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See Below in attached file- NXTGEN PCA MDA August 2025.docx

Instinct NXTGEN nitrogen stabilizer (nitrpyrin) and proposed new requirements with manure applications- fall of 2025

August 2025

The Minnesota Pollution Control Agency (PCA) is proposing new regulations requiring manure applications before October 15th to include either a nitrogen stabilizer, a cover crop, or both. These changes are expected to take effect in the fall of 2025- I think?

Fifty years ago, N-Serve and Instinct NXTGEN were classified as “general use” pesticides, not “restricted use” compounds. However, more recent nitrogen stabilizers are classified as fertilizer amendments, which do not require rules, regulations, or third-party verification. This inconsistency in classification creates challenges in the marketplace and does not align with Minnesota’s environmental goals.

Instinct NXTGEN is widely regarded as the longest-lasting and most effective nitrogen stabilizer, with endorsements and decades of supporting research from land-grant institutions such as the University of Minnesota, University of Illinois, Iowa State University, North Dakota State University, and the University of Wisconsin.

Currently, third-party manure applicators are required to hold a manure custom application license but not a pesticide custom applicator license. Since the active ingredient in Instinct NXTGEN (nitrpyrin) is classified as a pesticide, these applicators would need an additional pesticide license to use it. This added requirement would likely discourage adoption of Instinct NXTGEN, leading to increased use of non-EPA-approved nitrogen stabilizers. These alternatives often lack university endorsements, third-party verification, or proven environmental benefits.

Granting an exemption or variance for Instinct NXTGEN in manure applications would benefit both farmers and the environment. Farmers would achieve higher yields, while nitrate contamination in groundwater would be reduced. Instinct NXTGEN is one of only three nitrogen stabilizers recognized by the EPA, with proven efficacy in increasing corn yields and reducing environmental impacts. Research by Minnesota experts, including Jeff Vetch (Waseca) and Brad Carlson, supports its effectiveness.

I encourage you to consult with Jeff Vetch and Brad Carlson to verify the extensive third-party research supporting Instinct NXTGEN with manure. Their findings, along with those from other land-grant institutions across the Midwest, underscore the importance of this product in achieving Minnesota’s agricultural and environmental objectives.

Solution

- **Give Instinct NXTGEN an exemption for the pesticide custom applicator license for manure applicators or applications only. No exemption needed for applications with Urea or UAN.**
- Provide extra training requirements within the **manure custom application license** to address the classification of Instinct NXTGEN a pesticide.