



**IFA submission on the  
Combined Roadmap for the Evaluation of the EU Legislation  
on the Sustainable Use of Pesticides and  
Inception Impact Assessment for the Possible Revision of this  
Legislation**

## **Introduction**

The Irish Farmers' Association is the largest national representative organisation in Ireland, with over 72,000 members. We represent farmers across all the sectors. IFA represents farmers with Government, agri-business, and retailers. IFA is a member organisation of the EU farmer representative organisation COPA-COGECA.

IFA welcomes the opportunity to present a submission on this consultation. Firstly, we fully support the Sustainable use Directive in its current form and we believe it has been successful in reducing the risks to human health and the environment that are associated with pesticide use. Like other EU countries Ireland has a National Action Plan for the sustainable use of pesticides. Implementation of the SUD relies heavily on the training of the various people involved at all levels of the industry, including Pesticide Advisors, Pesticide Distributors, Professional Users/Sprayer Operators, and Inspectors of Pesticide Application Equipment. A programme to test all pesticide application equipment is also in place. In addition, there are a number of voluntary Sustainable Assurance schemes in the horticulture and tillage sectors which promote and audit the principles of the sustainable use of fertilizers.

The Directive is designed to further enhance the high level of protection achieved through the entire regulatory system for pesticides. It must be emphasised that in this regard the EU has one of the strictest regimes for the regulation of pesticides in the world. All decisions regarding the renewal of active ingredients are based on the precautionary principle and are based on a risk rather than a hazard approach which we believe is an over-cautious method of evaluation.

The use of Plant Protection Products (PPP's) is an essential part of food, feed, industrial, ornamental and amenity crop production. Without access to a proper tool box of active ingredients, the EU will struggle to keep crop output at current levels [https://www.ecpa.eu/media/reports\\_infographics/low-yield-ii-report](https://www.ecpa.eu/media/reports_infographics/low-yield-ii-report) and will be unable to react to any new challenges posed by climate change, new pests and diseases etc.

EU farmers are in general price takers, therefore if yields are reduced producers need to be compensated with higher farm gate prices. This will not happen in a retail environment where food is often sold as a loss leader and where the major retailers dictate the market right throughout the supply chain. In addition, if EU farm gate prices are benchmarked against cheaper imports grown to lower sustainability standards then local farmers will go out of business. There is an onus on policy makers to reveal the full facts to consumers that food production minus Fertilizer and PPP's inputs will invariably cost more.

## Integrated Pest Management

The Sustainable Use of Pesticides Directive also promotes the use of Integrated Pest Management (IPM). We are concerned that the reference document refers to IPM as almost being close to organic production and would appear to convey a system which involves minimal use of pesticides. Of course, this could be the case in some instances, however, this conception is a deviation from the correct definition of (IPM) and we must ensure that we adhere to the accepted definitions.

The EU Commission definition of IPM is as follows: ***IPM means careful consideration of all available plant protection methods and subsequent integration of appropriate measures that discourage the development of populations of harmful organisms and keep the use of plant protection products and other forms of intervention to levels that are economically and ecologically justified and reduce or minimise risks to human health and the environment. 'Integrated pest management' emphasises the growth of a healthy crop with the least possible disruption to agro-ecosystems and encourages natural pest control mechanisms.*** In adhering to this definition farmers do not use Plant Protection Products (PPP's) unless they are economically justified. Both the OECD and the FAO also refer to IPM as including the use of PPP's where necessary

Some of the principles of IPM such as conservation tillage, certified seed/plant material and the prevention of disease resistance actually depend to a certain extent on having access to a full toolbox of PPP's. The recent loss of several multi-site active ingredients will lead to increased levels of disease resistance and extra applications of pesticides in some cases.

## Reductions in Pesticide Use

According to Eurostat, the use of PPP's in Ireland has declined by 28% from 2011 to 2018. In addition across the EU, farmers had access to over 1000 active ingredients in the 1990's but this is now reduced to under 400. In this regard we disagree with the reference document when it questions the success of the existing Sustainable Use Directive.

## Level Playing Field

Due to the non-renewal of several active ingredients, Irish tillage farmers are struggling to compete with grain imports particularly those from third countries. For instance, due to the loss of Redigo Deter, Irish growers cannot plant Winter barley until later in the season. Last Winter this meant that farmers delayed the planting of crops which were then sown in poor conditions. This has resulted in a poor crop this harvest. It is very unfair to see some third countries having increased access to PPP's while Irish and EU farmers must compete against these imports which set the price in the European market. The loss of PPP's has also resulted in a severe decline of the EU rapeseed crop. This has coincided with an increase in the imports of oilseeds from third countries.

If EU policy under the Green Deal results in no equivalence of standards on imports, then we will see EU producers suffering further economic losses as we cut local production and increase less sustainably produced imports. The "Farm to Fork" Strategy element of the European Green Deal is aiming to make food systems fair, healthy, and environmentally friendly. There is nothing fair about targets in the Green Deal which will increase

the regulatory burden on EU farmers while continuing to allow access to non-EU feedstuffs produced to different standards.

### **Access to New Technologies**

EU farmers must have access to all new available technologies. The reference document does not refer to new plant breeding techniques such as gene editing etc. More onerous legislation cannot be placed on EU farmers, without allowing access to the best available technologies. In addition, any new legislation which places stricter controls on PPP's must run in tandem with advances in new technology development. In this regard, the existing SUD legislation must remain unchanged until these new technologies develop significantly to be of use to farmers.