



## **IFA opinion on the application for renewal of the approval of the active substance Creosote**

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.

The Irish agriculture sector has a gross output of €8.2billion at primary producer level. It accounts for 7.5% of Ireland's GNI and 7.7% of total employment. In 2019 the sector represented approximately 10% of the value of our overall exports at €13bn.

Creosote is used across all the individual agricultural sectors in Ireland, from livestock fencing to, tree supports in the top fruit sector.

Ireland has a moist maritime climate, with the annual rainfall figures in parts of the country exceeding 3000mm. This creates problems regarding the preservation of timber, particularly in the wet ground conditions which prevail in many regions of the country throughout the year. It is of critical importance that Irish farmers have access to a product, which can combat the effects of fungal attack and the subsequent rotting of timber-based materials such as fencing posts. There is no other product on the market which is an adequate or suitable substitute for creosote.

When applied correctly in conjunction with the recommended PPE, creosote presents no risks to humans or flora and fauna in the soil, air or water. In fact, by using creosote compared to other inferior products, it reduces the amount of preservative required over the lifetime of the timber, as numerous applications of a less effective product are not required.

While important to all sectors, creosote is of critical importance to the Irish top fruit sector of which apple production is the primary subsector. In Ireland we grow apple trees on dwarfing rootstocks such as M9. These trees require support for their lifetime in the orchard, due to the weakness of the root system and the brittle nature of the union between rootstock and scion (the variety of apple growing on that rootstock). Many commercial Irish orchards on M9 rootstocks have a productive lifespan of 30 – 40 years, therefore the posts supporting these trees must have a similar lifespan.

Posts available for supporting trees are either creosote treated (with the new form of creosote used for the last decade or so), or tanalised. In the moist soils of Ireland, tanalised posts usually have a lifespan of 4 to 5 years, before succumbing to rot. Clearly these are not a viable option for orchards with a productive lifespan of a

multiple of ten of that figure.

Alternatives that could be used for fencing, such as plastic posts, are not suitable for apple trees, as they are too flexible over the height needed above the ground (2m to 2.5m above ground). Over time, plastics can break down into microplastics, which damage earthworm viability, and growers do not wish to do long-term damage to earthworm populations and soil.

Steel posts have caused problems with canker infections in orchards due to mechanical damage to trees where they contact the steel. Apple canker is a particularly problematic disease in Ireland's mild damp climate, meaning that while steel posts might be viable in a dry climate, they are not viable here. At the moment there is no alternative to the use of creosote treated posts for apple orchards.

Due to the importance of Creosote in the context of its economic importance to the overall Irish agriculture sector, it is imperative that its approval for use is renewed at EU level. The product has no significant negative impact in relation to exposure, and not approving the substance would have a disproportionate negative impact on society compared to any associated risks. If outright reapproval is not possible, then at a minimum, a derogation must be introduced to, allow the active substance to be approved for use in biocidal products in the EU.