

## **IGFA Response to the Public Consultation on the European Commission's proposal for a Sustainable Use of Pesticides Regulation.**

February 2023

### **Introduction**

IGFA is the united voice of compound feed manufacturers, feed material importers, grain intake and premix companies in Ireland.

IGFA welcomes the opportunity to respond to the Public Consultation on the European Commission's proposal for a Sustainable Use of Pesticides Regulation. IGFA supports measures that aim to protect human health and the environment from the possible risks of pesticides. We strongly believe that this should be achieved without compromising farm productivity and sustainability and have therefore outlined a number of issues below for consideration.

### **Government Goals on Tillage**

The Government's Climate Action Plan 2023 aims to increase tillage to 360,000 hectares by 2025 and to support an increase in the area of tillage to 400,000 hectares by 2030. This measure is to encourage farmers to move to more carbon-efficient sectors and help reduce overall emissions. Given the structure of Irish agriculture, it will be a significant challenge to achieve these targets and as yet there is no clear plan on how this will be achieved. It seems contradictory that at a time when we are trying to encourage farmers to move towards tillage, we are limiting the toolbox available to them to farm that land efficiently and productively.

The concern is that even if tillage hectares are increased, the volume and quality of the product could be undermined by the inability to use the necessary plant protection products. Decreasing yields and reduced productivity of land will ultimately result in more land needed to grow the same amount of food.

### **Use Reduction Targets**

Setting arbitrary targets to reduce pesticide use does not take into account the specific needs, or circumstances of a particular farm, area or country. Due to its temperate climate, countries like Ireland may have a greater need for certain pesticides in comparison to others. Pest management does not work on a 'one size fits all' basis. Setting broad brush reduction targets not only risks the possibility of achieving the human health and environmental goals of the regulation, but also has a detrimental impact on farm productivity and economic sustainability.

The focus should be on better, more targeted, more responsible use of the plant protection products available. The promotion of best practice and encouraging/incentivising the use of latest technologies should be the priority.

## **Dealing with the Impacts of Climate Change**

Wide ranging pesticide reduction targets may also compromise our ability to deal with the impacts of climate change. Climate change will impact on the nature and distribution of future pests, weeds and diseases and more crop protection might be necessary, not less. Restricting pesticide use could limit our capacity to deal with new plant protection threats created by climate change and make these threats impossible to manage on farm.

## **Imports**

Irish native grains are vital for our animal feed sector and a large proportion of the grain grown in Ireland is used by animal feed companies. However, Ireland, like many countries in the EU, runs a large feed material deficit. In an average year the feed industry can be up to 65% deficient in feed materials and therefore needs to import from various countries. While this is necessary, it is important to us that the production of native grain is not hindered by regulation and measures that do not apply in other countries. Reducing the pesticides available to EU and Irish farmers and limiting the use of plant protection products can impact the competitiveness of Irish farmers on global markets. This is especially the case when these products are unrestricted and approved for use on imports.

## **Food Security**

Russia's war in Ukraine has highlighted EU food security vulnerabilities and this should not be exacerbated further by new regulations that makes it more challenging to produce our food. There is no question that measures to reduce the risks of pesticide use are necessary and many of these are outlined in the consultation. However, we do not want to find ourselves in a situation where we are even more reliant on imports because regulations do not prioritise increasing productivity at home. The Irish farming industry has fought hard to improve productivity against a backdrop of incredibly volatile markets, especially in recent years and curtailing production of tillage and grass would be a step backwards.

## **Pesticide Availability**

Although we understand that this consultation relates to the use of pesticides and not the authorisation and placing on the market of plant protection products, we think it is important to highlight the challenges the industry already faces on crop protection. Many studies have pointed to the fact that we have already lost a huge number of active substances in the EU over the past 25 years. In addition, slow and delayed assessment and approvals of active substances is causing significant concern - not only regarding the availability of key products but in the event of non-approvals, whether these key products can be replaced.

With fewer available, we are reliant on a much smaller number of plant protection products and face the increased likelihood of the development of resistance. If products are no longer effective, the options available to manage pests are significantly reduced.

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