocolate	0.003
Vitamin D3	Supplements, fish	0.002
Chlorpyrifos	Organophosphate pesticide	0.001
Nicotine	Natural pesticide, tobacco	0.0008
Rotenone	Restricted organic pesticide	0.0004
Mycotoxin T2	Fusarium, moldy grain	0.00002

Limits: Reference Dose (RfD or ADI), Reference Intake (RI), Upper Limit (UL), or Tolerable Daily Intake (TDI). Colours for readability (no official categories exist for these limits).

Sources: EFSA, WHO, EPA, NIH, NHS

More at: [thoughtscapism.com](http://thoughtscapism.com)

considers public comments through a process where risks and benefits are considered, and scientific data is at the center of the entire process. This process and the data considered within the process are sufficient to explain the human health risks. The label and the MSDS for each pesticide clearly explain the risks for human health, and the label is explicit for safe pesticide handling. Further, every North Dakota commercial and private applicator are required to recertify with continuing education every 3 years. These training courses emphasize the label as the law.

In recent years it has become somewhat uncertain about the availability of some pesticides during the growing season. Federal court proceedings or the EPA have vacated labels almost instantaneously with little to no warning for agriculture, and with little to no scientific evidence for the label vacation. This creates a challenging situation to manage pests in farming. Further, often alternative pesticides are more expensive and, often, less effective for the pest situation. This proposed legislation would help protect North Dakota agriculture from label vacations with no scientific basis.

Thank you for your time. I would entertain any questions you may have.

**ASK: Please support HB1318**

Sarah Hall Lovas  
Agronomist  
Hillsboro, ND  
701-866-1704