



Consultation Outcome

The Department of Agriculture, Food and the Marine sought views on the European Commission’s proposed Sustainable Use of Pesticides Regulation (SUR) to replace the existing Sustainable Use Directive (SUD) DAFM received over 300 submissions from the consultation period. The contributions from the submissions are provided below.

No.	Submission
1	In relation to the above proposal: In Ireland invasive species are becoming a big issue. Some of the pesticides that are used are the fastest, most effective method of control and removal of these plants. Restricting access to these pesticides would be an issue and reduce control. The areas are sensitive habitats and without control will be lost to the levels of growth from these plants. A derogation for the usage should be applied whereby trained individuals have the ability to use the chemicals correctly. This would need to be a straightforward process where delays are negligible. Derogation system needs to be incorporated and the circumstances in which a derogation can be used should be written before any ban is introduced to ensure that everyone is clear on which circumstances will and won't be affected by new legislation.
2	I believe EU needs to carefully consider some of the foreseeable consequences of the current draft of Sustainable Use Regulation. In particular I suggest that: A mandatory 50% reduction in pesticide use will inevitably lead to yield reduction in our main food and feed crops and consequently: Reduced viability of the Tillage sector in Ireland. Increased dependence on imported food and feed. Increased costs of both food and feed. Potential shortages of both food and feed. Mandatory IPM utilisation is to be welcomed however: IPM tools are not sufficiently developed to compensate for a 50% reduction in pesticide use in the timescale proposed. Banning the use of pesticides in sensitive areas will. Be extremely detrimental to all turf-based sports but golf in particular. Will reduce the tidy ambience of public recreation areas making them less attractive to the public. Allow our towns, cities and villages to become scruffy or at least very costly to maintain neat ambience. A target to reduce pesticide use is a worthwhile aspiration, however it needs be achieved in a more realistic timescale to allow innovative technologies to be developed to compensate.
3	One thought. Pesticides where not around at the time of the famine in Ireland.

4	<p>I am writing to voice my opinion on the proposed reduction in pesticide use. While welcoming the idea of spending less on agrochemicals I am concerned about the reduction of actives. Recently we have lost for example: Chlorothanonil. This resulted in a big surge in Septoria in our winter wheat this year. Ramularia was seen in our malting/distilling barley this year for the first time in several years. While the quality was ok in 2022 a wetter summer will cause problems. Neonicotinoids. BYDV has become a big issue and winter barley in particular has seen a big drop in acreage this autumn. Ridomil gold has been lost and there is now no pesticide control for downy mildew in our beans. These pesticides are gone. I'm not arguing for their return. I'm pointing out that their loss is a cost to Irish tillage farmers. These pesticides are available throughout the rest of the cropping world apart from Europe. Europe grows no GM crop but import millions of tonnes of GM food annually. It was recently stated by a minister that to ban GM livestock feed imports would mean it costing extra money. In Ireland we produce non-GM food but get no extra payment for this. So, to me the idea of pesticide reduction is good but not if it is significant cost to producers for no net gain for anyone. We are already at a distinct disadvantage. With regard to the Competent Authority and keeping of electronic records. This sounds like it will mean substantial extra work for farmers. Farmers may of course outsource it to competent record keepers. Who would pay? Already farmers keep IGAS records at significant cost. Would electronic records be safe from hackers? Who would have access to what would be commercially sensitive information? Is it just more bureaucracy for the sake of it? I am pleased to have a chance to voice my concern about SUR proposals.</p>
5	<p>Every endeavour is used to reduce or eliminate chemical use but as we live in a wet climate diseases like septoria in wheat, rhynco in barley and blight in potatoes would cause an immediate yield loss. This loss would then be made up from imports from an area with no restrictions on chemical use. If all of the country is in organic type of production, no premium for organics would occur as most food is sold on price. We presently produce wheat at 11 to 12 tonnes hectare and these proposals would cause a reduction of 50% to 6 tonnes per hectare which is unsustainable, with a similar prognosis for barley and potatoes. Also keep in mind more land will be required to produce the same amount as yields will be much lower. All producers have the environment in mind, but these proposals would result in food price inflation of 100% which will cause serious poverty.</p>
6	<p>These new proposals will have a major negative impact on the viability of tillage farming. Yields will be severely impacted and with such price volatility that has been seen in recent years and with increased cost of inputs, farmers will find it hard to have any security in making a profit. I seriously worry about the direction the EU is going as it decreases the amount of food produced in member states which will have to be replaced/imported from regions that are less concerned about regulation and climate change. This will therefore have the opposite effect in what they say they are trying to achieve. With the world's population growing rapidly we are going to see increased levels of famine in regions that are most affected by climate change and who are the poorest. If the war in Ukraine has thought us anything it's that we should not be so highly reliant on countries that are not democratic and should be working towards producing more locally produced goods rather than less.</p>

7	<p>These new proposals will have a major destructive effect on Agriculture as we know it, it sounds the death knell for farming and farmers, and in the long term for safe food production worldwide. Farming in Europe can no longer compete with crops grown with Pesticides that are banned here and travel halfway round the world to reach our shores. Incentivise growers to grow crops where they will be guaranteed a reasonable income whilst they are still in business. Also, it's a national disgrace that Solar Panels are allowed on arable land that will be out of production for at least a generation. Another point is that there is very limited information on the new Fertilizer Register that comes into force in January.</p>
8	<p>These proposals seem like total Nimbyism. The EU has already forgotten the cost of relying on others for energy. The EU was founded to create security both economically and politically. We must care for our environment but sensibly and not let the agenda be set by people who want to ban everything. The worst-case scenario is that we will be reliant on countries who don't care about the lives of their own people much less the environment. The EU must be self-sufficient, or we are negotiating the future of our planet from a very weak position.</p>

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Having read and considered your departments recent communication with regard to the limiting use of pesticides in a targeted way and in keeping with the principles of the “Farm to Fork” strategy document, I would like to make some observations and comments for consideration, all in an effort to make it a target that is meaningful, practical and achievable, as then I feel it will be best embraced and supported at farm and industrial level which are critical to the successful implementation of any new directives. I’m not going to debate the whole issue of world food supply as I feel that this is for a different submission, which I did make recently with a reply to the European governing body on this same subject. However, I would like to make one comment please on this issue before moving on to our national implications. We must at all time’s be aware as to how finely balanced our world food supply verses requirements are, something that has become very apparent in recent months as the land war rages in eastern Europe. A 5-10% reduction in food supply can have dramatic effects of the actual existence of large pockets of world populations, often taken for granted until it’s too late for the effected people. I think we are close to that point now and any actions that would see significant reductions of food production needs to be carefully monitored and measured before decisions taken that could cause hunger and famine on those in less fortunate parts of the world. The issue that of major concern, and accepting not the only issue involved, under this SUD review is that of pesticide use and applications, with a targeted reduction of 50% by 2030. I understand that we are more than 50% achieved already of achieving this target by the simple removal of a few notable products and a significant reduction of usage of several others for various reasons, and that’s good once it hasn’t reduced or ability to produce the quantities and quality of food that we need to. It’s important to remember that growers need to equally remain sustainable in what they do as otherwise the wheel stops turning, and we face increasing importations from outside the community that are produced using different technology that’s not allowed in the EU and often on land that’s reclaimed from forestry or other long term carbon reservoirs and Co2 recycling machines. Grower sustainability is a simple equation. (OUTPUT (Yield X Price)) – (INPUTS (Seed + Fert + Agronomy) + ESTABLISHMENT COSTS) = MARGIN Sustainability: As you can see from above, this is a finely balanced equation, not complicated by any means but any weak link in this chain can make the whole process of food production unprofitable and unsustainable for the primary producer, the farmer. I think it’s only prudent and responsible that those setting targets and goals need to carefully weigh up the consequence that are achieved if the targets are met, quantifying them and being always realistic in its achievability, while always maintaining food security to our world population. I’m not convinced that the above has been thought through or quantified pre-publication and quite honestly looks like a figure that was pulled from thin air. That is not a good way to sell a concept to the public and only leads to long term debates and arguments when a better though through process would be working and achieving its goals with the support of the people. The danger with these ad-hoc targets is that those who don’t understand will embrace and popularize them as the way forward without ever knowing or understand the consequences on others. This can even be referred to as the Green Agenda winning out at all costs. We’re in favour of reducing our pesticide usage but only when Yield and Quality is always preserved and that is paramount. In relation to

our own food production and accountability systems that are in place in Ireland, and indeed Europe as we are part of the hugely important food producing community of the world, I think it's fair to say that it is highly regulated and respected by most within the industry, with great respect given to the directives and requirements as laid down by the European Governing Bodies and our own DAFM. While often challenged, and with a certain degree of justification at times, they are still largely adhered too as farmers have shown and demonstrated their willingness and responsibility to protect our lands and environment in a very responsible way, now and going forward. However, there are some issues that I feel need addressing and further consideration, both at national and European level, before any document is moved to a legislative level as then it becomes a legally binding law. Training requirements for all involved in the industry. While there has and continue to be a great awareness of this requirement at governess level, I feel that often its diluted or misunderstood as to what's required and its targets as it works its way down through the chain. Education is probably the greatest tool that mankind has, often underused, often resisted but rarely rejected once correct and understood. This I feel has been the case in recent years as Teagasc and some private bodies work tirelessly, educating all who are willing to learn and embrace change but often rejected by some in due course as they only want to see the small picture rather than the greater good. Some of the requirements, while well intended and usually very practical are not understood by the farming community as to their purpose and benefits, resulting in a rejection or abuse and looked as a "heavy hand" approach to achieve something for somebody else's good. Complexity of options in both Eco and Acres schemes These are often overly complicated and puts farmers "off" the schemes as they don't buy Land in Water-catchments areas. Any land in identified water catchment areas or adjoining waterway need to be identified clearly, as I think in some instances the requirement for greater awareness and actions around the whole area of EFA and water bodies needs further tuition before enforcing laws that will be challenged. The real message and requirement purpose is often rejected at the grassroots despite compensation in most cases. There are extra actions required I feel to reinforce this requirement, such as. Any land been rented in an identified area that involves a water body should be given a specific area to work as then the grower can pay for what he can work; otherwise, being forced to pay for land that's largely unproductive. This will create a greater awareness of the requirement and encourage those farming it to respect it better. Consider curtailing the use of residual chemicals in such lands as contact herbicide and fungicides are much saver in this case.

9 (a)	<p>Pesticide definition and labelling: This is a serious area going forward as we introduce more biological and micro-nutrient products into the market, products that are making a case to replace and support present fungicides as their enhancing plant health benefits help to protect and stimulate the host to withstand fungal diseases. My understanding is that a lot of these products are going to carry a PCS No. going forward as they need to be monitored. I would argue that this is a mistake as they are organic compounds and shouldn't be compared to pesticides. By attaching a PCS No., they will automatically enter our pesticide use calculation at some level reducing our ability to reach our 50% reduction. I do agree this growing industry needs to be monitored and valued for what they bring to crop protection, but in my opinion, they shouldn't be classed as pesticides as they are natural compounds from natural products. The whole practice of pesticide derogation should also be discontinued as it has become a port of comfort for some who simply are trying to sell products that are in store rather than practicing good and proper agronomy in a proactive way; allowing these products are weighing heavily on our targets as they carry a very high points rating when being calculated into our usage figures.</p> <p>Advisory and Record Keeping: This is an area that has been taking very seriously for some years now by us as we are end users on nearly all that we grow either through feed mills or malting subsidiaries. We are very conscious of all pesticide applications, their implications to various cropping and product after use and indeed succeeding crops. We record all information on a database, dispensing a copy to our customers, retaining one for ourselves and populating it with GS and often Buffer zones where required. All our dispensing points and staff within are trained and upskilled regularly, working from stores that are purpose built and/or modified to such standards. All our advisors are trained and upskill each year, in keeping with DAFM requirements and work closely with the technical staff of the major chemical companies. We don't stock a lot of generics as they generally have a poorer backup service and often their quality and consistency questionable. I think that this is the standard that all in the field and retail should work to, but more so, those that choose to work in a less accountable way should be identified and called out; these are the people who can ruin good national reputations for their private gains and should not be tolerated. I think that what we preach, and practice is a very high standard of compliance and accountability and in no way abusive to our environment, grower or end customer; we have most to lose in such cases and we are very conscious of this. Tillage information is published annually, educating and promoting what is seen as good and proper agronomy and field work, always placing IPM at its core and in no way over commercialising an industry that is totally dependent of a sustainable grower as well as a sustainable environment.</p> <p>Pesticide substitution: While we must all be aware that there is a continuous requirement to upscale our pesticide range as better and saver products become available, it should also be accepted that a replacement product or action is available before removing what is identified as a concerning product or ingredient. This will make the process more acceptable and defensible while maintaining our ability to produce food in a sustainable way. Gene Editing has a big part to play in this field I feel as often it may offer a way of substituting a product by breeding better natural defence mechanism into a plant. This is commonly practice across the world, allowing others to make rapid advancements in plant breeding while we stand still,</p>
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	<p>reducing our present arsenal of PPP and exposing our ability to produce quantities and quality of food that will keep our populations fed and our producers sustainable. I think this whole process may yet prove to be the cornerstone of this whole debate. Educating the Legislators: On a final note, I think that is awfully important that our legislators are educated and brave enough to make decisions that are scientifically proved and supported and understand the complexities of their decisions, from producer to consumer or Farm to Fork in this case. The argument that food will get expensive as the cost of production rises is true, once it has not been replaced by similar products that were grown elsewhere in the world with cheaper technology that's prohibited in the EU, but the greater threat is that food will become scared and then price won't matter anymore. There is a real dangerous situation developing across Europe and Ireland is no different, maybe a strong promoter in some case of supporting Organic Food as the way forward. I can't see how we can feed a world of 9 billion people while reducing inputs and at the same time balance an environment that is in a difficult place at present all because some think is the right thing to do. These advocates need to be challenged and called out and asked to quantify their argument as people won't survive on fresh air. We are totally supportive in producing safe and quality food, in a manner that's sustainable both for the producer and environment and we will and are doing all that is right to promote this concept. If pesticides are to be reduced or removed from the production chain, please do it in a measured and informed way, always allowing for the introduction of new breeding techniques and plant stimulating products that will substitute the requirements for some of our present arsenal of PPP. We can't and shouldn't be overly reacting to some ad-hoc suggestions and ideas that are being promoted by people, often with different agendas and usually with no idea as to the overall consequences of their proposals. Thanks to those who take the time to read this submission and hopefully understand and appreciate our position on the subject; again we are all for a better and cleaner environment, including at all times the way we produce food but changes and adaptations need to be made in a measured and pro-active way that don't see us exposing ourselves to a situation that we won't have either a sustainably food producer, or maybe a customer that can't afford to buy food all because decisions were made in hast and miscalculated.</p>
10	<p>I was delighted to hear of the new proposals and support this 100%. We are surrounded by farmland which threatens our organic status as chemical drift can easily occur and ground waters seriously affected. Let's hope this proposal goes through while we still have some of the most pristine landscape in Europe. I would like to see an online vote on this.</p>

11	<p>I often wonder when the likes of these (anti) pesticide reducing proposals are being written up does anyone ever ask themselves the question why pesticides are being used in modern agriculture? Do they think the farmer is spending vast amounts of money on agrichemicals for the simple fun of it? Well, I can safely tell you they don't and I will give you the main reasons: Firstly - The supermarket and their customer. The supermarkets demand a quality of produce for their customers that cannot be met through intensive farming without agrochemicals. Yes, we can grow fresh produce in allotments and as Eamon Ryan suggested in flowerpots without agrochemicals, but it would take a lot of allotments and flowerpots to supply supermarkets. Secondly - If we were lucky enough that everyone decided to accept poorer quality fresh produce, and we didn't have the use of agrochemicals. For great parts of the year farmers wouldn't have a crop to supply with crops being either lost to weeds, disease, or pests. Which in return would lead to massive price needed to be paid for the crop that did make it to sale to cover its own cost and cost of all the losses that didn't make it to sale. Reducing agro chemicals in a moderate climate like Ireland will only work when massive advances are made in crop genetics.</p>
12	<p>Reading the targets listed under this proposal, it is my opinion these are not enough. An excellent start to reducing chemical pesticides with a definite goal. And the proposal does have excellent points on implementing the stated targets. However, considering the danger in chemical pesticides to human health, the environment and biodiversity, a tighter schedule should be considered to more hazardous pesticides. Our native fauna and flora, already under considerable treat, cannot wait seven years with a 50% reduction. Especially for more hazardous pesticides. I believe a more aggressive target of 70% for more hazardous pesticides by 2030 is more appropriate. The damage chemical pesticides are causing should not be diminished or ignored. The disappearance of bees has been highlighted globally but this fame overshadows to the decline of other species across Ireland and Europe and the devastating role pesticides have in this decline. Put simply nature cannot wait. There are many factors and chemical pesticides play a major role in this. This proposal must have human health and protection of biodiversity as central principles. With this in mind, it is important to have an enforcement regime that is robust and will enforce the targets. Consideration for national interests can be taken into account but this cannot be used a loophole to work around the rules. Vital action is needed.</p>
13	<p>Possible solutions to replace plant protection products for tillage farmers in Ireland? Currently, farmers plant 190 million hectares of GM crops globally, (soybean 50%, maize 30%, cotton 13% and canola 5%). This equates to a surface larger than 22 times the land mass of Ireland. I wish to point that the only GM crop cultivated in the EU (mainly in Spain) at the moment is GM Bt maize that is tolerant certain insect pests. A 2018 study, by (Brookes, G and P Barfoot), assessing the global economic and environmental impacts of GM crops for the period (1996-2016), showed that the technology has reduced pesticide spraying by 671.2 million kg and has reduced environmental footprint associated with pesticide use by 18.4%. The technology has also significantly reduced the release of greenhouse gas emissions from agriculture equivalent to removing 16.75 million cars from the</p>

roads. Despite the published advantage of using GM technology, the Irish Government announced in July 2018, the prohibition/restriction of the commercial cultivation of genetically modified crops (GMO) in Ireland. Making this decision, the Minister for Climate Action and Environment stated, “it was a very significant development and that it was critically important that Ireland takes whatever steps are necessary to maintain our GMO cultivation-free status, which is a key element of our international reputation as a green, sustainable food producer”. This decision will not allow Irish farmers or consumers to obtain the benefits of innovative agricultural tools, including GM technology in order to combat the challenges of climate change and food insecurity. It is ironic and somewhat contradictory that Irish farmers rely heavily on imported GM crops for animal feeding purpose, but, due to this decision, Irish tillage farmers will not be allowed to cultivate GM crops that could be critical to the future of Irish agriculture and to their own farms. Most of the GM crops that are cultivated worldwide, for example soybean is not suitable for cultivation under Irish climatic conditions but who knows what might happen in the future with climate change! However, GM potatoes tolerant to the late blight fungus might be useful for Irish agriculture. In a 2012 publication, scientists documented a dramatic shift in the population of the potato late blight pathogen (*Phytophthora infestans*) in northwest Europe in which an invasive and aggressive strain has emerged and rapidly displaced other genotypes. This could be the pathogen adapting to climate change. Scientists at Teagasc’s Oak Park crops research centre in Carlow have also recorded the emergence of highly aggressive strains of the blight disease that have also been exhibiting levels of fungicide resistance over the past 10 years. The GM potato field trials results which were carried out over a number of growing seasons by Teagasc and the results (2018) showed it is possible to reduce the need for fungicide inputs by 80 to 90% by using a single source of genetic resistance in the GM potato variety. In essence, one gene was taken from a wild potato called *Solanum venturii* and it was transferred (using GM technology) into a commercial variety called Désirée that gave the plant late blight resistance. Using GM technology, breeders are accelerating the plant breeding process (from 15 to 3 to 5 years), in effect taking a gene from a potato and transferring it to another potato in a process called Cisgenesis. As I stated above, spraying is a necessity for tillage farmers (multiple times during the growing season) at present but if plant protection products are reduced by 50% in accordance with the draft Agri-food 2030 strategy, there has to be a viable alternative to the use of chemical sprays. Based on Teagasc’s research, GM-bred potato varieties may provide that solution for Irish farmers? I suggest that this is an example of sustainable agricultural production where farmers are less reliant on fungicides. In conclusion, we need to proceed with caution as the EU GD policy might affect food security in Ireland and in the EU. Look what happened when the EU relied on Mr Putin's gas/oil!!

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Let me say at the outset that I welcome this opportunity to put my views on the record on this proposal. It is of great concern to me that pesticides are now continually in the firing line with regard to EU regulation. Some products in recent times have been withdrawn for reasons that make no sense to me, and as a result there may be greater environmental impact. I am particularly thinking of the neonicotinoid seed treatment for cabbage stem flea beetle in OSR and the active clothianidin in seed treatment for BYDV control in cereals. Is a seed treatment for insect control not hugely superior in terms of targeting a specific insect pest, rather than spraying the entire field with insecticides where beneficials maybe affected? This is happening as a result of these two product withdrawals. We have to be pragmatic about pesticides rather than misguided by an ill-informed green environmental agenda. Sound science must prevail. Glyphosate withdrawal is continually within the sights of the EU regulators and every couple of years we hear of will-it-or-won't-it reports as to whether its licence will be renewed. There is no scientific evidence to suggest to me that it is unsafe or indeed carcinogenic. Given that it has been around for fifty years now, surely, we would have seen side-effects if indeed there are any? Glyphosate's problem is that it's seen by an uneducated public (in this regard) as guilty by association in that Monsanto initially developed it and brought it to market. Monsanto are not popular with green environmentalists because of their links with GM in the US. But I relate this issue to the point I made earlier regarding the consequences of withdrawal. If glyphosate goes, then no-till and min-till crop establishment systems will not be possible. As a result, it will be back to ploughing with all its attendant disadvantages such as increased fuel use and increased soil disturbance with the subsequent loss of organic matter and unnecessary soil carbon release. Glyphosate is an absolutely essential tool in modern low carbon/carbon capturing crop production. There are no cost-effective alternatives. There are no alternatives full stop. But let's go back a step. I would like to be able to farm successfully without pesticides. One could try to do this but invariably yield and quality will be adversely affected. In reality, it's not possible and it won't be financially viable for me. It is also, to my mind, a poor use of precious land resources where yield must be exploited. To harvest 2 tonnes/acre of organic wheat off fields that are currently yielding almost five tonnes/acre under a modern pesticide/fertiliser regime can never be a sustainable use of a declining land base. Low yields also penalise the consumer in terms of higher food costs and the quality of that food without pesticides may be inferior due to mycotoxins and moulds. Whether we like it or not pesticides are an integral part of food production in Western Europe. To think otherwise is idealistic and we are in danger of re-inventing the wheel. The huge advances which have been made in food production in Europe, since the Second World War, in terms of quantity and quality have been achieved entirely as a result of pesticides and chemical fertilisers. The world population is growing at a phenomenal rate while the land base is declining. Therefore, it's a farmer's duty to maximise production but not at any price. This will have to be achieved in a responsible manner with respect for the environment. This is entirely possible with the regulated use of pesticides. Food in Europe has never been as cheap or as healthy and now constitutes only 10 percent of the average household budget. Human health and nutrition have greatly improved as a result and people are now living longer than even forty years ago. None of this would have been achieved

without pesticide technology and modern fertilisers. But maybe we are now using too many pesticides and more than is necessary? Pesticide maximum residue limits protect the consumer and ensure their food has been responsibly produced. Neither is it in a farmer's interest to use more than the recommended rate. There will be no quantity or quality dividend if products are over-used as the optimum rate is recommended by the manufacturer as the result of years of extensive field trials. However, it could be argued that, in the past, pesticides were probably over-used with prophylactic use. Conversely, using sub-optimum rates can lead to fungal or insect resistance. Therefore, to reduce pesticide usage by 50% effectively means the area we spray with fungicides is halved with a full rate on here and nothing over there. Pesticides are an expensive input which effectively guarantees responsible rate use and accurate application. Pesticides and fertilisers which, with unprofessional use, are leached into ground water are a direct financial loss to the farmer and it's entirely in their interests to avoid this happening. Nevertheless, we do hear reports of excessive MCPA being detected in waterways. This is entirely as a result of irresponsible and maybe even illegal use by untrained grassland farmers spraying rushes in completely unsuitable conditions. Such shameful use must be condemned. It gives our world-class tillage industry a bad name. It should also be pointed out that, for precisely these reasons, crop spraying is now highly regulated. The sprayer has to be tested every 3 years and certified as fit for purpose. The operator has to be trained and certified and allocated a professional user (PU) number. Pesticides have to be stored in an approved bunded store. After application the entire process must be recorded, and a log kept either electronically or written up. Pesticide name and PCS number, rate and water rate, and where and when applied must all be recorded with a reason for its use. Failure to do this is a serious breach of DAFM regulations and of the voluntary Irish Grain Assurance Scheme. But with all that said, change is happening with tillage farmers. We, on our farm, are trying to reduce pesticide usage by using cultural control methods. There are many examples of this. Light cultivations after harvesting high-slug-burden-crops such as OSR, reduce slug breeding by egg destruction. Equally rolling crops after sowing certainly reduces the slug burden. By using these techniques, we seldom have to use slug pellets now after OSR as we did before. And high-speed light cultivations will reduce our glyphosate usage on stale seedbeds. We do not use glyphosate as a harvest management tool unless there is a weed problem. We are also endeavouring to sow later in the autumn. This reduces the risk of BYDV-carried aphid attack. It also helps in grassweed control and disease control. We are also using spring-sown crops to reduce the burden of troublesome grassweeds such as sterile and barren brome. We use min-till on the farm, when appropriate, and as a result less weed seeds are brought to the surface.

14(a)	<p>Equally there are fields, in some seasons, where ploughing can also be a form of cultural control. However, we have tillage fields which have not been ploughed for more than ten years and are wonderfully biodiverse with high earthworm and carabid beetle populations. This reduced pesticide farming allied to the extensive use of cover crops has been styled regenerative farming and is gaining ground. I do not entirely agree with its naming as such as I see this trend as a simply a natural progression in tillage farming. And all tillage farmers have to accept that we have been too dependent on pesticides in the past. So, change is happening on Irish tillage farms and I would think most farmers are trying to reduce their pesticide usage which has to be welcomed. This decision is best left with the farmer rather than a legislative 50% reduction. But there is a difference between reducing use and eliminating or withdrawing pesticides all together. I cannot over emphasise that pesticides are an essential tool for sustainable food production. But like all tools they must be used responsibly. However, the EU could do more to help tillage farmers reduce pesticide usage. Gene editing or engineering (GE) is currently not permitted in mainstream plant breeding. The possibilities for GE are enormous. Disease control could be hugely improved, without pesticides, by inserting desirable disease-fighting or -resistant genes into a cereal or potato variety from another (same species) variety with better, or resistant, disease characteristics. Equally, desirable crop stem/straw characteristics (essentially short and strong) could be transferred to a wheat variety which is favourable in terms of yield and disease but with poor straw characteristics. GE would certainly reduce pesticide use and has the potential to even eliminate pesticides for, say, growth regulation and specific cereal diseases. However, we hear that the general public are not ready for the widespread use of GE technology. Frankly, I don't accept this. All of the current human vaccines for COVID have been developed by using GE techniques and without public uproar in this regard. And it's worth noting GE's more controversial brother GMOs are now used in over 70 countries worldwide but not in the EU. Summary. Pesticide usage, in that they invariably mean introducing chemicals to plants and/or the soil, should be tightly controlled and regulated - as it is - but pesticides are an essential crop production tool in terms of sustainable land use and quality food production. It is not possible to grow good high-yielding and quality tillage crops in Western Europe without pesticides or even with a 50% reduction. But in Ireland, due to our maritime climate and very high disease pressure as a result, the need for pesticides is even greater. But there a positive to our maritime climate. Rainfall is often a limiting factor to crop yields in many EU countries. Consequently, Irish grain and oilseed yields are possibly the highest in Europe. Maximising native production in a greatly cereal deficit country has to be sensible. Equally field beans are an indigenous source of animal protein for which we are very dependent on imports. Beans need a pesticide input but less so than the other combinable crops. However, our government must support our native grain production and seek to halt its reducing area. A proposal to reduce pesticide usage by 50% will decimate a hugely important indigenous industry. Ireland is unique in a European context as we are so in need of maximum production from our small tillage area, Organic production is not a responsible use of good tillage land while that land base is in decline. It caters for an affluent consumer, who can afford to make that choice but increasing organic production will lead to higher food prices, in a very unstable</p>
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	<p>world where EU grain and oilseeds output must be stimulated and maximised. The case for the continuation of the glyphosate licence cannot be overstated. Without glyphosate, crop yields will drop due to increased weed pressure. There will be no other form of control (chemical or otherwise) for some weeds whether in agricultural or amenity use. However, there is a case for withdrawing, or limiting, non-professional use of glyphosate and other pesticides purchased in garden centres. Much of these are sprayed on hard, typically urban, surfaces and invariably end up in ground water. The sale of garden-centre pesticides must be more controlled. Furthermore, excess pesticide in such situations after a dubious application is, more than likely, flushed down the toilet. Such unprofessional use and environmentally hazardous application and disposal must be prevented. It is undoubtedly having a disproportionate ill effect on pollution for the amount of pesticide used. On a related matter, may I commend the DAFM/EPA pesticide disposal schemes of recent years. These were a great initiative to take withdrawn and illegal pesticides out of the system. The fact that they were so well supported is indicative of how responsible most farmers are with regard to pesticide use and disposal. In my opinion, this scheme should be run every few years. Finally, I finish by re-iterating that the loss of glyphosate would terminate non-ploughing crop establishment methods such as no-till or min-till. These non-ploughing techniques are proven as the form of low carbon crop establishment throughout the world. Without glyphosate soils would have to be ploughed resulting in excessive soil carbon release. It is imperative that glyphosate remains for use by professional farmers in Ireland and I would respectfully suggest that DAFM and Government fight for its retention when its use is next under review. The environmental effects were it to be withdrawn would be later regretted just as this farmer laments the loss of targeted insecticidal seed treatments.</p>
15	<p>The EU needs to be aware that there will be negative consequences both within and outside the EU should the current draft SUR be implemented. There will be very negative consequences following a mandatory 50% reduction in pesticide use. This, if implemented, will lead to a reduction in yield and quality of the foods and drinks that we produce for the home and export markets. There will also be a very negative effect on farmers' incomes should this be implemented. There are also many businesses in rural Ireland who are dependent on a healthy and vibrant farming sector for their survival. The viability of some of these will be in question should the proposal be implemented with redundancies likely for their employees. There will consequently be an increased dependence on imported food and feed with the probability that many of these will come from non-EU countries where a less rigorous approach to pesticide regulations is in place. If particular pesticides are banned in the EU, then clearly food and feed containing residues of these products should not be imported into the EU. There is also a possibility/ probability that there will be food and feed shortages should the mandatory reduction in pesticides suggested be implemented. The EU is now rightly concerned about fuel security; however, the EU should now be ensuring that we are food secure. Policies that will likely compromise food security should not be implemented. Currently there are 49 million people in 43 countries close to famine – UN source: https://press.un.org/en/2022/sqsm21288.doc.htm. The EU should be supporting the production of food and feed not</p>

	<p>implementing policies which will limit it thereby placing more people in danger of hunger. PLEASE TAKE NOTE. Viable and effective alternatives to pesticides should be available before a sweeping 50% reduction in pesticide use is implemented.</p>
16	<p>Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. The inclusion of the heading “Sensitive Areas” is of particular concern to golf courses. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive area” includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. Golf courses can be considered to be included in recreation or sports grounds. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf) Any move to prohibit entirely the use of PPP’s will have a detrimental impact to the presentation and performance of golf courses in Ireland. As you are aware we are competing in an international marketplace where agronomy standards are expected to be world class and if we are not meeting customer expectations then the entire Irish golf industry will suffer with the consequent impact on the golf tourism economy and the thousands of jobs within the golf industry directly and the supporting industries of hotels, B&Bs, pubs, car and coach rental and other visitor attractions. We fully appreciate our responsibilities to the environment and the delicate ecosystem we inhabit. There are only 150 links courses in the world and Ireland has one third of these. We make very limited use of chemicals in keeping with our ethos of presenting a very natural environment and working with nature to limit the need for artificial interference. Natural ecological methodology is our preferred turf management strategy. However, the limited use of growth regulators, herbicides, insecticides and fungicides is critical to prevent the loss or damage of fine turf surfaces. These are always precision applications, timed and targeted to maximize the effectiveness of the product. Without this ability to react quickly to disease or infestation, golf courses would lose greens within days, and it would take years and considerable cost to replace them. The consequential loss of tourism revenue and the damage to the world class reputation of Irish golf would be immeasurable. Under this proposal, Member States will be able to provide support under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. I believe there would be a significant commercial impact to golf in Ireland were the regulation to proceed as drafted and would seek a derogation for golf courses and fine turf management.</p>

17	I see myself out of business if pesticides are banned, unless ye can allow modification seed, no spray no spuds, yield of barley very low price of fertiliser might not be worth growing and giving up land for fallow and birds and a shortage of food in the world, I'm going direct drilling if I can't spray can't use the drill, go back to ploughing?
18	In Ireland, we need all the sprays we can get because of the nature of our climate and if you take 50% away our crops will fail because we would be playing Russian Roulette with crop diseases, pests and weeds, in that case we need G.E. or G.M. help to compensate for spray loss. If you fail to provide help with farming, there will be no more professional farmers left because young people won't enter the trade when the older people fall by the wayside. In other words, STOP making life hell for the likes of me and my family and don't forget NO FARMERS = NO FOOD.
19	The proposed Sustainable Use of Pesticides Regulation, in my mind, poses a huge challenge for the production of crops in the Republic of Ireland. Ireland is the most westerly country in the European Union and we have quite unique climatic conditions relative to those prevalent in mainland Europe. We have distinct advantages in terms of crop yields as a result of this, but we also experience the highest levels of wet weather fungal diseases in Europe, highlighted by the many research trials conducted here. Ireland in essence is regarded as a proving ground for new actives due to its uniquely high fungal disease pressure. Trials conducted on cereal, oilseed and potato crops across the country have consistently shown yield responses of 20-40% over the past 2 growing seasons, seasons characterised by incredibly good weather. In 2012 these responses were >50% in the most extreme cases with mycotoxin levels rendering grain unusable in many cases. Farm profitability in this season was also put under extreme pressure. A blanket policy on this proposed legislation is likely to put the Irish tillage area under further pressure at a time when government policy aims to increase it by 15% in the next 7 years. Consumers, through historic EU policy, have become used to the idea of perfect produce, with consistency of shape, size and colour now first and foremost when purchasing food. The role that pesticides have played in creating that standard is undeniable. There is a strong possibility that in cases where pathogens have become endemic and crop losses are high, consumer rejection of perceived poorer quality food will also be high. How these fits in with the commission's stated aims to reduce food waste is a square I cannot circle in my mind. The largest source of food waste in horticultural production is the farm itself. By reducing the control options available, this problem will only be increased. The two most effective IPM techniques demonstrated by UCD and Teagasc include sowing date and varietal selection, which have shown promising results. However, both of these decisions are made prior to the seed being placed in the ground. There are limited control options except for pesticides to actively respond to problems as they arise through the seasons. Resistant varieties are by far the most economical and eco-friendly method of fungal disease control. This is not without its problems, which were highlighted dramatically recently in Ireland. A resistant (R) gene for septoria tritici (Cougar gene) was widely included in breeding programmes due to its effectiveness but broke down entirely in a single season in Ireland. Relying on single control methods, just like in human medicine, is a recipe for resistance in the pathogen and provides no sustainable control. The

	<p>reliance on pesticides needs to be reduced, but it cannot be replaced by another dependency. I would suggest that natural resistance becomes a minimum requirement in the varieties coming onto our recommended lists, and that any known genes that confer durable resistance to problem pests be given priority. Another key point which I believe has been lost in the middle of all this is that by cutting pesticide use, average yields in Ireland will be reduced. Access to fertilizers has recently been highlighted as a bigger threat to global food security than the blockading of Ukrainian ports. If these proposed reductions led to yield losses through fungal diseases, the fertiliser we would be applying would be feeding plant pathogens as opposed to increasing crop yield. It is always of fundamental importance that pesticides don't increase yield; they protect it. The key determinants of crop yield are genetic potential of the variety, climatic factors and nutrient availability. Pesticides allow us to negate the worst effects of climatic factors, of which we have no control. However, there is scope to reduce some level of pesticide application in certain specific areas of production. Stricter regulation around chemicals frequently detected in waterways should be prioritised. Justification for pesticide use should also be required, with chemical actives restricted to professional use only with correct enforcement. Most importantly, I don't believe anyone in the industry has any interest in using products which will negatively impact their health. Food is key to life and all steps should be taken to ensure its safety for consumption. There should be clear, scientific studies underpinning decisions to authorise products, with the appropriate health-based body given the last and final say. The people who stand to lose the most from this proposed legislation are the primary producers who are eternally at the mercy of the weather. To remove pesticides without proven alternatives is akin to taking the roof over their heads without anything reliable to replace it.</p>
20	<p>Tillage farming would not be sustainable without modern chemistry. The government want us to produce more and this is not possible without chemicals.</p>

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DAFM know only too well from their professional people engaged in crop breeding and varieties testing know exactly the effect on Irish growers this proposal will have. 1: Control of diseases in agriculture crops will suffer leading to loss of yields and consequently income to growers in a high risk, low return sector. Teagasc will confirm this, 2: If grain is traded with minimum standard applying. Every agronomist in the world knows that failure to control diseases properly in crops will absolutely reduce quality standard and will inevitably lead to produce rejecting at sale point. This has happened in 2012 during the wettest harvest in memory to our financial cost. Disease affected crops never meet bushel or meet screening standards. 3: The native supply to our Malting industry will not survive under proposed directive as the high spec required would be very difficult to consistently achieve and consequently growers will not take the financial risk and imports will take up slack then. Irish identity will be lost. fact. 4: The mild maritime climate of Ireland results in our crops being the most prone to diseases infections of country in Europe. So, EU will find it difficult to understand our different requirements in plant protection chemicals. DAFM have responsibility to point out the obvious here. 5: Our potato crops are particularly at risk from this directive. It's worth remembering the last time we had not proper intervention to fight blight infections, 3.8 million Irish citizens died as result. The most expensive crop you can grow and is high risk at best of times but no grower in their right mind would take on risk as result of lack of interventions to prevention spread of dreaded Potato Blight. The loss of Diquat without effective replacement has resulted in major issues controlling dry matter levels which in turn made harvesting without bruising impossible for many leading to whole crop rejection in washing trade. Storage problems resulting from this made for severe financial loss. 6: At the present time we have to compete with imports that breach practically every rule and regulations required of Irish growers. This includes produce that have been regularly treated with a whole range of chemicals that have been banned by EU food safety scientists and authorities for years. Information from DAFM will confirm the reasons for banning these chemicals are because of concerns for consumers health and environmental grounds. It is totally unacceptable to attempt to reduce our use of vital plant protection chemicals that have been approved by the same food safety scientists that banned the ones used on imports. Double standards for sure. 7: Food security is an important issue raised by all since unfortunate Ukraine war. Government policy is to increase Irish production of grain and pulses to reduce dependency on imports and increase self-sufficiency. This directive will result in complete opposite for sure. 8: There seems to be a complete lack of understanding over the need to use plant protection chemicals on our crops. I ask the question why any sane person would spend thousands each year protecting their crops with chemicals if they could get away with half of it. 9: IPM is a vital tool in modern day farming and our tillage sector is the industry leader in usage long before DAFM knew about it as we were regularly using it. There is not one experienced grower, agronomist etc involved in tillage that would not agree that it is and has not been a silver bullet for control of diseases. People with no experience in growing crops run with IPM as solution but 50 years' experience tell me it will not control the major diseases in crops. 10: Integrated Weed Management is very helpful as weed control tool but again very limited in overall effect. Teagasc studies presented very clearly show that the widespread blackgrass problem cannot

	<p>be successfully tackled without chemicals intervention. For every grower in this country this blackgrass spread is a business breaker if not fully controlled. 11: The withdrawal of clothianidin two years ago has placed the future of the Winter Barley in serious jeopardy. Last year half of crop return a yield of half the normal one. Lack of control of BYDV virus was reason for demise of this crop. Septoria will do same to wheat crops if chemical intervention is restricted. Potato crop with blight is the same thing. 12: Authorities tell us of all the opportunities to increase production and then ask us to play game without control tools to be competitive. This is very easy from an office in city, but in real life at farm level it's a whole different story. 13: It's very clear to those who are experienced and informed that if Authorities take away our plant protection chemicals that we have to be allowed access to the available alternatives. E.g., Gene editing or Genetically Modified Organisms or some other alternatives to keep sector viable. 14: The public have a clear choice here If you don't want chemicals in food production then new technology embraced everywhere outside EU has to be allowed to keep control of food supplies. 15: Again, everything in this submission can be verified by DAFM experts working everyday growing crops for assessment to pass on to the tillage sector to help keep it alive. There is a major role for them in this debate and the silence so far is deafening. 16: The future of our tillage sector is in hands of DAFM with how they handle this regulation. The necessary information is there and also in our state advisory agency Teagasc. 17 :The tillage sector has lowest carbon footprint lowest GHG and ammonia emissions of any sector and is only mainstream agri sector that is currently very close to meeting 2050 targets for agriculture as a whole and we are producing food of far superior quality than our replacement imports ,yet it is hit hardest in new Cap and Nitrates rules that will reduce production and now this directive/regulation look like the last straw that breaks the sector financial back. 18: So hard to understand the thought process of Authorities. Contradiction and double standards seem to be the recurring theme.</p>
22	<p>The SUR proposal of independent crop advisors is totally unrealistic and unworkable. Both Teagasc and the private consultants are way understaffed at present with the result that the private merchant advisors are doing up to 90% of the crop walking/advise given. All these merchant advisors are IASIS registered and qualified up through the DAFM PA system. These advisors use their training and experience to give out the best possible advise on crops and crop chemicals to all growers. Chemical application rates are recommended bases on crop situations, pest problems, weather conditions and product label correct rates and in most cases are NOT overdone for any extra profit margins. Any change in this system may leave growers without a regular and consistent advisory back up service.</p>

23	<p>From reading this proposal I feel that DAFM and the European Commission think we (farmers) have no regard to biodiversity and "sensitive areas". I and many of my peers have upgraded our sprayers to use GPS technologies in conjunction with the appropriate nozzles. This reduces considerably the amount of pesticides used as there is no doubling on the area sprayed and the newest nozzles considerably reduces the amount of drift from sprayers. I do implement IPM and use pesticides with independent advice from Teagasc. Considering the training and the way I apply pesticides, this proposal is unfair, because this is a blanket ban of 50% on all users (trained professional users as well as untrained users) instead of first tackling the issue of untrained users with non-tested equipment. Therefore, it makes more sense to examine the area around operating standards first rather than placing more restrictions on professional users where our lively hood depends on these products.</p>
24	<p>I believe that the use of agriculture chemicals should be guided by science and not public opinion. To say there can be no tolerance of risk from their use is ridiculous. A cost/benefit analysis needs to be done before any chemistry is dismissed and food security and supply is paramount. We who live in the well off the world will be the last to suffer from food shortage and we can afford to pay prices that developing places cannot.</p>
25	<p>While I agree with the principle of reducing pesticide use, there are many reasons why this must be done in a sustainable manner. The complete removal of pesticides, or even the 50% targeted reduction, will reduce crop yields if not done without appropriate alternative measures being researched and proven, at a time when the world population is growing and is expected to hit 10 billion by 2050. This could lead to widespread famine, especially in Europe. Secondly, this will prevent other conservation agriculture methods from being utilised such as non-inversion tillage, and especially no-till. These methods can greatly improve carbon sequestration. A reduction in pesticides available for use would put this system under pressure, forcing farmers to return to a conventional plough establishment method. This will hurt biodiversity, bird habitats, increase soil erosion, increase carbon emissions, and reduce soil health. Pesticides give us the power to protect the soil and the environment. It must also be noted that 50% of pesticides are used by non-agricultural users. These users, from county councils to homeowners, are mostly untrained, apply pesticides at grossly increased rates, and have no obligations when it comes to disposal of pesticides or their containers. One must look at regulating this sector, to help reduce pesticide misuse. Perhaps only pre-mixed pesticides at the correct rate should be sold to non-professional users. All county and local councils should have professionally trained pesticide users to ensure correct application. Another objective of SUR is to ensure IPM measures are implemented before any chemical control options. I totally agree with this, however the proposed implementation is unworkable. There is already a lack of trained agricultural advisors in Ireland, and this would further pressurise the sector. A farmer with a Level 7 or 8 degree should be allowed to make their own IPM decisions, while a farmer with a Level 5 or 6 qualification should be able to partake in a one-day course which would allow them to forego contacting an advisor in order to apply a chemical control. Finally, bio stimulants and microbial products will help to reduce pesticide use. However, it is imperative that these products are not subject to high levels of</p>

	<p>unnecessary regulation, and also that they are not classified as pesticides themselves. Regenerative farming does not have strict, inflexible rules or guidelines. It is an ever-changing system that responds to the needs of the plant. High levels of regulation will destroy this environmentally friendly way of farming. To conclude, it must be noted that the vast majority of farmers want to reduce their reliance on chemical applications. However, an approach that forces them to do this instantly is never going to work. Sustainable solutions will be found, but it may take time. The regenerative farming movement is having great success, with farmers greatly reducing their pesticide use, and this should be supported. SUR will greatly disadvantage tillage farmers, at a time when tillage farming has been proven to be the most environmentally friendly agricultural sector in Ireland.</p>
26	<p>As without any crop protection including pesticides, the crops would be lost to insects, diseases & weeds. Pesticides are important and should be used responsibly as their use is not only important in a crop protection sense but also in the protection of food supplies. They help farmers grow more food on less land by protecting crops from pests, diseases and weeds as well as help to increase yields per hectare. By using IPM (Integrated Pest Management) practices, this is the best sustainable method to manage pests/weeds and diseases. This is achieved by combining biological, cultural, physical and at the last resort chemical tools in a way that minimises economic, health and environmental risks. The responsible use of herbicides controls weeds so that crops can thrive without these weeds competing for space, water, light and nutrients. Fungicides especially in Ireland mild damp climate helps to protect plants/crops from disease causing organisms that can easily spread and destroy crops leading to food shortages and an over-reliance on imported food products which have been treated with plant protection products previously banned by the EU. This replacement method doesn't stack up to replace Irish locally produced crops/feedstuffs for animal feed with imported product that hasn't been subject to the same rigorous controls and could very well be of GM (Genetically Modified) crops. The EU should now look to adopt a Gene editing approach to select plant species that can fight off such fungal diseases and thus reduce our reliance on pesticide products. Furthermore, the use of these products from a farmer's perspective is expensive, it is not in our best interest to be using these products irresponsibly as they come at a serious cost, but we should be looking to secure our food supplies using safe and sustainable methods by using IPM and possibly Gene editing to protect our locally sourced food supplies. All products used on-farm are prescribed by an advisor, applied by a trained operative and with a certified sprayer. The date of application, rate are all recorded with PCS numbers of products used. All empty containers are triple rinse and brought to an approved recycling centre. Further to these practices, we are regularly audited by the Grain Assurance Scheme on these records.</p>
27	<p>Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. The inclusion of the heading "Sensitive Areas" is of particular concern to golf courses. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive area" includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive</p>

	<p>areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. Golf courses can be considered to be included in recreation or sports grounds. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of golf courses in Ireland. As you are aware we are competing in an international marketplace where agronomy standards are expected to be world class and if we are not meeting customer expectations then the entire Irish golf industry will suffer with the consequent impact on the golf tourism economy and the thousands of jobs within the golf industry directly and the supporting industries of hotels, B&Bs, pubs, car and coach rental and other visitor attractions. We are very conscious of our responsibility to human health and the environment. We have co-existed alongside the Bull Island for years which in 1981 was designated as a UNESCO Biosphere Reserve, the first in Ireland. We take all practical measures to promote very low pesticide input by giving wherever possible priority to the use of non-chemical methods to control pests. Synthetic pesticide applications when needed are limited to our main playing areas and only then used when there is no feasible economic alternative. We would strongly ask for the retention of the existing sustainable use directive for pesticides (SUDP) and the practice of integrated pest management (IPM) to avoid the damage that a banning of pesticides would bring to our international reputation. Under this proposal, Member States will be able to provide support under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. I believe there would be a significant commercial impact to golf in Ireland were the regulation to proceed as drafted and would seek a derogation for golf courses and fine turf management.</p>
28	<p>The new proposal (reality) is that the new regs would close my business down i.e., a cut of 50% on usage, and or a breaking of the link between advisor and supplier. I can see merit in both. Having read the complex document, there are many issues at stake that can be interlinked. I have just walked stubble fields to decide what rate of very expensive Glyphosate should be applied and when. A 50% rate would be totally ineffective, where Sowthistle and Brome grass are concerned. Similarly in a bad rust attack in early spring, or Septoria later in the season reduced rates, just would not be effective. Not only that, but it could be argued continued use of reduced rates would lead to resistance to the pesticide in question. Would a vet/doctor use a 50% rate of an antibiotic to cure an infection? How do we achieve the aims of the EU draft paper? Yes, it does have to be tackled. This must be done with all stakeholders aboard, including the end users of quality produce that is expected. Millers and Malsters will be very quick to reject grain if it does not make market standard and will import it accordingly, in many instances with no control on pesticide input. If we do not get buy-in from the farmer, we would be fighting a losing battle. Farmers are already overburdened with paper and digital recording. As outlined in the EU document, education (science-based) is proposed, which I strongly agree</p>

	<p>with. Simplicity and reasoning are also vital in explaining the changes. The cost of the above has to come from the CAP admin and not the farmer. The state agency Teagasc are best positioned to lead on this, and monitoring of records and equipment should also be undertaken by Teagasc. Similarly, Health and Safety training of the new pesticide era is also important and should be gradually introduced. Maybe 25% reduction of PPP from 2023 to 2025 followed by a further 25% of PPP from 2025 to 2030. Subsidiarity: agronomists must be allowed the flexibility of applying PPP at the appropriate rate in seasons of bad disease/weed/past pressure. Breeding will play a large part in reducing usage but takes time and much funding.</p>
29	<p>I am writing to you in relation to the proposed ban the use of pesticides by 2024. I know this date is being pushed back but even if was pushed to 2054 it is still totally unacceptable. The person who would come up with this kind of idea obviously hates chemical companies. I am not a lover of them myself, but I know we still need them and will continue to need them into the future. They will continue to sell their products to other countries that are not as stupid as the governments of the European Union, will the consumers of Europe be prepared to accept lower quality food at higher prices? They will not and will have no hesitation of buying imported better-quality food from any part of the world which might even be cheaper. There is a strong anti-farmer lobby in Europe and the sooner they are silenced the better, because they do not have the best interests of the consumer or the farmer at heart, can one imagine the outcry there would be if it was suggested that all tablets be banned, and we go back to herbal medicine? The idea of independent advisers for the use of pesticides it does not deserve comment and how long would they remain independent?</p>
30	<p>Pesticides use for tillage is needed to grow crops with the Irish Climate. We can reduce pesticides and it would be a big saving to Irish tillage farmers if GM seeds were allowed or Gene edited seed. So, no point in taking out pesticides until seeds are bred.</p>
31	<p>I would like to voice my opinion on the talk of having to reduce Pesticides/Fungicides and Herbicides by 50% by 2030 and restrictions on dangerous sprays. I am open to new technology and technics to work with crops but pulling sprays away from us this quick is not going to work as there is not enough work done on something to replace sprays. One of my big problems is how I am trained on how to handle sprays and doing things right but anyone off the street can walk into a hardware or garden store and buy some dangerous sprays off the shelf, this is totally unacceptable and needs to be enforced. More money needs to be invested in try and testing new options to prove we can grow good crops with a reduction on sprays. But for now, and into the early 2030s we need the sprays we have.</p>
32	<p>Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. The inclusion of the heading "Sensitive Areas" is of particular concern to golf courses. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive area" includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive</p>

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33	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. If implemented these proposals will lead to the closure of Golf courses. The inclusion of the heading "Sensitive Areas" is of particular concern to golf courses. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive area" includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens,</p>

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	<p>that apply to the Republic of Ireland. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
34	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission’s proposal for a Sustainable Use of Pesticides Regulation. Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. The inclusion of the heading “Sensitive Areas” is of particular concern to golf courses. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive area” includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. Golf courses are, one assumes, included in recreation or sports grounds. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP’s will have a detrimental impact to the presentation and performance of golf courses in Ireland. It clearly sets out why golf should be exempted from the definition of “Sensitive Areas”, highlighting the potentially devastating impact a prohibition on the use of PPP’s could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition given the agricultural sector will continue to have access to such PPP’s. We support the proposition that golf be specifically excluded from the definition of “Sensitive Areas” for the following reasons: Article 18 poses a significant threat to our sports turf professionals’ ability to maintain courses to standards expected and course conditioning will deteriorate, the fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euro and a reduction in employment levels in the industry, With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP’s on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP’s, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made, Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality, an 18-hole golf course will use on average 11,000 litres of</p>

	<p>fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy, The proposed regulations outlines supports Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years but no such supports will be available to the golf industry, Should a full exemption for golf from the sensitive area definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, were the regulation to proceed as drafted. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
35	<p>I am voicing my objection to the SUR Proposal for the following reasons: 1. If I cannot protect my potato crop from blight then I have no business in continuing to grow the crop as we will be right back as it was in famine times. 2. Just like we no longer produce sugar in this country we will bit by bit cease to produce potatoes and other food crops thereby becoming less self-sufficient and more reliant on imports from the UK and other non-EU countries. 3. I have invested money and years of my time in perfecting the production of potatoes. This experience and knowledge will fade out with no future generations of farmers being in a position to grow potato crops. 4. Why are we closing down more and more food production sectors. 5. No viable alternative to the blight sprays are being developed or suggested which doesn't make any sense.</p>
36	<p>Ireland needs to reduce its pesticide use to meet EU targets, but also to become more sustainable. Farmers do not apply pesticides unnecessarily. Pesticides costs money and using them inefficiently would not be practical or economical. Cutting pesticide use completely would make many types of farming unsustainable. For example, grass weeds are a huge threat in tillage and pesticides are essential in controlling these weeds. Conservation agriculture Glyphosate plays a huge part in conservation agriculture. Planting cover crops and maintaining a cover on the land helps to reduce soil erosion, collect nutrients and sequester carbon. Without glyphosate this type of farming would be extremely difficult. Gene editing In order to cut pesticide use in a sustainable manner EU countries will need access to the use of new genomic techniques such as gene editing. Record keeping Farmers currently keep records on Integrated Pest Management (IPM) and plant protection product use under cross compliance and some under the Irish Grain Assurance Scheme (IGAS). The system of record keeping needs to be easy to use and allow farmers to use it themselves. A plant protection product register should also be set up so that information is easily transferred between the point of sale and the Department of Agriculture. Non-professional users and members of the public, at present, with no training in pesticide use and with no advice, can go into a hardware or garden shop and purchase weed killers and insecticides. There is absolutely no regulation on these products. A consumer can purchase it in the shop, spray it at the wrong</p>

rate and throw the rest of the contents of the bottle down the drain or in the bin. On farms you have to be a professional user to purchase the product, get professional advice on what to apply, only allow a professional user to apply it, keep a record of the product used, rate, date and growth stage used, keep a record of the products in store on farm, triple rinse cans and dispose of them in an appropriate facility. Nearly 20% of pesticides are sold to non-professional users. This use needs to be regulated. Use should also be curtailed in areas where pesticide use is not crucial to food production. With regard to independent advice, there is no doubt that independent advice is a good thing. However, in Ireland at present we have a shortage of qualified pesticide advisors, so a major recruitment campaign is needed to encourage people into this sector and to go down this route coming out of third level. Until the numbers are there, independent advice will be extremely hard to avail or, even once a year. Our advisors are trained to a high standard at present and CPD forms an important part of this. With regard to sensitive areas, Ireland is currently classified as a sensitive area. This needs to be amended. Ireland has an aim to increase crop production in this country. We must ensure that the tillage area is not curtailed by definitions of sensitive areas. Pesticides when used responsibly should not impact on these areas. Taking tillage out of these areas could negatively impact bird and other wildlife populations. Water pollution warnings should be given to farmers in certain areas which are showing exceedances of pesticides. It should also be noted that exceedances in pesticides in Ireland are mainly in non-tillage areas and with grassland products or products used mainly on grassland and showing up in water in areas of grassland such as MCPA, glyphosate and clopyralid. Buffer zones should continue to allow for technology on sprayers which reduce drift. Sprayers are extremely accurate machines at present and where non-drift nozzles and technologies are being used, along with label recommendation buffer zones should be allowed to reduce. Grass weeds problems often begin in the headlands and so need to be controlled. Organic markets for tillage farmers are limited at present. These markets need to be developed if the Government is serious about encouraging farmers to cut pesticide use and enter into organic farming. Accurate figures are needed on pesticide usage. At present farmers are being told they need to reduce pesticide usage and while they know their own the target is on a country basis. Figures are available for fertiliser and should also be available for pesticides. Research into alternative products is needed like nutrition, bio-stimulants and things like Trichoderma. At present huge testing is carried out on fungicide rates and timings. However, research into bio-stimulants and other products is often only carried out when the companies fund the research. Independent research is needed into these products to provide farmers with information and advice.

37	<p>I feel it is important for me and my family to make a submission to highlight how serious a reduction in vital chemicals would be to the Irish tillage sector. We rely heavily on fungicides/pesticides due to our damp climate, without these yields would fall dramatically and quality would not pass current trade standards with Mycotoxins and low bushel weights etc. I only use chemicals spray/ fertiliser as needed. I take great care of looking after the environment, and only use what's needed at the right time, but when it is needed it is needed. So, if we lose vital tools in our armoury the game is up for Irish tillage, and imports will fill what we have left thus robbing Peter to pay Paul plus some carbon to go with it. If we are to compete with imports which come from places with far less standards, then Europe how is this fair or how does this make food safety anyway better? If anything, it will get worse and that's not mentioning food security. Please see sense and involve people who need to be involved and don't let bureaucrats ruin a sector.</p>
38	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of</p>

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39	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our</p>

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40	<p>I am writing in relation to the removal of 50% of the pesticide in the new proposals. The proposed changes will cause the death of cereal growing in Ireland, because we cannot remain viable without them. It is based on lobby groups and not on science, and definitely not based on reality. With increasing world population and need for consistency in food production, we are in danger of repeating history. Without crop sprays and pesticides, in the past, Ireland suffered from a famine. DO NOT REPEAT HISTORY.</p>

41

The Department of Agriculture, Food and Marine currently have a public consultation on the EU Commissions proposal for a Sustainable Use of Pesticides Regulation. Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. The inclusion of the heading “Sensitive Areas” is of particular concern to golf courses. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive area” includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. Golf courses can be considered to be included in recreation or sports grounds. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP’s will have a detrimental impact to the presentation and performance of golf courses in Ireland. As you are aware, we are competing in an international marketplace where agronomy standards are expected to be world class and if we are not meeting customer expectations then the entire Irish golf industry will suffer with the consequent impact on the golf tourism economy and the thousands of jobs within the golf industry directly and the supporting industries of hotels, B&Bs, pubs, car and coach rental and other visitor attractions. We fully appreciate our responsibilities to the environment and the delicate ecosystem we inhabit. There are only 150 links courses in the world and Ireland has one third of these. We make very limited use of chemicals in keeping with our ethos of presenting a very natural environment and working with nature to limit the need for artificial interference. Natural ecological methodology is our preferred turf management strategy. However, the limited use of growth regulators, herbicides, insecticides and fungicides is critical to prevent the loss or damage of fine turf surfaces. These are always precision applications, timed and targeted to maximize the effectiveness of the product. Without this ability to react quickly to disease or infestation, golf courses would lose greens within days, and it would take years and considerable cost to replace them. The consequential loss of tourism revenue and the damage to the world class reputation of Irish golf would be immeasurable. Under this proposal, Member States will be able to provide support under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. I believe there would be a significant commercial impact to golf in Ireland were the regulation to proceed as drafted and would seek a derogation for golf courses and fine turf management.

42	<p>I have gradually adapted into more agronomic roles with crop walking becoming the norm. I have found myself increasingly reverting back to some of the IPM practices picked up in that course as the goalposts have shifted each year with the loss of actives such as chlorothalonil or seed dressings containing clothianidin for example. While making things more difficult for grain growers, the loss of some of these important actives have forced our hands to think outside the box and in more recent times especially I have found myself and farmer alike have gone away from using chemicals as our main or sole weapon to combat weeds, disease and pests. It is my opinion that Irish tillage farmers are the best in the world at what they do. Aided by climatic conditions conducive to higher yields and superior grain quality to some of our European counterparts, Irish farmers are also educating themselves and implementing the latest technologies to constantly improve. I fully support the tightening of regulations as regards pesticide end users and believe that anyone handling our available crop protection chemistry should be adequately trained and educated. Experienced operators combined with agronomists identifying correct spray timings and, in some cases, lower application rates after a suitable risk assessment has aided us to naturally reduce our pesticide usage on a per acre basis without compromising on yield or quality. E.g., excluding aphicide when aphid migration is low in cool temperatures or reducing fungicide rates in times of low disease pressure. IPM strategies and pesticide reduction is in the farmers interest not only from an environmental point of view but also economic. But on the other hand, we cannot ignore the fact that the chemistry we currently have is absolutely essential to protect our higher-than-average yields and even more so to protect the quality of our native grains required more specifically for the drinks industry. Without these chemicals our native malting industry would collapse along with the yields required to make tillage in Ireland viable. With IPM, GPS technology, good agronomic advice and targeted spray timings there is very little chemical wasted on Irish tillage farms. Economically any reductions that can be made for reasons like examples I used earlier will always be made by the farmer in my experience. A lot of tillage farmers have become increasingly aware of water quality and the environmental implications of mismanaging our rivers and streams. Through eco schemes such as the upcoming acres and also general best practice wider buffer zones are becoming the norm around arable fields next to our watercourses. Compared to generations passed, I think Irish farmers are better educated and more environmentally aware than ever before of the hazards of pesticides. As a result of this I strongly believe that the misuse of pesticides is at an all-time low and reductions on a per acre basis are already being seen. But we will always need these tools in our armoury, to compliment IPM practices and technology. Without these pesticides our native tillage industry will collapse.</p>
43	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission’s proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive areas” includes the following description: ‘...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas</p>

under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial

	<p>impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
44	<p>I strongly feel that as a professional user of chemicals on crops it is in everyone's best interest that we are able to retain our current toolbox of chemicals. Yes, I would like to reduce the use of due to the ever-increasing cost, however removing or even a 50% reduction would lead to a combined loss of yield and quality without any solid alternative plant protection technology. GM is not available in Europe either, so how is tillage within Europe expected to survive without these important chemicals. Populations are growing annually, this in turn means you are asking the same land base to feed more. Tillage farms and contractors have evolved over the years, technology has played an important role, most are now equipped with autostart tractors, GPS section control spreaders and sprayers. Chemicals and fertilisers are regarded as high value inputs that no one is foolish to waste or misuse. I agree record keeping could be updated and made more robust, maybe an app created. Training courses for spray operators should be more frequent and maybe even tougher to pass. Organic crop production is definitely not the answer on a national level. As a contractor I have had to harvest some of these crops, generally they tend to be rotten with disease and leaving me thinking that we are safer with a quality disease free grain that received appropriate timely rates of safe chemical products.</p>
45	<p>1. I would like to propose that the SUR remains a directive. 2. That Irish cereal farmers be supported as essential workers for an expanding mankind. 3. That Irish cereal production inputs continue to be licensed for use in cooperation with the PCS. 4. That science is the guide to sustainable and environmentally secure supply. 5. That Irish cereals are allowed more PPPs than continental European climates. 6. That PPP quantities used will continue to decrease due to IPM, cost and return on investment. 7. That our reducing Irish tillage area be reversed to support our Irish carbon footprint obligations, as well as planet Earth obligations. 8. That Irish quality foodstuffs are not displaced by alternatives from around the globe.</p>
46	<p>The EU proposals under the SUR are idealistic in all its proposals. There are growing seasons in Ireland where we can reduce our pesticide usage by 20% sometimes in dry years and we make that decision by using all the tools already available to us e.g., weather forecast, farmer experience, agronomists, Teagasc etc. In Ireland our climate tends to be a good deal wetter and cloudier, with less drying than mainland Europe so we tend to need higher rates of particularly Herbicides and fungicides to keep disease at bay and for longer as our harvest tends to be later than mainland Europe. Should the SUR come in in its current proposals we can expect catastrophic yields from our crops some (many) years as disease will take hold and thus tillage farming incomes will be very variable and thus putting further pressure on farming families' incomes. Already there are many challenges due to massive hikes in fertiliser costs and all other inputs and currently a large reduction in forward grain sales values to attempt cover these costs. What is the EU under the SUR going to replace what pesticides they take away or reduce their application rates with? Biological and similar products are in their infancy and farmers and the industry are uncertain about their claims to reduce or replace current pesticides usage. Again, many of these new biological products are broadly untested to date and in themselves</p>

	<p>potentially harmful to nature unless fully tested by the EU before we can have little confidence in them. Where will our food come from in the future? let's produce as much as we can In Ireland and let's be practical in how we go about it and not go with the new SUR proposals.</p>
47	<p>To help form a baseline for the sector, a report in 2020 on the Economic Impact assessment of the Tillage Sector in Ireland was produced by Professor Michael Wallace of University College Dublin. There are very many elements of the new SUR proposals which are very concerning for the Irish tillage sector. While some of the stated objectives are understandable and perhaps desirable, others are bordering on unworkable given the current structure of the industry. Some of the proposals set out requirements or obligations which will be difficult or impossible to achieve without significant disruption to existing supply chains or services. The proposals for a regulation on the sustainable use of plant-protection products (SUR) aims to: (i) replace the SUD in regulating the use of pesticides; and (ii) better align it with the objectives of the European Green Deal and Farm-to-Fork (F2F) strategy. This proposal aims to: 1 Achieve the pesticide-reduction targets, 2 Promote the use of IPM and other alternatives to chemical pesticides, 3 Enhance other controls in the area of pesticide use and application. Use reduction targets. While the SUR proposals are largely built around the proposals set out in the F2F document, there is little objectivity used in the targets proposed. Indeed, pesticides are the first of the many F2F targets to become a regulation. Given that the SUD in its day introduced the hazardous criterion for product assessment, one must question the validity of any further decreases, given the huge expense and scientific effort that goes into the registration of these products within the EU. The proposals seek to reduce the use of what it terms “more hazardous chemicals” by 50% and this is perhaps understandable given the direction of travel in the SUD. This would be more acceptable if the concept of hazard was applied equally across all society activities. While it will inevitably cause some specific difficulties, there is some credence in the objective to remove the more hazardous products providing there are safer actives on the market to replace them. However, the objective to reduce overall pesticide use by 50% is then effectively adding a second attack on availability and use. There are no criteria set out around this objective other than a suggested methodology for its calculation. Why 50%? Why not 20% or 60%? As there are no criteria set out for the 50% target, there is nothing to indicate whether the regulation will have been effective in achieving its goal or not other than a volume calculation. This suggests that this overall usage target could be altered again in future. Surely the success of a production system that has utilised these plant protection products to help feed the growing world population up to now deserves rational thought regarding the introduction of use reduction targets. The failure to insist on an impact assessment ahead of these proposals clearly indicates the lack of understanding of their implications at farm level. Enforced reduction targets will inevitably have different implications for the continued productivity of different crops in different parts of the EU. The impact will depend on the need for and responsiveness of the input and on the availability of alternative technologies capable of doing part or all of the same job. Realistically, there should be satisfactory alternatives available before the forced introduction of use reduction targets. Sensitive areas and prohibition on</p>

use. The proposed prohibition on the use of pesticides in sensitive areas, or within 3m of same, is a worrying element of the proposals. Conceding that there are areas where plant protection products should not be used now paves the way for more drastic decisions in future. This has the potential to be a carbon copy of the 'natural' animal hormones story. Regarding sensitive areas, it would seem more sensible to initially prohibit the use of pesticides by users who neither understand the products nor are not trained in their use. As there is an element of risk to the public immediately following pesticide application, it may be essential to ban their use on public areas which cannot be closed for a short period post application. However, use might continue to be allowed in areas which can be closed for a specified period. Also, if effective biopesticides can be found to replace specific products, their use should be encouraged providing they are known to work. The blanket removal of pesticides from use in public places is highly likely to result in a significant deterioration in such facilities, as the labour requirement for maintenance would increase many folds and such labour is highly unlikely to be available going forward. On the issue of the sensitive areas that were to be subject to a 100% pesticide reduction, it now seems likely that these will not be applied on a whole of territory basis. It is more appropriate that any such areas be under national control and that their designation represents current agricultural activity rather than historic maps. Attention must also be paid to potential changes in the rules pertaining to water abstraction laws, as changes to these could seriously impact agricultural practice along river catchments. Forcing land out of tillage could well see a very low pesticide risk replaced by a much higher nutrient pollution risk. Also, the proposed derogation to a 100% reduction to help control the spread of a quarantine pest or invasive species in sensitive areas is welcome, the provisions suggested are far too restrictive to be of practical use for these purposes.

3 Application equipment. The SUD introduced testing and registration of sprayers and now the SUR proposes to have a new central electronic register of sprayers and other pesticide application equipment (PAE). This would seem to be akin to motor vehicle registration which would oblige owners to notify transfer of ownership or withdrawal from use within 30 days of any change. The proposals state that the Department of Agriculture must develop and manage this central register while also overseeing PAE testing. The SUR proposals indicate that testing is required every three years, with the first test at three years of purchase. It is likely that this proposal is driven by the fact that no one knows exactly how many sprayers are in the country or what proportion of the total were captured by the requirement to have them certified in the SUD.

47(a)	<p>This would mean yet another job to be done for no return to growers, but bona fide sprayer operators would want to have their machines in top class working order to ensure optimum use of the expensive pesticides applied. Professional operators are doing most of this anyway so this might not be seen as a problem for them. While it is unlikely that the measure would pick up many of the sprayers that have not been certified to date, it would capture most of them over time through the registration of new sprayers which would, presumably, have to be registered at the point of sale. Aerial spraying has been banned in the EU for many years, but derogations can apply. It is proposed that this will be the case in future also but there is also an acknowledgement that a derogation is possible for an unmanned aircraft (drones) where very specific criteria can be met and where the risk to operators is low. While this might not provide a practical solution for most field crops it could be beneficial where spraying is necessary in enclosed spaces like polytunnels. It might also be considered for some time-critical treatments, such as the application of aphicides in years like this where the ground is too wet to travel, and aphids are likely to be present due the mild autumn. Advice relating to pesticides. The proposals indicate that the Department must establish, oversee and monitor a system of independent advisors who will provide advice to users of pesticide and also on IPM actions. The proposals state that independent advisors must be free of conflict of interest and not in any way benefiting from the sale of products. This is a serious challenge because we have relatively few independent advisors or dedicated consultants who could be regarded as 'independent'. It would seem that such independent advice is only required once in the season so can the company advisors continue to give in-field advice for the bulk of the growing season? Indeed, does this independent advice have to be delivered on a one-to-one basis or might it be done in groups such as at a seminar or conference? The structure of the Irish tillage sector could not justify one-to-one advice for every grower. Most crop protection advice is provided by commercial companies whose agronomists recommend what the company supplies. It is unclear as to whether a grower can provide his/her own advice where such a person might be adequately competent. As well as these considerations, the obligation for pesticide users to keep a record of all specific advice given to him/her by an advisor for three years is likely to prove challenging and it is likely that many users will apply pesticides that have not been prescribed by advisors. It is also a concern that specialist arable graduates would not be as attractive to many employers who are also involved in supplying feeds or other inputs to livestock farmers over the winter period. This is important in the commercial model used here as turnover is essential to justify the labour employed. The further need to have independent advice on IPM related measures, at least once during a season, is another requirement of these proposals. The challenge here is to have some level of uniformity in such advice and also to ensure that measures to help reduce dependence on pesticides be implemented at farm level. We can already see a conflict between good stale seedbed practice to reduce weed pressure and the new obligations being imposed under nitrates. As well as these measures, there is a need for specific advisor training every five years. We already have a CPD in operation here which may well be far more timely, detailed and specific than any official training can provide. Some level of continuous training is essential for both PAs and PUs as our pesticide tools keep changing. And</p>
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effective IPM measures must now be implemented as part of the use programs for PPPs. It seems like overkill that the Department must set up a system to provide proof of PU training before an advisor can advise a user or before he/she can purchase or use professional PAE. There is also the issue of future legal responsibility arising from advice. The proposal that a PU will be legally obliged to comply with a range of IPM measures laid down by the Department seems very difficult to implement. The IPM suggestions are expected to be crop specific but how can we implement a single crop specific threshold for a problem like aphids and BYDV to cover an area from Cork to Donegal? The thresholds should differ, or we would spray unnecessarily in one area or run severe infection risk in another. The proposals suggest that these rules be reviewed every year – technically a good idea but this would only lead to massive confusion as to the details of things like threshold values in individual years. Funding. The proposals suggest the possibility of funding for incentives for farmers to reduce pesticide use under the new CAP, with exceptional funding to be provided as support for compliance across the five years. This would be welcome but there is no indication as to where this funding might come from or its potential magnitude. Interestingly, there was no commitment initially to engage in any real form of impact assessment, but this seems to have changed. However, this assessment is said to be concurrent with the introduction of the proposed measures rather than to be completed in advance and altered according to the likely outcomes. Other concerns. Once legally binding targets get introduced, they are most likely to be made more severe over time. What will happen if the area sown to crops in this country increases in accordance with our climate action plan? Will such a move be hindered by the imposition of these obligatory targets? Some of the proposals in the SUR might seem less daunting if alternative solutions were being developed and nearing completion. But they are not. We have no indication as to when gene editing technology might become available, if at all, and there is no good evidence yet as to the usefulness of biopesticides in the field for weed or disease control. Realistically these proposals require significant further research, coupled with technology development and financial support if significant output reduction is to be avoided. These proposals, targeted mainly against our small tillage sector, will further weaken its competitiveness against the current dominance of the dairy sector and thus further reduce our capacity to compete for access to rented land. This will mean increased feed imports with the knock-on consequences for carbon foot-printing and added vulnerability in terms of our ability to back up our claims of clean green food and drink exports of Irish origin. Tillage is already worst impacted by the adjustments in the new CAP, such as convergence and CRISS, so adding further additional costs for independent advice.

47(b)	<p>IPM measures and electronic recording systems further act to decrease competitiveness both within Irish agriculture and versus imported feeds. Loss of yield or quality, or both, are probable outcomes from these proposals. The magnitude of reductions will vary from crop to crop, as well as location and year, but this will be on top of the inevitable double reduction caused by the push to organic production. Output from organic will be lower because (1) it is a lower output system as a proportion of the land must be devoted to fertility improvement and (2) the fact that the lack of a price incentive is likely to further deter output. For all these reasons a thorough impact assessment is essential in advance if the EU is to avoid becoming a deficit area for food production. Production could be further impacted if systems fail to be profitable and this makes additional funding essential to help prevent an exodus from the productive sector. The designation of areas along by our main rivers as sensitive areas could prove to be very problematic for growers along river basins where water abstraction is practiced. One must question the proposal's attitude to advice. We have many good crop advisors in this country who are affiliated with commercial businesses whose advice has always been balanced and possibly more attuned to IPM measures than independent advisors. If all advisors are being trained through the CPD requirement their advice is likely to be broadly similar. The development of an electronic system to enable logging and recording of advice, application details and spray records is a large task in itself. It is a source of great concern as to whether such a system could be made available in time and what if any additional costs would this impose on sector players. The sector can ill afford additional costs where support and output reductions seem inevitable because of the combination of all the measures impacting tillage going forward.</p>
48	<p>Please accept this letter as our formal objection to the European Commission's proposed Sustainable Use of Pesticides Regulation (SUR) to replace the existing Sustainable Use Directive. We fully accept and welcome a review of the usage and control of pesticides and herbicides. However, the banning of growth regulators, plant protection products and wetting agents will have a profound effect on our ability to manage the playing surfaces of our golf course. The removal of such inputs will severely impact on not only the presentation of the golf course but the playability of the golf course going forward. A poorer maintained golf course will have a detrimental impact on our business and may affect whether visiting golfers choose Ireland as a golfing destination or instead travel to the UK, where the use of such products is still permitted and allows golf courses to be presented in the best possible way. Links golf courses, in the main have low inputs to encourage low input grasses. Indeed, the golf industry has already reduced its inputs significantly over the last 10 years with the removal of high concentration products like chlorothalonil and iprodione not to mention carbendazim and chlorpyrifos. Portmarnock Golf Club welcomes approximately 8,500 visiting golfers each year, many of whom come from North America. Golf tourism plays an important and vibrant part of tourism in Ireland. Bord Failte are investing millions of euros into Irish tourism, however the impact of the SUR proposal will have a wide-reaching impact on golf tourism. If we consider the whole hectarage of farmland predominately tillage (300,000 ha of tillage) where most PPPs are used compared to amenity, banning it in amenity would have little impact as we have less than 400 ha of greens in</p>

	<p>golf and approximately 4,000-5,000 ha in fairways. We are also concerned about the environment and have implemented many initiatives to reduce our carbon footprint and identify more sustainable energy sources throughout our site. We believe however, the text as outlined in the draft regulation moves towards a generalised regulatory approach, which would create inherent risks to golf and the management/standard of golf courses in Ireland with unintended and undesired social, environmental, and economic consequences. Rather than enforce a “blanket ban”, perhaps greater focus and scrutiny could be given to understand the quantities of inputs used by the various sports who manage turf. This would ensure a more focused recommendation could be tabled to cover farming and amenity independently. The directive is all-encompassing, based on the farm to fork strategy set out by the European Union. The majority of which is set out for agriculture, however given that golf courses are pesticide users they could potentially be treated as per agriculture, please see below: As part of the EU F2F (Farm to Fork) strategy, in 2024 a set of new Sustainable Use Regulations will come into force which, in their current form state that no use of pesticides will be permitted in “sensitive areas” The definition of sensitive areas is set out as - Art 3 (16) (a) "an area used by the general public, such as a public park or garden, recreation or sports grounds, or a public path;" The proposed changes to the SUR will have a profound impact on conditioning, standards, and maintenance practices and a detrimental impact on the playability of Irish golf courses and Irish sportsgrounds. Whilst prohibiting the use of all plant protection products in sensitive areas will maximise associated health and environmental benefits, the impact to golf courses will be far reaching and may lead to a number of golf courses closing as a result. We anticipate that many Irish golf clubs will submit objections and hope that all objections raised will be afforded the consideration they deserve.</p>
49	<p>I am worried about the new pesticide proposals. I use herbicides to clear land pre-planting and to control weeds in crops, aphicides to control BYVD and fungicides to control crop diseases. I see these sprays for crops as the equivalent of medicines for humans and animals. Those who have seen a healthy crop turn yellow and sickly will understand. I do not use pesticides wantonly. For a start, they are extremely expensive. Secondly, like most farmers, I am very aware of nature and the environment. Of course, there are careless farmers, but they should be strongly penalised, rather than denying crops the cures and preventatives that they need. 1. With regards to the proposal to ban all pesticides I can't see that working in Ireland. With our mild, moist climate, we are particularly prone to fungal diseases e.g., potato blight, septoria and the other fungal cereal diseases. Without fungicides, yields would be devastated. It was, after all a pesticide that solved the potato blight that caused the famine. Without a fungicide, in a high-pressure blight year, the crop would be ruined. BYDV is also a major problem in Ireland and the only answer is to control aphid numbers. To ask farmers to grow crops without pesticides is the same as asking cattle or sheep farmers to tend to their animals without curative and preventative medicines. All sprays have been thoroughly tested. I am told that if the same yardstick of hazard were applied to cars as is to sprays, that would be banned from the roads as potential killers. On the one hand, the Dept strongly promotes minimum tillage in its schemes. This cannot be done without glyphosate. Stales seedbeds help,</p>

	<p>but in the long run a herbicide must be used to control weeds. You can't have it both ways. Integrated pest management is a big help but cannot do the job on its own. The alternative is to breed in disease resistance through gene editing. Until this is done, we depend on sprays. 2. With regards to the proposal to have "independent advisors" to prescribe pesticides has merit in theory but who is going to pay for this service? I could see some consultants rubbing their hands at the thought of another lucrative income. Most small grain farmers went out of business long ago. We cannot afford another expensive cost. Our pesticide supplier comes and walks my crops and advises me on sprays. They have huge knowledge and experience and don't go overboard in their recommendations. Am I now supposed to pay dearly for advice that could only be of a poorer quality? 3. While we use sprays very carefully in a controlled manner, many of the same products are freely available in garden centres to be used indiscriminately by untrained people as they please.</p>
50	<p>I wish to express my concern on these new proposals, and I am not in favour of the new sustainable use regulation. My main reasons as cereal farmer is that, if the SUR is passed and our pesticide products are cut by 50% or banned our overall yield will be greatly reduced or wiped out, leading to a massive deficit of our grain stocks here in Ireland, resulting in a food shortage making our country more reliant on food stuffs from other countries particularly outside of Europe. As with cereal grains and other agricultural products from outside the EU there is no regulations, they are mostly genetically modified and there will be more deforestation in other parts of the world. The new regulations will cause a food shortage, resulting in the price of food escalating. The last point I have is, our food security is finished and we are at the mercy of other countries if we adopt these new regulations. See how the war in Ukraine has affected food prices along with other commodities.</p>
51	<p>We share in the concern for the environment as we depend on it as much as everyone else and maybe even more. Over the years we have improved our practices from handling and storage of products in suitable banded storage to filling the sprayer using appropriate PPE and fully trained operators and certified sprayers. Technology has evolved to minimise any waste or overuse of product using GPS to ensure no overlapping of spray up and down the field and automatic shut off of nozzles at the ins and outs at headlands and in angles. The tams grant has been a big help to facilitate the purchasing of such equipment. We as farmers fully support teagasc research which tests the range of products in field trials in different locations around the country. Through these results we make an informed decision on what product and rate is suitable for our crops needs. All decisions are formulated using the guidelines in the IPM strategy. We do not spray our crops if there is no return from that spray as that is deemed to be a waste as costs have escalated in recent years. We do not support any proposal to reduce the selection of products available to us as you cannot rely on only one product to cover everything e.g., when spraying weeds, we are advised to use multiple modes of action so as not to build up resistance. In the event of a resistance developing, we would need a different product and would be forced to use a strong rate. Similar problems occur in fungicides. Also, different products are tailored to different needs i.e., they have different strengths and weaknesses both in fungicides and herbicides. Long term this could have devastating consequences</p>

	<p>on the industry as a whole. Tillage farming would be wiped out on a large scale if this were to happen as well as jobs in the industry. One note I would have is about the misuse of chemicals by the public, landscaping companies and public authorities some of whom have no training can purchase chemicals in a shop and spray weeds on footpaths in housing estates and towns, villages etc. They are spraying high volumes of product (as it is usually not measured when filling a knapsack) onto the concrete or tarmac. When rain follows, the chemical is washed into the nearby drain and into the watercourse and eventually to the local river. Farmers cannot take the responsibility for this disregard of duty to the environment.</p>
52	<p>If this directive is to go through as it, is I feel it will have a detrimental impact on my enterprise. We use these products to a minimum as it is as they are very expensive and reduce our profitability the more, we use. But if these products are not available to us to use when needed our yield will reduce significantly and the quality of the product will suffer leaving us with no buyers for it. Ireland is known for the quality of the grain we grow from its use in the drinks industry, food grade oats and our top-quality equine oats. Our temperate climate leaves us with challenges other European countries don't have to contend with so we will be unduly effected by this directive. Tillage farming is carbon neutral and environmentally friendly and acreage needs to be increased. This will not happen under these rules. Tillage farmers cannot farm profitably with one hand tied behind their back. Candidates for substitution is a major issue as no products are there or coming to the market to substitute and once a product is gone it won't be replaced. Independent advice is another this will add more expense to the farmer to know benefit to the environment. I hope you can see how this will effect tillage farmers and do your best to protect the industry.</p>

53	<p>In Ireland we understand the environment and concerns for public safety we understand MRL's which are very important as we are producing food since the 50's we saw the progression of herbicide and fungicides in farming in Ireland at one time products were used just because they were cheap if they were needed or not that day has passed every operator is trained and have a complete understanding of the environment products are now only used if they have to and are part of the IPM strategy if we don't have a range of herbicides our production of food will be decimated it is not as simple as here is a herbicide that will do the job all herbicides have different strengths and weakness in weed control there is no herbicide which gives total control of all weeds in each crops that is without even discussing the control of invasive weeds or noxious weeds fungicides are only used when needed to control fungus in cereals so without these range of products we will not be able to produce quality foods insecticides are used only once per season and some crops receive none but that cannot be replicated in every field it is reckless to think that food can be produced organically to feed all people we produce quality food people are living longer and having a better quality life grain that is not sprayed with a fungicide turns black before harvest tastes bitter because of mycotoxins which will not produce bread as it will not rise and will be harmful to humans eating it due to the toxins there is a saying "too much of a good thing is a bad thing" regulated use is important but it is also important to have an anti-resistance strategy to protect these actives is in place I hear discussions about some chemical products can produce cancer at inflated over use rates that are not used every day in farming I have a bigger concern that all food products are packaged with plastic which is an oil based product petrol and diesel is carcinogenic but no one mentions banning them because they want to have their freedom i am deeply frighten if one looks under any kitchen sink and look at all the chemicals inside and these are used in place of food preparation "remember be careful what you wish for" the drive to reduce chemicals in farming will only end one way the loss of food security and scarcity of food for mankind we in Ireland are well placed to comment on this situation as Ireland had a potato famine in the 1850's where millions died for the loss of food and hunger due to potato blight and had to emigrate all over the world the population was dropped by 4 million due to this issue science has to play a part not people with agenda and how are these environmentalist going to feed the people they have no skills to produce food remember only farmers can produce food and we are good at growing it.</p>
54	<p>I believe it to be of utmost importance that EU carefully considers some of the foreseeable consequences of the current draft of Sustainable Use Regulation. In particular I submit the following points: A mandatory 50% reduction in pesticide use will inevitably lead to yield reduction in our main food and feed crops thus; Reducing the viability of the Tillage sector in Ireland, Increasing the dependence on imported food and feed, Increasing costs of both food and feed, Potentially creating a shortage of both food and feed, Creating a demand for grains from outside sources not nearly as well regulated as Irish produce, Potentially damaging Irelands 'Green food' image. Mandatory IPM utilisation is to be welcomed but it should be noted; IPM tools are not sufficiently developed to counteract a 50% reduction in pesticide use in the timescale proposed, Banning the use of pesticides in sensitive areas will; Be extremely detrimental to all turf based sports - golf in particular, Reduce the tidy ambience of public recreation areas</p>

	<p>making them less attractive to the public, Allow areas our towns, cities and villages to become overgrown and increase hazards in these areas, Significantly increase costs on local authorities to maintain these areas without achieving nearly the same results as demonstrated by a number of studies. Whilst the target to reduce pesticide use is a worthwhile aspiration, it must, however, be managed and achieved in a more realistic timescale to allow innovative technologies and worthwhile consistently performing preferences be developed to compensate.</p>
55	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission’s proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive areas” includes the following description: ‘...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.’ We assume that golf courses are included in the above description under ‘recreation or sports grounds’. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP’s will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP’s could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP’s. We support the proposition that golf be specifically excluded from the definition of “Sensitive Areas” for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals’ ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP’s on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP’s, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to</p>

	<p>experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
56	<p>I wish to make a submission on the proposed Sustainable Use of Pesticides Regulation (SUR) to replace the existing Sustainable Use Directive (SUD). Regarding the public consultation in relation to sustainable use of pesticides and their regulation, we feel that we have already taken considerable steps to reduce use of fungicides and pesticides. However, due to natural changes in pest and disease outbreaks such as the recent emergence of Grey Leafspot in southern England (2022) and previously unseen warm-season diseases such as Pythium spp., there could be situations where the use of a fungicide is required in order to ensure that the pitch remains in a playable condition and we do not have to spend huge sums of money to re-turf the playing surface. While it is accepted that all maintenance inputs, including products such as fertilisers, should be carefully managed and sustainable from an environmental impact point of view, it would be very concerning and potentially detrimental to the stadium's standing and appeal, should the availability and use of current and new products be prevented. We feel this could potentially lead to loss of major events due to international sporting governing bodies deciding to host events elsewhere because of concern or risk relating to the inability to control a potentially devastating pest or disease outbreak.</p>
57	<p>We wish to make the following comments in regard to the Sustainable Use Regulations: It is now stated National policy to: Increase tillage area to 400,000 ha, increase use of multispecies swards, increase inclusion of white clover into grazing swards, increase use of red clover into silage swards, increase area of potato production, Increase area of vegetable production, Rehabilitation of biodiversity areas, Control of invasive alien species. All of these very positive developments will increase the National use of pesticides. Imposing an arbitrary reduction in pesticides will decrease the effectiveness of these initiatives and overall have a net negative impact on biodiversity, water quality, carbon emissions and the overall environment. In relation to the rehabilitation of biodiversity areas and control of invasive alien species, these tend to be focused in areas that are designated environmentally sensitive areas. The SUR is silent on how the above objectives can be met in the absence in use of pesticide in</p>

these environmentally sensitive areas. The proposed SUR completely ignores the impact that Regulation 1107/2009/EC has had on the availability of active substance. This regulation has removed many active substances from the environment and has resulted in the remaining active substances having a much more benign environmental profile. The SUR totally ignores this trend with the imposition of an arbitrary reduction on pesticide availability without scientific basis. The EU commission impact analysis of the SUR outlined 'Higher production costs may also trigger a rise in food prices for EU consumers. EU reliance on imports such as cereals may increase'. The impact assessment also concluded that a reduction in pesticide use would have a muted impact on biodiversity, as it acknowledges that the primary cause of biodiversity loss is habitat loss. The impact assessment can be best summed up as 'all negative, no positive'. This impact assessment should form the basis of rejecting the main thrust of the SUR. The Independent advisory structure as outlined in the SUR is simply not available to provide agronomic advice on a one-to-one basis to all users. The current structure of embedded advice from merchants/ retailers is not perfect, but in general has served the industry well. A reconfiguration of this structure will require significant investment into the sector, mainly from public but also from private sources, with no clear benefit accruing. The lack of availability of well-trained agronomists is a serious threat to the agricultural sector as it stands, without arbitrarily changing the business structure of those that provide advice, again without any scientific justification. Use of unmanned drones, in controlled conditions, could be a very viable option in the rehabilitation of environmentally sensitive areas, especially for control of Bracken and invasive alien species, where use of mechanical machinery is not possible or extremely dangerous. Examples of these environments are mountainsides, river verges and rewetted bogs. Currently pesticides are being applied in these areas manually using knapsacks which is completely inappropriate and dangerous, or not at all, which is an infinitely worse outcome. The proposed ban on these forms of technology and in the use of pesticides in these areas, would have an overall negative impact on the rehabilitation of hard-to-reach areas of high environmental merit. The proposed reduction in the use of pesticides is being taken at a time when the potential benefits of gene technology are also being withheld from food producers. While 2001/18/EC is in operation in its current guise, especially in relation to the effective banning of gene editing technology, arbitrary reduction in the use of pesticides should be withheld. History is not kind to societies that engage in hubris and those that ignore the basis of their success. The EU in general, and Ireland in particular are blessed with a temperate climate that is conducive to the production of food in an environmentally friendly manner. The imposition of arbitrary reductions in pesticide use, with consequential reduction in food produced is ignoring these lessons of history. The existing SUD has its weaknesses but addressing these specific weaknesses would seem a more appropriate route to a more environmentally sensitive use of pesticides than the arbitrary nature of the regulations as proposed.

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Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements

	<p>imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
59	<p>I would like to register my support for the 'Sustainable Use of Pesticides Regulation' proposals. I presume that the Department of Agriculture is already aware of the damage that extensive use of pesticides is having on the world's Bee population and health. However, if you require that I expand on this further - please let me know. Expansion of Definition of Sensitive Areas: In particular, I would like to support the 'Sensitive Areas' section of this proposal and welcome the inclusion of Sports Grounds in this listing. From a Bee's perspective the grass on many Sports surfaces (from Golf Courses to Football pitches) is unnecessarily manicured with the help of pesticides to the point of being sterile - if not deadly. Whereas a good natural mix of grass and clover on such surfaces would not change the nature of the surface - it would provide a great source of nutrition and pollen to the local Bee population. Many of the areas listed in this proposal are locations that may host Beehives and I would further like to suggest the list of Sensitive Areas could be expanded to include Schools and Universities, Community Gardens & Allotments, and any area where Beehives are situated. Notification of Spraying: I would also like to propose that these regulations should also require anyone applying/spraying such pesticides within the limits of the regulations to, nevertheless, give 24 hours' notice to any beekeeper with hives within 1 km so that the bees can be confined to their hives for the period of application/spraying. Hoping that you can give these matters your serious consideration.</p>
60	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating</p>

	<p>impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
61	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission 's proposal for a Sustainable Use of Pesticides Regulation. 70% of our business comes from golf enthusiasts travelling to us and neighbouring golf courses to enjoy high standards of golf and the famed Irish hospitality. Tourism Ireland and Failte Ireland spend millions of Euros each year selling Ireland all over the world with the expectation that the experience will be 'first class' from our Cead Mile Failte, to our food, hospitality and of course active and leisure pursuits such as</p>

golf. Therefore, it is with concern that we wish to comment on the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The inclusion of the heading "Sensitive Areas" and definition of "sensitive area" includes the following areas: areas used by the general public and vulnerable groups; human settlements/urban areas; public parks or gardens; recreation or sports grounds; non-productive areas (GAEC 8); specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. Golf courses are, one assumes, included in recreation or sports grounds. This clause seeks to prohibit the use of these PPPS on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of golf courses in Ireland. We request that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate. Course condition is critical to a golfer's experience. 2. The fall in standards will impact this industry as participation levels and rounds played will reduce, passing the competitive advantage to our neighbours in close proximity, the UK, Scotland and England, particularly on links golf. 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, and retirees golf is their main outlet for exercising and socialising. 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPPS on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPPs, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location, the year-round golf season and access to the north American golf market that wants to experience the Irish links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPPS such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in Co2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines support that member states will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years. No such supports will be available to the golf industry. 9. Should a full exemption for golf from the sensitive area definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a

	<p>suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. There is indeed a bigger picture here and one the proposal fails to consider. There would be a significant commercial impact to golf in Ireland were the regulation to proceed as drafted. The Department, together with other State Departments with a beneficial interest in the golf industry should take every measure possible to protect this valuable industry to Ireland.</p>
62	<p>It appears to me that, it is the view of an Expert in tillage - Mr Jim Mc Carthy - who spoke recently – “That Tillage in Ireland is finished if Glyphosate is banned.” Many farmers, including myself share this view.</p>
63	<p>The tillage industry in Ireland is an integral part of agriculture - our key industry. Food production is what we do best. The tillage sector is a very responsible sector, wanting to produce the best quality food while at the same time being kind to the environment. Because of our climate and the disease pressure it creates, growers have to use pesticides. These pesticides are used very responsibly. All crops grown have records to show what and why products were used. Importing cereals from outside the EU is a 'slap in the face' to growers and consumers here. This imported food has no traceability. Pesticides that are no longer registered here can still be used in countries that we import from. So much for a level playing field. Why? – because Europe wants to sell more cars, computers etc, to these countries. The war in UKRAINE shows how dependent Europe has been on importing energy from abroad. We have been at the mercy of others for our energy supplies. We see how Russia is weaponizing fertilizer. Are we now going to do the same with food. Cut back production here and make ourselves dependent on outside forces? It is time to wake up before it's too late. Europe should be as self-sufficient as possible in supplying food for its population.</p>
64	<p>I have a few inputs to give on the proposed sustainable use of pesticides regulations and hope they will be taking into consideration when the final copy is been completed. I'll start with a few figures you may already know; World population: 8,012,293,600 and increasing as we speak, Population of Ireland: 5,056,935 and increasing as we speak, Total grain yield Ireland produced in 2022: 2.42 million tonnes, Grain imports into Ireland: 161,334 tonnes (wheat) for Jan -Aug 2022 alone, Total land in Ireland: 62% agricultural use and 10.6% forestry use, Tillage land in Ireland: 348,689 Hectares 2022 figures. Regarding the proposed regulations on sustainable use of pesticides: If the population, for both the world and Ireland, is increasing, land area is staying the same and if the pesticide usage is reduced by 50% how will we (Ireland) maintain our yield production? If our yield is reduced it leads to many problems; As inputs are increasing in price and we the grower have to pay for these inputs from what we receive at harvest, we have to hope that the price is good and our yields/quality is high to be able to make a living. So, if we reduce our pesticides by 50% we are basically reducing our yield by 50% also! The weather, Ireland and the world rely on the weather to grow crops. Ireland on its own has the weather and the high disease pressures to try and grow a crop of good quality and achieve the yields. If pesticides are to be reduced by 50% and how will a potato farmer compete with the high disease pressures to grow a crop of potatoes and achieve good quality high yielding crop? Seed companies/plant breeders are going to</p>

	<p>have the hardest job as they have been told that this regulation is coming. It takes 8-10 years to breed a seed that may have potential in yield and quality. Have you taking them into account to breed a seed that will produce a high-quality crop, be hardy against our high disease pressure climate and produce the yields we need to help feed our country and the world with the reduced reliance on chemicals? If pesticides are to be reduced this will wipe out the potato industry as we are already on our knees as it is, with a very small armoury to keep blight away and to harvest a crop with many of the good chemistry of the PCS list. How will you expect them who are all family farms to survive? If the quantity/yields are not achieved, the Grain imports figure I mentioned above will probably increase by 50% if pesticide usage is to reduce by 50%. Imported grain that comes into this country are GM grains, which are banned to be used in EU countries but yet the non-EU countries have the advantage of producing these crops and using the products that are banned for use to produce them crops are allowed into our ports, which are used in animal feed and human consumption. How can Ireland compete with that if you are to reduce the use of pesticides and not give use anything in return to maintain our yields and production? Just by reading the article, chapter IV, article 13 page 45 mentions IPM. Referring to the crop establishment techniques mentioned, one is the stale seedbed technique, which is a way many tillage farmers do to reduce the weed population so to give the crop a better chance of establishment, but glyphosate is required to complete this technique which is on the verge of becoming off the market. How will a tillage farmer control weeds or have any chance of establishing a crop at all if it (glyphosate) is taking of the market? How will yields be achieved if a crop doesn't get a good start in its cycle? It just won't be achieved! So I'll finish on this note, If pesticides are to be reduced by 50%, grain, potatoes, veg crop yields will possibly reduce by 50%, imports will likely increase by 50%, population could possibly decrease if food is not produced to feed them all, Land area is not increasing, but yet the tools to help produce our food for the world and Ireland is going to be taken away from us and nothing is there to replace it to help maintain the yields we have been producing today. Non-EU countries having the advantage and EU countries taking in the produce from these countries. If that's the case why have Bord Bia quality assurance, why have all the regulations, when you take in the food these bodies are not allowing to be done here in Ireland??? If you don't want a tillage industry in Ireland you are certainly going the right way about it too wipe us out!</p>
65	<p>I have a few inputs to give on the proposed sustainable use of pesticides regulations and hope they will be taken into consideration when the final copy is completed. Regarding the proposed regulations on sustainable use of pesticides: If the population, for both the world and Ireland, is increasing, land area is staying the same and if the pesticide usage is reduced by 50% how will we (Ireland) maintain our yield production? If our yield is reduced it leads to many problems; As inputs are increasing in price and we the grower have to pay for these inputs from what we receive at harvest, we have to hope that the price is good and our yields/quality is high to be able to make a living. So, if we reduce our pesticides by 50%, we are basically reducing our yield by 50% also! The weather, Ireland and the world rely on the weather to grow crops. Ireland on its own has the weather and the high disease pressures to try and grow a crop of good quality and achieve the yields. If pesticides are to be reduced by</p>

50% and how will a potato farmer compete with the high disease pressures to grow a crop of potatoes and achieve good quality high yielding crop? Seed companies/plant breeders are going to have the hardest job as they have been told that this regulation is coming. It takes 8-10 years to breed a seed that may have potential in yield and quality. Have you taking them into account to breed a seed that will produce a high-quality crop, be hardy against our high disease pressure climate and produce the yields we need to help feed our country and the world with the reduced reliance on chemicals? If pesticides are to be reduced this will wipe out the potato industry as we are already on our knees as it is, with a very small armoury to keep blight away and to harvest a crop with many of the good chemistry of the PCS list. How will you expect them who are all family farms to survive? If the quantity/yields are not achieved, the Grain and food imports will probably increase by 50% if pesticide usage is to reduce by 50%. Imported grain that comes into this country are GM grains, which are banned to be used in EU countries but yet the non-EU countries have the advantage of producing these crops and using the products that are banned for use to produce them crops are allowed into our ports, which are used in animal feed and human consumption. How can Ireland compete with that if you are to reduce the use of pesticides and not give use anything in return to maintain our yields and production? Just by reading the article, chapter IV, article 13 page 45 mentions IPM. Referring to the crop establishment techniques mentioned, one is the stale seedbed technique, which is a way many tillage farmers do to reduce the weed population so to give the crop a better chance of establishment, but glyphosate is required to complete this technique which is on the verge of becoming off the market. How will a tillage farmer control weeds or have any chance of establishing a crop at all if it (glyphosate) is taking of the market? How will yields be achieved if a crop doesn't get a good start in its cycle? It just won't be achieved! So I'll finish on this note, If pesticides are to be reduced by 50%, grain, potatoes, veg crop yields will possibly reduce by 50%, imports will likely increase by 50%, population could possibly decrease if food is not produced to feed them all, Land area is not increasing, but yet the tools to help produce our food for the world and Ireland is going to be taken away from us and nothing is there to replace it to help maintain the yields we have been producing today. Non-EU countries having the advantage and EU countries taking in the produce from these countries. If that's the case why have Bord Bia quality assurance, why have all the regulations, when you take in the food these bodies are not allowing to be done here in Ireland??? If you don't want a tillage industry in Ireland you are certainly going the right way about it too wipe us out!

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We welcome the opportunity to comment on the EU's proposal for a Sustainable Use Regulation on Plant Protection Products (SUR). The Farm to Fork 50% reduction target will seriously challenge agricultural / horticultural / forestry production. The loss of some key active ingredients will potentially create a very significant challenge for the trade and growers in tackling disease and pests in the absence of advanced chemistry and new technologies. The proposal in its current format will increase the inefficiency of use of scarce resources such as energy and fertiliser at a time when many EU citizens are facing food and fuel poverty. The recent pandemic allied with geopolitical events has once again shown the fragility of supply chains but also importance of food and fuel security. The Commission's own impact assessment with regard to the SUR points to a diminishing armoury of active ingredients, increased production costs for farmers and the supply chain, reduced crop yields and higher food prices allied with a greater reliance on imports. Increasing costs and regulations will aggravate the longer-term decline in EU and Irish arable/horticultural/amenity crop production and create an even greater reliance on imports. Less than 10% of Ireland's utilisable land area is under arable/horticultural crops. Competition from low priced non-EU imports which in many instances are produced to lower environmental standards, has seriously eroded farmers' incomes over recent years. According to Professor Michael Wallace's report [1] "Economic Impact Assessment of the Tillage Sector in Ireland" there has been a significant reduction in the arable crop area over recent years (42% since 1980) resulting in a greater reliance on imports. "Imports of cereals increased at a linear rate of 64,000 tonnes per annum between 2000 and 2018." Unfortunately, the SUR as proposed will increase the reliance on imports with its associated high carbon footprint. According to the DAFM report the Irish tillage sector, from an environmental sustainability point of view, is a low emission farming system [2t of Agricultural GHG (Co2 equivalents)/ha] when compared to livestock farms 3.4- 8.5t GHG/ha. However, the sector to date has not benefited despite showing the lowest emissions of CO2 per hectare. Under the current CAP reform, the majority of Irish arable crop farmers will see a substantial reduction in their CAP payments from 2023 onwards. This allied with increased production costs and reduced yields as a result of the proposed SUR will see a further decline in the sector with consequences far beyond farming. The Wallace report points out that the reduction in the tillage area has likely resulted in decreased biodiversity, "Tillage land is essential for biodiversity, especially farmland birds. UK research has shown that loss of arable cultivation, especially in pastoral landscapes, can negatively impact populations of threatened farmland bird species". The provision of extension services is key to promoting greater awareness amongst farmers and allowing for the adoption of new technologies/practices. It is estimated that 90% to 95% of the agronomy advice is provided to growers by the trade. Agricultural Co-ops, merchants crop specialists have invested heavily in providing: Dedicated agronomy advisory service, Staff training for agronomists and distributors, Warehousing and storage facilities, Record keeping systems, Closed loop systems i.e., the supply of inputs and credit. And the purchase of produce, Quality assurance schemes assuring traceability, Assurance to food business operators by meeting the exacting standards required by malsters, brewers, distillers etc. The proposed decoupling of the advisory from the input supply side will negatively impact on the viability of the arable/horticultural

	<p>crop sector given its fragmented nature coupled with low margins, unfair competition from non-EU country imports, increased costs, reduced productivity, potential loss of quality etc. There are approximately 10,000 arable crop growers with an average farm size of c. 33ha. Currently Teagasc does not have the resources to provide an independent advisory service with only 14 specialist tillage/horticultural advisors available. Unfortunately, they are unable to provide a proper agronomy service until post May due to the volume BPS applications they have to lodge on behalf of farmer clients. A standalone service is not commercially viable. Advances in technology are allowing farmers to produce crops more sustainably by reducing the reliance on pesticides. However, the EU to date has been slow if not opposed outright to their adoption. The EU must create an environment conducive to research and development of new technologies that will allow EU farmers to compete on a level playing pitch against imports while protecting the environment. The agricultural/horticultural sector has been to the forefront in adopting new practices/technologies. Any proposed regulation must enhance environmental and socio-economic sustainability. It must also take cognisance of the demographics of EU and Irish farmers along with computer literacy skills, broadband access etc. Recent attendances at national events [2] run by Teagasc (the Agriculture and Food Development Authority) have shown that the trade and farmers want to play a greater role in protecting the environment, but they must be given the knowhow, access to the appropriate tools/technology and the right incentives so that they can play their part.</p>
67	<p>Several years ago, I decided to improve the health of my soils by adding a good rotation to the land that I farm and to become more responsible in the way I grow crops. By that I mean direct drilling, minimum cultivations where possible, and to add organic matter to my soils whenever I can. This was all done before any debate on carbon releases, sustainability or any other buzz word that is now ever present. I don't count myself as being ahead of my time but like many of my colleagues in crop production it was the best and most economical way forward. I have been in tillage farming in Ireland for the past 45 years, and in that time, we obviously have seen major developments in cereal production and with the use of pesticides. Without doubt, I have over that time come to be more dependent on pesticides, and their sophistication to maintain output and to try and reduce the ever-increasing problems with plant disease and weed control that intensive agriculture in the 21st century creates. I am yet to be convinced that modern application of these pesticides is the main concern that should be addressed. It must be noted that the pesticide products today are not only more efficient than their predecessors but with research techniques and regulations far safer to users and crops. Most tillage farming in Ireland today is arguably quite localised and definitely very sophisticated. I apply pesticides only when needed, and in these applications, I would argue that they are applied with care and with the minimum rate so as to be not only economical, but environmentally sustainable. For example, I, on average (depending on situation) when I need to spray normally apply a water rate of 150 to 200 l/ha with a maximum of 1.5lts of a product. That equates to 1% of a dilution of a pesticide on that hectare. This by any metric is an incredibly small amount of a product, notwithstanding a view that by some it is deemed harmful to waterways etc. As an aside I have taken to a program over the last several years of keeping a buffer strip</p>

	<p>around ditches and definitely along watercourses and when finished will leave anything from 3 metres to 6 meters around fields. This alone in my opinion will allay any concern about runoff of pesticides and will not unduly reduce output from fields, as these areas are mostly the least productive part of the fields. It also has definitely attracted more wildlife and beneficial pests and has made it more manageable for me to maintain fields. When someone asks me to explain about pesticides and who has no experience in farming but reads all the negative comments that are in public domain (or worse on social media), I try and compare a person who is ill and visits their doctor and they get prescribed a medication that will make them recover from their illness. That same medication if taken irresponsibly by that person could potentially harm them so they take as instructed. In my view we are the same. I invest in the best, most efficient methods of applying the pesticides (medication!). We do so under all available regulations. We record every single application onto our recordkeeping database which is audited externally and most importantly only will I apply them when necessary. I grow some of the best yielding crops in the world, not only because we have world class land and a most suitable climate but because we are highly efficient at our job. We have a burgeoning Market evolving in the distilling industry and it would be catastrophic, shameful, and irresponsible if we were to become a country of just one nitrates zone. We might be a small country in comparison to some of our European neighbours, but we can still deliver a sustainable tillage industry and let it flourish if we are allowed. Pesticide use seems to be at the moment a bad word in the minds of people who do not understand why we use them. If we don't, we will destroy an industry overnight. I am not a huge supporter of vested interest groups in any sphere, as I feel they tend to be too extreme in trying to get their message out and can alienate people whose voice sometimes is not heard. But, in this instance it is too much too quick when any alternative to grow crops successfully is not scientifically proven to maintain standards that I have learnt and put into effect over the years especially the past 10 years. I would love to think I could farm without pesticides not only for the help it would give my profit margins, and to farm organically, but in reality, this is not going to work on a large scale. It has a role but a small one. The world has been told that we cannot feed the projected global population into the future yet here we are trying to defend our way of food production from a sustained political (and minority public) attack which if successful will not only reduce food supply but the consequence of that will be without doubt increased food costs. Most 1st world countries will probably be wealthy enough to withstand this, but as usual 2nd and definitely 3rd world countries will again bear the brunt of these decisions. Finally, without a risk of a geopolitical debate, I sincerely hope that this directive can be reworked for everyone's sake because as I hope I have stressed we as tillage farmers are extremely good, extremely responsible and extremely focused on what we love and what we hope to continue do into the future.</p>
68	<p>While I agree with a reduction in pesticide use, I overall think 50% is too high too fast. This will have a sever effect on a farmer's ability to control weeds pests and disease. I know IPM can be used to help control/ prevent some of issues with crop production of which farmers are using and implementing on farm BUT there are times where chemical control is really the only solution. If farmers can't use pesticides fully to grow crops to a good yield and a profitable reliable crop, then they may not take the risk or just</p>

	<p>go to organic farmer where output is greatly reduced and not possible for a lot of today's crops. i.e., Potato blight would fully wipe out crop and a grower can't take that risk. The issue of independent advisors is fine in other countries however most qualified agronomists in this country are linked to merchants and do a really top-class job. They only recommend what's needed and use threshold levels before using a chemical in a responsible manner. A suggestion. If Teagasc were to check over crop reports and IPM programme once a year and sign off on them in my opinion would be fine and let current system as is. Finally, I believe that no study has been done on how these changes may effect current crop production and are multibillion Agri sector. Please don't make changes unless there are current viable alternatives that growers can use otherwise you will see the collapse of the tillage sector in Ireland.</p>
69	<p>I do not agree with the proposed new Pesticide Regulations. There is no alternative. More thought needs to be considered before any rash decisions are made. A ban should not be considered.</p>
70	<p>With reference to the public consultation process on the new sustainable use of pesticide regulations I would like to make the following submission: 1. Proper and careful use of pesticides is critical to the production of tillage crops and grains in this country. The profitability of a tillage enterprise depends on the ability of a farmer to produce quality high yielding crops in order to cover the costs of production and to return an income. Where products are restricted or removed financial loss will occur. This will push small produces out of business and will result in much larger farms creating tracts of monoculture in the environment due to the size and scale of operation required to break even. 2. Farmers in Ireland cannot be financially disadvantaged where the price of commodities is set globally but regulation set locally. Any deviations in regulations or the way in which they are applied that will result is a competitive market disadvantage to the producer of a crop or commodity should be avoided or the difference should be monetised by way of a disadvantage payment to compensate for the deviation. 3. Where technology or software becomes mandatory under regulation access to this technology must be provided. The introduction of changes to the application methods or recording systems for pesticide use should not financially disadvantage any producer whereby before the introduction of the regulation the individual or business was able to maintain adequate records and or safely apply product. Where changes are proposed they should either not be mandatory or if mandatory, funding needs to be made available to transition. 4. Any changes need to be planned so that a business can manage the changeover financially and practically over a period of time.</p>

71	<p>I wish to strongly object to the proposal to reduce the use of pesticide usage by 50% by 2030...Surely a sane person can see that this draconian cut will result in the decimation of the Irish tillage sector. Due to our wetter climate than most of the rest of Europe, and therefore the higher incidents of wet weather diseases in our crops, our yields would be dramatically reduced and our family farms will be bankrupted. This will increase the cost of food to the consumer, with the shortfall in available tonnage of food being supplied by other nations, who would not be hindered by our ridiculous regulations, not to mention the food miles that will be incurred to get this "shortfall food" transported to the consumer...All of these extra cuts are coming at a time of already complicated CAP reform, and surely be to God, we have enough stress on our plates already, besides these ridiculous proposals having to be defended against, not to mention having to deal with, if they ever get forced upon us...Really and truly, who in high office, is pushing this agenda of ever increasing negative change and stifling cuts, which seem to be based on invisible lobby groups, that seem to be based on more of an unproven green agenda rather than sound scientific evidence. THEY SHOULD BE ASHAMED OF THEMSELVES. But of course they won't be, instead they will choose to pontificate their ridiculous rhetoric and proposals, that could easily get snook into law, so as to further treat the farmers of Ireland as fools and dictate down to them like they are ignorant, uninformed children....How many more ways can be thought up by the Department of agriculture to treat us like fools and torture us...Is it the department of Agriculture, or the department against Agriculture??...Also has anyone who is involved in drafting these proposals given even the slightest consideration to the high stress and anxiety levels that they are causing the farming community. We are told to mind our mental health, but you would want to be mad not to go mad and what faceless bureaucrat's name,(who can pay), can be used in the inevitable court case that will have to happen to get compensation for the families of bereaved farmers after they have lost their loved ones to suicide, and heart attacks etc, brought on by this stress that you have had the biggest part in causing...SCIENCE,NOT LUNATICS MUST PREVAIL.</p>
72	<p>We welcome the opportunity to participate in the Public Consultation on the EU Commissions Proposal for a Sustainable Use of Pesticides Regulation. It is a well-known fact that we are currently experiencing devastating biodiversity loss on a national and international level. In light of the rapid decline in precious native flora and fauna as a result of anthropogenic activities, we must do all we can to halt and reverse these losses. The Sustainable Use Regulation proposal is critical to the well-being of our biodiversity, natural environment, people, and ultimately the future of Ireland. We strongly support 'Option 3' of this Sustainable Use Regulation proposal, which would make the target to reduce pesticide use by 50% and reduce pesticide risks by 50% to be achieved by 2030 as a legally binding obligation on a national and European Union level. Additionally, the use of all chemical pesticides would be prohibited in sensitive areas such as urban areas and protected areas in accordance with Directive 2000/60/EC, Natura 2000 areas, etc. These restrictions on pesticide use are critical to protecting, enhancing, and restoring the biodiversity of this island and the wider European continent. Option 3, as outlined in the European Commission proposal will 'maximise associated health and environmental benefits. It is estimated that approximately 11,000 people die every year as a</p>

result of unintentional acute pesticide poisoning. The health impacts of pesticide use are severe and numerous and include dermatological, gastrointestinal, neurological, carcinogenic, respiratory, reproductive, and endocrine effects. The right to health, the right to adequate food, and the right to a healthy environment are all human rights that are interlinked with pesticide use. The human rights responsibilities and environmental law obligations related to pesticides must be understood, respected, and strengthened. Food security is often cited as an argument against pesticide reduction. However, as pesticides impact and reduce the microorganisms found in soil (which are essential for nitrogen fixation, amongst other critical activities), crop yields can actually be decreased through pesticide use, reducing food production and security. Furthermore, there is an abundance of food already being produced across the globe, food that is going to waste due to our inadequate production, transportation, and distribution systems. Stopping the overuse of pesticides will allow us to strengthen food security and move us closer to the goal of sustainable development as well as allowing the threat of the global biodiversity and climate crises to be addressed. As highlighted by 600+ scientists and researchers in December 2022, the heavy use of pesticides by the agricultural industry is directly linked to a significant decline in insects, birds, biodiversity species found on land and in our marine environments as well as having detrimental impacts on water quality and global public health and well-being.⁶ We would like to highlight some of the key points of this statement, which we support: The undelayed realisation of the Farm-to-Fork and Biodiversity Strategies' pesticides reduction objectives remains of utmost importance to stop and reverse the decline of biodiversity. The lack of binding targets is exactly the reason why investments in Integrated Pest Management have lagged behind since the adoption of the 2009 Pesticides Directive. The adoption of binding targets and a reallocation of public resources are expected to accelerate innovation of non-hazardous pesticide alternatives. A food system transition is non-linear and disruptive by definition. While current modes of impact assessment may provide insights into short-term market impacts, they are incapable of projecting longer-term innovation and disruption, which the Green Deal aims for. The protection, enhancement, and restoration of our natural environment are critical to long-term food security. The protections as outlined in the Sustainable Use Regulation proposal align with the European Green Deal, the Farm-to-Fork Strategy, the Biodiversity Strategy, Natural Restoration Law, and the zero-pollution action plan. The existing Sustainable Use of Pesticides Directive is too weak and unevenly implemented. The Sustainable Use Regulation proposal is critical to address these issues. We cannot allow powerful lobbyists to derail this initiative, as any delay in its approval and implementation will have severe environmental and health consequences. Comprehensive and coordinated action is essential to secure reliable food production methods that are sustainable and safe. We implore you to recognise the severity of the ever-growing biodiversity crisis and seize this invaluable opportunity to implement proactive measures which will protect nature and our people. The Sustainable Use Regulation proposal is essential for the regeneration and restoration of nature across the European Union. We urge you to strongly support this proposal and immediately implement these essential changes.

73

Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements

	<p>imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
74	<p>Rushes need to be controlled in the most environmentally friendly way. DAFM should have a rushes incorporation scheme (RIS) similar to the straw incorporation measure (SIM) and pay farmers to control rushes by cutting or chopping. A spoonful of MCPA pollutes as much water as in a swimming pool. Farmers might accept the banning of MCPA if they got paid to cut or chop them instead of spraying rushes. Thanks for the opportunity to submit an opinion. Hope you take it on board and pay for the control of rushes, if done in an environmentally friendly way.</p>
75	<p>We would like our public representatives to make representations on the future use of pesticides on agricultural land in Ireland. It doesn't make sense to have pesticides banned in the Republic of Ireland totally. We understand clearly that pesticides must be regulated in order to improve our environment globally. If we do not have advice on the ground, going forward about how to manage our land productivity how are we the farmers expected to keep our land productive while make a living and keep our animals in the best of health. It is my experience that land managed well with input from experts will help each and every type of farmer to produce food in a manner which is eco-friendly. We are being asked to keep electronic records on pesticides, plant protection products to name two. Not all farmers are trained in digital recording thus requiring help from experts in the ground. We want a more localized nitrates vulnerable zones to be put into force and when pesticides are required, that we the farmers have the back up of advisors readily on the ground to advise us on the pesticide best needed for our area of production. That surly would be more beneficial to our soil(land) animals, farmers & the local economy and most of all our environment. This is a future issue for all types of farmers, organic and intensive, so why not go about it in a manner that would suit all interested parties.</p>
76	<p>SUR regulations need to be considerate to the lack of alternatives to use of pesticide as a control of weed and invasive species. This so most important for tillage farmers for obvious reasons. Uncontrollable weeds or disease/fungus directly impact yield and presently, there is no alternatives suggested. Suggestions; Will there be a grant for machine weeding machines? I rely heavily on contractors but there are less and less tractors available to spray. This should also be considered in the consultation, don't make it more difficult for spray contractors, encourage them! Ireland is always subject to the highest standards, limit the importation of secondary products that are not subject to future SUR regulations! Before restrictions can be brought in, alternatives methods for weed, pest and disease control are necessary!</p>

77	<p>I would like to state my disappointment at the need to write a letter for the stupidity of the proposed new regulations regarding pesticides. We are being told how we are the cleanest farmers environmentally in Ireland and are told the environment advantage of not ploughing and now the tools required are being taken from me and my sector. This is effecting my mental health! I cannot plan for my family's future. One of Ireland's golden geese has been threatened as is my livelihood.</p>
78	<p>The Department of Agriculture, Food and Marine currently have a public consultation on the EU Commissions proposal for a Sustainable Use of Pesticides Regulation. Many of the items contained within the regulation relate to Agriculture and the Farm to Fork strategy but could also have a significant bearing on golf and golf course maintenance. The inclusion of the heading "Sensitive Areas" is of particular concern to golf courses. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive area" includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. Golf courses can be considered to be included in recreation or sports grounds. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of golf courses in Ireland. As you are aware we are competing in an international marketplace where agronomy standards are expected to be world class and if we are not meeting customer expectations then the entire Irish golf industry will suffer with the consequent impact on the golf tourism economy and the thousands of jobs within the golf industry directly and the supporting industries of hotels, B&Bs, pubs, car and coach rental and other visitor attractions. There are only 150 links courses in the world and Ireland has one third of these. We make very limited use of chemicals in keeping with our ethos of presenting a very natural environment and working with nature to limit the need for artificial interference. Natural ecological methodology is our preferred turf management strategy. However, the limited use of growth regulators, herbicides, insecticides and fungicides is critical to prevent the loss or damage of fine turf surfaces. These are always precision applications, timed and targeted to maximize the effectiveness of the product. Without this ability to react quickly to disease or infestation, golf courses would lose greens within days and it would take years and considerable cost to replace them. The consequential loss of tourism revenue and the damage to the world class reputation of Irish golf would be immeasurable. The value of golf tourism to rural areas, in particular, is of key importance in sustaining local economies and indeed regions. It really is that important locally and regionally. Under this proposal, Member States will be able to provide support under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. This is another huge anomaly, and as we are still</p>

	<p>only in the recovery stage post Covid, and dealing with unprecedented costs increases, this will be another hammer blow to our industry, and indeed the wider tourism industry nationally. I believe there would be a significant commercial impact to golf in Ireland were the regulation to proceed as drafted and would seek a derogation for golf courses and fine turf management.</p>
79	<p>I would like to express my deep concern over the Sustainable Use of pesticides Regulations proposal. There is a strong drive from consumers, industry, and Europe to reduce all chemical inputs in agriculture. With the introduction of the sustainable use directive (SUD) in 2009 and update in 2015, the stricter controls have tightened up the overuse of pesticides. A high percentage of Irish farmers are keeping pesticide use to a minimum. The Irish tillage sector is the highest performing in the world. The rainfall yields and mild conditions are ideal for plant production. These same conditions, however, create the perfect environment for plant pathogen and fungal growth, for example, Potato Blight, Septoria, Rynchosporium, Ramularia, Fusarium and BYDV all thrive in the mild damp conditions. Disease control is essential in Irish crop production and is very problematic to control every year. If they are not controlled yields will fall by 50% and in the case of potato's possibly crop failure. The legally binding Sustainable Use of Pesticides Regulations 50% pesticide reduction target by 2030 is extremely ambitious and will severely impact the tillage sector. Integrated Pest Management is being promoted as an alternative. The majority, of Irish farmers, are employing IPM already. Technologies, however, such as developing resistant robust varieties and genetic modification are not in place or prohibited. With increasing knowledge transfer, improved application techniques and IPM, the use of plant protection chemicals will reduce over time. Irish farming is part of the problem but is also part of the solution. The industry is embracing the need for fresh air, clean water, fertile soils, biodiversity, and vibrant ecosystems.</p>
80	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a</p>

	<p>prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
81	<p>I am objecting to removal of 50% of pesticides in the new proposals. We cannot remain viable without them.</p>
82	<p>Ireland is an important country for food production in Europe, and have a stated objective to increase crop production, therefore an adequate toolbox of solutions must be available for farmers to effectively protect their crops from diseases, weeds, and pests. Despite the many challenges faced by Farmers, Ireland's use of pesticides is low and declining over time. HRI1 and HRI2 indicators have been trending down since 2011 and Ireland's volume of pesticides used is comparatively low, at 0.64kgs/ha UAA. Regarding Pesticide Reduction Targets, we believe that these need to be proportionate and realistic to ensure food security and the viability of the agricultural sector in Europe. Historical achievements as measured by the use reductions since the reference</p>

years in individual member states demonstrates that the existing Sustainable Use Directive (SUD) is already achieving its primary objective of reducing the risks and impacts of pesticide use in the EU. With this in mind, new reduction targets also need to address additional factors including agronomic and climatic conditions, pest pressures, levels of pesticides used, food security, and food safety needs as well as acknowledge that pesticides on the market do already respond to the highest safety standards set into EU Regulation 1107/2009. Furthermore, it is vital that the EU ensures availability and access for farmers to effective alternatives and cutting-edge crop protection innovations such as digital and precision tools, as well as biopesticides in their already depleted toolbox. If EU farmers are expected to be able to achieve ambitious SUR pesticide reduction targets in five years, it is critical that regulatory processes can account for innovative application methods, new modes of actions and additional tools that can enable use and risk reduction to be achieved while still providing an efficient crop protection. The SUR should not on the one hand restrict farmers' ability to use vital crop protection solutions, while at the same time another Regulation (1107/2009) stalls introduction of the new and improved technologies which are needed for their replacement. Regarding sensitive areas, while acknowledging the need to better account for specific vulnerabilities at local level, it is also necessary to check to what extent the high level of safety standards of the current regulation on plant protection products does not already address these protection goals. In addition, risk assessment schemes could be developed to cover a range of protection goals corresponding to these specific areas and practical tools exist, already mentioned in the SUR, such as IPM for example or risk mitigation measures, that can enable a high level of additional protection for products that would be used in sensitive areas. Regarding IPM, as for the setting of reduction targets the success of their implementation is closely to how effectively the tools and operations entering in IPM programs enable an effective crop protection. This reflects the current status of existing IPM programs as well as the diversity of technological developments that will enable effective programs to take place, as for example in the area of application technologies, compatibility between biological control and other operations and Farm Management Systems. We encourage technical discussions to take place across a range of areas of expertise (application technologies, plant protection, biocontrol, ecosystem services, digital technologies) in order to share knowledge and support the design of effective IPM programs. Regarding administrative burden, we would like to mention the Digital Label Compliance project initiated by CropLife Europe, that offers to enable machine readable labels responding to approved standard of labelling, which, besides facilitating label compliance even of the most complex labels, would support farmers in documenting usage records and complying with the upcoming SUR data reporting.

83	<p>We welcome the opportunity to respond to the consultation on the EU commission proposals for the Sustainable use of PPP Regulation. The pesticides regulation therefore is important as custodians of the habitats and lands on our estate and our need to both protect our habitats and protect those who work and use the forest for recreation but also our need to ensure invasives and threats to those habitats are managed for the better good of the Forest estate. We welcome the regulation and welcome that the national law will set the targets. Member states need flexibility in setting targets and member states need to engage with key stakeholders before finalising national targets. With the varied climate difference between member states different challenges and conditions face each member state. It should be noted we manage a vast non-food land base with big variation in topography, with this said, climate change is having a big impact on the sector with pest and disease pressures, vegetation growth rates increasing, invasive species spreading within our estate, so it is ever important to protect our habitats and lands with PPP's. We note also the challenges for alternative non-pesticides for some pests. We would seek clarification on what may be defined as areas used by "general public or by vulnerable groups, communities" in the context of Natura 2000 habitats framework. We believe there needs to be a clear distinction on what is expected before pesticide is applied and credible scientific evidence on the impacts of pesticide before any restrictions or prohibition is made on these areas. We also will need to treat areas open to the public where pest, invasives or deceases are prevalent. We note the exemption process proposed by the competent authority. This provision needs to be clear and state that such exception should be sought once, based on set criteria and such exemptions are not required for each visit to a site. We would seek further clarification of the role of the Professional User. We have a contractor base who employ person(s) to apply pesticide. On sites where pesticides have been applied is it the case that all those users on site are defined as a professional user or is it one personal on site with the responsibility to return proposed records? It would be onerous for contractors and if each person on site had to made returns. In a related matter, what training is envisaged for professional users. We believe existing accredited courses should be adequate for professional pesticide users.</p>
84	<p>Our background in the last 3 years in trying to mitigate against the misuse of pesticides (MCPA) in our catchment during a pilot source protection project (funded by the Department of Housing & Rural affairs), has involved various initiatives engaging with both the general public and concentrating primarily on the farming community to try and result in the levels of MCPA to be eliminated from our drinking water supply, whilst we have had some success we feel that the farmers would have a much better chance on reducing the load of MCPA in our surface waters if they had the option of using a weed wiper for MCPA application instead of a boom sprayer. Our experience working with the boom sprayers has informed us of the challenge of trying to maintain boom sprayers which is essential for a tillage grower who is looking after his bottom line but is not a priority for the busy dairy or beef farmer that may only use the boom sprayer a couple of days every year. During the lifetime of the project we provided a weed wiping service to farmers (using Glyphosate), because of the limited success and low take up from our target cohort (dairy farmers) we then offered a boom sprayer service, which involved a pre certification service, low drift nozzles, calibration and</p>

	<p>certification, this was very well received by the majority of dairy farmers and whilst this did result in an improvement in the amount of MCPA in the surface water determined by our ongoing sampling program we do need the farmers to use much lower volume of the polluting product (MCPA), this can be achieved if the current stipulation on the restricted use on the application of MCPA using a weed wiper is allowed as the physical contact of MCPA can give the same or better results compared to the boom sprayer which uses multiple times the levels of substance (1l versus 600L) and maintenance of boom sprayers takes considerable time and expertise to keep in proper working order. Currently, there are trials using weed wipers with MCPA in Northern Ireland and Scotland which have shown that the weed wiper works for MCPA and similar trials need to be carried out in this jurisdiction. During the project we carried out a project investigating the amount of pesticide product available for sale to the domestic customer and found in the 8 stores selling the product in our catchment, 50% of the MCPA products available for sale was targeted for the domestic "pristine gardener", there is no benefit to the environment or economy, the next phase of sustainable use of pesticide programme should be including the phased out use of pesticide in a domestic situation, the level of pesticide product for sale to the domestic customer is growing and are constantly being targeted by producers of these products through marketing campaigns. The domestic gardener has absolutely no training or awareness of the potential hazards with MCPA/pesticides. Any information videos available for these products do not at any stage stress the potential hazards of the products and you would need 2020 vision to read the warnings on the labels, as for the sales staff they are only interested in completing the sale and cannot be expected to be the guardians for the environment. Our key recommendations are as follows: 1. All videos (Youtube) and advisory information should give clear warnings on the hazards of the pesticide to the aquatic environment. 2. Research trials are carried out by a regulatory body (Teagasc) on the use of MCPA in weed wipers with a view of lifting the current restriction. 3. The phased withdrawal on the sale of pesticides for the domestic gardener. 4. All local authorities refrain from the use of pesticides on all impermeable surfaces as they have a direct pathway to local rivers. 5. All boom sprayers are fitted with low drift nozzles. These are a couple of recommendations that we think would have a direct impact on the amount of pesticides sold in this country which will have the knock-on effect of less pesticides in our water and the wider environment.</p>
85	The struggle is real on a small farm like mine. I object to the cut in pesticides. My profit margin is poor most of the time and add poor crops from pest damage will finish me.
86	I strongly object to the proposal to cut pesticide availability by 50%. This proposal would put us out of business.

87	<p>In relation to my understanding of pesticides used with a professional manner be in agriculture and horticulture. I feel there in very few situations where current pesticides are used inappropriately or in a situation that could be avoided. The majority of farmers/growers only use pesticides when needed. Although there I feel is an issue with recently withdrawn active ingredients being withdrawn such as chlorothalonil has increased the rate in which other fungicides are used due to them not being as effective. We live and operate in a difficult climate, so we need to hold onto the chemistry we have. Currently the tools we have are not adequate to achieve maximum yield. Pesticides are extremely expensive and return on investment has dropped off. I feel the Irish/EU leadership is about to drive off a cliff based on the ethos and ideas they are following. All the objectives from these directives are good but with little alternatives in place we are going to see huge issues for Irish agriculture. Most unsafe issues with pesticides come from the amateur end of the market. Agriculture is our biggest industry, and it needs to be protected and developed, not be squeezed of vilified for something that is not forward thinking.</p>
88	<p>I strongly object to the proposed pesticide cut of 50%. This proposal, if enforced, will have irreversible negative consequences for the tillage sector in the Republic of Ireland.</p>
89	<p>I wish to inform you that I strongly object to the proposal to cut pesticide availability by 50% by 2030, due to the fact that it would result in tillage farming being unviable in our wet climate.</p>
90	<p>Over the last 40 years arable farming has changed dramatically coupled with plant breeding and pesticide development. The consequences were, yields improved, and varieties had a shorter life span due to their natural ability to fight ever evolving diseases, particularly in cereals. The climate within which these crops are grown is the biggest reason for pesticide use and the prevalence of these diseases. Wet climates in North-western Europe like Ireland are the outlier where the incidence of theses disease have prevailed more so than most, if not all European countries. These short straw varieties therefore needed more crop protection in order to maintain acceptable yields. The diseases in question were Septoria in Wheat and Net Blotch and Rhynchosporium in Barley. Many products were used in the attempted control of these disease, and some were proven to be inadequate due to resistance and the evolution of these wet weather diseases. Without their use, yield and family farm income would have been dramatically reduced as output dropped. As a further consequence of our wet climate, grassweeds incidence in all arable operations have been rising with seed crops and commercial crops now being jeopardised. Without existing herbicides and further developments in herbicides the following weeds will be endemic in cereal crops; Blackgrass, Brome spp; Italian Ryegrass, Annual Ryegrass, Rats Tail Fescue. The product development exists because the problems are present and serious! The Potato Industry is facing ever evolving blight strains developing across Europe with potential for output losses in wet seasons. The use of current and future fungicides is currently the only means to guarantee crop output and maintain farm viability. The farmers of Ireland and Europe use approved pesticide to aid producing staple foods like bread and vegetables. This food security is vital for our way of life! Without food that is nutritious and affordable we lose the basis of humanity.</p>

91

Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements

	<p>imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
92	<p>I am against the reduction by 50% use of chemical herbicides. We do as tillage farmers use the best technology and agronomist advice to minimise environmental contamination and ensure that the crops are being sprayed at the correct rate and timing. Our equipment is tested and certified for use and we as operators have certification as well. Given that we grow crops in Ireland with a Wet/damp humid climate, to reduce pesticide use by 50%, would have a detrimental effect on crop yields and quality. A 50% cut in pesticides would reduce the efficacy of the remaining or usable chemicals and would also shorten the lifespan of the pesticides thus increasing the rate of disease / weed growth, reducing yields and lowering the quality of our crops. Reduced yields would increase the financial burden on farms, it would impair the chances for crops to meet Industry standards for premium products, e.g. (Malting Barley and Food grade Oats). If we want to revive our Native Flour Milling industry in Ireland and help minimise our Carbon footprint, this reduction will have a devastating impact on the quality of the grain needed.</p>
93	<p>I would like to strongly object to the reduction of pesticide use on tillage farms for example how will we control rodents and such like, also aphids on the growth of tillage crops i.e., grain.</p>
94	<p>I am writing with great concern on the proposals under the new EU regulation for the Sustainable use of plant protection products. I farm in the northern part on the Island of Ireland with wet unpredictable weather patterns on the Wild Atlantic Way. Pesticide use is essential for our ability to produce yields on our tillage acreage to make a living. The north and west of Ireland were recently downgraded to a 'lagging region' by the European Commission after becoming significantly poorer relative to the European average over recent years. This confirms that current and past EU policies have failed to support the income of people working and living in rural Ireland, where the main sources of income either come directly or indirectly from Agriculture or Aquaculture. I have the link to an article as follows: https://www.businesspost.ie/news/eu-downgrades-irelands-north-and-west-to-a-lagging-region/ The introduction of the measures from the 2009 Sustainable use of Pesticides Directive have to date only increased costs, yields have plateaued, and pests/diseases have increased without any increase in revenue thereby making it less attractive to produce crops. There are a few things that should be considered before the implementation of this new regulation namely the following: Genetically Modified (GM) seeds – if the EU would approve GM crops this would remove the need to use a proportion of pesticides using blight/ virus resistant potato varieties or Septoria resistant wheat varieties, Alternative treatment methods to reduce viruses or diseases in plants before the removal of any pesticides on the market, Banning the importation of raw materials</p>

	<p>and products from countries that allow for GM crops or crops grown from pesticides currently banned in the EU. If the EU continue the path for more organic raw materials and products the new regulations will only widen the gap between EU produced raw materials and globally produced ones resulting in further inequality at farm level, Yield outputs are considerably lower for organic farming methods compared to conventional farming methods; this is then compounded by a 25% target organic area for the EU by 2030. Farm yields will be further compounded by the reduction of fertilizers usage and the reduction in pesticide usage as proposed in the new regulations, The impact of having less effective chemistry (modes of action) in pesticides will allow for the build-up of resistance in diseases to those active ingredients that are prescribed in the new regulation. I wish to make a point in relation to food security. I remember at a tillage meeting about ten years ago where it was recalled that back in the 1960s there was an acre of productive land to support each person on the planet, in the early 2000s this had reduced to half an acre per person and was then estimated to reduce to a third of an acre per person by 2030. This point is further exacerbated by the following: The loss of productive farmland to energy production (bio, solar, wind, etc) in this country with our insatiable appetite for energy going through the roof due to data centres, electric cars and the like, We have a further loss of farmland due to the expansion in the forestry sector both for energy and environmental reasons, We are constantly losing farmland for roads, building development and recreational purposes, Researchers in Canada found that if we all followed the United States Department of Agriculture diet then there would not be enough land in the world to produce it, I have a link to the article: https://www.cbc.ca/news/health/usda-guidelines-diet-agricultural-land-use-study-1.4781291 Does the Government of Ireland and the EU have a short memory in relation to food security for Ireland that over 150 years ago there was a potato famine which was brought about by plant disease and then the inability to produce any other food source by the common Irishman. Do we really want to have a repeat of this but possibly on a global scale? In regard to increasing the biodiversity and increasing the number of pollinators on our farmland we have lived in harmony, especially with the bees (having six or more beehives at any one time on the farm), for over 15 years now. We have seen no adverse effects on the bees due to the pesticides that we currently use. As guardians of the land, we do our utmost to care for it and ensure its future for our children. In conclusion, I believe that the pesticides that we currently use have come through rigorous tests for exposure, hazard, and risk assessments. In the past, I have welcomed integrated pest management (IPM) and I will continue in the future to look forward to furthering development in this area. Each EU member state has its own pest and disease challenges and the level of risk these bring to food production within their unique climate. As a result, I believe every state should have the authority to keep the pesticides necessary to produce crops in a safe and environmentally and sustainable way.</p>
95	<p>I object to the proposal to cut pesticide availability by 50 percent by 2030. I feel that I am growing crops for food. This is very important, and I feel that I would not be able to get good yields if I am not able to look after the crop. I have no problem doing measures to help the environment.</p>

96

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97	<p>I would like to have on record my concerns about the proposed Sustainable Use of Pesticides regulations, in particular the legally binding reduction of 50% in pesticide use by 2030. There needs to be a guarantee that the implementation of these new regulations will have no negative effect on yield. The science has to show that weeds, plant pathogens and fungi can be controlled successfully using alternative techniques, on large farm scale. I don't think it can at present. Please prove to me differently, before implementing such an aspirational reduction. When yields fall, the tillage sector will suffer, with margins becoming tighter than they already are. If they do, this will lead to increased imports and price. Consumers do not want this.</p> <p>The restrictions and regulations (Sustainable use of pesticide directives 2009) that already exist have been welcomed. They are rigorous and control the application and overuse of pesticides. Farming is a tough industry and, in order, to ensure European food security, needs all the weapons in its armoury to be competitive and profitable. The agriculture industry understands its responsibility to the environment and human/animal health. By employing best farm practice this can be achieved. Each farm and farmer are unique. Policy makers must develop an understanding of farming decisions and management if policy is to be effective and to encourage the adoption of practices that will improve environmental stewardship.</p>
98	<p>I wish to note my objection to the proposed ban on pesticide use and believe that weed control would be impossible to control without some pesticide use and a result would impact farming so I hope that any restrictions on pesticide use will be amended and allow for safe use of such products.</p>
99	<p>I strongly object to cutting sprays in grain crops as it will affect my livelihood.</p>
100	<p>I have the following submission on the SUR proposal. The climate within which these crops are grown is the reason for pesticide, wet climates in Ireland means we are at great risk of disease. In order to maintain acceptable yields and control weeds and diseases pesticides are required. If this ban is imposed, I will have a major challenge to produce quality crops, maintain yields and meet the requirements of my contracts. We in the tillage sector have suffered heavy losses over the years and the proposed ban will be detrimental to my customers and my family farm income. I am currently using some biological methods but even having undertaken several courses at a cost, I still at this time can't produce what is required without the pesticides. I use approved pesticides to aid the production of foods and animal feed. I will not be in a position to continue my business if these new regulations are brought in.</p>

101	We strongly object to the proposal to cut pesticide availability by 50 per cent by 2030. It is outrageous.
102	I object strongly to any reduction in the use of pesticides for the growing of cereal grain.
103	<p>Ireland is a food production country. Agriculture is and will remain a core sector for our country. Despite the importance of Agriculture, and the many weather-related challenges faced by Irish Farmers, Ireland's use of pesticides is low and declining over time. Ireland uses 32% of the EU average application of pesticides per Hectare of utilisable agricultural area. Over time 2011 - 2020 usage per hectare has declined by over 20%. These statistics are validated by Eurostat, and demonstrate the responsible approach taken by farmers, advised by the network of professional advisors to minimise the use of pesticides. Against this track record, Government in Ireland have a stated objective to increase crop production so an adequate toolbox must be available for farmers to effectively protect their crops from diseases, weeds, and pests. Rather than imposing arbitrary targets, coupled with overburdening administrative requirements, and an undifferentiated approach to sensitive areas, as proposed in the draft SUR published in June 2022, on member states who are demonstrating a responsible approach to reduce pesticide use, the EU Commission should focus on improving the toolbox available to farmers. Access to new products (both conventional and new bio pesticides), new technologies in plant breeding and precision agriculture need to be prioritised. Integrated Pest Management (IPM) depends on the availability of alternatives to pesticides, and progress has been slow. The EU Commission should speed up all evaluations. Consideration should also be given to the positive contribution pesticides can make to tackling climate change by lowering greenhouse gas emissions through carbon sequestration. Non-inversion tillage and the various associated minimum tillage approaches are enabled through the use of herbicides. Without these tools, conservation tillage will no longer be possible, so arbitrary reduction targets are not appropriate. Recent events have demonstrated EU external energy dependency. Whilst the EU may not yet view food security similarly, it should be very cautious of the warnings contained in the impact assessment of the draft SUR, which state "Professional pesticide users will face additional costs for record keeping and for advisory services. Banning the use of chemical pesticides in sensitive areas may result in lower crop yields from those areas. The pesticide industry may see reduced demand for their products. Higher production costs may also trigger a rise in food prices for EU consumers. EU reliance on imports such as cereals may increase" Suggestions that CAP funds can be used to compensate for the impact seems to imply that there is capacity in CAP to accommodate these costs, but our understanding of the demand on CAP funding suggests otherwise. In Summary, please Recognise the pesticide usage records of member states and do not apply arbitrary reduction targets in the absence of other tools to control weeds and diseases, Acknowledge the role of pesticides in managing and reducing greenhouse gas emissions, and don't reverse the progress achieved to date, Ensure that any prohibition on the use of pesticides in sensitive areas is appropriate and does not unnecessarily damage Ireland's: 1. Agricultural Output by preventing crop growing on arable land, 2. Tourism sector by depriving sports and leisure ground of necessary maintenance tools, 3. The public realm by depriving Local Authorities, Road Maintenance, and Public Transport of authorised pesticides used for ground</p>

	<p>maintenance. Do not force through regulation that will increase Europe's reliance on imported cereals. We already see the dependence Europe has created in the energy sector on imported sources. Please do not create the same situation for food.</p>
104	<p>I object strongly to any reduction in the use of pesticides for the growing of cereal grain.</p>
105	<p>The Irish tillage sector has many challenges. It has been widely recognised our tillage area needs to increase, the provenance of our food and feed is vital to reducing carbon footprint, we must manage yield and area threatening grass weeds and herbicide resistance, all while adhering to stringent rules and conditions governing farming practices and tilling in particular. Several aspects of the SUR proposal are of grave concern to the tillage sector. We are responsible for producing Irish Certified Seed, which is the most important input in crop production. The seed itself from its genetics to its targeted coating of PPP and nutrients in some instances can contribute to reduce chemical inputs during the growth stages after sowing. Some of the general objectives of the SUR are necessary, but the implementation of some is not workable and needed joined up thinking across several areas of policy, regulation and supply chain. The aim of proposals is to achieve pesticide reduction targets from F2F and promote the use of IPM and non-chemical options. Ireland uses 32% of the EU average application of pesticides per Hectare of utilisable agricultural area. Over time 2011 - 2020 usage per hectare has actually declined by over 20%. These statistics are validated by Eurostat, and show the responsible approach taken by farmers, advised by the network of professional advisors to minimise the use of pesticides. Efficiency benefits everyone. The target on reduction of pesticides by 50% cannot be implemented without consideration – We are seeking an increase in tillage area so volume target reductions are inappropriate in a country covered by a majority of grassland. A move to minimum tillage must be balanced as this is dependent on glyphosate at present. Ploughing can be part of Integrated Weed Management to reduce chemical inputs but this conflicts with some of the new measures aimed at reducing tilling. Huge effort went into introducing criteria for product assessment. Chemical development goes through robust and rigorous testing before approval and registration. Chemicals in farming must be treated equally to those in other elements of society also to ensure fairness. The impact of the cut must also be measurable and not just a random target to reduce the quantity sold. To reduce chemical inputs, we must give farmers every opportunity to succeed with growing equally viable crops as the world must feed more people from the same or diminishing land base. The proposals seek to reduce the use of what it terms more hazardous chemicals by 50%. Random targets on the reduction of volume should not be implemented until possible alternatives are made available to farmers. These include e.g., improved plant breeding technologies to develop varieties which can mitigate against chemical losses and other factors such as climate change. Proper accessible regulation around New Breeding (Genomic) techniques such be accelerated at EU Level. Prohibition of Use in Areas. The proposed prohibition of use on areas stated as sensitive, or within 3m of same, is a concerning aspect of the proposals. A blanket ban could have significant unforeseen consequences into the future. Pesticides are used in farming, but also in public areas for maintenance and upkeep of infrastructure and amenities. In these sensitive areas, it may be more sensible to initially prohibit the use of pesticides by users</p>

	<p>who neither understand the products nor are not trained in their use. Timing of application in some sensitive areas could be considered E.g public access times etc. Also, as other non-synthetic chemical or bio products become available their application could be considered. We do feel sensitive areas should be governed by each nation a local basis and reflect the use of lands in such areas. While the proposed derogation to a 100% reduction to help control the spread of a quarantine pest or invasive species is necessary and welcome, the provisions must be practical and not block the use of the derogation. Application equipment. The SUR proposes to have a new central electronic register of sprayers and other pesticide application equipment (PAE), on top of equipment testing. While it is desirable the state has knowledge of all users, introduction of such measures must come with capacity for implementation and not mirror the NCT, where you can be non-compliant through lack of resources on the testing element. All those in the crop production and seed production industries who are professional operators have a vested interest in ensuring the equipment is in working order and applying optimum rates to save on cost. Advice relating to pesticides - DAFM must establish, oversee and monitor a system of independent advisors who will provide advice to users of pesticide and also on IPM actions.</p>
105(a)	<p>These independent advisors must be free of conflict of interest and not in any way benefiting from the sale of products. This is a virtually impossible considering we have relatively few independent advisors or dedicated consultants who could be regarded as 'independent'. While this independent advice is only required once per year so merchant or ag chems advisors may continue to give in-field advice for the bulk of the growing season, the availability will still be way below demand. Other options must be considered for its delivery such as group, seminar and other settings, should the proposal be included in the new regulation. The scale of farms with crops in Ireland could not support independent advice on every farm. We must be very clear again that regulations must be implementable. Many of our member companies are struggling to find agronomists at present and there is no evidence of a big increase in qualified individuals coming on stream in the coming years. The nature of the sector here means many of our agronomists are also farmers and provide their own advice. Many of our seed companies employ their own agronomists to advise in house and at farm level. The proposed need for specific advisor training every five years again must be of benefit to those involved and not a tick the box. Many of our members run training events annually and these form part of the current CPD in operation. It is timely and efficient. Events distribute information widely as they are open to Farmers, Professional users and advisors. It must also be noted that IPM Measures are different depending on the area, the cropping plan and the species in question. The proposals need to be future proofed and not require regular review. Targeted application with minimum impact on surrounding soils, air and water must be prioritised. The use of PPP's and fertiliser for seed treatment will reduce later more widely broadcast inputs. Significant research of alternatives technologies and options for Plant protection needs to be invested heavily in and availability fast tracked, to give a hope of meeting any targets. Plant Breeding is a priority for our sector and we have lobbied for its regulation in such a way as to make it accessible and commercially viable. Things that threaten the</p>

	<p>viability of the sector and increase cost and hassle for farmers and stakeholders, give every opportunity for an increase in livestock production as ground goes into grass. This is not an objective we want to see achieved. Less land in tillage means increased imports of feed, increased carbon footprint for livestock and dairy production. In a world now demanding full transparency of a products supply chain and carbon footprint from farm to fork, this will not help these sectors in the long run. Finally, the regulations as proposed will decrease yield, quality, availability with variabilities across species and areas. With the area to organic getting major exposure and incentive, area and yield will yet again decrease. Food security must be considered in assessing the impact of the proposals for the EU as a whole.</p>
106	I object strongly to any reduction in the use of pesticides for the growing of cereal grain.
107	I object strongly to any reduction in the use of pesticides for the growing of cereal grain.
108	<p>We would like to make some comments and have our views known in relation to the proposed SUR and thank you for the opportunity to make them.</p> <p>Agriculture and food production is a key element of the Irish economy providing many jobs in food production at farm level and in food processing. This amounts to a valuable source of food for the Irish population and valuable exports. For modern agricultural production PPP's are an essential tool which farmers must have. In addition, our climate leads to problems with wet weather diseases and almost year-round weed growth. Despite this Ireland's use of pesticides is relatively low and declining over time. Ireland uses 30% of the EU average application of pesticides per hectare of usable land. Over time 2011 - 2020 usage per hectare has declined by over 20%. These figures demonstrate a responsible approach taken by farmers. Ireland has a stated objective to increase crop production in the future and if the SUR is adopted as indicated it will seriously reduce our ability to do so. An effective toolbox must be available for farmers to protect their crops from diseases, weeds, and insect pests. We feel that the targets of 50% if implemented will seriously impede our ability to grow crops effectively. We feel that a better approach to help growers would be a focus on improving the toolbox available to them. Access to new products, both conventional and bio pesticides, plant breeding technology and precision agriculture need to be prioritised. Integrated Pest Management depends on the availability of alternatives to pesticides, and progress has been slow. The EU Commission should put in resources to speed up all evaluations. Consideration should also be given to the positive contribution pesticides can make to tackling climate change by lowering greenhouse gas emissions through carbon sequestration. Non-inversion tillage and the various associated minimum tillage approaches are enabled through the use of herbicides. Without these tools, conservation tillage will no longer be possible, so arbitrary reduction targets are not appropriate. A reduction in the use of PPP's will inevitably lead to an increase in food production costs which in turn will also trigger a rise in food prices for EU consumers. EU reliance on imports such as cereals will increase hugely. This cannot be a good thing. In addition, an increase in our reliance on food and feed from outside the EU risks importing products which may not be grown or produced to our EU standards. We would ask you to recognise the progress that</p>

	has been made to date in reducing pesticide usage in Ireland and to recognise the importance that PPP's play in food production and in reducing greenhouse gas emissions. A target reduction of 50% is a step too far at this point in time.
109	Glyphosate a proven carcinogen should be banned. MCPA, a known water pollutant should also be banned. Hence very few farmers who do/did a lot of spraying live over 60. Farmers will accept a ban, if adequately compensated. Farmers should be paid to change to controlling rushes in an environmentally friendly way. Ban MCPA but pay Farmers to mulch or cut rushes. Rushes have to be controlled or they spread rapidly.
110	Pesticides have given the world and Ireland quantities of food to feed a growing population. The green revolution which included semi dwarf genes, fertiliser and pesticides have allowed good yields with very little crop losses. As older pesticides were withdrawn newer cleaner ones have replaced them and this has been very welcome for both operators and the environment. Now any future withdrawal of pesticides might not mean there are any replacements and this is already happening. The loss of chlorpyrifos means that as a grower/agronomist I have no real control of leatherjackets and have to let them eat crop areas. There is now no control and the levels will build. This may result in complete crop loss and with the high establishment costs involved in cereal growing this is an unacceptable risk to continue. Similar will happen with diseases like ramularia with the loss of chlorothalonil. Other diseases and pests will have no control if we continue to loose active ingredients with no replacements. Everyone wants a clean environment and wholesome crops, but everybody needs food and there is a balance. BYDV tolerance is a great breeding tool in controlling BYDV without pesticides and it works. Until there are meaningful replacements to any pesticides withdrawn, arable farming will not be able to continue as the losses that growers will incur will be too much and as said the risk of growing expensive crops will be too great. Weather and price fluctuations are a huge risk on their own. Transgenic crops, gene editing are all tools that will help us and many other technologies will come but they have to be allowed. At present we can all eat transgenic crops as they are imported but we are not allowed to grow them, this will have to change. We are relying more and more on imported food. Pesticides that are banned in Ireland are still in use from countries that we are importing food from- Is there any sense to this? The crops we grow, wheat, barley, oats, oilseeds, beans, etc are not native. Ireland would revert to woodland and scrub if it wasn't farmed - this is native. Growing these non-native crops to feed ourselves therefore need tools to protect against weeds, pests and diseases and while future breeding may help in reducing our dependence on pesticides, at the moment there are no alternatives for much of the pathogens that attack the crops we grow. Agronomists, whether they are independent or work as or under merchants are vital to the industry. Like most professions they are becoming rare and important to keep what we have. The use of precision machinery, knowledge, economics and good farming practice will ensure that only as little as possible is used at all times.

111	<p>The proposal of the Department of Agriculture will wipe out the cereal sector! Cereal farmers will end up growing grass for the dairy sector! As happened before (with potatoes) the majority of farmers will be involved in one section of food production (all eggs in one basket) this will leave us (as an island) very exposed to costly imports and price variations for replacement grain. The food production sector in Ireland should be a mixture of crops & animals Your proposals will not achieve that & will lead to the loss of cereal growing expertise.</p>
112	<p>I do not want to see pesticides banned abruptly as we will be put out of business. I have good knowledge and appreciation for nature being involved in all REPS schemes and GLAS for several years and hope to get into the present ACRES scheme. Pesticides should not be banned until viable alternatives are available.</p>
113	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission’s proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive areas” includes the following description: ‘...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.’ We assume that golf courses are included in the above description under ‘recreation or sports grounds’. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP’s will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP’s could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP’s. We support the proposition that golf be specifically excluded from the definition of “Sensitive Areas” for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals’ ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP’s on golf</p>

	<p>courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
114	<p>I am writing to put forward my position regarding the proposed new amendment to the Sustainable Use Directive. This is unfortunate given that within the EU and Ireland there is currently a focus on the importance of grains from a food security point of view, and in order to help Agriculture meet its climate targets. Introduction and what I do to carefully manage the use of pesticides on my farm. I am a firm believer that we should use inputs only where required both from an economic and an environmental perspective. As such I used Integrated Pest Management for long before it became a well-known term. This involves assessing the problem or potential problem and acting accordingly. I may omit certain pesticides from my input program depending on the risk. For example, in a dry year I may reduce my fungicide application or omit applications altogether. I also use low drift technology to reduce the potential for drift when applying pesticides onto non-target areas. My sprayer is tested routinely to ensure effectiveness and under current regulations I must get it tested on a 3-year basis. Records are and must be kept of all pesticides applied, stored and purchased. Recently I have invested in GPS technology to enhance my sprayers capability. Pesticides used must go through rigorous testing before they are submitted to the EU market and are removed if a potential risk of environmental damage is identified. While this is a positive it can have negative efficacy as we are tending to rely on a smaller pool of active ingredients. What happens if we use no pesticides. If we were to use no pesticides what would happen. As it currently stands crop production in Ireland would not be feasible for several reasons. The potato famine in Ireland of 1845 should serve as an example of a shock that has been avoided in recent times with the use of pesticides. To this day there are very few varieties of potatoes that do not suffer from potato blight. Before the advent of modern chemistry copper sulphate was used for</p>

potato blight, which is significantly more toxic than many modern chemicals, yet it remains in use in organic production as it is seen as a more naturally occurring chemical. Given our climate we suffer from severe fungal disease pressure on crops. Many chemicals used are for food safety reasons. A typical head application on winter wheat in Ireland is mainly to prevent Fusarium, a fungus which will increase the risk of Mycotoxins which are present in a lot of grains in Europe. Mycotoxin consumption is considered by the World Health Organisation to be a risk to human health. Many crops will fail in the absence of suitable pesticide intervention as some diseases if not controlled will result in elimination of the plant. Current proposal issues: 50% cut in pesticide use: Within the proposals a 50 percent cut in pesticides is proposed. The 50% reduction target by 2030 if made legally binding could prove very problematic as it takes no account of the availability of alternative control methods. There is also very little evidence of a scientific basis for setting this target other than a number plucked out of thin air. Nitrates vulnerable zone: As Ireland is classed as a nitrates vulnerable zone it could in effect mean that all pesticides would be banned in Ireland from 2024. Irelands environmental performance on pesticide exceedances should not be based on its nitrate criteria. This shows a lack of scientific competence in setting criteria. Sensitive areas: A proposal to prohibit plant protection products within 3 meters of sensitive areas would be problematic in a country such as Ireland with a small field size. In a typical 4-hectare field with an 800 meters of boundary hedges this equates to a 6% loss in cropping area. Further if the hedge is widened to increase biodiversity, then it would appear the working area must be reduced. This is irrespective of the chemistry used or application method and the potential risks. Advisors for professional users: It is proposed that all users should consult with an independent advisor once every three years. As advisory services are often aligned with suppliers of pesticides it would be much more beneficial to have professional users engage in a low level of continuous education, similar to that currently required for pesticide advisors under current regulations. This would result in a higher level of understanding of current Integrated Pest Management measures and be more beneficial than the box ticking exercise proposed. Increased emphasis on biological alternatives: There are currently very few if any biological control options available to tillage farmers, so it is unlikely that this is viable in the short term. Conclusion While I have mentioned only a couple of the concerns which are currently apparent, I'm sure more issues will come to light in time. It is incredibly important that we follow sound science which takes a balanced approach if we wish to have a sustainable and safe food supply in Europe. Current legislative proposals seem to ignore the positives plant protection products have delivered for society and the implication of famines which have been prevented by modern chemistry. The legislative proposals here are clearly going down the road of eliminating pesticide use while ignoring the potential consequences of doing so. We must ensure that measures brought in are scientifically sound, workable, and practical if we want to ensure a safe food supply into the future. To not do this threatens our ability to sustain our food supply.

115	<p>I want to make a very brief submission about the pesticide proposals. In my humble opinion, I consider the use of certain pesticides as absolutely essential at present for the growing of cereals in the temperate climate that we have here in Ireland where relatively high yield potential conditions are usually accompanied by a range of naturally occurring plant diseases. Left untreated these diseases can have a devastating effect on both yield and grain quality to such an extent that commercial growing of cereals would consequently become unviable. I consider the use of certain herbicides as essential to allow the growing and harvesting of cereal crops. Left unchecked certain fast-growing weeds can completely overpower a cereal crop and even a small infestation of weeds can render a crop difficult and at times almost impossible to harvest as weeds unlike cereal crops tend to wrap around augers on combine harvesters causing blockages, excess wear and tear and poor-quality grain samples. Yield loss also occurs as not all grain will get to the grain tank when sieves become blocked or partly blocked with weeds.</p>
116	<p>The possibility of a further reduction of "50%" to our currently available chemistry, which is vital to the sustainability of our family farm, is of extreme concern to me and, would impact severely on the viability of our farm. Our farm grows a rotation of various tillage crops. The financial viability of our farm depends on achieving both consistent high quality and high yields from our crops. Our location in the south of the country ensures high rainfall, which is beneficial to crop growth but unfortunately, also results in high fungal disease pressure. We operate a very stringent IPM practice on our farm. Any chemicals we use are first prescribed on a field-by-field basis by our local Agronomist. Only approved chemistry is used, all of which are applied using "section control", ensuring gps accuracy. All chemical applications are recorded and documented as required by our produce purchasers (Dairygold). We can only continue to achieve viable yields and quality through the prescribed use of the chemistry currently available to us. In the short term we need to protect the currently approved chemicals we use. This requires the availability of more than one chemical to control any particular disease in order to preserve the effectiveness of the chemistry and, prevent fungal disease developing resistance to any one particular chemical. This will avoid the need for higher doses of chemicals to control any particular disease. I have no doubt, if left uncontrolled, the wet weather fungal diseases, would decimate our crops. The result being lower yields and failure to achieve the required quality standards. The financial consequences would be unsustainable for our farm. Our best hope for future viability is, the continued development of new approved chemicals and, the use of new plant breeding techniques which will accelerate the development of new disease tolerant crop variety's, which will help reduce the chemical applications required to keep our crops healthy. Over the last 4 years, we have increasingly practicing noninversion tillage and cover cropping on our farm. Our intention in doing so is to capture and retain carbon, while also improving our soil health. This practice would not be possible without the responsible use of Glyphosate which allows us to reduce subsequent expensive herbicides in the crops we grow. In short, Glyphosate, plays an essential role on our farm. Glyphosate allows us to reduce the use of chemical herbicides used in our growing crops. Glyphosate allows us to practice noninversion tillage which along with cover crops, help our soil retain and capture carbon which, in turn, improves our soils health. I strongly</p>

	believe in the importance of ensuring the health of our citizens and our environment. I also believe the use of accurate, proven science will help deliver this.
117	Glance through what I assume none of you in DAFM have actually nothing to do with only implement orders while the rest of the world food producers have not been held to the same sword. We are not ignorant to climate change and know we must do.
118	<p>We need proportionate regulation of GE technology at EU level otherwise our farmers will be deprived of this potentially revolutionary technology! Possible solutions to replace plant protection products for tillage farmers in Ireland. Currently, farmers plant 190 million hectares of GM crops globally, (soybean 50%, maize 30%, cotton 13% and canola 5%). This equates to a surface larger than 22 times the land mass of Ireland. I wish to point that the only GM crop cultivated in the EU (mainly in Spain) at the moment is GM Bt maize that is tolerant certain insect pests. A 2018 study, by (Brookes, G and P Barfoot), assessing the global economic and environmental impacts of GM crops for the period (1996-2016), showed that the technology has reduced pesticide spraying by 671.2 million kg and has reduced environmental footprint associated with pesticide use by 18.4%. The technology has also significantly reduced the release of greenhouse gas emissions from agriculture equivalent to removing 16.75 million cars from the roads. Despite the published advantage of using GM technology, the Irish Government announced in July 2018, the prohibition/restriction of the commercial cultivation of genetically modified crops (GMO) in Ireland. Making this decision, the Minister for Climate Action and Environment stated, "it was a very significant development and that it was critically important that Ireland takes whatever steps are necessary to maintain our GMO cultivation-free status, which is a key element of our international reputation as a green, sustainable food producer". This decision will not allow Irish farmers or consumers to obtain the benefits of innovative agricultural tools, including GM technology in order to combat the challenges of climate change and food insecurity. It is ironic and somewhat contradictory that Irish farmers rely heavily on imported GM crops for animal feeding purpose, but, due to this decision, Irish tillage farmers will not be allowed to cultivate GM crops that could be critical to the future of Irish agriculture and to their own farms. Most of the GM crops that are cultivated worldwide, for example soybean is not suitable for cultivation under Irish climatic conditions but who knows what might happen in the future with climate change! However, GM potatoes tolerant to the late blight fungus might be useful for Irish agriculture. In a 2012 publication, scientists documented a dramatic shift in the population of the potato late blight pathogen (<i>Phytophthora infestans</i>) in northwest Europe in which an invasive and aggressive strain has emerged and rapidly displaced other genotypes. This could be the pathogen adapting to climate change. Scientists at Teagasc's Oak Park crops research centre in Carlow have also recorded the emergence of highly aggressive strains of the blight disease that have also been exhibiting levels of fungicide resistance over the past 10 years. The GM potato field trials results which were carried out over a number of growing seasons by Teagasc and the results (2018) showed it is possible to reduce the need for fungicide inputs by 80 to 90% by using a single source of genetic resistance in the GM potato variety. In essence, one gene was taken from a wild potato called <i>Solanum venturii</i> and it was transferred (using GM technology)</p>

	<p>into a commercial variety called Désirée that gave the plant late blight resistance. Using GM technology, breeders are accelerating the plant breeding process (from 15 to 3 to 5 years), in effect taking a gene from a potato and transferring it to another potato in a process called Cisgenesis. As I stated above, spraying is a necessity for tillage farmers (multiple times during the growing season) at present but if plant protection products are reduced by 50% in accordance in line the draft Agri-food 2030 strategy, there has to be a viable alternative to the use of chemical sprays. Based on Teagasc's research, GM-bred potato varieties may provide that solution for Irish farmers? I suggest that this is an example of sustainable agricultural production where farmers are less reliant on fungicides. In conclusion, we need to proceed with caution as the EU GD policy might affect food security in Ireland and in the EU. Look what happened when the EU relied on Mr Puttin's gas/oil!!</p>
119	<p>I feel that the proposals in place for the reductions of pesticide control and the banning of glyphosate to the industry of tillage and cropping farming is detrimental in my view and is more lobby group driven more than scientific basic .as a passionate farmer I am driven and open minded to changes in most policies of agriculture and of course I strive every day in my work to be maintain a healthy eco system for man and beast the banning of glyphosate and 50% reduction in chemicals isn't going to help the food security or food production in a time when food production and food security is of such importance as a passionate farmer I feel we can farm more of a better environmental impact with technology and good agronomy advisory decisions available to farming in a sustainable environmentally manner that will be of much greater benefit to mankind and as a farmer farming to the best of his or her practices is foremost of every farmer goals.</p>
120	<p>The days of spray should come to a close. My place is a bit untidy from not spraying for years but we get there every year, there's too many correlations between Parkinson disease, cancer and autism. Mechanical means such as hedge cutting and or topping should be the norm and safest for all. I did my sprayer course ago and renew my sprayer NCT, every 3 years as it is the first thing Bord Bia inspectors looked for both licences and rightly so.</p>
121	<p>Check this out on Agriland! https://www.agriland.ie/farming-news/commissioner-urges-caution-on-call-for-pesticide-ban/?utm_source</p>
122	<p>The current purposed sustainable regulation submission will have a major negative effect under the following points: 1: Reduce crop yields on Irish tillage farms 2: Impact on grain quality on Irish tillage farms 3: Reduce food security in Ireland. 4: Implications in IPM strategies on Irish tillage farms. 5: Loss of rural employment in Ireland for Agronomist. 6: Unclear how the recent purposed government plan to increase tillage area in Ireland is achievable if this is in-forced. 7: The purposed legislation would reduce our home-grown grain yields and increase our dependence on imported grains sourced from country's outside of EU who don't conform to the same stringent chemistry protocol and use GM grain. 8: Reducing capacity in Tillage industry will have long term effect on carbon sequestration.</p>

123	<p>While I am in favour of reducing the use of pesticides across Europe, glyphosate use must remain available to farmers who use regenerative agricultural practices. I believe the benefits of carbon sequestration in min till and particularly no till farming, compared to plough-based systems, far outweigh any negative effects of glyphosate. Without an alternative herbicide, regen farmers would need to engage in more cultivation, which would create more ground disturbance, releasing more carbon, and more diesel usage.</p>
124	<p>We wish to respond to the EU's proposed direction of travel to reduce the risks and impacts of pesticide use on human health and the environment. To this end Ireland and especially Irish Tillage Farmers with the aid of the Department of Agriculture and bodies like Teagasc have been leaders in achieving this goal up to now. Ireland has trained farmers and Agricultural contractors to apply Pesticides in a safe manner. They are classified as Professional Users of Pesticides and are registered with the Dept of Agriculture. Integrated Pest Management is to the fore for every Tillage Farmer and their Advisers; indeed, a pyramid table has been developed where pesticide application is seen as the last port of call when taking husbandry decisions to produce crops. However, while we acknowledge that this is at proposal stage only, we have outlined in this submission the key concerns we see at this point. We have deep concerns of the impact on our livelihoods if the proposals were implemented in its current form. The fact that we are known for our temperate climate and therefore high grain yields, leads to the reality that disease pressures are greater here than many other regions of Europe. This proposal would leave us Irish Tillage Farmers at a distinct disadvantage compared to our EU partners. Add to this fact the EU has already eliminated a huge array of pesticides since Ireland joined the EU, many of which are still used outside of the EU we are led to believe. These countries outside of the EU are our competitors when we are trying to sell our produce. This Proposal potentially will leave us completely uncompetitive where we have grains traveling from up to sixty different countries to Ireland yearly. We also worry that alternatives to pesticides have not been proven yet at farm level and potential technologies may not be made available to us in time due to the complex political arena in the EU. Our reputation as a group is known for working with parties to seek practical, workable solutions. We will endeavour to do the same in relation to this Proposal and this submission is the first step in achieving a satisfactory conclusion. Key Concerns: Loss of Yield and Economic Impact: Irish tillage farms can produce some of the biggest yields in the world. In fact, we can produce 50% more wheat per hectare than most of our EU counterparts and while our chemical use per hectare is very high, our chemical loading per tonne of grain produced is very low with an excellent carbon footprint profile. Our high yield capacity and favourable climatic conditions ensure that we are one of if not the most efficient producers of grain on a per ton basis in the world. Our ability to produce big yields needs to be given special consideration as a "one size fits all" approach across the EU would be unfair to Irish growers. Our cool temperate maritime climate provides the foundation for record yields but as a consequence also provides the challenge of growing crops with some of the highest disease pressure in the world. This means our chemical usage is high but on a per ton basis leaving the farmgate is quite low. Due to our high-cost base the only competitive advantage Irish growers have</p>

against our competitors on the world market is our ability to produce very high yields. This is what sustains our business model and what makes us viable as an industry. Any enforced reduction in pesticide usage across the EU will impact more on Irish growers than anyone else. Our yield potential will suffer, quality will deteriorate, and farm incomes will be decimated. The land base used to produce crops will most likely move to the dairy industry as the only viable alternative for food production. Dairy farming has a significantly heavier carbon footprint than crop production and will only serve to exacerbate the problem the commission is trying to solve under the green deal and will not improve it in any way shape or form. This is a huge unintended consequence of this draft regulation and one which we feel the commission hasn't fully thought out when formulating these draft proposals. A 30-40% yield reduction renders the Irish Tillage industry unviable. This will present a host of environmental, social and economic problems for Irish Society and policymakers for the next generation. We cannot let this happen.

Impact on Grain Quality: The proposed reduction in pesticide usage by 50% by 2030 will have a profound devastating impact on grain quality in this country. Our cool temperate maritime climate makes our growing conditions ideal for high yields and quality but also favours the proliferation of wet weather diseases such as Rhynchosporium, Net Blotch, Septoria and Fusarium. All these diseases have major negative impacts on grain quality and infected crops are deemed unsuitable for food grade cereals due to mycotoxin production from said diseases. The Irish market has developed exponentially in the past decade or so with a massive increase in demand for grain to the Irish Drinks industry. Our Oats are world renowned for their quality be it Porridge Oats for Flahavans, Gluten free oats for the US market or Connolly's Red Mills world renowned equine rations. It is now estimated that the drinks industry is worth 2 billion to the Irish economy and growing. Huge global brands such as Guinness and Jameson are synonymous with the quality and reliability of Irish barley as a raw material. In order to supply these premium markets, all grain must meet certain quality criteria in terms of KPH, protein, moisture, be free of mycotoxins and ultimately sweet and sound. Due to our climatic conditions which provide these global brands with their renowned authentic provenance and flavour the Irish drinks industry has boomed. It is now one of our most valuable exports and provides a host of quality jobs. The fact of the matter is without the current supply of Plant Protection products the quality of grain required by this valuable industry will be impossible to achieve. It will be a huge opportunity lost for the Irish Ag Food Sector, Economy and Society as a whole.

124(a)	<p>Food Security: In light of recent developments in world geopolitics since this proposal was first drafted the issue of food security has become a massive concern. The Russian invasion of Ukraine a key world food producer and major exporter into Europe has seriously exposed the fragility of the global food supply chain. Markets have spiralled in terms of input costs and the market price for grain. Record prices were achieved in 2022 primarily on the back of issues around Black Sea Exports. This has fuelled inflation to record levels and made food very expensive for the consumer. We are lucky as Europeans as we can by and large afford to purchase expensive food but most of the developed world will struggle to afford and secure expensive food. This will and has plunged millions of people into hunger. This surely flies in the face of the EU farm to fork strategy. The European union as the most developed trading block in the world also has a moral obligation to feed its citizens and not to contribute to world hunger on humanitarian grounds. The reduction in the yield which will inevitably come about as a result of these proposals will only serve to exacerbate these already very real problems. We must not forget that one of the four key pillars of the Common Agricultural Policy from its inception was “to provide certainty of food supplies to the citizens of Europe and to ensure that those supplies reached consumers at reasonable prices”. This draft proposal seems to directly contravene these stated aims by directly inhibiting farmers ability to produce high quality food for the people of Europe and beyond. EU policy seems to have drifted from food security to more lofty environmental aims. The environment and how our food is produced is clearly important, but the green agenda needs to realise that world population is continuing to increase with a 55% increase in output by 2050 required to meet global demand. The draft proposal also includes an aim to produce 25% of European food organically. Due to poor yield and quality from organics this will take 50% of the land area to achieve. This will accelerate food scarcity and increase inflation pressure. Surely the Commission can see that this will be a massive unintended consequence of the draft proposal. A fairer balance needs to be found between the green deal and ensuring food security for all the citizens of Europe than is contained in this draft proposal. It should be remembered that in order to move forward we must first and foremost refrain from prohibiting until alternative solutions have been found. It is only science that can respond to these challenges. Issues around Candidates for Substitution: We have significant concerns in relation to products that are deemed candidates for substitution. Candidates for substitution should mean what it says, and no active ingredient should be substituted until a replacement, which is at least as effective, is found. From our reading of the draft proposal this does not appear to be the case. It appears to us more like a list for removal with no clear alternative proposed. Take chlorothalonil for example, the most high-profile casualty from this list in recent years. It was one of the only multisite modes of action preventative fungicides, and most effective. It formed the cornerstone for resistance management in fungicide programmes for a generation. It was revoked in the EU (and granted an extension in Canada) in 2019. The replacement product for chlorothalonil is Folpet with a recommended rate 50% higher than chlorothalonil. It is also less effective than chlorothalonil, so the partner products also need to be used at 20% higher rates. With chlorothalonil, a typical T1 on Spring barley was 1.0l/ha chlorothalonil, 0.5l/ha pyraclostrobin and 0.4l/ha prothioconazole grams active/ha). With Folpet a typical T1 on Spring</p>
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	<p>barley is 1.5l/ha folpet, 0.6l/ha pyraclostrobin and 0.5l/ha prothioconazole (995 grams active/ha). This equates to a 40% increase in chemical loading yet still has reduced efficacy on the target disease in this case ramularia. If this is how the “candidate for substitution” process will work, we cannot see how the commission can achieve any reduction in pesticide usage under this proposed regulation. We feel there is a lack of clarity and joined up thinking around the whole concept of reducing pesticide usage under current guidelines. Any removal of active ingredients should be science based only. Political trade-offs have no place in food security issues. The removal of epoxiconazole in 2020 was forced by three dominant member states, even though evaluations of the active were not fully completed. Most remaining triazoles are candidates for substitution. This is a huge concern for Irish Growers as losing any more of them will accelerate resistance development and directly contradicts scientifically proven Agronomy best practice.</p>
124(b)	<p>Implementation and Interpretation of IPM strategies: We feel there is quite a large emphasis on Integrated Pest Management in the draft proposal. We are fully behind IPM and feel it is essential to sustainable crop production. We feel there might be a misconception as to how it is viewed and used currently and we wish to address that. The tone of the draft proposal suggests that farmers are disregarding IPM strategies and instead blanket overusing pesticides to produce crops. Nothing could be further from the truth in terms of everyday practice on Tillage farms in Ireland. IPM is the toolbox from which crops are produced and pesticide use is just one very important tool in that toolbox. Farmers always use a number of strategies prior to using pesticides i.e., crop rotation, seed and variety selection, cultivation practices, planting dates and planting densities. In recent years, farmers have wholly embraced cover cropping to reduce fertiliser usage, promote soil health and biodiversity and improve water quality. Significant investment has been made by Irish farmers in machinery to reduce reliance on ploughing and adopt minimum tillage, strip till and no till methods to reduce soil disturbance and carbon release. Pollinators are actively promoted on Irish Tillage farms and beehives are seen in most crops of oilseed rape. To adequately fight against pests and diseases a wide range of solutions is required, including pesticides. This will in turn aid resistance management. As stated in European and Mediterranean Plant Protection Organization PP 1/271 (3) Guidance on efficacy aspects of comparative assessment, if there is evidence of medium risk of resistance in the target organism, at least three modes of action are recommended. With evidence of high risk, at least four modes of action are recommended. Maintaining a broad range of crop protection modes of action is therefore essential to reduce the risk of resistance. Without pesticides there will be reduced availability of solutions, potentially an increase in resistance and in turn reduced yield. Pesticides are an integral part of a holistic approach to IPM on every viable Tillage farm. Clarity around Independent Advisory Requirements: The draft proposal contains some specific proposals around the use of independent advisors for plant protection products. It is stated in the proposal that there is a conflict of interest between plant protection advisors who also sell plant protection products. In the context of the Irish market this may present considerable challenges. Teagasc as our state advisory body do valuable work but lack the manpower to commercially walk crops to the levels currently</p>

	<p>provided by technical sales agronomists. Agronomists are a very scarce commodity as it is and many growers have long standing relationships with their merchant agronomist build up over years and in whose advice, they rely on and trust. The Irish market may be unique in this regard but relies very much on a collaborative approach between growers and commercial agronomists. The notion at policy level that many plant protection products are being used at excessive levels to boost sales is a falsehood. Many commercial agronomists often use reduced rates to try adding value to their customers in a competitive marketplace. The blanket approach is not taken and great effort is made to only use products as required. It is the weather and not commercial interests that dictate levels of usage of plant protection products in this country. We feel that the imposition of an independent advisory body would be counterproductive to best practice already in widespread use on Irish Tillage farms. Impact of Draft Proposal in the context of increasing Tillage Area: The government has committed in principle under the climate action plan to increase the area under Tillage by 50000 ha to 400000 ha. This has been done in the context of mitigating our carbon emissions as a country and using crop production as the vehicle which the country uses to reach its emissions reduction targets and combats climate change. We see this as a massive positive for our industry and wish to commend the government for realising that crop production can be part of the solution for all of society. However, we feel this draft proposal will directly scupper that stated aim. If crop production is unviable, then despite all the ambition to increase the Tillage area it will not happen on the ground. We need land to achieve this production increase and we are currently in the highest demand cycle for land in the history of the state. We feel the government has failed to calculate the unintended impact of the new Nitrates regulations. Dairy farmers are not reducing stocking numbers they are actively seeking to increase their farmed area to dilute stocking rates. They are willing to pay exorbitant land rents to achieve this and are being actively encouraged to do so by state bodies. Tillage farmers for which a significant portion of their cropped area is derived from rented land cannot compete at figures of up to 500 acres for land. This is in direct opposition to what the government wants to achieve under the climate action plan. So why is it being actively encouraged by Nitrates policy?? Farmers cannot be expected to produce crops at an economic loss. Without plant protection products we cannot remain viable as an industry due to inevitable yield and quality losses as a direct consequence of this proposal. We urge the government to reject this proposal in its current form and produce a fairer solution for Irish farmers and all food producers in the EU.</p>
124(c)	<p>Increased reliance on Imported Grain from Third Countries: The proposal states in its impact assessment that yield will be reduced and costs will go up as a result of its implementation. The direct result of this is a reduction of Irish and EU grain crops. If this proposal is designed to reduce the risk of dangerous chemicals in the food chain, then we fear this proposal will achieve exactly the opposite. As nothing has changed in terms of demand for grain, more unregulated imported grain will be needed as a reduction in regulated, carbon neutral Irish produce becomes less available to the market. Non-EU countries, from which we already import grain, use hundreds of active chemicals which have long been banned in the EU. The direct result of this proposal is an increase in imported grain and therefore an increase of dangerous active chemicals used on grain consumed in Ireland.</p>

Ireland is the highest yielding country in the world per acre for wheat barley and oats, this means that chemicals per ton of grain are lower than other countries. Pesticide controls inside the EU are already the best in the world, so why are we implementing a policy which reduces the amount we produce here? The unintended consequence of this policy is a net decrease of safely produced EU grain, to be replaced with less regulated 3rd country imports. This cannot be in line with the farm to fork strategy and in the best interests of EU Citizens. Reduced Tillage Capacity would have negative impact on Country's Carbon Reduction Targets: Irish grain is farmed with a very low carbon footprint. When taken into consideration against our EU counterparts and worldwide competitors it is probably the most carbon efficient grain in the world when all factors in production and supply chain are factored in. In fact, crop farming can be developed to be a useful source of carbon sequestration. Acting as a sink taking carbon out of the atmosphere and storing it into the soil. With the previously stated reduction in Industry competitiveness, we face as a result of the proposed SUR, more land will revert to dairy farming. Dairy expansion coupled with very strong Dairy markets has seen demand for land for Dairy farming explode exponentially. New Nitrates regulations in terms of stocking densities permitted mean dairy farmers must spread their herd over more land. Although the dilution of that sectors' footprint over more acres seems positive, if it takes carbon neutral crop farming out of production (due to impossibly high land rent rates for tillage farmers) it is counterproductive. SUR makes tillage farming less competitive and opens the door to more dairy and less tillage. As a result, this proposal will directly prevent us from meeting our stated targets under the climate action plan. The Irish Government have stated that their aim is to increase the area under tillage to reduce the overall carbon output of agriculture. Again, why introduce policy that stops us from meeting our climate targets? The change in land use from tillage to dairy would increase carbon emissions of the country, in addition to the added carbon emissions from an increase in imported grain. The carbon footprint for imported grain is as much as 24 times higher than grain produced in Ireland. Any increase in imported grain is importing huge carbon emissions. This increase undermines the credentials of Ireland's food and drinks sectors as well as animal feed. A broader holistic approach is essential here to evaluate the consequences of this proposal. Conclusion: In conclusion we feel that this proposed directive will have a hugely detrimental impact on tillage farming in Ireland. While we recognise the need for a reduction in overall pesticide use, we feel that this needs to be concentrated on other users of these products. The use for food production must be maintained or it will have a detrimental impact on both the tonnes per acre produced and the quality of the grain produced. Tillage farming is almost carbon neutral and is always improving itself environmentally by using the latest technology, farming practices, regenerative agriculture and IPM. If this directive is passed in its current guise, it will only have the effect of reducing the acreage under tillage farming rather than increasing it. In terms of our national carbon output this can only have a negative impact. We as the sole representative for professional tillage farmers in Ireland recognise the need to embrace the challenge of sustainable food production whilst underpinning our food security. Tillage farmers have always been at the forefront of Agricultural innovation. In that spirit we and our members wish to be part of the solution to reduce carbon emissions and produce safer more sustainable

	<p>food. Pesticides are an essential piece of this jigsaw, and we implore the Irish Government and the Commission to amend this draft proposal to ensure a fairer fruitful future for all.</p>
125	<p>We strongly disagree with the proposed 50% reduction in Pesticide use by 2030. Reducing our Fungicide Programme by 50% will automatically reduce crop yields of Wheat, Oats and Barley here in the West due to the fact that we can get such high rainfall during the growing season. Glyphosate is also a very important tool pre-ploughing to control couch (scutch) in rented and leased land. It is also essential for pre-harvest desiccation to even the ripening process and reduce moisture content. We fully believe that a 50% reduction will make grain growing uneconomic especially on rented land. We would seriously request the Department of Agriculture to resist this proposal otherwise tillage enterprises will be decimated for all time.</p>
126	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf</p>

	<p>courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
127	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in</p>

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129	<p>"Article 26 of the draft SUR requires each professional user to take advice from independent advisors at least once per year". The background to this proposal appears to assume that currently registered Pesticide Advisors are not offering independent advice and are commercially motivated to offer biased advice. This is simply not correct. There are pesticide advisors register with DAFM, who are our members for the purpose of maintaining continuing professional education compliance. These advisors are</p>

	<p>very often employed by farmer owned co-operatives, grain merchants, and suppliers of farm inputs. They offer a valuable service to growers, based on the advisor's educational qualification, professional experience, knowledge of growing and the management of pest challenges. Their advice is valued by growers, who themselves have significant knowledge and experience of their enterprises over many years. To imply, as the regulation draft does, that these pesticide advisors are biased, and somehow promoting expensive pesticides when other solutions are possible is offensive not only the advisors but also the growers. The commission should recognise that any advisor offering 'biased' advice would not survive in their role for very long. This regulation if passed would cast aside pesticide advisors who were not deemed to be independent. It is also important to recognise that Teagasc advisors, who would be deemed 'independent' already exist, and all growers are entirely free to choose where they seek advice today. However, if pesticide advisors, deemed by the regulation not to be independent were to be removed, grower choice would be reduced, and it is doubtful that the Teagasc service could meet the needs of growers. We perceive Article 26 to be ill conceived, based on an assumption that current sources of advice are not independent and therefore biased. We believe that the decision criteria underlying Article 26 are flawed, and that growers should be free to choose where to take advice in the future as they are today.</p>
130	<p>With regard to the public consultation on the EU proposed Sustainable Use of Pesticides regulation, I have a number of comments to make: 1. It is laudable and appropriate that the use of pesticides is reviewed and regulated in a well-defined and technical/scientific manner. 2. Cereal production is a key part of the production of native grains and proteins within the EU to reduce our dependence on imported products that have been produced from Genetically Modified Organisms outside of the EU borders. 3. Native cereals and proteins are a key ingredient in the transition to a lower carbon footprint diet by reducing the carbon footprint of feed ingredients for milk and meat production as well as lower carbon footprint ingredients for direct use in human diets as the consumers utilise more plant ingredients in their diets. 4. Plant diets have a lower GHG emissions profile than dairy and meat proteins, and natively produced cereals/proteins can reduce the GHG emissions of meat and dairy proteins collectively. 5. The production of native cereals and proteins within the EU is critical to enable the transition to a more sustainable diet for both humans and animals and the ability to grow and produce our own cereals/proteins ensure that we can verify the sustainability of the agronomic practices for the production of those cereals/proteins while at the same time not being held hostage by international trade disagreements in these valuable ingredients. 6. At present within the EU we have a stock to use ratio for cereals of circa 18.5% which is a historical low, and this means that the EU will be dependent on a strong health supply in 2023 to try and rebuild the internal availability. In the absence of a strong internal production, the EU will be dependent on importing more cereals from South America with the negative impact that will have on forest devastation in that region and associated ongoing impacts on climate change. 7. Within Europe and specifically within Ireland, we are vulnerable to significant disease and pest damage to the crop sector and hence rely on plant protection products to enable growers to produce high quality and health crops for supply to</p>

the numerous industries across the EU that depend on these ingredients. 8. Plant protection products need to be and must be used as part of an overall integrated IPM strategy for crop production. Setting legally binding targets removes the opportunity to plan for more cohesive and integrated pest/disease management strategies. 9. The objective should still be to reduce the amount of pesticides in use, but the binding targets should be to enable the development of more sustainable management practices that enables the reduction of the pesticides to be implements. 10. Setting a target of a 50% reduction in pesticide use is a very blunt instrument and will force competent growers out of cereal production thus leaving land as fallow or low output systems and hence reducing the availability of cereals and protein and causing millions of people to starve globally as grain is sucked out of third world markets to feed the demand in wealth Europe thus causing cereal shortages in those regions. 11. A far more competent approach would be to set an objective to reduce pesticide use by 2030 and to legally require the development of multiple pest/disease management strategies. These strategies need to be tested across multiple seasons and weather patterns so that the technical advisors have sound scientifically backed advice to enable growers to deal with wet weather diseases and changing disease patterns. These solutions will be built on alternative strategies that use multi crops, multi cultivars within each crop, more diverse rotations, earlier interventions with pesticides based on spectral assessment of diseases within crops and disease transmission patterns. All of these solutions hold the key to enabling the sector to reduce the amount of pesticides used but the solutions need to be stress tested over the different weather patterns and from that we can build highly integrated decision support systems whereby pesticides are one tool in that solution box - and while they are a necessary tool, they would no longer be the front-line tools. 12. For these above integrated decision support systems to be made - we need a well-developed data base of how diseases progress and how different mixed cultivars can reduce disease spread, how the impact of different sowing systems and cover crops can boost soil biology and hence transfer that to a health crop and a healthier crop has a higher chance of naturally warding off pests and diseases. 13. We need the data and information first before we can develop the appropriate sustainable pesticide reduction targets - hence we need to work towards a pesticide reduction objective. In conclusion I would urge you not to set a fixed legally binding pesticide reduction target but instead set a pesticide reduction objective and set a legally binding requirement for member states to develop much more coherent and integrated pest management systems that will facilitate the reduction in pesticide use.

131	<p>We are keen to highlight the existing control measures and the widespread industry and producer compliance with same. We believe that by working with the controls already in place and adapting to the prevailing scientific research as required, the desired environmental outcomes of the regulation can be achieved without compromising food production. For instance, we already have strict oversight in place on the sale and usage of Plant Protection Products (PPPs) through the register of sale and records of usage of PPPs. This means that PPPs are only sold in approved retailers who maintain a record of sale, and PPPs will only be sold to commercial farmers with a herd/producer number. All users must attend mandatory training in the storage and use of PPPs and register as a professional user – this includes all farmers and farm contractors engaged in the application of PPPs. Records of usage must be maintained at farm level as to the specific land parcels that PPPs are applied to within a holding. Further, regular monitoring is in place to monitor watercourses which could be regarded as sensitive. An outright ban would be extremely restrictive, if additional controls are to be put in place, they should only apply where watercourses may be deemed at risk or sensitive – the definition of ‘at risk’ or ‘sensitive’ should be determined by the relevant authorities in member states with the requisite scientific expertise utilising local topographical, metrological, land use and soil data. In short, we are of the opinion that additional measures should focus on improving the responsible use of licenced PPPs rather than outright blanket bans which may impact on output and food security without significant environmental gain in all cases. Further comments on the points on the DAFM consultation webpage are set out below: “Target 1 aims to reduce by 50% the use and risk of chemical pesticides by 2030. This target is measured using pesticide sales data which measures the quantities of active substances contained in the pesticides which are placed on the market (sold), and therefore used, in each Member State, and a weighting based on the hazardous properties of these active substances. Target 2 aims to reduce by 50% the use of more hazardous pesticides by 2030. This will be measured by sales data for the more hazardous pesticides, known as the ‘candidates for substitution’. The proposed SUR includes the legal requirement for the setting of these targets using baseline data from 2015-2017.” The ‘candidates for substitution’ list give particular cause for concern, as if a pesticide is re-categorised as hazardous and placed on this list of candidates for substitution before a suitable alternative product is identified and made available for sale on a widespread and cost-effective basis, then food production may be severely impacted. The incorporation of the 50% target into legislation is arbitrary and is not based on scientific data on an active ingredient basis. We accept that the need for ambition in this area is necessary, but more consideration should be given to scientific data. Further, having the same target across all member states does not factor in local conditions around soil type, climate and rainfall and management practices. There could be unintended negative consequences, for example the availability of ‘clover-safe’ PPPs may be compromised as a result of this regulation, this would impact on the successful incorporation of clover into grassland swards. Availability of Clover-safe PPPs is already limited, and further limitations will hinder clover establishment, a key action in reducing chemical nitrogen reliance. “The proposed SUR also establishes additional requirements for the use, storage, sale and disposal of plant protection products (PPPs), pesticide</p>
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	<p>application equipment (PAE), training, awareness raising and for implementation of integrated pest management (IPM).” There are already stringent measures in place with regard to all of the above and compliance is widespread, there would be a concern that any additional measures could place undue administrative burden on retailers and professional users of PPPs without any environmental benefit. “Some additional measures included in the draft proposal. Sensitive Areas: The SUR proposes to prohibit the use of PPPs in sensitive areas and within 3m of such areas. The definition of “sensitive area” includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. There is provision in the proposed regulation by means of a derogation, subject to approval following application to the Competent authority (CA), to permit the control of invasive species or quarantine pests.” Where any area is currently in a productive agricultural state, it is imperative that the risk of blanket prohibition of the use of PPPs is considered very carefully. Certain productive areas may now come into scope as a result of this proposed regulation. We would have particular concerns as to what is in scope regarding non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. We would welcome clarity on which areas will be defined as sensitive before a final decision is made at EU level. This measure, if adopted on a widespread basis could have a significant detrimental impact on food production.</p>
131(a)	<p>“Advisors: Designated CA’s in Member States will be required to establish, oversee & monitor a system of independent advisors for pesticide users which are free of conflict of interest. Pesticide Users must seek advice on integrated pest management, risk mitigation etc., at least once per year from an independent advisor and a record of this advice must be kept by pesticide users for 3 years. Electronic Systems: The CA must establish and maintain electronic IPM and PPP use registers and professional users will be required to keep electronic records on any intervention used (chemical, biological, physical or cultural). Crop specific rules will incorporate threshold levels before intervention which allows for enforcement of IPM. A central electronic register of pesticide application equipment (PAE) in professional use including a notification requirement for transfer of ownership/withdrawal from use is required.” All current registered advisors should be permitted to draft annual advice on integrated pest management and risk mitigation. Any electronic system for record keeping should be user-friendly and the current practice of recording purchase and usage on approved farm software packages should continue. DAFM should facilitate a simplified system of recording ownership and transfer of ownership of PAE. “National Action Plan (NAP): A new Irish National Action Plan will be required which will include national reduction targets, national measures to encourage use of non-chemical methods and to support innovation in this area. The NAP will also include links to the Irish CAP strategic plans in relation to plans for an increase in the utilised agricultural area (UAA) under organic farming. The NAP will be updated every 3 years and an annual progress and implementation report must be</p>

	<p>published. Integrated Pest Management (IPM): Professional Users (PUs) will have legal obligations to implement IPM. Competent authorities (CA) shall adopt binding crop-specific rules and IPM for crops, considering relevant agronomic and climatic conditions in that Member State. These shall be reviewed annually and updated where necessary.” Our comments: The proposed Irish National Action Plan should take into account the emerging and developing bioeconomy in Ireland when supporting innovation and adoption of new methods and alternative pesticides. In increasing the UAA of organic farming, the current organic standards should be reviewed in light of scientific and technological advancement in recent years. In implementing IPM, each member state should be permitted to factor in climatic, and relevant agronomic conditions.</p>
132	<p>The proposals to reduce pesticide and fertiliser usage on all crops by 50% before 2030 is totally unrealistic and highly dangerous from the point of view of European crop production, food production and food security. Such a move would drastically reduce crop yields, profit margins and output at farm level with knock on effects on quality and available food production across Europe and also third countries depending on Europe for food exports / supplies. While we all accept reductions in pesticide and fertiliser usage is required for sustainable farming going forward a target of 20 to 25% MAX is more realistic and workable without serious reductions in crop and food production.</p>
133	<p>I am contacting you in relation to the sustainable use regulation. It is vital that the existing chemistry is available for use going forward. The Irish climate is a temperate climate which receives a lot of rainfall and disease pressure is a constant problem on grain crops, without which yields will collapse, family farm livelihoods will be lost. The Government wish to grow the Tillage sector, removal of vital chemistry will cause it to contract. The Irish climate is not the same as mainland Europe and has different disease pressure. Please re consider any removal as it will have a drastic impact on the Tillage sector, rural Ireland and those businesses which are linked. Correct and appropriate usage is required but please consider all factors in any decisions.</p>
134	<p>I want to voice my deep concern in relation to the removal of all chemicals sprays by 2024. It would lead to huge crop reduction output and much poorer quality grain, which would have to compete with foreign superior grain which arrives at our ports with little or no controls on how it is produced and with no traceability .The Government say's on one hand that the tillage area must increase, yet on the other hand, take away all the tools from us so that we can't produce it cost effectively and compete with world markets which we have to do. Is the Government talking about compensation for our reduced yields if these changes come to pass? I think not. If these changes come to pass then reduction in tillage area is inevitable and this area will most likely return to grass and dairy use, by far the biggest greenhouse emitters. The tillage sector has already done more than its fair share of the heavy lifting in relation to greenhouse gases with regulations and loosing key chemicals over recent years, it's time to focus on other farming sectors.</p>
135	<p>Our submission is provided as part of the invited consultation for the “Proposal for Regulation in relation to the Sustainable Use of Pesticides” and we respectfully invite the Department of Agriculture, Food and Marine to consider the contents of this submission</p>

in tandem with submissions from other field sports. We are willing to work cooperatively and collaboratively with EU and National Institutions and Departments to utilise and develop sector wide knowledge and solutions to the issues outlined in this submission with a view to reducing the use of pesticides over time. Because of the cool, mild climate in Ireland, pest and disease pressure is relatively low. Consequently, pesticide use is low, but it is nevertheless a very important tool in managing pests, diseases, and weeds when there is a severe outbreak. As weather patterns change so can pest and disease pressure which may impact the maintenance of cricket sports turf moving forward. Grounds staff are reluctant to apply pesticides except when there is a real need. Pesticides on Cricket Pitches are used to: Produce consistent playing surfaces, Maintain Grass cover, as growth regulators to reduce fossil fuel use, Co2 emissions and extend the life of machinery, Control of weeds, to control grass diseases on outfield and squares, to control the vertical growth of grass to produce dense grass cover. As a result of using pesticides: The ball travels consistently off the playing surface avoiding weeds and/or unhealthy bare areas, The square and outfield, which are the playing surfaces for cricket, are maintained free of weeds as required by the ICC at a professional level and semi-professional level, Consistent grass cover is maintained on outfield and squares, Avoidance of severe disease outbreak on square that can render them unplayable due to inconsistent grass cover and soil profile, Grass cutting is reduced to a minimum resulting in a reduction in the use of fossil fuels, saving on energy use and impacting on climate change, Reduction in the wear / maintenance of machinery thus extending their useful life. Alternatives to Pesticides. The three main alternatives to using pesticides and herbicides are: Scarifying to reduce organic matter build up – This involves the use of machines that use energy and fossil fuels thus impacting on climate change, Increased use of fertilisers - This is not desirable due to possible contamination of ground water and adjacent rivers / lakes, Increased use of seeds – This involves an increase of energy use to plant the seed and in the production of the seed. We support the objective of a more sustainable use of pesticides and the aim to protect human health and the environment from the possible risks of pesticides. The organisation via its consultants and ground staff has actively been involved in pesticide reduction. However, the sport presents a low risk profile for exposure compared to other sectors. We believe that the text as outlined in the draft regulation could create unintended and undesired social, environmental, and economic consequences and risks to the field sport sector including cricket. Should the sport of Cricket and its playing pitches be deemed for inclusion in the definitions of sensitive areas, including urban green spaces and sports grounds, then we believe that the change should be transitional rather than a sudden prohibition in order to give clubs and their ground staff and contractors time to review and consider alternative mechanisms and for us to educate its, primarily volunteer, ground staff to deal with the issues that have previously been dealt with via the use of pesticides. We are concerned that the proposed legislation will negatively impact on the delivery of quality playing surfaces. We request the opportunity to discuss these issues in the round with the wider field sports community to clarify details and so we can impress upon the need for flexibility in relation to the application of any new rules in relation to sports grounds, specifically in relation to allowances for: Ongoing national interpretation and derogations (including

	<p>emergency use licensing), Continued access to currently registered plant protection products in the short-term allowing for a transition towards controls that allow for the management of issues, Promotion and ongoing expansion of measurable integrated pest management practices where plant protection products are used as a last resort, Specificity in terms of areas that are most important to the playing quality of the sport. In cricket this would be the square and outfield. While these allowances would have a great impact on the future health and success of Cricket, we believe that they will not be significant in terms of meeting the wider EU targets for pesticide reduction in society. The sport of cricket uses only a tiny fraction of the active ingredients used in Ireland meaning prohibition in Cricket will not be significant in meeting the EU's broader targets. Additional Concerns over the proposed regulations. The unplayability of the most important aspects of the cricket pitch, i.e. the square, at a time when climate change is increasing the frequency of, impact, and variance of pest and disease damage to cricket pitches, Damaged playing surfaces will be a major source of player dissatisfaction potentially leading to a loss of matches, players, spectators, and a loss of revenue to clubs, Bumpy playing surfaces may lead to the injury to players as hard, rapidly travelling cricket balls may frequently jump and hop into players faces causing injury, From an Irish perspective the implementation of the regulation as proposed will create a unique situation in that on the island of Ireland cricket clubs in the North of Ireland, which is outside of the EU, and which are also under the jurisdiction of us, will operate under different rules / regulation and have different standards compared to those in the Republic of Ireland.</p>
136	<p>Public consultation on the EU Commissions proposal for a Sustainable Use of Pesticides Regulation - Our feedback is specifically on the use of plant protection products in "sensitive areas". The Sportsturf sector in Ireland accounts for any sport played on a natural grass surface. Golf courses, racecourses and sports pitches account for the vast majority of playing areas. Over the last number of decades, the quality of Sportsturf surfaces have improved exponentially. This is due to science, Sportsturf machinery and technology and professional training and education. GAA, soccer and rugby are the most attended sports in Ireland all of whom are predominantly played on natural grass pitches. The GAA alone has 1,811 pitches across Ireland. Participation levels of the three games are amongst the highest across all of sport. The improvement in the quality of pitches has helped grow the various sports commercially. There are 540,000 people playing golf in Ireland with 205,000 registered as members of a Golf Club. Golf is the third most popular activity ranking only behind walking/hiking and cycling. Putting greens, which are fundamental to the sport, are the most intensively maintained areas in all Sportsturf. PPP's have a critical role to play in management of these surfaces, which are cut as low as 3mm. The objective of the Sportsturf professional is to produce a playing area of the highest turf quality. By doing so, they create a safe and sustainable area for the sport to be played. While each of the different sports played on these areas have unique demands, they all aspire to have a uniform, stable and resilient surface. Pests such as fungal pathogens and weeds negatively impact the visual and functional quality of these surfaces. The availability and application of PPP's have further enabled playing standards to be raised by controlling the negative impact of pests. While significant strides</p>

have been made in reducing the use of PPP's and following an IPM approach, there are no viable alternatives to address the most detrimental Sportsturf pests. The three main types of PPP's in the Sportsturf sector are as follows: herbicides, fungicides and plant growth regulators. Herbicides: Weeds cause the greatest disruption to the establishment of uniform and stable playing surfaces. Selective herbicides are used to remove unwanted weeds from playing areas. Herbicides account for approximately 80% of PPP's sold across all sectors. Fungicides: Disease control strategies are mainly focused on an integrated approach of enhancement of plant health and alteration of the environmental conditions to discourage the pathogen. Chemical controls using synthetic PPP's are instigated when these measures are alone are insufficient. The impact of a disease outbreak can be severely detrimental to the playability of Sportsturf surfaces. Plant Growth Regulators: There are currently 2 Plant growth Regulators registered for use in sportsturf. The benefit of the products is the reduction in the leaf growth of the plant. Therefore, plants treated require less frequent mowing, reduced fertiliser and water inputs and demonstrate a greater resistance to disease and damage. Strict Controls currently in place for PPP's usage in Sportsturf: The Sportsturf sector currently has strict rules with regard to application of PPP's. The application rates of PPP's in the Sportsturf sector is far lower than what is permitted in the agricultural sector. Less than 1% of the PPP's used annually in Ireland are used in the sportsturf sector. The cost of amenity labelled PPP's is far greater than that of agriculture. This encourages applicators to use the PPP's judiciously. Users must have the relevant pesticide spraying certificates, properly calibrated sprayer and PPE to apply PPP's in a responsible manner. PPP Sales Ireland (CSO): Herbicides account for 78% of all PPPs applied. Fungicides account for 15% and PGR's just 5%. Sportsturf likely account for less than 0.25% of the land area dedicated to agriculture. Any impact on the environment of a total ban of pesticides in sportsturf will be minimal. Use of PPP's in SA's: The SUR proposes to prohibit the use of PPP's in SA's and within 3m of such areas. It is assumed the definition of a "sensitive area" will encompass all the natural grass playing areas of the sportsturf sector. Such a measure will have significant impact on the performance and quality of these playing surfaces. The derogation proposed in Article 18, paragraphs 3-8, does not allow the use of PPP's to target the most detrimental pests of sportsturf playing areas. The derogation is impractical in its current form to implement for a professional sportsturf manager. Impact of total ban on use of PPP's: A total ban on PPP's for participation perspective will undoubtedly result in poorer playing conditions on sportsturf surfaces. This will be most felt deeply on golf courses, where proper course conditioning is fundamental to the playing of the game. The retention of existing members and the attractiveness of the game to new players will be severely impacted if courses regress in standard. For games played on sports pitches, the loss of herbicides and ingress of weeds will reduce the uniformity and stability of surfaces. This will result in more frequent and serious injury to players as well as poor quality games as a resultant reduction in participation. For tourism, if the current and expected standard of golf course cannot be maintained golf tourism will decline, especially as PPP's remain available to our biggest competitors in the UK. The average golf tourist spends a huge amount compared to other tourists accounting for 5% of the total tourist revenue from 2% of all annual

visitors to Ireland. Many of these visitors travel to remote parts of Ireland, providing a vital source of employment and business in the locality. The knock-on effect of a reduction in golf tourism will not only harm the golf industry, but also the hospitality sector that caters to their needs. The illegal use of PPP's would put pressure on golf courses and sports pitches if a ban on PPP's is introduced will be severe. The sportsturf manager and their staff will feel this most severely. This pressure opens the door for the illegal and unregulated use of PPPs from the agricultural sector which will be still available. Anecdotally, in countries where the total ban is already in place managers are using non approved chemicals to maintain existing standards. Continued improvement in IPM and the correct use of current registered PPP's will have a lesser environmental impact than that of unregulated use of agricultural and unregistered chemicals. The environmental impact of artificial turf: In field sports, a viable alternative to natural turf exists. The loss of conditioning on natural grass pitches will push more and more sports to utilise artificial turf. Synthetic pitches are primarily made from plastic fibres. The infill is usually made from rubber tyres. There are no environmentally sound reasons to favour artificial turf over natural grass pitches. There are concerns that use of artificial pitches could increase the risk of cancer in young adults. 52 of the components used in artificial turf are already classified as carcinogens with a possible total of 197 that are likely carcinogens. Once an artificial pitch reaches the end of its life, they cannot be recycled. These must be disposed of in landfills which is not sustainable. Conclusions: Sportsturf facilities should not be classified as a "sensitive area" due to the reasons outlined. The proportional impact of this legislation on the sportsturf industry is at odds with impact that these areas have on the environment. Encouraging improvements in management and responsible use of available active ingredients is preferable to unregulated and uncontrolled use of PPPs. Lack of participation, attendance and tourism will be devastating for the industry. The resultant pressure on sportsturf professionals will be a barrier to recruitment and retention of staff, a sector already struggling to attract people. Should these facilities be classified as "sensitive areas", a robust suite of derogations must be available to maintain existing standards.

137	<p>Integrated Turf Management is at the heart of modern greenkeeping and sports surface management. Our approach when giving recommendations is to follow the tenets of the Sustainable Use Directive. Turf managers should look at cultural and non-chemical approaches as a first line of defence when tackling turf issues that detract from playability on golf courses and all sports surfaces. It is the use of an approach that emphasises the analysis of the root cause of issues and look to tackle those, thereby reducing the potential for further pest, weed and disease issues. Plant protection products are used and recommended as part of this integrated approach to resolve existing issues and to strategically control pest, weed and disease populations often where there is no practical or economical alternative. Recommendations should follow best practice guidance of preventing issues, create the conditions that reduce the pressure from pests, weeds and diseases and minimise the use of plant protection products, whilst promoting turf managers to make full use of cultural and non-chemical approaches. The plans to remove plant protection products from sensitive areas under the proposed Sustainable Use of Pesticide Regulations will undoubtedly cause challenges for a range of golf surfaces (predominantly golf greens and larger fairway areas) that continually suffer pest, weed and disease issues. This is likely to be a challenge for a range of sporting surfaces included within these measures. ITM should be at the heart of tackling these challenges that will come about as the result of a powerful range of tools being removed from a turf managers arsenal. If the removal of plant protection products goes ahead, those golf clubs that experience issues will have to refocus their efforts at implementing ITM to its fullest extent and accept lower quality at certain times until and if non-chemical alternatives present themselves. It is of course noted that some European countries already have implemented enhanced non-PPP control measures for a number of years, so it will be vital to learn from those experiences. It is also recognised that these case studies will not always duplicate the climate of Ireland and the natural disease pressure that occurs there. There will be an impact on a range of golf courses if plant protection products are removed. It will make managing pests, weeds and diseases more challenging. Following the approaches laid out in best practice for ITM will help alleviate and mitigate many of these effects but not all. It will also mean that turf managers will need to be more flexible and proactive in the approaches that they adopt.</p>
138	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission’s proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive areas” includes the following description: ‘...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.’ We assume that golf courses are included in the above description under ‘recreation or sports grounds’. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and</p>

controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.

139	<p>I would have strong objections to the proposals to cut the use of pesticides by 50% by 2030. We live on the west coast of Europe which gets high levels of rainfall which as you know leads to higher levels of disease and problems in crops. No farmer or advisor wants to use chemicals if they don't need to. However, in the current high cost of production everyone knows that you need to have an insurance policy to cover the costs and you must grow quality crops that are safe to feed (no fusarium etc) in order to make a profit and survive in this industry and reinvest into your business. We have a limited number of active ingredients available to choose from and by reducing these products further it will make it much more difficult to survive. If the government is serious about increasing the arable area, then we need to have the tools to implement this strategy. If chemicals are being removed without any viable alternatives to replace them then we could see a huge reduction in the arable area as crop production could become unviable in our high rainfall conditions. Crops grown locally make far more sense compared to imported grain with the high cost of importation and air miles associations with it. Arable farmers are among the most highly skilled and biggest users of the most up to date technologies to grow their crops. If given the right supports, then most farmers would adopt these technologies which would help to reduce the amount of actives they use and also make it more targeted to the crop there are spraying. I think farmers need a lot more education and knowledge on the types of nozzles and machinery they use in order to make the most of the products they apply. Europe has one of the most highly regulated agricultural industries in the world. If we cut pesticide use down to what's proposed, then who will grow the food we need to feed a growing world population of 11 billion by 2050???? Are we going to hand our food production to Brazil and other South American countries who are destroying rain forests to grow more crops and increase their production???? Will we allow Russia to take over the Ukraine (as what's seems to be allowed happen) so they can control grain production for nearly 30% of the world's crops!!!! I attended a recent conference where the prediction was that due to the ever-increasing drought in Africa, they expect in excess of 200 million people to emigrate northwards towards Europe to survive and avoid starvation. This will lead to an unprecedented humanitarian catastrophe if this continues. Hopefully the EU will look favourably on our unique growing conditions and climatic patterns and reconsider this draconian approach to removing all chemicals.</p>
140	<p>We need to produce gain locally from an environment point of view. if pesticides are going to be reduced grain production will fall and we will have to import from countries that can produce without proper controls. A lot of our pesticides /herbicides/fungicides are gone and if we lose more yields will drop off. If Glyphosate goes, we cannot control grass and clear up grassland. We have lost chemistry on leather jackets and slugs and aphids, and this is going to make some crops more difficult to grow. We need gene editing to fast track and get it into field production. We are training operators to spray pesticides and these amateurs are giving us users a bad name. I am spraying crops for the last 45 years and I am very concessions of the environment and applying in the right conditions. Please put common sense into food production or we will have to import from countries that have no common sense.</p>

141	<p>I wish to comment firstly on the proposal document which is a lengthy one. I have personal experiences and observations concerning one chemical in particular over many years which I believe to be a fair and accurate account and I consider it reasonable in view of the proposal that I share them with you - Glyphosate. Firstly, the broad trust of the SUR proposal document is constructive and reasonable in its objectives with regard to the use of pesticides and a target reduction of 50% by 2030. The stated aims of improving environment and health are to be commended but it is not clear to me the parameters to be used in order to benchmark progress. It is very apparent that human health problems may not appear for many years after using chemicals E.g Glyphosate and its known association with diseases like Parkinson's disease, dementia etc. Another problem is that under law association does not prove cause. I believe it will take years of monitoring to establish real progress such is the amount and range of chemicals that is used in society as a whole and not just plant protection products. Will each farm have a baseline of biodiversity and soil biology established in order to assess progress over the planned length of this proposal? On page 13 of the proposal document, Section, Impact assessment, it is stated that farmers are to be compensated for increased costs associated with the proposals and for yield loss. It is rather vague and doesn't elaborate on how the calculation of lower yield will be arrived at. Lower yield can be multifactorial with factors such as field sites and location, base fertility, weather, crop variety, fertiliser use, use of alternative methods to control pests and disease. Limited to 5 years. This does not give confidence in the way the proposal is currently worded especially as the proposal is for a 50% reduction by 2030 which is 7 years away. The setting up of independent advisors has some merit but serious questions arise. Where do advisors get safe independent verifiable information regarding specific chemicals so that they can advise clients? How long do chemicals have to be in use to get established facts and information in order to impart safe advice? Should a legal case against the advisor arise how will they be covered or indemnified? Will insurance be available at a reasonable cost? What happens in the event of a product being withdrawn after a number of years use because it is no longer regarded as safe and claims arise? If a chemicals use has had environmental effects far greater than the targeted purpose what is the legal position for farmer and advisor? Will the chemical manufacturer accept responsibility? (Example: Glyphosate used as a herbicide in good faith but damaged soil structure by killing microbes, mycorrhizae fungi, biodiversity loss etc) Will there be sufficient advisors in place to implement the proposal? What happens if a farmer is penalised post inspection for incorrect use of chemicals because of poor or wrong advice from the independent advisor? Has a template been drawn up to train and educate advisors and indeed to update their skills as chemicals change and new ones appear? Will there be an independent arbitration service in the case of unresolved disputes? Precision farming or use of modern IT equipment and so forth is fine for larger farmers but perhaps not viable or practical for smaller operators. Drone technology is growing rapidly and may be suitable in certain circumstances and as the proposal document points out may help chemical reduction and safety. Training is always important and should be supported. Testing and maintenance on sprayers and equipment is also important but can only be successful if there is adequate profitability and viable returns to allow investment in upkeep and</p>
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replacement. Disposal of empty containers and unused chemicals needs to be improved both in terms of frequency of collection and more available locations. In the event of the EU withdrawing approval for a particular pesticide can we assume that animal feed or food for human consumption will not be imported into member countries which has been treated with the withdrawn substance? For example, Glyphosate. Currently licenced for one more year as a pesticide in the EU. If G.M. Soya bean and G.M. maize from the USA or Brazil was allowed in that would be unfair in so many ways but there has to be an alternative sourced to replace current importations. Has this been factored in with the current extension? Other examples may include crops grown using neonicotinoids outside the EU. Cotton for clothing grown with Glyphosate could also fall into that category. Such scenarios are not mentioned in the proposal and is a serious omission. Within the EU different countries are assigned the task of risk assessment to decide if a chemical is safe or fit for purpose and use. Germany was given the task of examining Glyphosate but considering Bayer is based in Germany that looks like a serious conflict of interest and undermines confidence in impartiality and independence. Another point of concern is that different regulatory authorities across the world use different values and different testing regimes so that is an area open to exploitation by chemical manufacturers. Also, in many cases the regulators are using data from the manufacturers which is going to be biased or perhaps only part of the facts and information are being submitted for evaluation. It must be recognised that farmers are only end users and not the creators of chemicals used in the agri food industry. We can only operate on the guidelines supplied and so food residues however undesirable are not the fault of farmers when the products are used as per the supplied guidelines. I am happy to see that there is provision to report cases of poisoning during the course of the use of chemicals. However, many of the problems associated with chemicals are from cumulative exposure and the slow build-up of toxins or residues over time e.g., cancers, Parkinson's disease, Dementia and so on. There is room for substantial improvement in the EU with regarding to testing of chemicals, agreement on safe values of plant residues, environmental effects on Biodiversity, human health and animal welfare. No matter how good farm equipment and training is if the chemical is not safe in the first place everything will pay the price of the resulting toxicity in food, water, environment etc. If important information regarding chemicals comes to light, there needs to be a system which can bring forward a review BEFORE the scheduled date.

141(a)	<p>I was one of the first people in Ireland to use Glyphosate after its release in 1974. It was promoted as being a very safe chemical to use and only killed living plants. All seemed fine in those early days but over the years my observations and experience tell a very different story. Monsanto were very economical with information regarding its unique properties. They never told us it was a powerful chelator of cations in the soil or that it was a very powerful broad-spectrum antibiotic. In fact, I have never seen that information on any of the containers of Glyphosate which I have purchased. Also, they never told us that any safety tests done and submitted for licensing purposes were only carried out in controlled tests without the adjuvant which creates a whole new effect. Furthermore, there are no warnings on the containers alerting users of the horrific damage it does to soil biology. In my view that is highly irresponsible and totally unacceptable. The damage done over the years is enormous & can be cumulative with very far-reaching consequences. Monsanto have not issued specific warnings on the containers about the potential damage to bees and other insects. Glyphosate kills the lactobacillus microbes they need to digest the honey they live on. It also affects their endocrine hormone system on which they depend to find their way back to the hives or colonies. It is now believed that even one part Glyphosate per trillion can be an endocrine hormone disruptor. In fact, as far as I know there is no agreed safety limit for glyphosate regarding the endocrine hormone system of any living species. There has been a very noticeable drop in insect population around my area over the past number of years. All one has to do is go for a drive in the summertime and it is so obvious that the number of dead insects from impact damage is very low compared to 50 years ago. Soil Food Web. It is very obvious to keen observers that the damage done to soil structure and soil health is enormous due to the effect Glyphosate has on the soil food web, (viruses, bacteria, archaea, ciliates, flagellates, amoebae, nematodes, fungi, micro-arthropods, micro animals beetles' earthworms etc) These are all essential to have a healthy soil and feed our plants and crops. Broken soils mean more chemical fertilisers and chemical sprays to produce a crop, further environmental damage. Fungi are very important in the transport of nutrients to plants and especially water in dry periods. They can penetrate deeper into the soil to access nutrients and bring them to plants operating with the help of plant signalling mechanisms. This helps to produce plants with much more nutrient density. Glyphosate can kill mycorrhizae fungi in the soil within 2 weeks of a foliar application to the crop or plants above. Mycorrhizae fungi play a major part in the creation of good soil structure by the production of Glomalin which sticks the smaller micro crumbs to form macro aggregates. When Glyphosate is used on areas pre sowing and fungi are destroyed plant diseases such as Fusarium are much more prevalent and so must be sprayed with fungicides to get a reasonable yield. The chemical merry go round continues! Damaged soil structure means poor water infiltration after rain, more run off and loss of nutrients to our rivers and waterways. In particular the smaller soil particles (clay colloids) or cation exchange sites bringing with them valuable nutrients and anions such as phosphorus. Furthermore, damaged soils have less organic matter and carbon and so less water and nutrient holding capacity. In addition, there may be losses of Glyphosate into the rivers and waterways as a direct result of run off due to poor structure. This can cause further damage to our aquatic life and coastal areas in particular to species like seagrasses, crabs,</p>
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crayfish, salmon etc. In addition, much of our municipal water in Ireland is taken from our lakes and rivers. Glyphosate is hard to filter out due to its small molecular size and so must pose a risk to public water supplies at times. Perhaps pre harvest Glyphosate could be considered one of the most likely sources of waterway contamination due to bare fields after harvest is completed. I have experienced a number of problems which I believe Glyphosate is implicated and causing both financial losses, stress, animal health issues etc. Even though I have stopped using Glyphosate the affects may still be seen in soil biology though thankfully has reduced substantially in recent years due to greater awareness and diligence. I believe GM products such as Soya Bean and GM maize in our dairy ration together with native Irish grain treated pre harvest with Glyphosate has caused considerable undesired effects on our dairy herd. A figure of 20 parts per million is often given for Glyphosate in GM feed but can be far higher in crops dessicated by Glyphosate. This can affect our animals in a number of ways. Firstly, any Glyphosate in the feed can chelate the micro minerals in the rumen and prevent uptake by the animals. Secondly as Glyphosate is a broad-spectrum antibiotic it can kill many of the beneficial microbes in the rumen especially those with a shikimate pathway. This can be about 50% of the microbes. Secondly pathogenic bacteria such as E coli or salmonella are not affected and so with less competition can multiply and potentially cause illness and disease. It is notable that since I introduced a product called Prime Humic into the diet of the cows 2 months ago, I have had no case of E coli mastitis. Glyphosate as an unwelcome part of the bovine diet makes a complete mockery of antimicrobial resistance and the use of antibiotics for animals. The only way I could get a Glyphosate free dairy ration is to either grow my own or purchase organic dairy ration at double the price of standard ration. Clearly not economic. We are continually encouraged to use less antibiotics and rightly so, for example new paradigms being promoted around drying off cows. Yet Glyphosate is the single most widely used antibiotic on the planet and it is not mentioned in any farm business code of use or conduct regarding antimicrobial resistance to my knowledge. Veterinary tests on 4-month-old calves confirmed vitamin B12 Cobalt deficiency. I believe it is due to chelation of Cobalt and other trace minerals in the soil and the calves rumen from concentrated feed. Copper was also obviously lacking and so I had to take remedial action in the form of injections and oral tonics. This problem has arisen each Spring in the past 3 years. Other observations include hoof and feet problems on the increase.

141(b)	<p>Could Glyphosate be chelating zinc in the rumen and making it unavailable for the development of healthy horn in their feet? Subnormal reproductive performance in recent years despite the use of reproductive specialists, nutritionists and veterinary intervention when warranted. Also, I have noticed in the past 3 to 4 years a number of preterm deformed calves. Very often deformed heads or legs. There has also been an increase in respiratory problems in recent years especially in young stock with compromised immune systems. More antibiotic treatment required, higher costs and losses. Vaccination program is in place. If our livestock are consuming dairy ration with Glyphosate there must be a considerable element of that passing out in the manure and urine. This of course goes out on to the land and so a cycle of damage continues. Farmyard Manure made from bedding livestock with pre harvest Glyphosate treated crops could be even more contaminated with the further knock-on effect. I have to purchase untreated straw as a matter of high importance. My farm produces food for human consumption, and I take pride in trying to meet high standards. I should be able to guarantee food from my farm to be of the highest standard and free from Glyphosate. Alas I can't, I find it somewhat disturbing that some of our biggest Cooperatives promote and sell Glyphosate or generic equivalents as part of sustainable agriculture. They also sell livestock rations that they must surely realise contain Glyphosate. What really concerns me is if members of the public or supermarket chains were to test any of our end products going for human consumption and found Glyphosate in the food it could potentially destroy our valuable market share so carefully built up around a green image. (BSE or mad cow disease or horse meat scandals come to mind). Climate change. The use of Glyphosate in many parts of the world can leave soils bare for long periods and in so doing become eroded with heavy losses to rivers and waterways. Secondly as no plants are photosynthesising no CO2 is being converted to plant sugars and plant root exudates to build carbon. Bare ground in warm dry weather can create heat domes blocking rain bearing clouds from providing much needed rain. While these areas are not in our jurisdiction, climate change is affecting us and this practice of bare soil is so damaging that it has worldwide implications. It should perhaps be part of any deal between the E.U. and the U.S. for example that if they want to trade with us that means no bare soil and no G.M. products or grain containing Glyphosate. If cover crops were practiced around the world as a matter of good soil husbandry, we would lower CO2 levels substantially and also reduce run off of nutrients and chemicals into the oceans which is in all our interest. There is no doubt in my mind that the extensive use of Glyphosate worldwide is contributing to climate change and all that goes with it. Human health. Dr. Stephanie Seneff has written a brilliant book regarding Glyphosate and its toxic effects. (Toxic Legacy, How the weedkiller Glyphosate is destroying our health and the Environment.) I have experienced first-hand much of the conditions she describes in her book and I am still struggling with some of that toxic legacy as she so aptly calls it. I have had autoimmune disease (Sarcoidosis, 2002), abnormally high LDL Cholesterol following the Sarcoidosis, Coronary heart disease, (Triple bypass and valve repair 2018) Muscle weakness and cramps to this day, fatigue and all the implications that entails. I have seen close family members, friends and neighbours with many of the other conditions Dr. Seneff describes including Non-Hodgkin's Lymphoma, Kidney cancer, Multiple Sclerosis, Dementia, Autism, non-alcoholic fatty liver</p>
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	<p>disease, Parkinson's disease, Colitis, Krohn's disease and many more. Our health service is struggling under the weight of many of these problems which is imposing such a large financial burden on the state. We are nowhere near as bad as the United States, but we have no room to be complacent and we owe it to the generations to come to take action now and reduce the damage in all its totality. We need to demonstrate that our environment and the health of our people is far more important than corporate profit. The health of our bodies depends on the health of our gut microbiome often described as our second brain. Good microbial activity in the gut is paramount to our health and wellbeing. They are vital in the assimilation of essential amino acids. The Glyphosate molecule is very similar to the Amino acid molecule Glycine and can impose itself in building proteins instead of Glycine so disrupting the normal sequence of Amino acids. Often how autoimmune disease starts in our bodies as the protein has now got a foreign body in its midst. The Farmers Journal had a recent article on a sample survey of 200 people carried out by a Galway University researcher. This showed 26 of the 200 had positive urine samples for Glyphosate and only 2 of those were users of the chemical. It was not established how the other 24 became positive. I would have thought it can only come from air food or water so the idea that it could have come from food concerns me most as contaminated food should not be acceptable but may unfortunately be difficult to achieve in the short term. The EPA points out the water quality in some of our rivers such as the Slaney, Barrow, Nore and Suir is below standard. I suspect that these areas are also the highest users of Glyphosate and soil structure has therefore been compromised and worsened by higher rates of artificial fertiliser. For the most part farmers are not breaking regulations and are working within current guidelines and accepted practices. Many of my colleagues reduced inputs last year and it will be interesting to see if there is any improvement in water quality. At the very least I would like to see a complete ban on using Glyphosate for pre harvest dry down. Also, the practice of making baled silage from Glyphosate treated pasture or grazing 10 days post treatment must be completely stopped for animal welfare and food chain implications.</p>
141(c)	<p>It saddens and puzzles me when I have observed Glyphosate for sale to the general public in DIY stores, Garden Centres & even a garden section in a Supermarket. No training in the safe use of pesticides required yet the chemical formula is exactly the same as that which is sold to professional farmers and growers. Double standards in my view and sadly could be the way some of the people in the survey got Glyphosate in their bodies. As I am drawing to a close in my farming career it has become increasingly clear that the most fulfilment is got from promoting life rather than killing. We are all part of an ecosystem, and it is incumbent on us all to take care of our great natural world as we journey through it so that we can pass it on in a better condition than we received it in. We have borrowed it from the generations to come and so we must guard and respect it to the best of our ability. Glyphosate does not fit in to that ideal, it has no respect for life whatever. In my lifetime farming I have witnessed the withdrawal of a number of chemicals which were all deemed to be safe when introduced such as DDT, Paraquat, 245T also known as agent orange and Atrazine. After a period of time, it was clear they were no longer SAFE and in fact never were. I believe we have passed reaching that point with Glyphosate. It is so dangerous because people really believe it is safe when the reality is so</p>

	<p>different. Complacency sets in under those circumstances. Monsanto have been very clever up to now in hiding the truth and the facts about its use and properties. There are a lot of court cases pending regarding the damage it has caused and so bit by bit the real truth will emerge. Dr. Stephanie Seneff and others like Dr. Don Huber and Dr. Zach Bush have in their courageous exposure of the dangers of Glyphosate done the world a massive service. Legislators and users alike need to listen and act. I note that several citizen groups have submitted their concerns to the commission in the past as per the proposal document. Finally, as the proposal is concerned with sustainability, I believe that Glyphosate use is unsustainable as a plant protection product and must be considered as such if the proposal is to have any meaningful validity.</p>
142	<p>Firstly, the first target of the proposal is very concerning for me. A 50% reduction in pesticides by 2030 in my eyes will cripple the arable industry in Ireland. Our climate allows for the highest yields in the world for cereals, but this cool maritime climate also provides the perfect conditions for wet weather fungal diseases. These diseases can have dramatic effects on my lively hood for example Septoria has the ability to reduce wheat yield by 50% if not controlled, similarly, yellow rust has the ability to take over a field in a matter of days and reduce yield by up to 50%. In the case of barley, ramularia is a disease we didn't really have to think about 5 years ago as we had the chemistry to control it but with the loss of Chlorothalonil this disease now is having a big impact on my crops. It also has the ability to reduce disease up to 40%. There are more diseases I could mention in other crops but in short, they all have impacts on yield and therefore the productivity of my farm. On our farm we practice IPM, for example picking disease resistant varieties, delaying sowing date and crop assessment for the presence of pests. But with current varieties and farming practices we are not at a stage when we can grow our crops without the use of pesticides. It is widely known that Ireland is a net importer of cereal grains to feed our livestock population. If this purposed reduction in pesticides is to occur our reliance on imported feed will increase. This has both environmental and economic impacts. The carbon footprint of our animals' products will increase as the imported feed emits more emission than native feed. There is a cost in getting the feed to this country, therefore the price of feed will have to increase leading to a greater cost of production for the animal industry. For the above reasons I feel that purposed reduction in pesticides should be rejected as they are an essential tool in current farming practices. Another area of concern is sensitive areas. From my reading of the proposal sensitive areas are not clearly defined. For years the department has ignored the non-professional use of pesticides in amenity areas. There are large volumes of pesticides being applied in areas such as parks, railways and roads which are areas where pesticides should not be applied. Currently there are very few true "independent" advisors in the country. We use a few different advisors on our farm that are linked to merchants selling chemical products. I can only speak for the ones we deal with, but we find that they all practice IPM and are not prophylactic in the use of chemicals. They assess the crop and give the recommendation for what the crop needs to maximise yield which in turn maximises our profit on the crop. If these advisors were not allowed to advisors on crops, we would have no</p>

	<p>advice on the management of our crops. The impacts of this proposal are too long to mention but the destruction of an industry is the reality of the situation. I urge the department to strongly consider my points.</p>
143	<p>I'm greatly concerned about the new sustainable use regulation. Firstly, the first target of the proposal is very concerning for me. A 50% reduction in pesticides by 2030 in my eyes will cripple the arable industry in Ireland. Our climate allows for the highest yields in the world for cereals, but this cool maritime climate also provides the perfect conditions for wet weather fungal diseases. These diseases can have dramatic effects on my lively hood for example Septoria has the ability to reduce wheat yield by 50% if not controlled, similarly yellow rust has the ability to take over a field in a matter of days and reduce yield by up to 50%. In the case of barley, ramularia is a disease we didn't really have to think about 5 years ago as we had chemistry to control it but with the loss of Chlorothalonil this disease now is having a big impact on my crops. It also has the ability to reduce disease up to 40%. There is more disease I could mention in other crops but in short, they all have impacts on yield and therefore the productivity of my farm. On our farm we practice IPM, for example picking disease resistant varieties, delaying sowing date and crop assessment for the presence of pests. But with current varieties and farming practices we are not at a stage when we can grow our crops without the use of pesticides. It is widely known that Ireland is a net importer of cereal grains to feed our livestock population. If this purposed reduction in pesticides is to occur our reliance on imported feed will increase. This has both environmental and economic impacts. The carbon footprint of our animals' products will increase as the imported feed emits more emission than native feed. There is a cost in getting the feed to this country, therefore the price of feed will have to increase leading to a greater cost of production for the animal industry. For the above reasons I feel that purposed reduction in pesticides should be rejected as they are an essential tool in current farming practices. Another area of concern is sensitive areas. From my reading of the proposal sensitive areas are not clearly defined. For years the department has ignored the non-professional use of pesticides in amenity areas. There are large volumes of pesticides being applied in areas such as parks, railways and roads which are areas where pesticides should not be applied. Currently there are very few true "independent" advisors in the country. We use a few different advisors on our farm that are linked to merchants selling chemical products. I can only speak for the ones we deal with, but we find that they all practice IPM and are not prophylactic in the use of chemicals. They assess the crop and give the recommendation for what the crop needs to maximise yield which in turn maximises our profit on the crop. If these advisors were not allowed to advisors on crops, we would have no advice on the management of our crops. The impacts of this proposal are too long to mention but the destruction of an industry is the reality of the situation. I urge the department to strongly consider my points.</p>
144	<p>Growing crops in our temperamental climate is a serious challenge every year. The chemistry we are using currently is necessary to protect grain quality and assure crops are profitable for farmers to grow. As tillage Farmers' we only use chemistry as it is needed. We do not waste chemical and treat all our fields the same and blanket apply across our farms. We take advise from Trained professional advisors and use chemicals as sparingly as possible while protecting our crops. Chemicals are too expensive</p>

	<p>to be using unnecessarily. I would fear that if we were to reduce our pesticides by 50% then our yields would also drop by 50% across all crops. I also fear that disease pressure would not be controlled properly, and this would lead to crops which are undesirable to our feed industry because of poor quality. This could lead to animal and human health problems. If the overall Irish annual harvest is reduced significantly because of this pesticide reduction, then this will increase the amount of grains being imported from countries outside the EU. These grains are produced by farmers who do not have the same quality standards EU grain farmers, and they are using chemicals that are already banned in the EU. I think this proposal has to be abolished to protect European food security as well as our livelihoods.</p>
145	<p>Growing crops in our temperamental climate is a serious challenge every year. The chemistry we are using currently is necessary to protect grain quality and assure crops are profitable for farmers to grow. As tillage Farmers' we only use chemistry as it is needed. We do not waste chemical and treat all our fields the same and blanket apply across our farms. We take advise from Trained professional advisors and use chemicals as sparingly as possible while protecting our crops. Chemicals are too expensive to be using unnecessarily. I would fear that if we were to reduce our pesticides by 50% then our yields would also drop by 50% across all crops. I also fear that disease pressure would not be controlled properly, and this would lead to crops which are undesirable to our feed industry because of poor quality. This could lead to animal and human health problems. If the overall Irish annual harvest is reduced significantly because of this pesticide reduction, then this will increase the amount of grains being imported from countries outside the EU. These grains are produced by farmers who do not have the same quality standards EU grain farmers, and they are using chemicals that are already banned in the EU. I think this proposal has to be abolished to protect European food security as well as our livelihoods.</p>
146	<p>The purposed new rules and regulations will have a huge on our farming practices which will lead to poorer quality crops and crop yields will fall off complete. Taking away our countries food security out of our hands were we will be depended on other countries to feed us. (Russia Brazil etc.) We have seen this recently in the removal of Clothianidin on seed dressing for Winter Barley in Ireland with crops been destroyed by aphids in winter barley crops in the south of the country and along the east of the country were we ourselves cannot grow the crop in lands we have along the coast which historical always gave us excellent Quality Barley. The removal of Chlorothalonil is another hammer blow for barley growers in this country with ramularia a disease that hasn't been a problem in Europe for the last 30years plus now back with a bang and the Quality in barley going way down from its highest standards of the past 20 years. So, the Quality of our drinks industry will fall too. It's not a one rule fits all approach the department of Agriculture should except when the European union come out with this very pro green agenda. Ireland has a temperate maritime climate unlike any other in the European Union with our location as an island of Europe. Our ecosystem is like no other with the weather systems coming from all directions which gives a very different weather patterns than mainland Europe. With the banning of these products might have no effect in the likes of Poland or Luxembourg etc but will have devastating affects</p>

	<p>here in Ireland. And with this war in the Ukraine having a huge impact on food security across the world. These new rules been forced on farmers will be the death nail in European food security. With the farmers hands in Europe been tied it is a type of green washing has to stop as they are happy to import the problem from somewhere else. Like Brazil where the size of a GAA pitch is disappearing every second due the rain forests been cut down this carry on has to stop to save the world. European and Irish farmers are some of the best farmers in the world and manage their crops to the highest standards and use crop protection products when the problem arises. And even in the last 10 years I've seen a dramatic decrease in the use of pesticides and insecticides on our own farm. But without them we'd have no crop and be out of a business which has been in the family for generations.</p>
147	<p>I have no problem in a reduction in pesticide use, but it has to be done for the right reasons. We are using very little chemicals at present as we are transitioning to a biological approach to growing our crops. We are using a direct drill to establish our crops so there are certain chemicals that have to be used with this method of farming. We are sequestering approximately 1.5 tonne of carbon per acre every year by the use of zero tillage and low inputs, while still maintaining high yields. Therefore, it is important for global food security and global warming that we have access to the chemicals that we need to continue to farm this way.</p>
148	<p>I'm greatly concerned about the new sustainable use regulation. Firstly, the first target of the proposal is very concerning for me. A 50% reduction in pesticides by 2030 in my eyes will cripple the arable industry in Ireland. Our climate allows for the highest yields in the world for cereals, but this cool maritime climate also provides the perfect conditions for wet weather fungal diseases. These diseases can have dramatic effects on my lively hood for example Septoria has the ability to reduce wheat yield by 50% if not controlled, similarly yellow rust has the ability to take over a field in a matter of days and reduce yield by up to 50%. In the case of barley, ramularia is a disease we didn't really have to think about 5 years ago as we had chemistry to control it but with the loss of Chlorothalonil this disease now is having a big impact on my crops. It also has the ability to reduce disease up to 40%. There is more disease I could mention in other crops but in short, they all have impacts on yield and therefore the productivity of my farm. On our farm we practice IPM, for example picking disease resistant varieties, delaying sowing date and crop assessment for the presence of pests. But with current varieties and farming practices we are not at a stage when we can grow our crops without the use of pesticides. It is widely known that Ireland is a net importer of cereal grains to feed our livestock population. If this purposed reduction in pesticides is to occur our reliance on imported feed will increase. This has both environmental and economic impacts. The carbon footprint of our animals' products will increase as the imported feed emits more emission than native feed. There is a cost in getting the feed to this country, therefore the price of feed will have to increase leading to a greater cost of production for the animal industry. For the above reasons I feel that purposed reduction in pesticides should be rejected as they are an essential tool in current farming practices. Another area of concern is sensitive areas. From my reading of the proposal sensitive areas are not clearly defined. For years the department has ignored the non-professional use of pesticides in amenity areas. There are large</p>

	<p>volumes of pesticides being applied in areas such as parks, railways and roads which are areas where pesticides should not be applied. Currently there are very few true “independent” advisors in the country. We use a few different advisors on our farm that are linked to merchants selling chemical products. I can only speak for the ones we deal with, but we find that they all practice IPM and are not prophylactic in the use of chemicals. They assess the crop and give the recommendation for what the crop needs to maximise yield which in turn maximises our profit on the crop. If these advisors were not allowed to advisors on crops, we would have no advice on the management of our crops. The impacts of this proposal are too long to mention but the destruction of an industry is the reality of the situation. I urge the department to strongly consider my points.</p>
149	<p>Ireland has a maritime climate which allows us to produce some of the best yields in the world. The same climate gives us more weed & disease pressure than anywhere else, and for this reason our pesticide use needs to be higher than our neighbours. Without these pesticides, yields would be decimated, and grain quality would be dramatically reduced. A blanket reduction (based on sentiment rather than science) would impact Ireland much more than the rest of the EU. The obvious results would be more imports of feed from countries with looser regulations and far higher carbon footprints than the EU. Internally, more of our tillage land would go to dairying (again with a carbon footprint at a multiple of tillage). Our rapidly expanding exports of porridge oats and gluten free oats would stall and fall. Our exports of beer and whiskey made from malting and distilling barley would also be slashed. All this at a time when global warming is causing severe drought in Africa, Argentina, and California and closer to home, extended dry periods in Italy, France, and even east England. When food security is threatened worldwide, surely, we cannot refuse to use our climatic advantage. The minister's well-intentioned plan to expand the tillage industry would be blown out of the water! Professional agronomists advising growers already recommend reduced rates in most cases for environmental as well as cost reasons. I strongly suspect any "independent" adviser would have difficulty reducing these rates further without risking both yield reduction and pest resistance. We can tighten up regulations on pesticide use to ensure only trained and registered professionals supply and apply and reassess these regulations periodically.</p>
150	<p>Without chemicals I will not be able to produce a crop that will be profitable for me to make a living so I have to change farming practices for tillage which might be as environmentally friendly.</p>

151	<p>I'm greatly concerned about the new sustainable use regulation. Firstly, the first target of the proposal is very concerning for me. A 50% reduction in pesticides by 2030 in my eyes will cripple the arable industry in Ireland. Our climate allows for the highest yields in the world for cereals, but this cool maritime climate also provides the perfect conditions for wet weather fungal diseases. These diseases can have dramatic effects on my lively hood for example Septoria has the ability to reduce wheat yield by 50% if not controlled, similarly yellow rust has the ability to take over a field in a matter of days and reduce yield by up to 50%. In the case of barley, ramularia is a disease we didn't really have to think about 5 years ago as we had chemistry to control it but with the loss of Chlorothalonil this disease now is having a big impact on my crops. It also has the ability to reduce disease up to 40%. There is more disease I could mention in other crops but in short, they all have impacts on yield and therefore the productivity of my farm. On our farm we practice IPM, for example picking disease resistant varieties, delaying sowing date and crop assessment for the presence of pests. But with current varieties and farming practices we are not at a stage when we can grow our crops without the use of pesticides. It is widely known that Ireland is a net importer of cereal grains to feed our livestock population. If this purposed reduction in pesticides is to occur our reliance on imported feed will increase. This has both environmental and economic impacts. The carbon footprint of our animals' products will increase as the imported feed emits more emission than native feed. There is a cost in getting the feed to this country, therefore the price of feed will have to increase leading to a greater cost of production for the animal industry. For the above reasons I feel that purposed reduction in pesticides should be rejected as they are an essential tool in current farming practices. Another area of concern is sensitive areas. From my reading of the proposal sensitive areas are not clearly defined. For years the department has ignored the non-professional use of pesticides in amenity areas. There are large volumes of pesticides being applied in areas such as parks, railways and roads which are areas where pesticides should not be applied. Currently there are very few true "independent" advisors in the country. We use a few different advisors on our farm that are linked to merchants selling chemical products. I can only speak for the ones we deal with, but we find that they all practice IPM and are not prophylactic in the use of chemicals. They assess the crop and give the recommendation for what the crop needs to maximise yield which in turn maximises our profit on the crop. If these advisors were not allowed to advisors on crops, we would have no advice on the management of our crops. The impacts of this proposal are too long to mention but the destruction of an industry is the reality of the situation. I urge the department to strongly consider my points.</p>
152	<p>Please see our submission in response to your public consultation regarding the EU Commission's proposed sustainable use regulation. We are firmly of the view that DAFM should strive to have golf courses exempt from the "Sensitive Areas" definition included in the proposed regulation as the impact of Article 18 will be detrimental to our industry, resulting in a significant economic and tourism impact to Ireland. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive area" includes the following areas: areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or</p>

sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive. Golf courses are, one assumes, included in recreation or sports grounds. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of golf courses in Ireland, causing a potentially devastating impact on golf courses and Golf Clubs in the Republic of Ireland, with associated knock-on effects to the economy and tourism potential. There is a complete lack of biological alternatives available in the market at present. We are calling for golf to be exempted from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euro and a reduction in employment levels in the industry, 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made, 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality, 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy, 8. The proposed regulations outlines supports Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years but no such supports will be available to the golf industry, 9. Should a full exemption for golf from the sensitive area definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there will be a significant commercial impact to golf in Ireland were the regulation to proceed as drafted. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.

153	<p>The two targets for pesticides within the Farm to Fork Strategy with aim to reduce pesticides by 50% by 2030 will not work for Ireland. This target is for a different climate, not one which has 10 times the rainfall as other EU competitor countries. Ireland also has a much higher disease pressure due to this climate and the bonus of this is the highest yields in Europe. Irish grain producers commit to investing in their crops up to 10 months before they are harvested. In that time frame the crops undergo weather ranging from drought conditions in the spring to completely impassable due to adverse rain also in spring. The disease pressure is a complete unknown at the time of sowing as is the price the farmer will be paid for his produce. Tillage farming in Ireland is not a get rich quick scheme, but a love and labour of the land. Farmers are willing to adhere to environmental measures, but we must be able to still grow these crops. Who will pay for substandard produce? Farm to fork also focuses on food produced locally, by forcing farmers to use 50% less pesticides, inevitably 50% less produce will also be available. Is purchasing produce to sustain a growing nation in line with farm to fork? The replacement produce will be grown in potentially non-EU countries and will have non-EU approved pesticides used on them. Integrated pest management is already incorporated into tillage farming. From the time a field is chosen Farmers already utilise IPM measures to limit the impact of pests and diseases on crops. From the time a field is selected, and the crop decided to go in that field, the variety, sowing date etc are all part of IPM tools. To adequately fight against pests and diseases a wide range of solutions is required, including pesticides. This will in turn reduce the severity and impact of disease and weed present. I feel having an electronic system will be in breach with GDPR, single farm payment is already there for all to see. Also, electronic systems are for the younger farmer, of which only 6.9% of total farmers are less than 35 years old, according to CSO figures in 2020. Bearing the Irish farmer age profile into consideration an electronic will not work.</p>
154	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission’s proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive areas” includes the following description: ‘...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.’ We assume that golf courses are included in the above description under ‘recreation or sports grounds’. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP’s will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP’s could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a</p>

	<p>prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
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156	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission’s proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of “sensitive areas” includes the following description: ‘...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.’ We assume that golf courses are included in the above description under ‘recreation or sports grounds’. This clause seeks to prohibit the use of these PPP’s on golf courses. PPP’s include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP’s will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP’s could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP’s. We support the proposition that golf be specifically excluded from the definition of “Sensitive Areas” for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals’ ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP’s on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP’s, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP’s such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements</p>
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	<p>imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
157	<p>Sustainable use of plant protection products. Irish farmers use several steps to achieve excellent quality, the highest yields in Europe and as environmentally friendly as possible produce. Several factors are considered before pesticide choice including, field selection, choice of crop to be planted, method in how the crop is planted, crop rotations and finally pesticides used. As the EU strives towards greener agriculture, the role of pesticides is sometimes not fully understood, and assumptions are sometimes made they are used unnecessarily, therefore, putting pressure on their availability. The pipeline of new crop protection products is a very slow and a lengthy process taking decades in some instances from molecule selection to finally having a product on farm. In the meantime, available products are reduced. The size of the crop protection toolbox of many specialty crops is already limited and specialty crops are already at risk for potential yield losses. If pesticides are excluded, it is currently possible, after following IPM measures, that there are no alternative methods to treat specific common diseases, pests or weeds. As part of IPM, diversity in available substances is crucial for facing immediate pest pressure and preventing long-term resistance effects. Withdrawn substances are not likely to be easily replaced. Barley, wheat, rapeseed and maize could face 10-20% lower yields, while potatoes and sugar beet might decrease by up to 30-40%. Higher yields and lower production costs for these crops support farmer income. Ireland is an importer for grain, reduction in yield will further increase the risk of grain entering Ireland that is produced with non-EU standards. As a knock-on effect from yield reduction, additional farmland might be needed to feed Ireland and Europe as a whole, where will this land be made available from? Integrated pest management (IPM). Currently, farmers carefully evaluate IPM measures to limit the impact of pests and diseases on crops. Before farmers consider the use of pesticide products and even before sowing crop rotation, seed and variety selection, cultivation practise, planting dates or planting densities are some of the different strategies used by farmers. To adequately fight against pests and diseases a wide range of solutions is required, including pesticides. This will in turn aid resistance management. As stated in European and Mediterranean Plant Protection Organization PP 1/271 (3) Guidance on efficacy aspects of comparative assessment, if there is evidence of medium risk of resistance in the target organism, at least three modes of action are recommended. With evidence of high risk, at least four modes of action are recommended. Maintaining a broad range of crop protection modes of action is therefore essential to reduce the risk of resistance. There is a fear in the agricultural industry that resistance could increase, reduced availability of solutions will have a knock-on effect and potentially increase resistance. This will in turn put pressure on the remaining alternatives, which</p>

would ultimately create yield losses. Not only yields will be affected but also cost of production, putting more strain on the already burdened farm income. This will in turn create a loss to the Irish economy. With lower average yields per hectare additional land would be needed to produce the same amount of output. Where will this land be made available from? Ireland has a favourable climate for cereal production with one of the highest yields/ ha in Europe, but Ireland is heavily reliant upon intensive application of pesticides due to high disease pressure. Yields achieved in 2020 in Ireland of winter wheat on average were 10.8t/ha in comparison with France 6.8t/ha. Due to unpredictable weather, it is imperative Ireland receives an allowance to use more pesticides in adverse weather conditions as a means of protecting the crop and remaining viable. Purchase of plant protection products, since 2015 all spray operators must be a qualified professional user. Also, since 2016 all sprayers must be tested. Farmers are adhering to all requirements already. Electronic record keeping; I have huge GDPR concerns with keeping records. The single farm payment is there for all to see and this will now be used as a tool from competitor farmers to bash each other. Or more importantly, from those who don't have the understanding of pesticides to create a flurry of concern about products that have gone through rigorous testing before they ever reach the market. The age profile in Irish farming is predominately above 35 years old, CSO figures in 2020 show only 6.9% of Irish farm holders to be under 35. This is a barrier to adequate record keeping if farmers are not computer literate. Advisory system, independent advice, Teagasc already offer independent advice but a lot of farmers choose to use advice from where they purchase pesticides. There is currently a shortage of advisors specialised in crops and it takes years to develop expertise. We are a small country and don't have the capacity to have independents and sales reps. Control on use of PPP in specified areas, the Nitrates directive was implemented to deal with this and the Climate action plan is ongoing. Control on storage, supply and disposal of PPP; there is currently a register of all sprayer operators. Professional pesticide users to spray pesticides already exists and they must be qualified. Also, IGAS, Irish grain assurance scheme is monitoring pesticides used. In conclusion, the 3 options suggested in the Sustainable use of plant protection products do not fit with Irish agriculture. A new purpose-built option must be made available taking into account; the levels of disease pressure in Ireland, the Irish climate different from other EU countries who can successfully use less chemistry, the already restricted pesticides available when compared with non-EU countries, the size of Ireland, we are sensitive zone according to EU guideline and restricting use in sensitive zones will completely eliminate crop growing in Ireland, independent advice, advice offered is specialised and takes years to master, where will the independent advisors come from?, Irish farmers age profile will potentially limit their computer literacy abilities and create unnecessary stress completing obligatory paperwork, It costs hundreds of millions for agrochemical companies to register pesticides and pesticides go through rigorous testing to gain approved, they are deemed safe at EU level to be approved therefore this reduction in use is unnecessary.

158	<p>This email is in relation to the inclusion of golf courses in the category of 'recreation or sports grounds' and 'sensitive areas' under the EU's proposed Sustainable use of Pesticides Regulation. While I agree with the theory of a chemical free maintenance programme for sports grounds and golf courses, with the current resources and alternative products available in the market to sustain such a proposed transition, it is impossible to do so. The introduction of these restrictions without the support of alternative products or education on alternative management techniques would be devastating to the sport on a domestic and international tourism level. The fine turf surfaces would become unplayable within months or even weeks resulting the closure of the course and facilities due to the inability to manage turf diseases and pest control. I ask that Golf Courses are made exempt from this ruling until the support mechanisms are in place to ensure a smooth transition so the industry may avoid the mass closure of golf facilities across the country.</p>
159	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of</p>

	<p>agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
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controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.

162	<p>I write to ask you to consider the very serious consequences of the proposed reduction in pesticide usage. Already the EU has the most stringent regulation in the world. I only use pesticides as sparingly as possible and only where necessary. I urge you to consider the points below. The reason for pesticides is to protect plants against pests and diseases which can dramatically reduce yield. If the EU makes a decision to reduce pesticides usage by 50% the remaining pesticides available will be used more, which over time will reduce their effectiveness. This will in turn reduce the yield of grains grown significantly. Mycotoxins can cause serious illness in both humans and animals. These mycotoxins thrive in wetter climates like Ireland. If the fungicides that control these fungal diseases were to be removed, it would make grain unsaleable and dangerous to use. To my way of thinking this is a very intentional way of reducing grain production in the EU. This will then have to be replaced with imports which the EU has little or no control over. If Europe reduces its production, we will have to buy grain on world markets. This leads to key questions; 1. Where will this grain come from? 2. What will it do to the cost of food in the EU and in the wider world? 3. Who in the world is going to go without? It should be noted that at the moment world grain markets are finely balanced with ever reducing carryover stocks on a year-to-year basis. We have an excellent family farm tillage enterprise in Ireland. It would be a shame to throw it away on questionable environmental benefits which haven't been explained and on an economic front that has not yet been costed. We shouldn't forget or take for granted food security. Recently, we all got a shock when energy prices shot up because of the very unexpected war in Ukraine. Are we going to expose ourselves to the same risk with food security?</p>
163	<p>We have steadily transitioned to a system of Conservation Agriculture (rotation, cover crops, no till crop establishment) and are now reaching a point where some might describe our farm practises as regenerative. In that time, we have also cut our reliance on pesticides, starting in 2013 with the elimination of foliar insecticides, in the last three years we have started to reduce our reliance on fungicides, for harvest 2022 30% of the farm was fungicides free, rather the focus has been on correct plant nutrition to produce health and more robust plants. This year we will be starting to look at how we can reduce the use of fungicide seed treatments. In that time, herbicides and particularly glyphosate have played an important role, we use glyphosate to terminate cover crops, which we then plant our cash crops directly into. We have experimented with mechanical methods of cover crop destruction, but never find them as total or complete as glyphosate and then a follow up application is needed. In crop weed control also plays an important role, but herbicides only form part of the strategy, with hand rouging, rotation, seeding date, machinery hygiene, variety and crop selection also part of the decision-making process. In all this time we have been reducing pesticide on farm, we have done so with the safety net of a well-stocked and easily accessible range of plant protection products available to us. In the case of fungicide free crops, the fields are walked and monitored on a regular basis, if felt that a pathogen had taken hold then a fungicide could be selected for its control in the next pass of the sprayer. I would advocate for the maintenance of the current range of plant protection products and for companies and research institutes in Europe to continue developing new products. Rather than forcing a reduction on farmers, I would much rather see decision support systems</p>

	<p>developed so that crops can be produced with the minimum of plant protection products, but should the need arise, they can be accessed. Conservation agriculture allows me to farm part time in a profitable manner, this system of farming, while not reliant on herbicides, is greatly simplified by their use. I fear that an enforced cut on pesticide usage would present me with a choice, switch to organic or rent/sell the family farm. In switching to organic I would be forced to spend longer hours on the tractor, cultivating soil to eliminate weeds and still not produce crops to the quality standard I currently do and spend less time with my young family- I struggle to see how this is a sustainable approach from both an economic, environmental or social perspective. The second alternative is to sell or rent the family farm, whose environment, and soils I have played a role in maintaining and improving is unbearable. Small, intensive, profitable farms producing high quality fuel, food, fodder and fibre for European supply chains is a future I believe in. It can only be achieved with the full "toolbox" as it were, available to European farms. We are now entering a dark period in world history, if European democracy is to survive and thrive, we will need all available resources at our disposal.</p>
164	<p>New varieties of cereals are being developed which are resistant to disease. Can we not wait for them. Ireland has a damp climate and needs to be able to stop diseases. We have some of the top yields in Europe and without disease prevention this would not be possible. Remember the famine. The war in the Ukraine is a reminder of food security. Europe has a very short memory. The carbon footprint of transporting food across the world is not acceptable anymore.</p>
165	<p>I strongly object to any more regulations on pesticides used in food production. There's already a food shortage in the world and organic farming will reduce food production.</p>
166	<p>I understand that regulations coming down the line with regards to the use of pesticides will aim to reduce their use by 50% before 2030. This is part of a directive to protect human health and food security, but I can only see this leading to the opposite effect and food shortage on a global and national level. Food producers are growing crops to attain the highest level of quality and yield to cover costs. This is only achieved with the use of pesticides at the recommended rates. Where would we be if we had mycotoxins in cereals, blight in potatoes, septoria in wheat, rhynchosporium in barley we would have no yield to cover cost and poor-quality food leading to health risks and shortages. I would like to see other alternatives to this proposal please. Otherwise, I see my future in food production diminishing rapidly.</p>

167	<p>I wish to respond to the EU's proposed direction of travel to reduce the risks and impacts of pesticide use on human health and the environment. If my farm becomes unviable as a tillage enterprise the only economic option is to convert to dairying which will have many environmental consequences. It will reduce the supply of native grains thus increasing the need for imported feed from abroad, which would substantially increase the carbon footprint of my farm while also having serious impacts on the local environment through the stocking of more dairy cows. I have implemented minimum tillage systems on my farm in the last 5 years and have invested in the latest technology which has allowed me to reduce my farm inputs while maintaining high production. I intend to keep progressing my farm in the future by means of diversity and working with nature to make it more & more economically & environmentally sustainable. However, there is no doubt that in the climate conditions which I farm, the use of essential chemicals will always be needed to allow me to achieve these objectives. I outline some of my concerns below in regard to the commission's updated proposal on the Sustainable Use of Pesticides Regulation. Key Concerns: Loss of Yield and Economic Impact: My farm can produce some of the biggest yields in the world. I can produce 50% more wheat per hectare than most of my EU counterparts and while my chemical use per hectare is high, my chemical loading per tonne of grain produced is very low with an excellent carbon footprint profile. My high yield capacity and favourable climatic conditions ensure that I am one of if not the most efficient producers of grain on a per ton basis in the world. My ability to produce big yields needs to be given special consideration as a "one size fits all" approach across the EU would be unfair to my Irish tillage enterprise. The cool temperate maritime climate provides the foundation for record yields but as a consequence also provides the challenge of growing crops with some of the highest disease pressure in the world. This means my chemical usage is high but on a per ton basis leaving the farmgate is quite low. Due to my high-cost base the only competitive advantage I have against my competitors on the world market is my ability to produce very high yields. This is what sustains my business model and what makes my farm viable as a tillage enterprise. Any enforced reduction in pesticide usage across the EU will impact my farm more than other EU producers. Yield potential will suffer, quality will deteriorate, and my farm income will be decimated. My land base used to produce crops will move to the dairy industry as the only viable alternative for food production. Dairy farming has a significantly heavier carbon footprint than crop production and will only serve to exacerbate the problem the commission is trying to solve under the green deal and will not improve it in any way shape or form. This is a huge unintended consequence of this draft regulation and one which we feel the commission hasn't fully thought out when formulating these draft proposals. A 30-40% yield reduction renders the Irish Tillage industry unviable. This will present a host of environmental, social and economic problems for Irish Society and policymakers for the next generation. We cannot let this happen. Impact on Grain Quality: The proposed reduction in pesticide usage by 50% by 2030 will have a profound devastating impact on grain quality on my farm. The cool temperate maritime climate makes growing conditions on my farm ideal for high yields and quality but also favours the proliferation of wet weather diseases such as Rhynchosporium, Net Blotch, Septoria and Fusarium. All these diseases have major negative impacts</p>
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on grain quality and infected crops are deemed unsuitable for food grade cereals due to mycotoxin production from said diseases. The Irish market has developed exponentially in the past decade or so with a massive increase in demand for grain to the Irish Drinks industry. Our Oats are world renowned for their quality be it Porridge Oats for Flahavans, Gluten free oats for the US market or Connolly's Red Mills world renowned equine rations. It is now estimated that the drinks industry is worth 2 billion to the Irish economy and growing. Huge global brands such as Guinness and Jameson are synonymous with the quality and reliability of Irish barley as a raw material. In order to supply these premium markets, all grain must meet certain quality criteria in terms of KPH, protein, moisture, be free of mycotoxins and ultimately sweet and sound. Due to our climatic conditions which provide these global brands with their renowned authentic provenance and flavour the Irish drinks industry has boomed. It is now one of our most valuable exports and provides a host of quality jobs. The fact of the matter is without the current supply of Plant Protection products the quality of grain required by this valuable industry will be impossible to achieve. It will be a huge opportunity lost for the Irish Ag Food Sector, Economy and Society as a whole.

167(a)	<p>Food Security: In light of recent developments in world geopolitics since this proposal was first drafted the issue of food security has become a massive concern. The Russian invasion of Ukraine a key world food producer and major exporter into Europe has seriously exposed the fragility of the global food supply chain. Markets have spiralled in terms of input costs and the market price for grain. Record prices were achieved in 2022 primarily on the back of issues around Black Sea Exports. This has fuelled inflation to record levels and made food very expensive for the consumer. We are lucky as Europeans as we can by and large afford to purchase expensive food but most of the developed world will struggle to afford and secure expensive food. This will and has plunged millions of people into hunger. This surely flies in the face of the EU farm to fork strategy. The European union as the most developed trading block in the world also has a moral obligation to feed its citizens and not to contribute to world hunger on humanitarian grounds. The reduction in the yield which will inevitably come about as a result of these proposals will only serve to exacerbate these already very real problems. We must not forget that one of the four key pillars of the Common Agricultural Policy from its inception was “to provide certainty of food supplies to the citizens of Europe and to ensure that those supplies reached consumers at reasonable prices”. This draft proposal seems to directly contravene these stated aims by directly inhibiting farmers ability to produce high quality food for the people of Europe and beyond. EU policy seems to have drifted from food security to more lofty environmental aims. The environment and how our food is produced is clearly important, but the green agenda needs to realise that world population is continuing to increase with a 55% increase in output by 2050 required to meet global demand. The draft proposal also includes an aim to produce 25% of European food organically. Due to poor yield and quality from organics this will take 50% of the land area to achieve. This will accelerate food scarcity and increase inflation pressure. Surely the Commission can see that this will be a massive unintended consequence of the draft proposal. A fairer balance needs to be found between the green deal and ensuring food security for all the citizens of Europe than is contained in this draft proposal. It should be remembered that in order to move forward we must first and foremost refrain from prohibiting until alternative solutions have been found. It is only science that can respond to these challenges. Issues around Candidates for Substitution: I have significant concerns in relation to products that are deemed candidates for substitution. Candidates for substitution should mean what it says and no active ingredient should be substituted until a replacement, which is at least as effective, is found. From my reading of the draft proposal this does not appear to be the case. It appears more like a list for removal with no clear alternative proposed. Take chlorothalonil for example, the most high-profile casualty from this list in recent years. It was one of the only multisite modes of action preventative fungicides, and most effective. It formed the cornerstone for resistance management in fungicide programmes for a generation. It was revoked in the EU (and granted an extension in Canada) in 2019. The replacement product for chlorothalonil is folpet with a recommended rate 50% higher than chlorothalonil. It is also less effective than chlorothalonil, so the partner products also need to be used at 20% higher rates. With chlorothalonil a typical T1 on Spring barley was 1.0l/ha chlorothalonil, 0.5l/ha pyraclostrobin and 0.4l/ha prothioconazole (700 grams active/ha). With folpet a typical T1 on Spring barley</p>
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is 1.5l/ha folpet, 0.6l/ha pyraclostrobin and 0.5l/ha prothioconazole (995 grams active/ha). This equates to a 40% increase in chemical loading yet still has reduced efficacy on the target disease in this case ramularia. If this is how the “candidate for substitution” process will work, we cannot see how the commission can achieve any reduction in pesticide usage under this proposed regulation. I feel there is a lack of clarity and joined up thinking around the whole concept of reducing pesticide usage under current guidelines. Any removal of active ingredients should be science based only. Political trade-offs have no place in food security issues. The removal of epoxiconazole in 2020 was forced by three dominant member states, even though evaluations of the active were not fully completed. Most remaining triazoles are candidates for substitution. This is a huge concern for me as an Irish Grower as losing any more of them will accelerate resistance development and directly contradicts scientifically proven Agronomy best practice. Implementation and Interpretation of IPM strategies: I feel there is quite a large emphasis on Integrated Pest Management in the draft proposal. I fully agree with & am behind IPM and feel it is essential to sustainable crop production. However, I feel there might be a misconception as to how it is viewed and used currently, and I wish to address that. The tone of the draft proposal suggests that farmers are disregarding IPM strategies and instead blanket overusing pesticides to produce crops. Nothing could be further from the truth in terms of everyday practice on my tillage farm. IPM is the toolbox from which crops are produced and pesticide use is just one very important tool in that toolbox. Farmers always use a number of strategies prior to using pesticides i.e., crop rotation, seed and variety selection, cultivation practices, planting dates and planting densities. In recent years farmers have wholly embraced cover cropping to reduce fertiliser usage, promote soil health and biodiversity and improve water quality. Significant investment has been made by me & other Irish farmers in machinery to reduce reliance on ploughing and adopt minimum tillage, strip till and no till methods to reduce soil disturbance and carbon release. Pollinators are actively promoted on Irish Tillage farms and beehives are seen in most crops of oilseed rape. To adequately fight against pests and diseases a wide range of solutions is required, including pesticides. This will in turn aid resistance management. As stated in European and Mediterranean Plant Protection Organization PP 1/271 (3) Guidance on efficacy aspects of comparative assessment, if there is evidence of medium risk of resistance in the target organism, at least three modes of action are recommended. With evidence of high risk, at least four modes of action are recommended. Maintaining a broad range of crop protection modes of action is therefore essential to reduce the risk of resistance. Without pesticides there will be reduced availability of solutions, potentially an increase in resistance and in turn reduced yield. Pesticides are an integral part of a holistic approach to IPM on every viable Tillage farm.

167(b)	<p>Clarity around Independent Advisory Requirements: The draft proposal contains some specific proposals around the use of independent advisors for plant protection products. It is stated in the proposal that there is a conflict of interest between plant protection advisors who also sell plant protection products. In the context of the Irish market this may present considerable challenges. Teagasc as our state advisory body do valuable work but lack the manpower to commercially walk crops to the levels currently provided by technical sales agronomists. Agronomists are a very scarce commodity as it is and many growers have long standing relationships with their merchant agronomist build up over years and in whose advice, they rely on and trust. The Irish market may be unique in this regard but relies very much on a collaborative approach between growers and commercial agronomists. The notion at policy level that many plant protection products are being used at excessive levels to boost sales is a falsehood. Many commercial agronomists often use reduced rates to try adding value to their customers in a competitive marketplace. The blanket approach is not taken and great effort is made to only use products as required. It is the weather and not commercial interests that dictate levels of usage of plant protection products in this country. I feel that the imposition of an independent advisory body would be counterproductive to best practice already in widespread use on Irish Tillage farms.</p> <p>Impact of Draft Proposal in the context of increasing Tillage Area: The government has committed in principle under the climate action plan to increase the area under Tillage by 50,000 ha to 400,000 ha. This has been done in the context of mitigating our carbon emissions as a country and using crop production as the vehicle which the country uses to reach its emissions reduction targets and combats climate change. I see this as a massive positive for my industry and wish to commend the government for realising that crop production can be part of the solution for all of society. However, I feel this draft proposal will directly scupper that stated aim. If crop production is unviable then despite all the ambition to increase the Tillage area it will not happen on the ground. Land is needed to achieve this production increase and is currently in the highest demand cycle for land in the history of the state. I feel the government has failed to calculate the unintended impact of the new Nitrates regulations. Dairy farmers are not reducing stocking numbers they are actively seeking to increase their farmed area to dilute stocking rates. They are willing to pay exorbitant land rents to achieve this and are being actively encouraged to do so by state bodies. Tillage farmers for which a significant portion of their cropped area is derived from rented land cannot compete at figures of up to 500 acres for land. This is in direct opposition to what the government wants to achieve under the climate action plan. So why is it being actively encouraged by Nitrates policy?? Farmers cannot be expected to produce crops at an economic loss. Without plant protection products we cannot remain viable as an industry due to inevitable yield and quality losses as a direct consequence of this proposal. I urge the government to reject this proposal in its current form and produce a fairer solution for Irish farmers and all food producers in the EU.</p> <p>Increased reliance on Imported Grain from Third Countries: The proposal states in its impact assessment that yield will be reduced, and costs will go up as a result of its implementation. The direct result of this is a reduction of Irish and EU grain crops. If this proposal is designed to reduce the risk of dangerous chemicals in the food chain, then I fear this proposal will achieve exactly</p>
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	<p>the opposite. As nothing has changed in terms of demand for grain, more unregulated imported grain will be needed as a reduction in regulated, carbon neutral Irish produce becomes less available to the market. Non-EU countries, from which we already import grain, use hundreds of active chemicals which have long been banned in the EU. The direct result of this proposal is an increase in imported grain and therefore an increase of dangerous active chemicals used on grain consumed in Ireland. Ireland is the highest yielding country in the world per acre for wheat barley and oats, this means that chemicals per ton of grain are lower than other countries. Pesticide controls inside the EU are already the best in the world, so why are we implementing a policy which reduces the amount we produce here? The unintended consequence of this policy is a net decrease of safely produced EU grain, to be replaced with less regulated 3rd country imports. This cannot be in line with the farm to fork strategy and in the best interests of EU Citizens.</p>
167(c)	<p>Reduced Tillage Capacity would have negative impact on Country's Carbon Reduction Targets: Irish grain is farmed with a very low carbon footprint. When taken into consideration against our EU counterparts and worldwide competitors it is probably the most carbon efficient grain in the world when all factors in production and supply chain are factored in. In fact, crop farming can be developed to be a useful source of carbon sequestration. Acting as a sink taking carbon out of the atmosphere and storing it into the soil. With the previously stated reduction in Industry competitiveness, we face as a result of the proposed SUR, more land will revert to dairy farming. Dairy expansion coupled with very strong Dairy markets has seen demand for land for Dairy farming explode exponentially. New Nitrates regulations in terms of stocking densities permitted mean dairy farmers must spread their herd over more land. Although the dilution of that sectors' footprint over more acres seems positive, if it takes carbon neutral crop farming out of production (due to impossibly high land rent rates for tillage farmers) it is counterproductive. SUR makes tillage farming less competitive and opens the door to more dairy and less tillage. As a result, this proposal will directly prevent us from meeting our stated targets under the climate action plan. The Irish Government have stated that their aim is to increase the area under tillage to reduce the overall carbon output of agriculture. Again, why introduce policy that stops us from meeting our climate targets? The change in land use from tillage to dairy would increase carbon emissions of the country, in addition to the added carbon emissions from an increase in imported grain. The carbon footprint for imported grain is as much as 24 times higher than grain produced in Ireland. Any increase in imported grain is importing huge carbon emissions. This increase undermines the credentials of Ireland's food and drinks sectors as well as animal feed. A broader holistic approach is essential here to evaluate the consequences of this proposal. Conclusion: I feel strongly that this proposed directive will have a hugely detrimental impact on my own tillage enterprise & ultimately will render it unviable. While I recognise the need for a reduction in overall pesticide use, I feel that this needs to be concentrated on other users of these products. The use for food production must be maintained or it will have a detrimental impact on both the tonnes per acre produced and the quality of the grain produced. Tillage farming is almost carbon neutral and is always improving itself environmentally by using the latest technology, farming practices, regenerative</p>

	<p>agriculture and IPM. If this directive is passed in its current guise, it will only have the effect of reducing the acreage under tillage farming rather than increasing it. In terms of our national carbon output this can only have a negative impact. I wish to be part of the solution to reduce carbon emissions and produce safer more sustainable food. Pesticides are an essential piece of this jigsaw and I implore the Irish Government and the Commission to amend this draft proposal to ensure a fairer fruitful future for all.</p>
168	<p>In response to the SUR proposal, I outline the following reasons as to why this is not a viable proposal: 1. I make my living from tillage farming to support my young family, 2. Removing pesticides will reduce the quality and yield of my crop. Furthermore, it will detrimentally affect my ability to sustain an income that will support my young family. If quality is reduced as a result of a virus/fungal infection merchants are not interested in taking substandard products - who then will take my product? and who compensates me for a loss of earnings? 3. If yields decline across Ireland/Europe then where will the shortfall come to make up the difference and meet the needs of the Irish/EU market? 4. Furthermore, if yields decline and as a result, outside markets are used to fill the shortfall, what pesticide criteria will these markets have in place in order for their products to enter our markets? - If Ireland/EU ban pesticides which leads to a reduction on our market yield, and we then have to go to outside markets who potentially have no pesticide restrictions we end up using markets that are using produce we have banned to replenish our market.</p>
169	<p>Any move to prohibit entirely the use of PPPs will have a detrimental impact to the presentation and performance of golf courses in Ireland. The impact on golf courses, associated golf clubs and golf tourism across the Republic of Ireland would be devastating. Business case for exemption of golf courses as a 'Sensitive Area'. With no biological alternatives available in the market at present, we call for golf to be exempt from the definition of 'Sensitive Areas'. 1. Article 18 poses a significant threat to sports turf professionals' ability to maintain golf courses to standards expected. Course conditioning would deteriorate rapidly and substantially, 2. Declining standards will cause a major shock to the industry. Participation levels will reduce, golf tourism will reduce given Ireland's proximity to alternative UK links courses, 3. 8% of the European citizens that live in Ireland will experience deteriorating golf experiences. For many older people, golf is their main outlet for exercising and socialising, 4. The economic impact in Ireland could run to tens of millions of Euros and mass industry unemployment, 5. Golf courses represent just 0.17% of the land mass of agriculture and golf accounts for just 0.34% of active ingredient applied. The prohibition of PPPs application on golf courses will have little environmental impact, should the agriculture sector continue to apply PPPs, 6. Ireland will be disproportionately affected given its location in the Atlantic stream, year-round golf season and the country's popularity within the North American golf tourism market, 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPPs will increase mowing frequencies and the use of such equipment, which will increase in CO2 emissions and adversely impact human health and the environment (two key objectives of the European Green Deal and Farm to Fork Strategy), 8. The proposed regulations outline 5-years' of supports that Member States may provide to farmers under the CAP to help cover</p>

	<p>the costs of complying with these imposed requirements. No such supports are available to the golf industry, 9. Should a full exemption for golf from the sensitive area definition not be achieved, or not gain enough support across Europe, it is vital the Irish Government ensures a suitable derogation is provided to protect the golf industry in Ireland. There will be a significant commercial impact to golf in Ireland should the regulation proceed as drafted. The Department of Agriculture, Food and Marine, together with other State Departments with a beneficial interest, must take every measure to protect the golf industry in Ireland.</p>
170	<p>In my submission I would like to make practical suggestions. I have grass I reseed every 10 years to put in more clover I do this by no till reseed which involves killing off the existing sward and then "scratching " the ground to bring up a fine layer of dust to adhere to the grass and clover seeds glyphosate is vital for this always docks grow from seed at this time if I do not spray the new crop with clover friendly spray I have negated the advantages to reseed the alternative is ploughing if no sprays available with diesel / energy outputs and a potential degradation of soils however the amenity gardener has no real need of chemicals in their gardens so I propose only food producers have access to pesticides.</p>
171	<p>I see first-hand the care and attention to detail that surrounds the use of agro chemical in the tillage industry. These chemicals are essential to maximising yield and preventing noxious weeds from taking a foot hold on Ireland productive land. The proposed reduction of chemicals would greatly reduce the viability of both tillage and grass production sectors with major losses of jobs. This planned reduction goes against Irelands climate actions targets of having an extra 40,000 Ha of tillage by 2030. With the tillage land base already under threat from the dairy sector this will further reduce if not abolish the tillage sector in Ireland. It is proven that high yielding crops sequester more carbon into the soil, a drop in crop yields will lead to a reduction of carbon sequestration. Irelands temperate climate means we have a higher requirement for pesticides versus the rest of the EU, therefore these rules will have a greater impact on the sustainability of the agri sector here. If Ireland tillage sector is lost due to this rule it will increase Irelands and EU's reliance on imported feed, which has a higher carbon footprint. This imported feed is produced in countries where pesticides which are banned in the EU can be used, this will result in more pesticides in the food chain. This will also reduce European food security and may led increase food prices. I would ask you to reconsider the proposed SUR and consider the long term affects that this will have on Ireland, the rural economy, and my career in the tillage sector.</p>

172	<p>There is a business case for exemption of golf courses as a 'Sensitive Area'. With no biological alternatives available in the market at present, we call for golf to be exempt from the definition of 'Sensitive Areas'. 1. Article 18 poses a significant threat to sports turf professionals' ability to maintain golf courses to standards expected. Course conditioning would deteriorate rapidly and substantially, 2. Declining standards will cause a major shock to the industry. Participation levels will reduce, golf tourism will reduce given Ireland's proximity to alternative UK links courses, 3. 8% of the European citizens that live in Ireland will experience deteriorating golf experiences. For many older people, golf is their main outlet for exercising and socialising, 4. The economic impact in Ireland could run to tens of millions of Euros and mass industry unemployment, 5. Golf courses represent just 0.17% of the land mass of agriculture and golf accounts for just 0.34% of active ingredient applied. The prohibition of PPPs application on golf courses will have little environmental impact, should the agriculture sector continue to apply PPPs, 6. Ireland will be disproportionately affected given its location in the Atlantic stream, year-round golf season and the country's popularity within the North American golf tourism market. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPPs will increase mowing frequencies and the use of such equipment, which will increase in CO2 emissions and adversely impact human health and the environment (two key objectives of the European Green Deal and Farm to Fork Strategy), 8. The proposed regulations outline 5-years' of supports that Member States may provide to farmers under the CAP to help cover the costs of complying with these imposed requirements. No such supports are available to the golf industry, 9. Should a full exemption for golf from the sensitive area definition not be achieved, or not gain enough support across Europe, it is vital the Irish Government ensures a suitable derogation is provided to protect the golf industry in Ireland. There will be a significant commercial impact to both Golf & Tourism in Ireland should the regulation proceed as drafted. The Department of Agriculture, Food and Marine, together with other State Departments with a beneficial interest, must take every measure to protect the Golf & Tourism Industries in Ireland.</p>
173	<p>We are very concerned of this new directive that is looking to be introduced. It would be detrimental to the wider golf industry within Ireland. We list below some key points raised by common industry friends and would insist that you take this very seriously. The implications could wipe out one of Ireland's major tourist attractions not mentioning a huge industry employer. Article 18 poses a significant threat to sports turf professionals' ability to maintain golf courses to standards expected. Course conditioning would deteriorate rapidly and substantially. Declining standards will cause a major shock to the industry. Participation levels will reduce, golf tourism will reduce given Ireland's proximity to alternative UK links courses. 8% of the European citizens that live in Ireland will experience deteriorating golf experiences. For many older people, golf is their main outlet for exercising and socialising. The economic impact in Ireland could run to tens of millions of Euros and mass industry unemployment. Golf courses represent just 0.17% of the land mass of agriculture and golf accounts for just 0.34% of active ingredient applied. The prohibition of PPPs application on golf courses will have little environmental impact, should the agriculture sector continue to apply PPPs.</p>

	<p>Ireland will be disproportionately affected given its location in the Atlantic stream, year-round golf season and the country's popularity within the North American golf tourism market. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPPs will increase mowing frequencies and the use of such equipment, which will increase in CO2 emissions and adversely impact human health and the environment (two key objectives of the European Green Deal and Farm to Fork Strategy). The proposed regulations outline 5-years' of supports that Member States may provide to farmers under the CAP to help cover the costs of complying with these imposed requirements. No such supports are available to the golf industry. Should a full exemption for golf from the sensitive area definition not be achieved, or not gain enough support across Europe, it is vital the Irish Government ensures a suitable derogation is provided to protect the golf industry in Ireland.</p>
174	<p>The war in Ukraine has demonstrated Europe's lack of energy security. If this proposal gets through, then Europe will also expose itself to the risk of reduced food security. Food production will become more difficult and more expensive. There will be an increase in imports from outside Europe as yields will decrease in Europe because of lack of plant protection products and also more land been taking out of production. Irish and European growers are well trained and use plant protection products in the correct manner. By bringing in this proposal, we will have to take food from parts of the world where there are not the same high standards. We have a healthy regulated industry in Europe already, we do not need to make life more difficult and at the same time pass food production to regions that are not as regulated as European countries. Please let common sense prevail.</p>
175	<p>The proposed regulations will militate against any increase in arable crop areas. It will leave our bovine herds reliant on imported animal feeds, much of which will come from outside the E.U. and which will not comply with current E.U. standards not the mind the proposed new standards. Most of the imports are GM material and many will have received pesticides which are long banned in Europe. Our horticultural industry has been in decline for the past 20+ years leaving us importers of vegetables which we are well able to grow ourselves. Further restriction on pesticides will hasten that decline leaving the Irish people consuming vegetables and fruit to whatever standard other countries may have. Irelands climate leaves all crops at risk of wet weather diseases; so much so that many pesticides are tested here, by international companies, before products are launched in the E.U. and throughout the World. Imposition of the proposed legislation will put our farmers at significant disadvantage; force us out of crop production and leave us reliant on whatever product is offered to us by non E.U. countries. The fact that we are not being offered any solutions should enable an appeal to the European Courts if the legislation in its current form is adapted. The legislation is looking for a blanket reduction in active ingredients (a.i.) without scientific basis. The fact that the reduction in pesticide use in Ireland will not necessarily give a reduction in a.i. used in the products that our animals and our people will consume puts the proposal into a category of RESTRICTION WITHOUT BENEFIT. In addition to the impact on commercial feed and food production the legislation will also impact on our ability to control invasive species which in turn will impact on biodiversity. Our biodiversity has already been impacted by dairy farmers renting our good quality lands forcing beef and tillage</p>

	farmers to take poorer quality lands, some of which are biodiversity rich, and farming them in a more intensive manner. Legislation drafted without fully researching potential impacts is likely to do much more damage than maintain the status quo.
176	I am totally against the SUR proposal. In the Irish climate we cannot take any more cuts in pesticide use without an alternative way to control disease. With a 50% reduction it would set back cereal yields by 50% or 50 years. GM crops should be in place before anymore reduction in pesticides. After all, if the grain is not produced in Ireland, it will be imported from other countries where GM is allowed and where there is no traceable.
177	Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately

	<p>affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
178	<p>It would be impossible to control weeds in over 350 locations without the use of pesticides. If there was a viable alternative, we would definitely consider its use, if efficient and costed reasonably. It is not possible to control weeds by use of strimming equipment. Physically you couldn't pull all weeds with the same number of operatives. The increased possibility of re-growth would be a costly factor. We previously worked in Dublin, but the spraying business was terminated due to the use of pesticides. We have noticed a lot of growth on the footpaths, playgrounds, pedestrian crossings etc and it makes the areas look unsightly, uncared for and in disrepair. We also see the possibility of trips and falls as weeds reach full height / strength. From a tourist point of view, it makes roads, paths, crossings etc look unsightly and unkempt. For a normal bodied person with good eyesight only a small trip hazard but for elderly people or people with poor eyesight it could cause falls / injury. In more extreme cases the integrity of the concrete, paths etc can be affected. It would not be unusual for weeds to damage tarmacadam etc resulting in costly road repairs and inconvenience caused to road users etc. both car & bicycle. In relation to Japanese knotweed, hogweed, ragwort, noxious weeds etc pesticides such as glyphosate are vital in controlling the growth of these poisonous weeds to both the general public and animals. Iarnrod Eireann also would need weeds to be controlled on their entire train infrastructure. How could this be done? How could weeds be controlled over such a large area without spraying? We would recommend that any decision be postponed for a minimum of say 2.5 years to improve the likelihood of an alternative product to be found that could control the growth – spread of weeds.</p>
179	<p>Whilst we are aligned to the EU targets for overall pesticide use reduction, and to the need to reduce all human and environmental health risks, we would like to present the following concerns in relation to the current proposed regulation – most notably the potential for a blanket ban on all pesticide use in urban areas, sports grounds, and sensitive areas (regardless of toxicity,</p>

biological chemistry). Our concerns include the unplayability of the most important parts of the golf course. Golf clubs will be at risk of catastrophic damage to playing surfaces (Including the specific areas that are vital to the playing quality). This at a time when climate change is increasing the frequency, impact and variance of pest and disease damage to golf courses. Severely damaged playing surfaces will be a major point of golfer dissatisfaction (making golf courses unplayable), leading to a predictable loss of players and a primary source of revenue into grass roots golf facilities. For many facilities this could undermine the business resilience, profitability, and viability of the facility. With weakened business models, golf course land becomes more vulnerable to be acquired and reused – most often for harder and less environmentally sensitive forms of development leading to loss of the vital urban/rural greenspaces, ecosystem services, recreational provision and other wider social benefits golf generates in communities. Loss of urban biodiversity is a particular concern as already pressured as urban areas increase in spread and density. In terms of golf clubs in rural areas that are no longer viable it would be a concern that these lands return to farmland which would result in an increase in the use of pesticides on that land. From an Irish perspective, the implementation of the regulation as proposed, will create a unique situation. In that on our island, golf courses in Northern Ireland will have a distinct advantage in terms of playability and maintenance over their colleagues in the Republic of Ireland. This potential situation would be untenable. The impact of Irish Golf Tourism which as highlighted previously significantly contributes to the Irish Economy and specifically the Irish rural economy. Ireland is at greater risk of this impact since Golf Clubs in United Kingdom and Northern Ireland will not have to adhere to this regulation. This will result in playing conditions deteriorating in Ireland leading golf tourists to pick destination in the UK instead of Ireland. This is particular relevance to links courses which see a high volume of tourists arrive in Ireland to play and which competition exists from facilities in United Kingdom. The reduction in playing numbers will adversely affect the social and health impact of Golf in Ireland. As highlighted previously Golf has a significant impact on the physical and mental health of individuals and is one of the most popular sports in Ireland. The resulting loss in participants will also serve to reduce the health of 540,000 golfers that play annually. The inconsistency between a targeted and transitional reduction in the larger agricultural sector with potential sudden blanket ban in the much smaller amenity sector. The current wording of the EU Draft Regulation creates inherent risks to Golf in Ireland with potential unintended and undesired social, environmental, and economic consequences, as outlined above. With the risk of weakened business models, it may also require different forms of public financing since the majority of golf courses are currently privately funded. In the context that golf, it is already an extremely small consumer of PPP's and active ingredients (in terms of gross consumption as well as input per hectare across the EU), and with fair, transformative regulation could continue to advance IPM, lower toxicity chemicals and transition to biological solutions, we respectfully request that when finalising the specific text of the regulation, the EU institutions include the following provisions to ensure some small but extremely important allowances for the unique context of the sport of golf. Allowance for national Member State regulatory agencies to determine specific policies towards golf and other sports grounds in their national determinations and

	<p>target setting. Allow National Governing Bodies to continue to liaise with the competent regulatory body in each country to discuss specific targets, as well as developing the means to monitor, validate and report. The opportunity to build out existing co-regulatory approaches that benefit all stakeholders. In this way we encourage adoption of the reduction target contained in Option 2 – namely: “Member States would set their own national reduction targets using established criteria.” Options for continued use of specifically registered and approved for amenity use plant protection products, with regulation directed towards the more hazardous category 3 active ingredients and not to lower toxicity products and biological controls which are targeted towards specific areas vital to the playing quality on golf courses. Retain options for golf to use low toxicity and biological controls for specific pests and diseases when these new generation products for targeted areas vital to playing quality come to market, this way driving innovation to replace the currently labelled substances. Golf courses and their “areas vital to the playing quality” to be specifically referenced in definitions and therefore considered separately from the total managed area of the golf facility. Specify these small areas of the golf course as particularly important to the success of the sport and all the social, economic and wider environmental benefits that golf brings. In terms of the total area of land across Europe to which plant protection products are applied, these areas are extremely small.</p>
180	<p>It is important to note from the outset that we support the EU’s stated objectives to reduce chemical use in society, and any associated risks to human and environmental health. We have been actively involved in encouraging and implementing Integrated Pest Management (IPM) programme on turf sports pitches for over 15 years. We have a track record in collaboration with and adherence to the existing Sustainable Use Directives (SUD). Football and Sports turf presents a low risk profile for exposure to chemicals in comparison to intensive farming. It is however critical that as part of our IPM programmes, the use of chemicals in control of turf disease in particular remains an option. We believe the text as outlined in the draft Regulation, moves towards a generalised regulatory approach which would create inherent risks to our members ability to create natural turf football fields in climates such as Ireland. This would also lead to the unintended consequence of developing fewer natural turf pitches and more synthetic turf pitches with increased microplastics as a result of not being able to manage natural turf in our climate. Natural turf pitches form the backbone of football in Ireland. A reduction in the quality of the turf in such facilities will inevitably lead to lower usage levels of the facility. This in turn will lead to less participation in the sport of football and also the loss of jobs in the maintenance of such facilities. Plant protection products are an essential tool in the management of natural turf and must remain available (under strict controls) as a last resort tool of management. We would recommend that a phased approach to regulation is implemented to allow for the development of new biological and cultural methods in disease control. In the meantime, we urge that the currently available pesticides would remain available until suitable natural alternative methods are established.</p>

181	<p>We want pesticides used only as a last resort. Pesticides destroy soil, pollute water, destroy biodiversity, harm our health, and force farmers to be dependent on costly toxic chemicals. Ireland should aim for a reduction of 80% of synthetic chemical pesticides by 2030. Vote with other EU States to stop the licence from allowing toxic glyphosate use. Support farmers and small-scale food producers to transition to more ecological methods of farming and food production. The definition of pesticides should specify 'chemical pesticides' in order not to include biocontrol, a method of controlling pests, such as insects, mites, weeds, and plant diseases, using other organisms. Define reduction targets, timelines and measures to reduce dependency, not only for the five most used pesticides but for all chemical pesticides. Full transparency and controls of all pesticide use i.e., detailed and monitored measuring and record-keeping by everyone involved. An immediate end to desiccation to the practice of spraying glyphosate on food crops before harvesting. Ban chemical pesticides in all sensitive areas (including railways, sports grounds, roads, playgrounds, schools, public gardens, sensitive habitats, woodlands and forests) as well as for private use. Apply a polluter pays principle where it is found that excessive use has occurred.</p>
182	<p>If this proposal is to find its way into European agriculture regulation, we can say goodbye to the Irish tillage sector as we know it today. It will be dead and gone!! What will that do for our environment, not to mention carbon footprint for this fabulous food producing country of ours.</p>
183	<p>I write to object in the strongest possible way to the proposed changes in the use of pesticides. Farmers have never been better trained and coupled with sprayers which have been tested and declared fit for purpose by the department of agriculture, surely a little trust should be placed in the current system. One of the principles of the EU is food security, for not alone the citizens of Europe but for the world populations, surely these proposals will put this basic security at risk. Please rethink this proposal and allow farmers to produce crops in a sustainable fashion.</p>
184	<p>It is essential that we farm alongside our environment and try to protect the natural habitat that surrounds us We as farmers are trained in the use of pesticides and all other plant protection products even down to the sprayers we use are regulated with inspections, but, when we are so tightly regulated the ordinary people in the streets can simply walk into a hardware store and pick up glyphosate or pesticides such as slug pellets or indeed pesticides to kill green fly on roses which are with in a very small distance from a house It seems to me that you no longer want Irish farmers producing food in Ireland but import from around the world where there is no regulation on what is applied to food crops What about the carbon footprint We need more than ever to have food security and not rely on imported poisonous food.</p>
185	<p>I was an early adopter of integrated pest management which I viewed as just writing down the common-sense things I was already doing on my farm. Here we only use pesticides when they are absolutely required, they are so expensive it is commercially disadvantageous to do anything else. We have stopped using insecticides here as we think the benefit on average over a number of years doesn't outweigh the costs both financial and environmental. Any products we use on our farm are</p>

	<p>required to produce a commercially successful crop with harvested produce which meets all standards necessary for its intended market. Trying to reduce our pesticide usage to an arbitrary lower figure would jeopardize our business. In conclusion, I say we use only products that are necessary to produce a commercial harvest of high-quality food and reducing the number of products available to us, the number of treatments we can apply or the rate we can use would most likely make growing winter cereals unviable and make spring crops very doubtful. Changes like this would have vast and unquantifiable effects both on the industry here and on the environment, with major changes in land use and habitats for threatened species like the Yellowhammer which feed on stubble and do well in our area.</p>
186	<p>Against the proposal for a Sustainable Use of Pesticide Regulation. Both target 1 and Target 2 within the Farm to Fork Strategy will have a detrimental effect on Potato and vegetable production in Ireland. The viability of potato and vegetable production in Ireland will be ultimately undermined by the reductions set out in Target 1 and Target 2. The temperate Irish climate has been producing some of the best and world leading produce along with some of the highest food producing standards with the Bord Bia accreditation however this climate comes with its challenges of diseases, virus and weed pressures throughout the season. 90% of the varieties that we are producing have been grown in Ireland since the 1980s and 1990s with very limited development in new varieties that may have resistance to some of our challenges, even when new potato varieties are available for example, we cannot get them listed in retailers as the Irish consumers demand traditional varieties such as Rooster, Maris Piper, Kerr Pinks, Golden Wonders and British Queens. Over the past decade we have been growing crops to eliminate our reliance on imports, two examples that have been well covered in the national media along with the Department of Agriculture, Bord Bia, Teagasc and the IFA are the Salad Potato project and the Chipping Potato project. Both projects have the ultimate outcome of growing these crops locally and eliminating our reliance on imported produce. We are delighted that we now have 12 months' supply of Irish Bord Bia approved salad potatoes for our customers and are driving the chipping project forward each year to the goal of full year supply. Food Vision 2030 mission 2 action 27 aims to develop the chipping and salad potato sector along with Horticulture Action 32 focusing on significant potential for import substitution of fruit and vegetables. The reduction of these imports will reduce our reliance on imports from other countries, increase our own food security and reduce the carbon footprint / food miles drastically. The reduction set out in Targets 1 and 2 will force growers out of the industry due to them not being able to compete with imported produce from countries that either don't have the same diseases, virus and weed pressures we have or from outside the EU as farm gate prices will not increase to meet the increased costs occurred with crop losses and waste. We cannot produce organic produce at commercial prices, if the industry is forced down this road it will make growers unviable. The demands from consumers for top quality product on the shelf have been increasing every year. Retailers and consumers in the country promote 'reduction in cardboard, reduction in plastic and biodegradable packs' however nobody speaks about the fact a third of everything we produce is waste as it doesn't meet the product criteria. Food waste at farm gate level is not spoken about and our goal is to reduce this</p>

	production waste, pesticides are a tool we can use to increase nett yields and overall be more sustainable. The overall outcome will be the demise of potato and vegetable in Ireland, a country that despite its history of potatoes and vegetables is only 70% self-sufficient in potatoes and vegetables.
187	I have been using pesticides for as long as I have been farming and I can't see my way forward without using pesticides to grow malting and feeding barley.
188	I believe the new proposed measures that have been outlined under the sustainable use of pesticides as ridiculous. The proposed measures will have a detrimental effect on the farming community and on wider society through the reduction in quantity and quality of production. This will not only affect the profitability and viability of family farms, but also affect secondary jobs in the agri food sector. The reduction in native production due to reduced use of pesticides will also increase the amount of imported grains into the country increasing greenhouse gas emissions. Secondary the grain that will be produced will have higher levels of mycotoxins present due to the reduction in use of plant protection products, causing serious health concerns.
189	I think the current proposal to reduce all pesticides by 50% would be a huge step backwards. In recent years I have changed from a plough-based system to minimum tillage to protect soil health and a step towards more regenerative farming and have already reduced pesticide use as much as possible without affecting crop performance and I also practice integrated pest management. If glyphosate were to be banned, I would have no choice but to go back to using the plough again which would certainly be a step backwards and also regarding the application of pesticides I have completed a Boom sprayer pesticide application course and had my sprayer tested in accordance with regulations. In light of recent suggestion of increasing the tillage area in the country reducing the use of pesticides would have the opposite effect.
190	I am concerned regarding the proposed reduction in the use of pesticides. This will greatly reduce the yields and profitability of an enterprise that already faces a lot of challenges and tight margins. This will result in the import of more grain which is not subject to the same criteria. We should be protecting our own industry and the quality of the grain, or we will be left without a viable tillage industry and relying on imports with less quality.
191	A regulation like this would be a massive blow to my confidence in going into a tillage career and would be an even bigger blow to the Irish tillage industry as a whole. We are already experiencing massive pressure with the cost of inputs and the strong competition for land with dairy farmers in particular. I believe that this regulation would practically wipe out our ability to compete fairly and would potentially put us out of business through losing even more land. If the tillage sector takes a great reduction in Ireland, thanks to the proposed regulation changes, we will also see a big increase in the emissions and pollution from agriculture in Ireland, as livestock-based systems take a hold in place for tillage. I appreciate your time taken to read this and I hope my voice can be heard in this matter that will undoubtedly play a huge role in my future, going forward as a hopeful young farmer.

192	<p>The EU and others want farmers to move more towards regenerative agriculture, for example in the past few years my father and I have started to grow more cover crops. We have been using a mintill and striptill system to sow our crops. This would not be possible without the use of glyphosate and other chemicals. If they ban more chemicals like these, we will have to go back to using the plough again and releasing more carbon into the atmosphere, which we are being encouraged against. We have a humid wet climate which leaves our crops very vulnerable to diseases. If the use of pesticides and fungicides are reduced by 50% or further, the yields and quality of native grown grain in Ireland will be greatly reduced if not halved. This in turn will probably have us importing grain from other countries that are already less regulated than we are now. All this in a time when food security is so important. I hope that the right decisions will be made. There are a lot of livelihoods at stake.</p>
193	<p>I wish to submit as part of the consultation on the proposed sustainable use of pesticides that section 25 on page 26 referencing precision farming and the use of drones. Drones must be legislated and approved for use for pesticide application immediately– to suitably qualified and licenced operators. Drones are proven to show how they can support an overall reduction in pesticide application. The use of drones will eliminate the requirement of tramlines and thus increase the productive area and output for each acre/ha of land. Precision application via drones allows for spot spraying which cannot be achieved by traditional spraying methods. Drones will support EU agriculture in reducing the usage and impact of pesticides & for EU agriculture to become more environmentally friendly by; 1. Less pesticide usage (precision application- spot spraying). 2. Less water usage, (more concentrated application rates - precision application). 3. Less soil compaction – better soil health (reduction in tractors or self-propelled sprayer use). 4. Less diesel fuel consumption (reduction in tractors or self-propelled sprayer use), (unrestricted direction of flight to area of treatment as compared to following tractors/self-propelled sprayers following tramlines). 5. Improved output per Acre/Ha (less unproductive land- land lost due to tramlines). EU agriculture will be at a competitive disadvantage if modern agricultural techniques are not embraced and this will result in EU food demands relying increasingly on non-EU imports, reducing our food security and increasing the presence of foodstuffs produced to non-EU standards in the EU food market.</p>
194	<p>50% reduction in pesticides means 50% reduction in all crop yields in our damp Irish climate at a time when food security was never as important and at a time the minister for agriculture is pushing for another 100,000 hectares of tillage. With less yields in Ireland this means more imports from the likes of north and South America who have no restrictions on pesticides usage and more rain forests cut down to meet the extra demand and more transportation pollution, completely making no sense. With proper use of fungicides which give bigger and better crop canopies, more carbon is taken into soils through more green leaf. Should pesticide usage be fully confined to usage by qualified tillage farmers and contractors who are also advised by professional agronomists and ban the sale of chemicals from D.I.Y stores etc, to tighten up on bad practices by general public Finally, if pesticides are used correctly and by the right people, they are very positive and fully help in the need of food production and security.</p>

195	I am very worried about your proposal to cut pesticides by 50% by 2030. I am not sure if there has been much practical thought put into this regarding the consequences for our Irish Tillage sector. Which stands to have our returns cut by 30% which would make our enterprise unviable. We have been very successful so far with the regulations we have that are being patrolled by our government. Our water ways are improving in quality since we have used buffer zones etc. I ask you to put some more thought into this proposal.
196	The 50% reduction of chemicals pesticides on farms by 2030 is going severely destroy the agriculture sector. They will just end up with food shortages!
197	I am deeply concerned with regards the sur proposal I believe it is reckless to remove or even reduce their availability. I think a strong problem with this argument is that a lot of the people in favour of their removal are very articulate people but also are far removed from their use. And they also have no concerns with regards putting food on tables. I can't understand how food security can be taken so lightly; we need all the tools we can to produce safe food and keep food in good supply. I have also seen first-hand how the use of glyphosate can have a positive effect on the environment, through the use of conservation agriculture. My suggestion to reduce the use of pesticides would be to restrict their use on amenities. I also realise a majority of pollution results from the use of pesticides on grass land, but their restrictions will have a greater effect on corn production.
198	If we are to have any hope of growing our crops in a way that not only protects water quality, sequesters carbon and maintains reasonable output of food production we desperately need glyphosate. Conservation agriculture, also known as regenerative Agriculture, relies massively on cover crops to open up the soil, protect it from wind, sun and rain, help retain nutrients, feed soil biology, improve structure and maintain yields. It's a chemical, so we don't like it. There's no argument. And in time I really hope a replacement can be found. But removing glyphosate would be akin to banning diesel and petrol. Yes, we know they aren't ideal, but the alternatives just aren't ready to replace them yet. and banning those fuels would end up with widespread chaos across the globe. We rely on glyphosate for our systems to work. We are only in the infancy of learning this amazing method of farming here I. Ireland and it's potential to transform the way we farm is enormous! Please consider regenerative and conservation ag when reviewing the pesticide laws. The unintended consequences of a ban would be a disaster, not just for famers but for the public at large.
199	As Ireland has a temperate climate crop grown here are more prone to disease than in many parts of Europe. These diseases which have a huge negative effect on yields if left unchecked include rhynchosporium, septoria, mildew, light leaf spot and chocolate spot. With the loss of plant protection products in recent years a reduction in yields is already happening. IPM is practised on our farm but in reality, crops cannot be produced without the use of effective pesticides The reduction in use of pesticides as proposed would seriously threaten the economic sustainability of our business. Yield loss would be huge and quality of produce severely negatively impacted. The inevitable result would be higher food prices and the import of grains and legumes

	produced possibly using products that have been banned in Europe. The traceability and carbon footprint of said crops has got to be questioned. Together with the very positive role that tillage plays in biodiversity, carbon sequestration, greenhouse gas emissions the importance of keeping a viable sector in Ireland cannot be over emphasised. As arable farmers we are always adapting trying new methods and technologies on our farm. However, the current proposals on pesticides together with the increase in buffer zones would seriously threaten the viability of crop production.
200	We use a wide range of products, including herbicides & fungicides to help produce top quality grain, we don't use sprays for the fun of it, we use what is necessary and as we live in Ireland. With our average rainfall of 1100/ 1200 mm rainfall, we have no choice but to use fungicides to keep crops healthy. We need access to the best products if we are to maintain production. We have to live in the real world. And these proposals must be opposed. There's a huge drive to encourage farmers to use min-till methods with a view to use less diesel, less CO2 emissions and to encourage the long-term fertility of soil – Min-till farming doesn't exist without chemical assistance like glyphosate which is one chemical we're aware is in the crosshairs.
201	I want to say emphatically that modern pesticides are needed to help feed the world's population. At the beginning of the 20th century when food production was more or less Organic and population was only a fraction of what it is now, a huge proportion of them were starving now thanks to modern agriculture embracing pesticides, mechanisation fertiliser and technology billions more are being fed well. There needs to be rigorous and robust testing of all pesticides to ensure no harm is done to human beings and the environment. This can be done and is being done. Let us then proceed to make the best use of what science and research has developed for us.
202	Having adopted regenerative agriculture 10 years ago on our farm whereby we have improved soil health, increased soil carbon storage, restored natural habitats and improved water quality it would be a travesty If we had to return to using intensive cultivations into grow our crops. Our system uses cover crops and direct seeding where there crops are established without any soil disturbance or cultivation. Losing chemical tools in our armoury would leave no option but to plough every year, undoing all of the good work of the last 10 years.
203	I object to the stated proposals as I believe they will further affect our ability to produce food. It will increase the costs of production and affect our ability to compete on the world market. Effective sustainable alternatives must be put in place before any of these proposals can begin to be considered.
204	I have the following comments to make in regard to the commission's proposal to reduce pesticide use by 50%. 10 years ago, I changed my system from a plough based to a minimum tillage one with the aim of improving the health of my soils. I use cultural control methods, IPM, regenerative agriculture methods, new technology and all of these have helped greatly. And I am pleased to say that the quality of my soils is unrecognisable now to where they were then. Year on year I am reducing inputs without comprising in yields. However, my journey would not have been possible without also using PPPs. They are a vital tool in our

	<p>armoury. Thanks to IPM I now think of an alternative to the can of spray. I have and will continue to reduce or completely stop using PPPs in certain instances (E.g. I no longer use insecticides, I prefer not to dress seed and in certain instances and depending on weather conditions I will greatly reduce the amount of fungicide applied to a crop). But there are a certain number of products that I cannot envisage being able to continue to farm without (glyphosate applied presowing is essential to my system) and maybe if there is to be restrictions on its use that this is targeted at the unqualified pesticide users who purchase it from garden centres and spray it down the sides of ditches and drains!! So, to conclude I would urge the commission to consider that a one size fits all approach is flawed. I am using PPPs only where needed but when I do need to use them, I need to be able to use them at the recommended rates in order for them to be effective. And I hope that they also recognise that there has already been a significant reduction in the number of PPPs available and that further bans could really undermine the progress made to date as IPM will not work on its own.</p>
205	<p>I am particularly worried about the SUR proposals of the reduction by 50% of chemical and hazardous pesticides. I think it is premature at this stage until there are cereal varieties developed which will match the yield of current varieties while only using 50% less pesticide. If yields drop, more tillage farms will become unviable and the long-term decline of the tillage area will continue. This is at odds with Govt policy to try and increase the tillage area as it has the capacity to be the lowest carbon emissions per acre across agriculture. Ireland only produces about 50% of the cereals it requires and has to compete with imports from countries where GM is allowed and access to more efficient (but more damaging) pesticide is allowed. Will these imports still be allowed?? Is there going to be an equivalence of standards and allowable pesticide usage on these imports? if not it will speed up the decline of the tillage sector. Please consider the fact that it is Govt policy to increase the Tillage sector and the proposed reduction of pesticide usage will reduce the tillage sector.</p>
206	<p>I am responding to your request for submissions on the Sustainable Use Regulation proposal. It is my current belief, with the information that I am aware of, that if the proposal goes through with a 50 % reduction, I will be financially unviable and therefore will have to choose another land use. I believe, with the current available technologies, my yields will drop substantially if my PPP choices are limited going forward, again I'll have to change land use. Will there be any differentiation put in place between my crops grown to proposed EU standards and imports with questionable husbandry standards? What compensation is on offer if these proposals are voted through? Will alternative technologies be available that are PROVEN or will there be a time lag due to the complexities of EU policy making that will ultimately be too late for me to avail of. Why do I feel that the EU is bowing to populist opinion and not to science-based fact. Yes, we need to advance our farming techniques for the betterment of the planet, but science must be first and foremost. Trained people with the necessary knowledge are currently in short supply in the tillage sector, how is it proposed to overcome this glaring challenge with the extra work this is going to take to implement the SUR? Will we have unintended consequences of having to import more grain to Ireland from all over the world, thus increasing the</p>

	<p>environmental impact as a whole. Has an analysis been done on the Climate impact of SUR? Will the GHG emissions increase substantially in Ireland due to the loss of tillage land and thus unable to reach the Irish government's Climate Action Plan targets? I believe the plan is to implement this Regulation on an equal footing for each member state. Ireland grows some of the highest yielding crops in the world because of our temperate climate. Because of the temperate climate we are more prone to a higher level of diseases pressures, like blight and fusarium for example, compared to many of our fellow EU member States. For this reason, we cannot implement a one fits all Regulation, we must consider each individual countries circumstances and work off the vast array of research available in those countries. I do have to show my opposition to this Proposal as an individual who works within the EU guidelines as a farmer depending on PPPs currently. I welcome the advancement of technologies and appreciate that changes must evolve. I depend on nature, why would I logically want to destroy something I depend on?</p>
207	<p>Against the proposal for a Sustainable Use of Pesticide Regulation. Both Target 1 and Target 2 within the Farm to Fork Strategy will have a detrimental effect on Potato production in Ireland. I wholeheartedly think if this proposal is passed it will see the industry collapse. This is not because growers like using pesticides but because growers need to use pesticides in order to have a viable operation. If this proposal is passed potato production in Ireland will have to virtually cease as pests and diseases will make it impossible to produce. At least to produce to the yields that are at the moment achievable. If yields are reduced it will mean two things, the price of the product will have to rise, or growers will not be able to produce it (which we are seeing in the UK at the moment) and secondly to fill the void in the market the produce will need to be imported. Hence greatly increasing food miles and increasing the industries environmental impact. We use a system for applying pesticides called an 'air sleeve sprayer'. Although these systems have largely gone out of 'fashion' due to the extreme cost when purchasing, we believe they may be the answer to operating in a more environmentally sustainable way. Through using this system, we are able to reduce our spray drift by 30% and hence we have been cutting back on chemical application rates by the same 30%. I believe that through trials and research carried out that these application rates can be reduced further. Hence perhaps even reaching the target of 50%. I firmly believe that the unjustified removal of certain pesticide products is not the answer. For example, we are told the removal of diquat was due to operator exposure and hence health issues. As a grower I can say the removal of this product has actually been more detrimental to growers' health than the product itself due to the untold stress and problems it is causing in the industry. Recently we have seen an unfortunate amount of growers ceasing production of potatoes and vegetables. This is largely due to rising costs and hence financial pressure on growers as the price of the end product does not rise in line with production costs. This proposal will not help this problem but only compound it further. If this proposal goes ahead, it will see the cessation of many more growers possibly including ourselves. As a young grower the way I'm looking at it is, if it becomes much more difficult to make a living this way then why should I try and continue? This is the sad truth.</p>

208	<p>The SUR Proposal is something we have been aware could come for many years now. We have reduced fungicide application by 80% and introduced finer grasses that are more disease resistant. We have also worked hard to reduce our carbon footprint with the introduction of electric vehicles where possible and the purchase of Tier 5 diesel equipment for mowing. I am in favour of more controls but what I ask is that a more phased approach be taken and for some chemicals to be permitted at certain times of the year. Limiting their use rather than removing their use would be a far more pragmatic approach in my opinion. We are all well aware of the implications on tourism, golf course presentation etc. that this Cliff Edge legislation will have but I ask that we are mindful of the wellbeing and livelihoods of those this will affect. From speaking to numerous greenkeepers around the country many have said they will be seeking to leave the industry should this come to pass. The stress and pressure it will create would simply not be worth it. We have always worked in a professional and measured manner within the greenkeeping industry when it comes to applying pesticides. That will not change. The only definite outcome of this SUR Proposal will be the death of the Greenkeeping Industry as we know it.</p>
209	<p>We would indeed like to draw your attention to the fact that under current proposal of the SUR, residential gardens fall under the definition of sensitive areas, for which the Commission proposes a blanket ban on all plant protection products, including low-risk and biological control solutions and under the non-Paper only the additional use of low risk and biological control solutions (excluding minerals?). While we understand Member States are still currently discussing and assessing different scenarios where it comes to the provisions related to sensitive areas, we would hence like to be able to share and exchange on our views regarding some solutions which could both ensure more sustainable residential garden practices remain available under the new SUR, and the society continues to benefit from the home garden sector in the EU considering the important benefits that safe and low-risk protective solutions can bring to: Prevent the spread of invasive species, illnesses, and insects in untreated residential areas; Prevent the illegal use of non-registered alternatives (chloride, vinegar etc.) in case of a total ban Increase food security through better crop production productivity in backyard gardens; Flood prevention – in case homeowners may decide to replace their lawns or plants with simpler options like impermeable surfaces, etc.; Conserve biodiversity and prevent biodiversity decline. We hope in this context not only to bring some solution-oriented food for thought but to also support in providing targeted information as regards our experience in this area when it comes to potential impacts and how in practice the garden industry sector has evolved towards green practices in view of meeting sustainability and safety-driven societal demands.</p>
210	<p>Targets 1 and 2 set out on the Sustainable Use Regulation along with exclusion of “sensitive area” for food production could firstly wipe out the vegetable industry in Ireland and also create huge food security issues for Ireland. Vegetable growers at present are struggling to hold prices at retail level with what looks to be no chance of an increase, growers are already in a below cost of production scenario, and this can be seen in national media with long established family business ceasing production due poor returns. The Irish climate brings challenges we face compared to the rest of Europe increasing our threat of high diseases and</p>

	<p>virus pressures throughout a growing year, weather is the one factor that we cannot control, pesticides are a vital tool to ensure our business is sustainable. The standard required from our consumers has dramatically increased over the past decade, downward pressure is on all growers to meet these standards for their business to be viable, however farm gate prices have been spiralling downwards over the same decade. Growers can only be viable if they produce top quality product, sustainable use of pesticides with IPM plays a large part in ensuring produce meets customer standards. The removal of 50% of our chemistry toolbox will adversely affect crop quality and drive growers out of business as the industry nor the varieties would be able to overcome this reduction. The climate action plan aims to increase the tillage area in Ireland to 360,000ha by 2025 with another 40,000ha of an increase but 2030. The focus on Irish protein production which is still in its infancy stages will not be viable at farm level. Growers and produces will not be on a level playing field with other EU countries with less diseases pressure nor countries outside of the EU that can produce GM crops. Our livestock will be fed GM protein crops with the Irish tillage sector not being viable at producing conventional crops? again increasing food security issues.</p>
211	<p>Pesticides damage soil, pollute water, destroy biodiversity, harm our health and force farmers to be dependent on costly toxic chemicals. These are all interdependent and mutually reinforcing elements, for example public health is dependent on a healthy environment, good soil and water quality and robust biodiversity. The aim of the Department of Agriculture for the new Irish National Action Plan should be to establish a long-term vision for reduction of pesticide usage -beyond 2030 - with clear pathways on how to get there. The Department should take immediate measures to phase out pesticide used in agricultural practises, except for Invasive Species, and not substitute them with other harmful chemicals under different names. The Irish government including the Department of Agriculture is subject to the National Development Plan, the National Heritage Plan, the All-Ireland Pollinator Plan, the River Basin Management Plan et al. All of these recognize the need to prevent biodiversity loss and protect water and soil, and include pesticide as a contributing factor to the biodiversity emergency we find ourselves in. Many of our species are in decline. It was reported in Sept 2022 by Birdwatch Ireland that 63% bird species in Ireland are under serious threat. Recent research from Germany highlights a severe collapse in flying insects. 75% had vanished in the last 27 years. We as humans are highly dependent on a healthy biodiversity. The classic example of this is our dependence on pollinators for food production, including of course flying insects, however many other species are also critical for human wellbeing such as earthworms and other soil biota. The Heritage Ireland 2030 Action Plan acknowledged threats to biodiversity as a chief concern that emerged from their public consultation. They highlighted with grave concern that 85% of EU-protected habitats in Ireland were found by the State of Nature report to have “unfavourable” status. Many studies point to pesticide use as a major contributor to the declining condition of habitats, including hedgerows and water bodies; clearly affected by and connected directly to agricultural practises. Furthermore, new studies on the direct impacts on human health as a result of pesticides are coming to light all of the time. Pesticides have been linked to both endocrine disruptors, hormone, prostate and testicular disorders and Parkinson's</p>

disease [2]. The WHO reported glyphosate is probably carcinogenic [3] and there are well documented studies linking it to Non-Hodgkins Lymphoma [4] and other cancers. Pesticides are prevalent in the environment and in our food. In a study of fresh fruit and vegetables provided to school children in the UK, PAN UK (2017) have found 123 different pesticides, some of which were linked to serious health problems such as cancer and hormone disruption. We recommend the following for the new Irish National Action Plan. Alternative methods of land management should be implemented, in parallel with raising public awareness and encouraging a more positive attitude towards weeds and untended vegetation and an understanding of their value. Farmers should be supported and educated towards more environmentally sound practises. 100% of the more toxic pesticides should be completely phased out by 2030, not just 50%. Pesticides from the so-called "Candidates for Substitution list" should have already been phased out since 2015, from when EU Member States were required to substitute them. Alternatives already exist and Member States have not implemented the rules since 2015. The main purpose of Ireland's National Action Plan must be to define reduction targets, timelines and measures to reduce dependency, not only for the five most used pesticides, but for all chemical pesticides. The Department of Agriculture need to give a clear overview of the current situation in Ireland and how they aim at moving towards a pesticide-free agricultural model with clear milestones. Quantifying pesticide applications: measuring and record-keeping obligations must be properly implemented, ensuring effective and easy-to-use digitised recording and transfer of pesticide use and Integrated Pest Management data from the farm to the Department of Agriculture. Agroecological practices, including organic farming practices, need to be put at the heart of Irish agriculture, rather than precision farming adapted to pesticide use, as is promoted by the chemical industry, but which can shift but maintain farmer input dependency. For this to happen there is a need to define and classify what these agroecological practices are, while at the same time better define the agronomic practices being defined as Integrated Pest Management (IPM). It is also time to define what is not IPM and update the crop-specific guidelines accordingly. Chemical pesticides should be immediately banned in all sensitive areas (including railways, sports grounds, roads, playgrounds, schools, public gardens, hospitals, sensitive habitats, woodlands and forests) as well as for private use. Introduce a pesticide tax to start applying the polluter pays principle. Additionally, apply a polluter pays principle where it is found that excessive use has occurred. Bring about the immediate end to desiccation, the practice of spraying glyphosate on food crops before harvesting. Encourage and support political actions towards a pesticide-free future. Vote with other EU States to stop the licence allowing toxic glyphosate use.

212	<p>On reading the proposal it appears that this regulation focuses on the negative effects of PPP in isolation of the negative effects of the alternatives such as cultivation and ploughing or importation of feed from outside the EU. While Ireland has some of the highest yields in the world out climate does cause issues with disease pressure, if we are to produce good quality then PPP are important as part of IPM. Indeed, I would advocate that we should increase the amount of grains for direct human consumption to become more food self-sufficient and reduction in PPP will have an adverse effect on the quality of product available and thus likely its viability. For Arable Farming, which government policy is currently trying to expand the utilize agricultural area (UAA), conventional means inversion tillage our ploughing. However, I would implore the department to consider climate smart alternatives such as Conservation Agriculture. Ploughing reduces soil carbon (refer to Gary Lanigan, Teagasc) by exposing soil organic matter to oxygen, releasing nitrogen which aids crop growth which leads farmers to believe more cultivation is better for crop performance in that year. However, this fails to account for long term impacts of reducing soil organic matter. The excess use of chemicals with ploughing could be seen as very detrimental as Soil biology in a healthy soil breaks down chemicals quicker than in an unhealthy soil. Long term ploughing reduces soil health and could be an issue. However, banning of PPP may force farmers to cease Conservation Agriculture and return to the plough which would be detrimental on soil health. Conservation Agriculture uses cover crops, crop rotation and reduced tillage to increase soil heath and soil carbon. Without use of herbicides to terminate cover crop however will lead to an increase in tillage and I have yet to see evidence of its effectiveness in Irish Climate. I would implore the department to take a holistic approach to include soil health and soil carbon along with sustainable pesticide use. While certain practices such as pre harvest weed control I feel is hard to justify, or the use of insecticides, I feel there is a massive difference with termination of cover crop before crop establishment. Thus, blanket banning of chemistry I would consider to be a detrimental to viability of conservation and arable farming. Viewing the usage of chemicals without consideration that the alternative required inversion tillage which is linked with degradation of soil carbon reduction in soil health. Viewed in isolation chemicals can be reduced by ploughing etc... however at the cost of soil health and soil carbon. Equally there should be a stance to provide detail independent information to the farmers, Farmers are the ultimate custodians of the soil and should be provided with the agency to be involved in the decisions of IPM, outsourcing ultimate decisions to "remote experts" reduces farmers' agency over their own future. Farmers should be empowered and protected from industry reps, be it chemical and machinery salespeople, education and not replacing with a new separate level of bureaucracy. Use of chemical in no food related situation such as garden or amenity areas should be seriously considered. particularly where users are spraying chemicals onto concrete and surfaces that are not soil as the ability to absorb and destroy the chemical is practically non-existent. Chemicals should only be allowed where there are living roots.</p>
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213	<p>The two targets for pesticides within the Farm to Fork Strategy with aim to reduce pesticides by 50% by 2030 will not work for all tillage farmers in Ireland. We rely on pesticides to grow quality crops. We can grow the best crops in Europe but with that we are subjected to a higher disease pressure. If Ireland is to comply with the Sustainable Use of Pesticides Regulation, there must be an allowance for our climate and disease pressure over other competitor countries like France. We trade on world grain prices, but we will not be able to compete at a disadvantage for quality and quantity. Pesticides allow for greater yields and protect the crops in adverse weather conditions. Tillage Farming in Ireland will be unsustainable with a reduction of 50% pesticides. IPM is already incorporated into every tillage field, IPM isn't just about less pesticides it's about managing the crop from start to finish. Field selection, variety selection etc. I implore you to speak to farmer representing bodies such as the Irish Grain Growers to get their opinion before a new nation action plan is developed. Currently existing farmers are losing entitlements and those entitlements are going to "new" farmers. The majority of these "new" have no intention of farming and have employment elsewhere and the entitlements are just easy money.</p>
214	<p>We welcome the opportunity to comment on the EU's proposal for a Sustainable Use Regulation on Plant Protection Products (SUR). The Farm to Fork 50% reduction target will seriously challenge agricultural/horticultural/forestry production. The loss of some key active ingredients will potentially create a very significant challenge for our business and growers in tackling disease and pests in the absence of advanced chemistry and new technologies. The proposal in its current format will increase the inefficiency of use of scarce resources such as energy and fertiliser at a time when many EU citizens are facing food and fuel poverty. The recent pandemic allied with geopolitical events has once again shown the fragility of supply chains but also importance of food and fuel security. The Commission's own impact assessment with regard to the SUR points to a diminishing armoury of active ingredients, increased production costs for farmers and the supply chain, reduced crop yields and higher food prices allied with a greater reliance on imports. Increasing costs and regulations will aggravate the longer-term decline in EU and Irish arable/horticultural/amenity crop production and create an even greater reliance on imports. Less than 10% of Ireland's utilisable land area is under arable/horticultural crops. Competition from low priced non-EU imports which in many instances are produced to lower environmental standards, has seriously eroded farmers' incomes over recent years. According to Professor Michael Wallace's report! "Economic Impact Assessment of the Tillage Sector in Ireland" there has been a significant reduction in the arable crop area over recent years {42% since 1980) resulting in a greater reliance on imports. "imports of cereals increased at a linear rate of 64,000 tonnes per annum between 2000 and 2018." Unfortunately, the SUR as proposed will increase the reliance on imports with its associated high carbon footprint. According to the DAFM report the Irish tillage sector, from an environmental sustainability point of view, is a low emission farming system [2t of Agricultural GHG (Co2 equivalents)/ha] when compared to livestock farms 3.4- 8.5t GHG/ha. However, the sector to date has not benefited despite showing the lowest emissions of Co2 per hectare. Under the current CAP reform the majority of Irish arable crop farmers will see a substantial</p>

reduction in their CAP payments from 2023 onwards. This allied with increased production costs and reduced yields as a result of the proposed SUR will see a further decline in the sector with consequences far beyond farming. The Wallace report points out that the reduction in the tillage area has likely resulted in decreased biodiversity, "Tillage land is essential for biodiversity, especially farmland birds. UK research has shown that loss of arable cultivation, especially in pastoral landscapes, can negatively impact populations of threatened farmland bird species". The provision of extension services is key to promoting greater awareness amongst farmers and allowing for the adoption of new technologies/practices. It is estimated that 90% to 95% of the agronomy advice is provided to growers by the trade. Agricultural Co-ops like us, have invested heavily in providing: Dedicated agronomy advisory service, Staff training for agronomists and distributors, Warehousing and storage facilities, Record keeping systems, Closed loop systems i.e., the supply of inputs and credit and the purchase of produce, quality assurance schemes assuring traceability and assurance to food business operators by meeting the exacting standards required by maltsters, brewers, distillers etc. The proposed decoupling of the advisory from the input supply side will negatively impact on the viability of the arable/horticultural crop sector given its fragmented nature coupled with low margins, unfair competition from non-EU country imports, increased costs, reduced productivity, potential loss of quality etc. There are approximately 10,000 arable crop growers with an average farm size of c. 33ha. Currently Teagasc does not have the resources to provide an independent advisory service with only 14 specialist tillage/horticultural advisors available. Unfortunately, they are unable to provide a proper agronomy service until post May due to the volume BPS applications they have to lodge on behalf of farmer clients. A standalone service is not commercially viable. Advances in technology are allowing farmers to more sustainably produce crops by reducing the reliance on pesticides. However, the EU to date has been slow if not opposed outright to their adoption. The EU must create an environment conducive to research and development of new technologies that will allow EU farmers to compete on a level playing pitch against imports while protecting the environment. The agricultural/horticultural sector has been to the forefront in adopting new practices/technologies. Any proposed regulation must enhance environmental and socio-economic sustainability. It must also take cognisance of the demographics of EU and Irish farmers along with computer literacy skills, broadband access etc. Recent attendances at national events? run by Teagasc (the Agriculture and Food Development Authority) have shown that the trade and farmers want to play a greater role in protecting the environment, but they must be given the knowhow, access to the appropriate tools/technology and the right incentives so that they can play their part.

215	<p>We wish to highlight the following points: Innovation: The range of technologies available to farmers is continuing to increase. Integration of digital and precision agriculture tools in IPM strategies can reduce the risks and impacts associated with use of plant protection products and improve record keeping and administration. The SUR should enable and promote the development of new agricultural technology giving growers access to all available pest control techniques when implementing IPM. It is widely recognised that the process for bringing new plant protection products (both chemical and biological) to the market meets with delays during the approval/authorisation process. We would encourage the Commission to focus on speeding up these processes to ensure that new plant protection products fully evaluated to the latest guidelines are available to growers at the earliest opportunities to replace exiting options with less favourable environmental and human health profiles. Integrated Pest Management (IPM): IPM is key to building a sustainable future. However, the current SUR proposal moves away from the FOA definition of IPM, which promotes consideration of all available pest control techniques, and instead aims to remove use of chemical plant protection products unless all other options have been exhausted. To enable farmers in Ireland (and the EU) to continue to effectively protect their crops in an economically justified way and to compete with produce imported from outside the EU, IPM strategies must be flexible and continue to recognise appropriate use of chemical plant protection products (authorised in accordance with Regulation 1107/2009) as part of the control strategy. Reduction targets: The SUR proposal has a very strong focus on reduction targets for chemical plant protection products which have been arbitrarily determined. Rather than broadly applying these arbitrary targets to all Member States, consideration should be given to current use levels and use trends in individual Member States noting that some States, such as Ireland, already have a relative low use rate compared to the EU average and showing a declining trend in use. The impacts of the definition of “sensitive area” should also be scoped at a Member State level to ensure any targets are practical and manageable. Overall, we would encourage revision of the current SUR proposal to ensure a positive focus on expanding the range of effective and economically justified tools available to growers to ensure growers within Ireland and the EU can continue to succeed on a global level.</p>
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216	<p>The targets set out in the Farm to Fork strategy will severely hamper the viability of Irish vegetable producers. The food service industry in Ireland has always been awash with non-Irish produced fruit and vegetables. The challenges that the industry face from production cost, energy cost, labour shortage and age demographic of the primary producers are very difficult. The reduction in pesticide usage will create an impossible challenging to overcome, all the crops we grow are annual crops. This seasonality creates very high risk for growers as their livelihood depends on the weather, disease, weeds, and virus pressure which all lead to either a sustainable harvest or complete crop failure. Risk management in the industry has never been higher with the extremes of production cost increases and very little or no farm gate increases to meet the spiralling inflation costs. A reduction in pesticides will challenge primary producers to meet customers standards and the viability of the business. Growers are already questioning the viability of their business as it stands never mind a reduction on pesticide armoury. Irish producers have historically been very resilient in overcoming challenges, this can be seen with the willingness to produce imported substituted home-grown local produce. This import substitution for example for carrot and chipping potato production allows growers to produce and store potatoes and carrots behind the Irish season, therefore reducing foods miles / carbon footprint and giving Ireland better food security. The Targets set out in the Farm to Fork strategy are going to put growers out of business as the risk will be far too high to produce these high value crops. Imported produce from countries with less climatic challenges in the EU or from outside the EU where they do not have these constraints. Primary produces will ultimately be asked to produce the same quality produce at the same price as imported produce, but they will have to do it with one had behind their back. Vegetable production in Ireland is currently facing massive challenges, this strategy will make primary production unfortunately in Ireland unviable, a country that has some of the highest food producing standards and accreditation in the World.</p>
217	<p>The current proposals of overall reductions are very worrying as there doesn't seem to be any reference to how it will be achieved. Such as, will reductions be based on an overall basis, individual basis, a reference year, or whether domestic use (which is significant) will face stricter conditions similar to agriculture where the user has done a course and is trained professional. I am an entirely arable farmer and whilst I have reduced the use of all chemicals and chemical fertiliser by over 30% in the last 10 years, I know I do need these methods of control. I utilise IPM strategy and often the pesticides are the last port of call. It takes a lot of time to build a system around reduction whilst still maintaining yields. I am currently looking at more regenerative agriculture with reduced cultivations, but this can be quite reliant on glyphosate in particular which is why I'm holding off changing systems. Financially, I am currently better off leasing the farm to a dairy farm, but I want to be able to grow crops in an environmentally friendly manor. One of the unintended consequences of restrictions around chemical use for arable farmers is that a lot more arable land will end up in dairy, leading to higher emissions, deterioration in water quality and an over reliance on imported feed. I do have to question who will accept responsibility for these flawed proposals in 5- or 10-years' time dealing with the unintended consequences. Most farmers use all pesticides in a very frugal manner, and I firmly believe that an overall reduction in use will be</p>

	farmer lead through research and education. Keeping tillage farmers in business should be a priority currently and anything that limits the tillage farmer should be treated with extreme caution.
218	I wish to make a submission for the retention of pesticide use in Ireland for cereal crops as farmers and the tillage industry depends on the sustainable use of these products to survive in the industry. Our wet and temperate climate necessitates the use of these pesticides to control diseases more so than in most other cereal growing countries with drier climates.
219	I have witnessed the drop in yields from a period when aphid numbers were high and pesticides in use at that time were ineffective. Yields dropped to between 1 to 2.5 tonnes per acre compared to the normal yield of 4 to 5 tonnes per acre. The Irish National Action Plan for the Sustainable Use of Pesticides (PPP) states the following: "The plan aims to achieve a balance between ensuring human and environmental safety while maintaining continued viability of the farming and amenity sectors." The simple fact is that this plan uses the word 'sustainable', but this will render the commercial production of grain in Ireland as unviable and therefore completely unsustainable. 50% rate of pesticide use will simply not work and against the backdrop of increasing prices for fuel and nitrates, it will drive farmers off their land. Grain will then be imported to this country with the added cost of transportation and the fact that these supplies are produced under no restrictions in pesticide use, means that we are reducing damage here only to pass on that damage to the exporting country. I wish to object to this scheme and ask it to be deferred until a sustainable plan is also a viable plan for Irish agriculture.
220	In regard to the proposed changes to the use of pesticides and the current SUR proposals I disagree with the proposed amendments. If we as farmers are to remain in business and competitive against the ongoing and ever evolving disease & weed control, we require to hold our existing chemistry availability and application rates in order to operate. Quality, sustainable and safe food production is at the centre of the majority of Irish farmers operations. Modern traceability methods can be applied to ensure existing permitted levels of chemicals use can be traced on a plot-by-plot basis to comply with maximum dosage levels alongside several other increased controls & register to control chemicals appropriately.
221	We have set our responses to the targets and additional measures in the Commission's proposal. We are supportive of the two pesticide targets as they will accelerate the reduction of the risk of pesticide exceedances in drinking waters within Ireland. It is unclear if a 3-metre buffer will offer the level of protection required for drinking water. For example, some pesticide products already have greater buffer distances than 3 metres. Buffer distances should be based on the risk to human health and as well as ecological impacts. Having a standard buffer doesn't take into account the inherent properties of the pesticides or the likelihood of runoff based on soils, subsoils and slopes. Deleting the reference to protection of drinking water under the SUD on the basis that it is adequately covered by other legislation should not be done as this is not the case in Ireland or indeed other Member States. Within the Irish context there are no existing designations that we could use as sensitive areas for drinking water. The Water

	<p>Framework Directive (WFD) protected areas were never properly delineated, and they do not offer any level of protection of drinking water sources. Under the Recast of the Drinking Water Directive “catchment areas for abstraction points” will have to be delineated. The intention is that they would be the whole contributing catchment. In the Irish context this would cover extensive areas for some abstractions and combined together would cover half of the country. High risk areas within the “catchment areas for abstraction points” for pesticide application would need to be designated as sensitive areas within a specified timeline to ensure implementation of this measure. Moving away from the terminology ‘safeguard zone’ should be considered as there is a lot of confusion between the WFD safeguard zones and the SUD ones and the definitions currently differ. We are supportive of the approach to establish a framework for independent advisors for pesticide users at a frequency of at least once per year. We have seen that provision of advice is one of the most effective tools to reducing the risk of pesticides entering drinking water sources. We are supportive of the establishment of electronic records that are centralised, with the online publication of trends. This will increase the transparency of pesticide use and reduction measures. The data gathered should be shared with water suppliers for the purpose of source risk assessment and management under the Recast of the Drinking Water Directive. IPM is not practiced widely in Ireland and making it mandatory should increase its uptake and reduce the risk of pesticide exceedances within drinking waters. Professional users should have to provide evidence that non-chemical options have been explored. Within Ireland there is evidence that the training is not undertaken by all professional users, so we would support strengthening of the governance around training. Areas that need to be addressed, and it’s unclear if the draft proposal covers this adequately, include: Frequency of training should be increased with the requirement for refresher courses. A valid training certificate should be required to purchase pesticides, with consequences for the distributor/seller if this is not adhered to. There is significant evidence that drift reducing nozzles are effective at reducing drift and therefore their use should be made mandatory.</p>
222	<p>Sport is a driver of positive change in Irish society assisting in the delivery of wider government policy objectives particularly in the areas of public health, education, social integration, tourism, and economic growth. It is important to preserve sport as a public good and realise policy goals through sport. Our submission is provided as part of the invited consultation for the Proposal for Regulation in relation to the sustainable use of pesticides. We respectfully invite the Department of Agriculture, Food and Marine to consider the contents of this submission. We support the EU’s stated objectives to reduce chemical use in society, and any associated risks to human and environmental health and it is important to note that sport has engaged with relevant bodies to limit and reduce the use of pesticide and has put in place policies to regulate the safe use of any pesticides to enable sport to be played and participated in. We believe however, the text as outlined in the draft regulation, moves towards a generalised regulatory approach which would create inherent risks to the Irish Sport sector that use green areas for their activities with unintended consequences, such as lower human health and wellbeing through lower participation in sport and physical activity;</p>

loss of associated employment and loss of significant tourism investment for certain sports that rely heavily on sports grounds for activity and income generation. These new proposals, adopted on 22 June 2022, are part of a package of measures to reduce the environmental footprint of the EU's food system and help mitigate the economic losses but the measures do not in the opinion of the Federation take in to account the impact of maintenance of playing surfaces for sport and the overall impact for sports development and solvency. Our affected members concern is the ban on all pesticides in sensitive areas as defined in the Proposal for a Regulation Of The European Parliament And Of The Council on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115 pg. 45 'sensitive area' means any of the following: (1) an area used by the general public, such as a public park or garden, recreation or sports grounds, or a public path; Based on stakeholder consultations it is assumed that approximately 90% of total pesticide use in the EU is in agriculture, with the rest in other areas such as forestry, urban green areas, sports grounds, and along roads and railways. This then is a strong indication that the inclusion of "urban green spaces" and "sports grounds" does not take into account or note the safe and targeted application to specific parts of the sports playing area on a seasonal basis to maintain optimum playing surfaces. We request the opportunity to discuss these important definitions in more detail along with a selection of our members who will be adversely affected by these proposals. We are conscious of our responsibility in being climate responsible, respecting sustainability principles, the environment, safeguarding biodiversity and ecosystems, however, it is our strong view that the imposition of a rigorous regulated application of any new rules would have an adverse impact on the provision of sport and physical activity to Irish society and have a sizeable impact on the contribution of sport to the health, wellbeing and economy in Ireland and also the impact of such regulation on tourism related activity such as Golf. We are open to considering the alternatives to chemical pesticides, however, currently there are no current proven alternatives that can ensure that activity for the sports concerned can continue without pesticide use and as previously stated the use is limited and targeted. However, we do believe that engagement and dialogue will have better outcomes rather than blanked obligation and that allowances and flexibility specific to sport be made, to allow for: Irish interpretation and derogations (including emergency use licensing), Continued access to currently registered plant protection products in the short term, transitioning towards controls that are even lower in toxicity and biologically based in combination with further development of precision application techniques, Promotion and ongoing expansion of measurable integrated pest management practices (where plant protection products are adopted as a last resort following all available cultural, mechanical, behavioural / attitudinal measures), Specificity in terms of areas that are most important to the playing quality of the sport ("targeted areas vital to playing quality"). Consideration of the aforementioned points will ensure that the sport sector will not be adversely affected and that sports proven contribution to a healthy, active, and vibrant Ireland will be maintained. We believe in the context of this regulation that Sport presents limited risk and over regulation in a sport context will have a detrimental effect on the sports sector to function effectively and deliver its full range of opportunities.

223	I oppose any change of the use of pesticides in agriculture. There will be a knock-on effect on food shortages if this were to be implemented. It will have a major effect on crop production in the future.
224	<p>I am very concerned by the proposals which are being laid out in these regulatory proposals. These proposals will take away some of the key controls and tools we have in arable farming particularly in Ireland and Northern Europe to produce food to the highest standards worldwide. Integrated pest management is and will become an ever more important tool in our industry to control weeds, disease and produce economically and environmentally sustainable crop production. However, it is not the single solution for producing safe, viable and secure food supplies to feed the EU and Irish population. I will outline some key examples below relating to key cereal crops in Europe which may be jeopardised by ill-informed current proposal to ban or significantly reduce key sprays for cereal production. The current statistics on pulses, grain and oils import for EU foods are shown below. Keeping an import and export balance to EU food production is critical from a social (stable food supply), economic (supporting jobs and rural employment) and environmental (preserving our current farming systems to avoid displacement of products by import, with further global environmental impacts). Without safe viable pesticide use, this balance in import and exports will be seriously put at risk.</p> <p>1. Any changes to pesticides and their availability must be complimented by appropriate alternatives. These are not yet fully developed (e.g., biostimulants for disease resistance, gene editing for disease resistance) and fully proven widescale technologies. Banning all key products now without an alternative is a major social, environmental and economic risk. The required alternatives include technologies such as gene editing which will in time become more critical in the face of increasing disease levels and in the absence of adequate fungicide products. For now, and the foreseeable future, chemical control of diseases plays a critical role in crop production and stable food supplies in Europe.</p> <p>2. Unforeseen impact both in Ireland, EU and worldwide on biodiversity: Rapeseed is a key oil for human consumption and cooking in the EU. It has a much lower overall environmental impact alternative to large scale cultivation and use of Palm Oil. It is a crop which can be grown in a highly regulated farm environment here in Ireland and the EU. While Oilseed per hectare of land has much lower oil yields (0.7 tons/hectare oil yield), Palm Oil cultivation (at 2.9 tons/hectare oil yield) has massive destructive effects on biodiversity in non-EU Countries. It is leading to removal of existing tropical rainforests in areas like Indonesia-much of which has up to >50% of worlds biodiversity per square kilometre. Banning key sprays for Oilseed in herbicides and fungicides without full evaluation of local and global risks accelerating the trend towards more Palm Oil consumption in the absence of viable Oilseed Production in Europe. This as an EU policy will be disastrous both for biodiversity (using regulated products in the EU) and lead to accelerated deforestation in these non-EU regions. In a time of climate crisis, this should not be supported. Supporting EU agriculture on already farmed land for our essential food products in a sustainable way will do a far better service to the environment both in the EU and worldwide.</p> <p>3. Negative impact on EU and Irish cereals, crucial to our human food supply: Take the example of Septoria tritici. It is one of the most damaging foliar diseases of UK wheat and Irish wheat. It has shown to cause yield losses that can</p>

range from about 30% to as much as 50% in high-pressure seasons. A key control for this and one of the only remaining "pesticides" or fungicide known to control it is Folpet. Folpet if banned will mean no product will remain on the market for the control of this fungus in wheat crops. Folpet is also applied to apple trees such as apple scab. Its removal too will inhibit apple production in the EU jeopardising the industry and crucially our own apple supplies. If a product like Folpet is to be banned with no viable alternative, this could impact wheat yields by up to 20-50% in Septoria vulnerable regions like Northern France, UK, Germany and Ireland. These are significant wheat producing regions for EU consumers and food manufacturers.

4. Increased importation of cereals from non-EU countries, with higher levels of potentially harmful pesticides in our food chain. The importation of grains and foods without adequate levels of pesticide use control in regions such as South America will be accelerated by outright bans on key pesticide products. This effects our beef production, sustainable milk production aspirations and also our Farm to Fork strategy and Food Vision 2030. The meat and milk industry of Ireland depend on use of both EU and non-EU feedstuffs. Increasing imports through internal EU pesticide bans will result in higher levels of pesticide residues in our food chain, defeating the very purpose of this SUR directive.

5. Risks to food security and inflation in Ireland and the EU: Food prices in the EU in Dec 2022 were 17.82 % over December 2021 levels according to <https://tradingeconomics.com/european-union/food-inflation>. This is also similar to food inflation experienced in 2012. The war in Ukraine has put a huge proportion of the worlds wheat and oilseed supplies at risks. The outright ban of chemicals now and in coming years will exacerbate this situation and lead to harder impacts on many Irish and European food consumers with significant food inflation and potential shortages like those seen with eggs this year in the UK. It makes the production of meat and eggs with cereals more financially unviable and poses a significant risk to food supplies.

6. Chemicals used in pesticides, fungicides in the EU are and will be more rigorously tested in the future on a world level: This has led to better pesticide use training and also efficiency on farms with new weather apps for best spray timing and new GPS technologies used to enhance spray use efficiencies. This technology and improved use are ever improving with time to reduce environmental impacts. The REACH system is vigorous testing of product. The EU in its decision on keeping or banning chemicals must properly assess all vital metrics with appropriate judgement and sound science weighing up: biodiversity risks, human health risks, food supply impacts, are alternative products, replacement available to support domestic agricultural production, will it lead to increased imports from poorly less regulated countries lowering the EU food standards? How will this then overall impact the health of Irish and EU citizens in time to come? I hope the above points will be considered appropriately in your public feedback and input into new policy. Common sense, weighing up all social, economic and wider environmental impacts of such decisions and basing it on sound science is critical. All of us want to see a better environment and world, food supply for our people now and in the future. Doing so with the right actions and policy decisions now will do, for the betterment of people, our livelihoods as farmers and our planet.

225	<p>I use the word pesticides as a broad inclusive word to include all types of chemical agricultural crop protection products including but not limited to fungicides, herbicides, insecticides etc. Unfortunately, herbicides and fungicides are a lot harder to farm without in our damp mild maritime climate. I feel this must be kept in mind when making rules for Ireland as our climate is so different to the majority of the farmland in the EU. We are lucky to have one of the best growing environments as anywhere in the world but where we humans, plants and animals thrive so do weeds and pathogens. It is in a large measure thanks to the innovation of pesticides that complete crop failure is almost unheard of in our day, something our grandparents could only dream of. Our food security is maybe taken for granted now but we may have forgotten our own history and we need to be careful not to throw the baby out with the bath water. Pesticides are a tool that have transformed farming, given us yields that would have seemed like fairy tales a few generations ago, but like all tools they can be harmful if not respected and used correctly. Over the past years farmers have seen many forms of pesticides come onto the market and be removed again and rightly so as they have been scientifically proven to be extremely harmful to the environment and to human health. No farmer wants to use a product that is known to be harmful to himself, anyone else or the environment. As a farmer though it's easy to wonder is scientific reason being followed in all cases? Especially when we see almost on a daily basis a vocal minority politicising and demonising our profession and our methods? Pesticides especially are an easy target, stirring up deep emotions and polarising opinions and glyphosate is probably at the top of the list for polarising opinions. I describe myself an arable farmer now, I used to say I was a tillage farmer but over the past years I have realised the incredible damage tillage does to soil, so I have transitioned to direct drilling or No-till as it's also called as much as possible, it's not all no-till yet but any tillage done now is minimal compared to traditional plough-based tillage farming practices. No-till crop establishment is only possible in the Irish climate at the with the continued availability of glyphosate. At the present time there is no known alternative available. Is glyphosate harmful? So far, when used correctly the science says no! I can see with my own eyes the difference since I have stopped ploughing, after heavy rainfall I no longer see brown water running down the fields cutting tracks as it goes, taking the valuable topsoil and nutrients with it to pollute the streams and rivers! Instead because of no-till and always having a cash crop or cover crop planted thus keeping living roots in the soil as much of the year as possible, the soil has transformed into a sponge that is able to infiltrate the water and reducing run off to almost zero, retaining our precious natural resource that we all as humans depend on for our food and as famers for our livelihoods. There are other easy to see benefits as well, the worm population has quadrupled, the soil structure is becoming more like a permanent pasture and crops are more resilient in a drought to name a few. Then there are the benefits that are harder to see and measure like carbon sequestration instead of emissions, a biologically active soil and so on. With only 800g/ha of glyphosate and direct drilling into a cover crop using minimal fossil fuel (on average 10lt/ha) we can establish a crop! Without glyphosate it has to be replaced by many heavy tillage passes, burning lots of fossil fuels (on average 50lt/ha) destroying the soil</p>
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	<p>structure and microbiome and releasing huge amounts of Co2 to the atmosphere from the fuel burnt and also from the disturbed soil which is estimated by some scientists to be as much as 3 tonnes/ha.</p>
225(a)	<p>In targeting pesticides for reduction care needs to be taken to not inadvertently cause greater harm than the pesticide itself is causing. Would removing 0.8kg/ha of glyphosate only to cause 3000kg/ha of carbon emissions be considered a good deal? Maybe it could be, but we must look at the whole picture and let the real scientific data and facts inform our choices instead of kneejerk reactions to vocal populist claims without any genuine scientific evidence to back them up. In the Farmers Journal on Jan 25th Pat O'Toole reported that approximately half of glyphosate used in Ireland is not used by agriculture at all but is used for amenity purposes. This is an incredible amount of pesticide just to keep the place tidy. If a reduction in glyphosate has to be found then amenity users have alternatives, yes, they may be more expensive and maybe not as effective, but alternatives do exist for substitution whereas no-till farming as yet has no alternative to glyphosate. When seeking a reduction for pesticides it would perhaps be better to reduce the amount or frequency that an active can be applied in a calendar year rather than a complete ban. One of the core principals of IPM (integrated pest management) is to vary the active ingredients used and not use the same active repeatedly. As more actives are removed from the market this is getting harder to do and it only speeds up the inevitable resistance to the available actives. Rather than reducing the amount of actives on the market, reduce the allowed applications per year but make sure to keep enough different active ingredients available on the market for farmers to practice IPM in a meaningful way. Our world record breaking yields in Ireland would not be possible without pesticides. If we are to farm with an arbitrary target of 50% less pesticides, the reality is we are going to have to accept less yields. This will mean more imports of grains and pulses usually from countries outside the EU that are growing those crops with the very pesticides and other GM technologies EU farmers are not allowed to use. Is it really better for "the greater good" to reduce our domestic yields and import even more untraceable products from halfway around the world? Surely it would be better to grow as much of our own grain and pulses as we can here in the most environmentally friendly and sustainable way as possible? Irish growers produce to some of the highest standards in the world with full traceability and knowledge of what inputs are used. When seeking what pesticides to reduce let the data lead the way. According to the data MCPA accounts for the majority (approximately 75%) of pesticide exceedances in drinking water in Ireland followed by 2 4-D, Mecoprop and Clopyralid. This needs to be addressed and most farmers would agree, unfortunately there are always some who don't care. Most of the areas with MCPA and the other pesticides also found in the water are where rushes grow plentifully. If weed wipers were subsidised for farmers in these areas and glyphosate was used in a weed wiper by a trained competent operator instead of pesticides being blanket sprayed onto wet fields next to water ways, it could help reduce or even eliminate the problem if all in the catchment area followed the correct protocol. It could be included in schemes like ACRES where there would be options to be paid to only use weed wipers in catchment areas where pesticides are finding their way into the water. Other actions could also be incentivised like fixing drainage and educating farmers on how to go</p>

	<p>about addressing the soil health and structure issues that are causing the rushes to grow in the first place. Robust legislation backed by scientific facts is good and necessary, but we don't want to end up like Sri Lanka where ideology and dogma created a manmade disaster. The Russian invasion of Ukraine has shown us all how sensitive the markets are to even a small reduction in the worldwide availability of grain. I hope we can find the sensible middle ground.</p>
226	<p>I am writing to you to make a public submission to the proposed sustainable use regulations. These regulations in their current format as proposed, pose a serious risk to the commercial viability of our all-farming sectors and also food security. Farmers and users of pesticides in food production seek only to use "pesticides" and all chemical products in a safe and coherent manner. This includes care and due diligence around watercourses, avoiding excessive rates on cereals and crops. The removal of all such products with Carte Blanche approach will disable cereals production in Ireland and other European countries leading to collapse in production. With a lack of viable alternatives available on the market this poses a serious risk also to European food security and food safety for our consumers. It does this by taking away the key functions of such spray products in modern agriculture: 1. Control of diseases in cereals: an example of key chemistry is the use of folpet is a key compound in control of ramularia in barley crops and septoria tritici in wheat crops. Without this product yields in wheat can reduce by up to 50% in cereal research trials. Should this product be eliminated there is no viable existing alternative to control these diseases in key food crops for animal rations (meat production), milling wheat (baking products and carbohydrates) and our distilling industry. 2. Control of weeds in cereal crops: Pinoxaden is a key active used in the control of wild oats and canary grass in cereals such as barley. Removing this active will mean such invasive weeds will take over cereal crops leading to long term problems with reduced yields and ever-increasing persistence of such weeds in cereal crops. 3. Aphicides in cereal: Aphicides provide an essential function in controlling yellow dwarf virus in Barley and wheat crops. This disease at high levels can drive yields down by up to 15-20%. The total removal of such chemicals will leave no options to control aphid populations which have proven problematic in 2022. Weather and other factors whilst they also dictate aphid populations must be complimented by reasonable chemical control. It erodes both crop quality and viability of crop in yields. 4. Food security in Ireland and EU: The total removal of necessary chemicals will both make farming unviable in much of Ireland and Europe, resulting in increasing food scarcity, food inflation and collapse in our rural economy. It puts a serious risk to the viability of our cereal and other farm sectors which support farmer livelihoods and safe food supply in Europe. This will lead not to better food quality, but in fact lead to large scale imports of unregulated cereal products from South America and non-EU countries. These grains do not face the level of food quality regulations our own cereals do. This in turn will pose a further risk to human food safety using products over which the EU has no control what sprays or chemicals are used in them. In the EU all chemical products used in crops face rigorous testing and robust research before use in the market. This has helped to provide a proven, relatively safe and secure food supply for our citizens. Furthermore, the displacement of our farming will only lead to accelerate further environmental destruction in Latin America (cereals and soya with deforestation) and</p>

	<p>further use of Palm Oil (deforestation in Indonesia displacing oilseed production in the EU). This will have far greater impacts on climate change and other environmental crises we currently face. It is finally very important that sound science, research is accounted for along with the massive risk to an economically viable food sector. We cannot let new regulations without proper consideration of its impact jeopardise our food supply and farming sector.</p>
227	<p>The proposed target of 50% reduction in use of all pesticides by 2030, in the absence of developed alternative control measures, is unrealistic. It will lead to reduced crop yields across all crops. Currently examples of diseases controlled by pesticides (all of which go through a rigorous R+D programme before being brought to market) would be, Rhynchosporium in Barley, Septoria in Wheat, Blight in Potatoes, to name just a few. A 50% reduction in pesticides will significantly reduce the control of all of these pathogens, and subsequently lead to a significant reduction in crop yields, in the absence of new technologies to replace these pesticides. Reduced yields will lead to reduced viability of the agricultural sector, particularly crop/plant production. For a more sustainable planet, the thinking is more food needs to be derived from plant production. If Europe is serious with regards to this point, then it needs to maximise sustainable plant production within Europe, and not do the opposite by imposing unrealistic limits on pesticides, which are only used as required, in the absence of alternative control measures. The alternative is Europe will import the majority of its plant-based food requirement from outside of Europe, where it won't be subject to these restrictions or regulations. This situation puts a risk of instability within Europe with regards plant based staple food supplies, and will inevitably lead to higher consumer prices, and food poverty among the less well off in society.</p>

228	<p>I am writing to you to highlight my concerns relating the proposal to replace the sustainable use directive (SUD) with the sustainable use of pesticides regulation (SUR). I have a multifaceted viewpoint of potential issues that the proposed SUR will have, both to farmers and the wider EU socio economic environment. Firstly, I do accept that the farming community needs to work with organisations and legislators to protect the environment we work in. However, at the end of the day we rely on it for our livelihoods. The forefront of my concern is the impact any proposed changes would have on the livelihoods of hundreds of thousands of working farmers. I / we work every day with nature to provide food for the people of Europe and in my opinion, there is a complete disconnect between members of the public, politicians and the NGO as to what the primary objective of farming is – to produce food. We don't farm to reduce biodiversity, slaughter the bees, remove beneficial plants from the ecosystem, pollute watercourses or to cause cancer – we farm to produce food for the benefit of the general population. Currently, all active ingredients in the EU have been approved pursuant to one of the most rigorous approval processes in the world, Regulation (EC) 1107/2009. The most concerning proposals in the proposed SUR are – Target 1 aims to reduce by 50% the use and risk of chemical pesticides by 2030. This target is measured using pesticide sales data which measures the quantities of active substances contained in the pesticides which are placed on the market (sold), and therefore used, in each Member State, and a weighting based on the hazardous properties of these active substances. Target 1 highlights the basic lack of understanding in the proposed SUR of the current pesticide products on the market, the catch all target of reducing the quantity by 50% places no value on the risk profile of the product. The silver bullet for target 1 is to remove the active ingredients which are used in higher quantities per hectare regardless of the classification or tox makeup of the product. In this scenario we could be in a position where we meet the 50% reduction in pesticides, but the remaining products are potentially more environmentally hazardous but have lower application rates. Target 2 aims to reduce by 50% the use of more hazardous pesticides by 2030. This will be measured by sales data for the more hazardous pesticides, known as the 'candidates for substitution'. Target 2 aims to reduce "more hazardous" pesticides which are explicitly stated here as candidates for substitution. Candidates for substitution are, by their nature, approved as they are deemed to be crucial tools farmers have in securing food supply and under the reregistration process, the A.I. would not have been authorised if it was not deemed necessary. This blanket approach to a 50% reduction does not consider the benefit and key role they play in ensuring that we can grow crops which adequately provide food and an income for farmers. You can't remove something which is a candidate for substitution if there isn't any substitution. Above all, my main concern is that it appears the personnel drafting the proposal have simply never stepped foot in a field or seen the devastation a septoria in wheat, or blight in potatoes, outbreak can cause. Farming is not as simple as planting some seeds in the ground and walking away until the crop is harvested, it needs to be nurtured and protected from the first to the last day. We simply cannot expect to feed the ever-growing population if we don't start respecting farmers and the work they are doing. The proposal also fails to address the impact on jobs within the agricultural industry and how the proposals could result in a situation where farmers</p>
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	<p>are left with no choice but to find alternative employment due to the insurmountable costs of meeting the new proposed regulations. The impact of the proposed SUR will be felt by the consumer, over time there will be food shortages and food prices will increase – which is inevitable if farmers are to continue to make a sustainable living. Perhaps it is not important that farmers make a living in the eyes of politicians, where the farming community is an ever-shrinking segment of the voter pool. And therein lies the narrative driving the agenda, populism at its finest. A 50% reduction in pesticides sounds like a real success to the general public who have been misled and misguided by NGO's whose true agenda is misconceived in the idea that fewer chemicals will reverse the impact of climate change. Of course, the EU parliament have a solution to this problem – we can be assured that Europe will not suffer hunger or food shortages. We can import whatever wheat, maize, potatoes, carrots, beef, milk, etc. that we are short from around the world on the pretence that they will come from countries with a much more questionable environmental agenda or lack thereof and on the back of supply chains with a carbon footprint that needs to be considered. My proposal is simple, respect farmers and the work we do. Trust us to apply the products in the correct and proper way, only where we deem necessary. Come down hard on those farmers who do not follow the rules, cut their payments, introduce criminal sentences. Educate farmers on best use practices, on how to adopt IPM correctly and work with all the tools we have available to us. Don't send us back to the 19th century, it simply is not sustainable, and ensure the progress made wasn't developed in vain. Educate the general public on farming practices and highlight the roll agriculture plays in farm to fork. I truly believe that in Europe we have the best farmers in the world, who want the same thing you do, but you need to work with us rather than against us. If the proposed SUR is adopted in its current guise, farmers in Europe will be operating at a complete disadvantage to every other part of the world. We will be working blindfolded with our arms tied behind our back. Isn't the very nature and purpose of the EU to promote and facilitate the common market and avoid a situation where importation is the only choice? Farmers have been custodians of the land for centuries and we will continue to be for centuries more, we care for and understand the environment more than anyone else ever will.</p>
229	<p>We are entirely dependent on the availability of safe, legal, and effective pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make our business unviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. The result of this lower production will see increased imports of produce of unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes.</p>
230	<p>I would not be in agreement of the 50% reduction in the use of pesticides, however I would be in favour of a smaller reduction with the following factors being taken into consideration- the need for pesticides on the crops and the amount of pesticides being used on the crops. Over a period of time, a review should take place on the above factors to see if the reduction can be increased only if the results prove positive from the review.</p>
231	<p>Spray: I grow barley for next year seed, so it needs to be free from weeds and disease.</p>

232	<p>After reviewing the Sustainable Use Regulation (SUR) proposal, it is difficult to comprehend the magnitude of the ambition and its implications on not just Irish farms but European. At a time of global instability where the ongoing war in Ukraine has brought food production into focus and shined a light on the fragility of the world's supply chain for feedstuff, the Farm to fork strategy and the states ambition to increase the organic area to 25% would be dangerous and further increase our reliance on imported feed from South America, fuelling further deforestation and increasing the carbon footprint of our food system. We are entirely dependent on the availability of safe, legal and effectives pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make out business unviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. Ireland, already an importing country of circa. 6 Mmt of feed materials per year, produces less than a third of its requirements domestically by the tillage sector. As the climate continues to warm with weather extremes more frequent, reducing the ability of farmers to protect crop yields would be ill advised. In the current 2022/23, Europe has imported over 14 Mmt, (10 Mmt of corn alone from Brazil), Ukraine and Canada the main origins as a result of relentless drought across the EU which is an increase of 200% year on year. Moreover, Ireland imports close to 40% of its corn from the Ukraine which due to war, is no longer an available and reliable supply source for Ireland. The majority of arable farms are located in the east and south of the country with average rainfall amounts of between 700 – 1,000 mm per year. Unlike our European counterparts, Ireland's temperate climate has the benefits of reaping higher yields per ha. Inevitably however, high rainfall and humidity leaves crops vulnerable to many pests and diseases which the state and fellow farmers spend millions per annum in R&D and pesticides defending against these diseases. The result of this lower production will see an increased reliance on imports of produce of unknown provenance grown with unknown pesticides. Ireland has been making huge strides in sustainable farming practices with the re-introduction of mixed farming and regenerative techniques which indirectly cut pesticides significantly in production systems. However, to make these systems feasible, glyphosate is a fundamental active ingredient required to manage weeds and reduce the negative effects of tillage on soils which increase nutrient run off and soil erosion. Plant protection products are an expensive input on farms and used accordingly in response to yield-robbing fungal diseases such as Septoria tritici and Fusarium head blight. The following proposals "to promote organic farming to achieve 25% of agricultural land" is not a realistic proposition to farmers and stakeholders. If anything, it is greenwashing and displacing production in Ireland to further pressurize global ecosystems elsewhere (the Amazon Forest for example). The following proposals have all negative effects with no positive outcomes. I urge you to please reconsider.</p>
233	<p>We are entirely dependent on the availability of safe, legal and effectives pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make out business unviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. The result of this lower production will see increased imports of produce of</p>

	unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes, and I urge you to reconsider.
234	In light of recent discussions to ban the use of pesticides and the hope to reduce pesticide use by 50% by 2030 I would like to express my concerns as a young farmer in the current climate. I grew up on a farm, spent every free minute as a child working on the farm helping my father in any way that I could, I have watched my father, grow his farm invest every spare penny he and my mother had into improving the processes, buying new machinery, taking on more conacre and doing everything he could to produce the best crops to meet standards including malting barley and milling wheat standards. I am horrified and disgusted with the EU's plans to ban the use of pesticides, pesticides have been a saving grace for farmers, for years I heard my father recall tails going out to the fields on his hands and knees pulling weeds such as scutch grass, docks and wild oats is this the process we will have to return to? My Father and I spent a lot of money buying the best quality tractors and sprayers abiding by all the rules, only spraying in the correct conditions i.e., in calm conditions, ensuring not to overspray, using GPS, precision sprayers and completing pesticide training courses. I spent two years in college training to become a farmer, if you allow this pesticide ban it will result in a massive decline in young farmers as it simply will not be possible to make a living, with the help of pesticides we are able to achieve yields of 3-4 tonne per acre with barley and 4-5 tonne to the acre with wheat, this will be reduced to 1-2 for barely and similar for wheat, who is going to make up the difference? Will this be imported from countries outside the EU who use pesticides? Last year the EU expressed concerns of food shortages and urged farmers to grow more, but now you want to take away the one thing that dramatically helps with the successful growth of these crops? Who is going to grow malting barley? As without the help of pesticides it will not be possible to meet the requirement. I urge you to think about the long-term impact of this decision, think of the young farmers and all the work they have put in, thinks of the EU people and who is going to feed them, and think of the industry as a whole this decision could have devastating impacts on the long-term sustainability of farming.
235	It is now stated National policy to: Increase tillage area to 400,000 ha, increase use of multispecies swards, increase inclusion of white clover into grazing swards, increase use of red clover into silage swards, increase area of potato production, Increase area of vegetable production, Rehabilitation of biodiversity areas, Control of invasive alien species. All of these very positive developments will increase the National use of pesticides. Imposing an arbitrary reduction in pesticides will decrease the effectiveness of these initiatives and overall have a net negative impact on biodiversity, water quality, carbon emissions and the overall environment. In relation to the rehabilitation of biodiversity areas and control of invasive alien species, these tend to be focused in areas that are designated environmentally sensitive areas. The SUR is silent on how the above objectives can be met in the absence in use of pesticide in these environmentally sensitive areas. The proposed SUR completely ignores the impact that Regulation 1107/2009/EC has had on the availability of active substance. This regulation has removed many active substances from the environment and has resulted in the remaining active substances having a much more benign environmental profile. The

SUR totally ignores this trend with the imposition of an arbitrary reduction on pesticide availability without scientific basis. The EU commission impact analysis of the SUR outlined 'Higher production costs may also trigger a rise in food prices for EU consumers. EU reliance on imports such as cereals may increase'. The impact assessment also concluded that a reduction in pesticide use would have a muted impact on biodiversity, as it acknowledges that the primary cause of biodiversity loss is habitat loss. The impact assessment can be best summed up as 'all negative, no positive'. This impact assessment should form the basis of rejecting the main thrust of the SUR. The Independent advisory structure as outlined in the SUR is simply not available to provide agronomic advice on a one-to-one basis to all users. The current structure of embedded advice from merchants/ retailers is not perfect, but in general has served the industry well. A reconfiguration of this structure will require significant investment into the sector, mainly from public but also from private sources, with no clear benefit accruing. The lack of availability of well-trained agronomists is a serious threat to the agricultural sector as it stands, without arbitrarily changing the business structure of those that provide advice, again without any scientific justification. Use of unmanned drones, in controlled conditions, could be a very viable option in the rehabilitation of environmentally sensitive areas, especially for control of Bracken and invasive alien species, where use of mechanical machinery is not possible or extremely dangerous. Examples of these environments are mountainsides, river verges and rewetted bogs. Currently pesticides are being applied in these areas manually using knapsacks which is completely inappropriate and dangerous, or not at all, which is an infinitely worse outcome. The proposed ban on these forms of technology and in the use of pesticides in these areas, would have an overall negative impact on the rehabilitation of hard-to-reach areas of high environmental merit. The proposed reduction in the use of pesticides is being taken at a time when the potential benefits of gene technology are also being withheld from food producers. While 2001/18/EC is in operation in its current guise, especially in relation to the effective banning of gene editing technology, arbitrary reduction in the use of pesticides should be withheld. History is not kind to societies that engage in hubris and those that ignore the basis of their success. The EU in general, and Ireland in particular are blessed with a temperate climate that is conducive to the production of food in an environmentally friendly manner. The imposition of arbitrary reductions in pesticide use, with consequential reduction in food produced is ignoring these lessons of history. The existing SUD has its weaknesses, but addressing these specific weaknesses would seem a more appropriate route to a more environmentally sensitive use of pesticides than the arbitrary nature of the regulations as proposed.

236	<p>I am well aware of the EU Water Framework Directive and over the years have always been conscious of maintaining buffer zones near water courses and limiting the amount of quick release fertilisers we apply. I am also conscious of the dependence we place on certain plant protectant products which enable us to maintain our golf courses to a standard expected and paid for by our members and guests. Since golf courses would come under the 'recreation or sports grounds' category, we are potentially impacted by this Directive with regard to maintaining and presenting a high-level golf course. Whilst our overall usage of materials would be minimal in comparison to the agricultural industry, I still understand the potential for diffuse pollution. I accept that some level of accountability must be put in place but would urge the Department of Agriculture, Food and Marine to consider options other than a blanket ban for our industry. My proposal would be for a licencing approach to pesticide usage which would allow continued usage to specified limits and also remove the potential for black market chemistries that no doubt exist. We consider ourselves to be an important player in the tourism sector, which creates many jobs and brings millions into our economy annually, from overseas in particular. I feel strongly that, if a blanket ban were introduced pertaining to golf courses, our sector may be detrimentally impacted by job losses and the reality that golf course conditioning will deteriorate greatly without the availability of plant protectant products.</p>
237	<p>We provide quite a wide range of products and services to Irish farmers all over the country, with the core of each business based around the Irish arable sector. We pride ourselves in the utilisation of sustainably grown native Irish grains, for use in either the compounding of livestock rations, to make them as sustainable and Irish as possible, or for utilisation in the Irish malting/distilling industry. There are few organisations better positioned within Ireland that will understand the real implications of the proposed SUR if it is implemented as it is currently stated. It is also worth noting that much publicity and commitment in recent times by numerous government bodies and figureheads, including minister for agriculture Charlie McConalogue, has been given to the Irish arable sector and the greater role it has to play when it comes to Ireland's 'Climate Action Plan' and maintaining and improving our image as a low carbon footprint and sustainable producer/exporter of meat and dairy products. Should the SUR be implemented as is proposed, then it is essentially impossible to see how the arable sector can play the role that is envisaged by the policy makers and marketeers of our produce over the coming years. The SUR proposal aims to; 1. Achieve pesticide reduction targets, 2. Promote IPM and alternatives instead of pesticides, 3. Make it mandatory for farmers to seek independent advice and move to electronic recording of pesticide use 4. Prohibition of pesticide use in sensitive areas 1. Achieve Pesticide reduction Targets. There is no stakeholder in the Irish arable sector that is opposed to a reduction in pesticide use, provided it is achieved in a sustainable and targeted manner. It seems that the reduction targets set out in the SUR are completely baseless, with quite significant reductions in use, in quite a short space of time. Without a scientific impact assessment on what benefits a targeted reduction will bring, it could be described as a pointless and dangerous (in terms of food security) regulation; and if it is found five or so years after implementation that the SUR is not having the desired effect, what stops the EU from going a step further, increasing the restrictions around PPP's, again with baseless reasons. The increase in agricultural output across the world</p>

essentially correlates with two things; 1. The requirement for more food by a growing population, up to 8 billion today, and 2. the commercialisation of pesticides for use in agriculture, both of these instances coincide with the end of World War II, or the 1950's. The world and Europe have become dependent on plant protection products to produce enough food to feed the world's population through specific production evolutions in technologies and genetics over a 70-year period and now the EU wants to cut its dependency by 50% in seven years, without having an effect on production, in a region that is already more regulated for pesticide registrations than anywhere else in the world. The Irish arable sector is vital to a sustainable Irish agricultural industry, it is the lowest carbon emitting sector as well as being a vital cog in the sustainability narrative for our livestock feed sector. There are a variety of crops grown across the country which in their own way add to Ireland's biodiversity with many native species of wildlife and plants benefiting from current arable practices, which no doubt could be improved further, without having to introduce a blanket ban/reduction on pesticide use. In Ireland we achieve exceptionally high yields which make the production of grains a viable option for farmers. These yields are mainly achieved through a combination of factors; our temperate climate, long hours of daylight through the growing season and our soil's unique ability to hold moisture and at the same time be free draining. However, these three factors provide quite a good environment for pests also, and if not managed appropriately, growing crops in Ireland can become unviable. Wet weather diseases and weeds in the two largest arable crops in Ireland, barley and wheat, are managed with the use of pesticides in a programmed approach, if this programme is altered or reduced then the level of output and the high yields required are simply not achievable. However, history has shown that humans have adapted to situations in the past, and over longer periods of time new technologies and genetics can lead to new production methods. One would question our ability to reverse everything that has led us to where we are today over the last 70-year period, in just seven years, especially considering it takes ten years or more to bring a new plant variety or plant protection product (PPP) to the market. 2. Promote IPM and alternatives instead of pesticides. With the loss of many PPPs from the toolbox over the last 20 years due to EU restrictions, it is becoming more apparent to the Irish arable farmer that IPM is having a much greater role to play in the production of grains in Ireland. This has stemmed from a cumulative approach by both the farmer and advisor. However, this is far from a perfect science with much more research and development being required in this area before we can simply introduce a blanket reduction on pesticide use. IPM will have a significant role to play in the production of arable crops into the future, provided we are still growing arable crops in the future. Providing the right management practices to any crop at the right time is crucial to reducing crop stress, weed infestation or the onset of disease; this starts with timely sowing dates, adequate and timely nutrition and in this country, due to our climate, it also requires a programmed approach of PPPs (mainly herbicides and fungicides). Arable farmers and advisors are moving more and more in the direction of IPM by default, but as mentioned above, we are quite a way from having the perfect IPM model. However, with further advancements and knowledge in IPM, more widespread implementation of specific practices will occur when the tools are there i.e., new technologies, new PPP and new plant varieties.

237(a)	<p>3. Make it mandatory for farmers to seek independent advice and move to electronic recording of pesticide use. Independent advice is currently far from the norm for arable farmers, this is predominantly a result of the current structure of the arable industry in Ireland, whereby the agronomist that is giving the advice is predominantly employed by the end user of the grains. This is quite an important arrangement, as the end user of the grains needs to have oversight as to how a crop has been managed throughout the growing season. This oversight by the end user allows for prudent and sustainable use of arable inputs by a qualified and experienced agronomist, who ensures that the end product will be in the best possible condition at harvest, and free from toxins and other potential hazardous issues when entering either food grade produce such as malt/distilling or livestock feed. The description around how a farmer seeks independent advice in the regulation is also quite vague, with little understanding of how such an arrangement will work. It is fundamentally impossible to prescribe a full arable production programme in a country like Ireland, where the climate dictates what the best practice is on a given day, never mind a given month or even season. The successful and prudent production of crops in Ireland depends heavily on the close relationship that is built up over time between a farmer and his/her agronomist. The structure of the current arable industry and supply chains would require a complete overhaul, with many businesses having built up their viability on providing inputs and advice to farmers in turn for a consistent supply and quality of grains among their farmer customers. It is also hard to comprehend the capabilities of any organisation in Ireland that has the capacity to service the entire arable sector with independent advice. A move to electronic recording of pesticide use is a good idea in theory and would be welcome by all stakeholders in the industry, however, there are still a significant number of farmers that are not IT literate, this measure will likely prove challenging and cause resentment and poor record keeping should it be a compulsory requirement.</p> <p>4. Prohibition of pesticide use in sensitive areas. The reduction of pesticides in 'some' sensitive areas is understandable, however, with the parameters of the original SUD much of the problems have been addressed in sensitive areas. This raises the question, did the parameters of SUD implementation have the desired effect or was it more aimless solutions to what was envisaged to be a problem. If it was the latter, one would have to question the current parameters of the proposed SUR, will it have the desired effect or is it just baseless solutions to what is perceived rather than proven to be a problem. The use of PPPs; by amateur users, on areas that are for aesthetical purposes, and even using a specific product in specific scenario are areas that could be targeted by this SUR, but the blanket reduction across an industry is a blatant lack of understanding to the fundamentals of food production. The farmers of Ireland are custodians of their land, that understand and relate to the importance of biodiversity and prudent use of PPPs. If the SUR is implemented as proposed, there are huge areas of land currently in arable production that will no longer be viable for this purpose, these lands will end up in grass production which as mentioned earlier does little for biodiversity if all crops in Ireland are grassland.</p> <p>Summary. The proposed SUR is an agenda that stems from the Green Deal and Climate Action commitments set out by the EU. It seems clear that the targets set out in these agendas are aggressive, overstated and essentially out of touch with the realities of what happens on the ground,</p>
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	<p>furthermore the timelines for these changes to be implemented is totally disregarding the time and resources required to establish alternative tools to achieve the same levels of production. It seems apparent that the EU are on a mission when it comes to these agendas, with little regard given to the unintended consequences of such drastic measures. The proposed SUR came to light in summer of 2022, though it was actually due to be publicised in February 2022, however, the Ukraine war suspended its publication due to the sensitivities of the issues it raises. With the benefit of hindsight and the unfortunate circumstances in the Ukraine, it seems apparent the governance within the EU is paying little homage to Europe's ability to be self-sufficient in food production for an ever-growing population, with our dependencies on third countries is becoming great and greater as the EU increasingly becomes more stringent in its approach to the rules and regulations that our farmers must abide by. This proposed SUR will have detrimental impact to the production of arable crops in Ireland, which will then have significant consequences for the industries that these crops support i.e., sustainable livestock production and the Irish drinks sector. Ireland's location in Europe is favourable when it comes to our climate, which directly results in our ability to be among the most sustainable and carbon efficient producers of food in the world. It seems we are unable point out the unique advantages that we have at EU level, and our policy makers seem content in reducing our output of sustainable production for it to be only taken up by less sustainable and less carbon efficient countries, predominantly outside of the EU.</p>
238	<p>I would strongly disagree with the suggestions made on the pesticide reduction directive. The proposed 50% reduction in pesticide use would make this farm unviable straight away. Climate in Ireland makes growing crops difficult without the loss of herbicides and fungicides protecting these crops against wet weather diseases and weeds that flourish in our climate. The farm practices minimum tillage establishment methods so to control volunteers and weeds between cash crops herbicides such as glyphosate are essential for this system to continue which is what the government are pushing for carbon emissions compared to traditional establishment methods. If pesticide usage is reduced the yield and quality of the grain grown will dramatically fall again leaving a family farm arable unviable! Pesticides are a tool in our IPM strategy and usage is already curtailed true measures, but another reduction will see a serious decline in tillage area nationally. TIS scheme was introduced to increase the arable area, protein payments to increase national protein crops grown, tams on tillage machinery to establish crops min till, direct drilled or no till and raise crops using GPS sprayers and spreaders, and now a proposed directive to reduce pesticide usage makes no sense at farm level at all. There is no regard to food security nationally or across the EU. For the island of Ireland to produce top quality grains pesticides are needed in our IPM strategy. Growth regulators, fungicides and herbicides all have a place used correctly to achieve the consistent yields produced from this country's arable area without them or even a 50% reduction we will see the arable decline and grain production going back to the 1960's.</p>
239	<p>I agree with the safe use of pesticide and the continuous safe use of pesticides.</p>

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So how will this proposal effect our farming operation. Well, if it is to go through as is, dramatically! The thinking that IPM is going to solve the problems resulting from the removal of this chemistry is misguided. Why, because we are already doing most if not all of the IPM recommendation currently, rotations, detailed crop monitoring, using appropriate rates etc. But we call it just good farming practices. If some of this chemistry is removed yields will drop, and from experience herbicide or lack of them, for us would lead to a big yield drop of around 40% in the case of bad grass weeds present in the crop. Now at this level we would be losing money so it is not just that we would produce less grain, we could not afford to grow the crop at all. So, if the EU think that they will have a yield penalty but that this would be acceptable. Have they factored in the amount of growers that will not produce anything? By my calculations it won't make economic sense to grow these crops. Margins in cereal production are usually tight, but it is generally the last 10-15% of the yield which is the profits, remove these yields and the viability of growing cereals on rented or leased land would be questionable. By reducing the chemistry available, this would put more pressure on the remaining chemistry, which actually goes against IPM guidelines of using different crops and therefore different chemistry (with different mode of action) to reduce the build-up of resistance. But also, the risk attached to growing cereals in our climate would be increased quite dramatically. The weather at key times of the year would be critical, currently fungicide buffer the weather and in a high disease pressure year we have the chemistry to control these outbreaks. Without the current fungicides we would be completely at the mercy of the weather. Here in Ireland, we in the top countries of the world for wheat yield, is this yield taken into account when we talk about the amount of pesticides used, how does the amount of A.I stack up per ton produced and not on a per ha basis. This evening on Today FM last word program it was mentioned that we export 90% of our agricultural produce but that we import 80% of our food. This is a result of policy that has focused on producing more milk and beef. Food security will become a bigger and bigger issue in the next decade and by removing some of the tools needed to produce high yielding crops we will no longer be able to compete with imports from abroad. And it's not only yield that will suffer but also quality. The grain produce here is of the highest quality and produced in accordance to the highest standards in the world. By reducing the chemistry available, as a country we will be using more imported grain produce to lower standards and using pesticides that have been ban in Europe for some time. In recent years we have practiced more and more min till or non-ploughing of the land we work. This has definitely helped improve the soil. It isn't always an option or the best solution but where we can do it, it has improved soil health. A simple task of digging a few holes in fields revealed an increase in worm numbers (a sign of healthy soil). We are probably not releasing the same amount of carbon with these cultivations, and by producing high yield crops we are putting more carbon into the soil. The structure and carrying capacity of the soil has also improved. But this is only possible with glyphosate to create stale seedbeds. If we were to lose glyphosate, we would have to return to ploughing all the land, this would increase the amount of fuel used, more steel wearing parts and release more carbon. So, in summary could we continue to farm with less available chemistry, it is very difficult to answer, probably the biggest concern would be the risk attached to growing

	<p>cereals. Would the return justify the risk, probably not if we have to compete against imports. Imports that would have the some of the chemistry that is ban in the EU apply to it. If our yields drop the cost per ton rises and grain from these other countries would clearly have an unfair advantage. If the aim is to improve water quality, it would be far more beneficial to limit all pesticides to professional users. Equipped sprayers with low drift nozzles. Restrict pesticides to food/feed production to protect food security. Improve application techniques with training and operator safety with carbon cab filters and quality PPE. A blanket approach to reducing pesticides will only increase the price of food further, and that is if the food is available! Thank you for your time in reading this submission.</p>
241	<p>We appreciate the opportunity to comment on the proposal for a Regulation on the sustainable use of plant protection products. We are in favour of a sustainable use of pesticides. Providing the means to farmers to adopt Integrated Pest Management (“IPM”), and stimulating the implementation of IPM are commendable initiatives, fully supported us, provided that the implementation is conducted in a realistic manner. Our comments focus on the main flaws in the draft legislation.</p> <p>A 50% reduction target for the use of pesticides however, expressed in kilo’s, does not contribute to sustainability. A 50% reduction target for the risk of pesticides is a political target. If such a target is considered desirable, it can only be managed if the risk of pesticides can be quantified. Technically this is complicated, but possible. The “Harmonised Risk Indicators” proposed in the draft Regulation however do not quantify risk in any way. Suggesting that the success of risk reduction can be measured with these indicators is misleading. As explained in the comments below, it is not only misleading, but even irresponsible to rely on such meaningless numbers. The draft Regulation proposes also the development of meaningful indicators, which is welcomed by us. This is however not a matter of improving the current indicators: it is a fresh start, with real indicators, to replace the current meaningless numbers. It may be politically correct to “set ambitious goals”. It is bad governance to introduce legally binding goals based on meaningless numbers. When serious, meaningful indicators are available, targets can be set, and measures can be taken to achieve them. At this moment this is not possible. It takes political courage to admit that. According to Article 3 of the draft Regulation, “‘risk indicator’ means a measurement indicating the relative change in risks for human health or the environment associated with the use of plant protection products...” It is broadly acknowledged that there is no such thing as “zero risk”. The use of plant protection products, like the use of any other category of products, can bring certain risks. Establishing the risk connected to the use of plant protection products is a matter of science. Establishing what level of risk is acceptable is a political choice. The acceptable levels of risk for plant protection products are laid down in the Uniform Principles, part of the regulatory framework under Regulation (EC) No. 1107/2009. Notwithstanding the fact that Regulation 1107/2009 ensures that the risk of every authorised use of a plant protection product is acceptable, and in line with the Uniform Principles, we take note of the political desire to yet reduce those risks ever further. With the currently available tools however the 50% reduction target for both use and risk is an overambitious goal that will disrupt agriculture, driving farmers to restructure their production methods for no</p>

other reason than to satisfy politically motivated yet meaningless “indicators”. The draft Sustainable Use Regulation (“SUR”) applies a 50% reduction target to all Member States, ignoring the huge differences and starting points. An attempt to mitigate these differences is made via the introduction of the “weighted intensity of use and risk” and the already achieved “use and risk” reduction. The “weighted intensity of use and risk” is a misleading a wrong concept. It assumes a direct link between quantity used and intensity of use, meaning, if a higher number of kg is used per ha, then a higher intensity of use is concluded. This would be correct only if the dose of active substance applied per ha was similar for the different alternative products. But it is not. In fact, the differences can have several orders of magnitude. To illustrate with an extreme example. Control of grape powdery mildew can be made, amongst several alternatives, with dustable sulphur or with chemical compounds, of which triazoles are an example. All these substances are listed in Part A to Regulation 540/2011 and therefore fall under Group 2 of Annex I methodology. The typical dose of dustable sulphur is 25-35 kg of active substance/ha. The typical dose of triazoles ranges from 25-35 g/ha (penconazole) to 100 g/ha (tebuconazole). The dose rate of dustable sulphur is thus roughly 300 to 1000 times higher than the one of triazoles. Therefore, a country where a significant part of the control of the grape powdery mildew is made with dustable sulphur will have, with the use of this calculation formula, a higher “weighted intensity of use and risk” than a second country where powdery mildew is mostly controlled with triazoles. It seems obvious that such higher indicator on the “weighted intensity of use and risk” of the first country is not real. Moreover, the use of sulphur is permitted in organic agriculture, whilst the use of triazoles is not. The Farm-to-Fork objective to bring at least 25% of the EU’s agricultural land under organic farming by 2030, therefore, is bound to lead to an increase of the volume used of such pesticides, demonstrating once again the arbitrary nature of a “use reduction” based on kilos. This dose effect is seen throughout the entire range of crops and uses. Therefore, two countries with the same number of ha’s treated, may have different “weighted intensity of use and risk”, depending on the actual range of products used. In addition, it is mistaken to conclude that a product used at a higher dose rate leads to a higher risk or environmental impact. Products used at kilos per ha do not necessarily pose a higher risk than products used at grams per ha. Furthermore, countries and crops have different base requirements regarding the number of treatments required to effectively control pests: The same crop in different climatic regions, will have different pest incidence and pressure, leading to different needs. Different crops will have different needs in the number of treatments and products required for an effective control. These base differences are still valid, even where a full implementation of IPM, or adoption of organic farming is achieved. The modulation of the reduction target based on the Member States’ “weighted intensity of use and risk” seems appropriate. However, the formula proposed to measure such “weighted intensity of use and risk” is not correct. The calculation of the “weighted intensity of use and risk”, should be based instead in the developed treated hectares per crop and per country. It is proposed to have a transitory period of 3 years, where such information will be collected and worked. That information would be the benchmark used to set up the “weighted intensity of use and risk” from each country. The same criticism is made to the already achieved use and risk reduction. Since this figure has

the same method of calculation, the same flaws apply. A country where farmers have switched from products requiring higher doses of active substance per ha, to products with lower doses per ha, will appear to have achieved a significant use and risk reduction. However, this use and risk reduction is not real since the same number of hectares are being treated. The calculation of the “achieved reduction of use and risk”, should be based instead on the reduction of developed treated hectares per crop and per country. Probably it will be difficult to know the developed treated hectares in the period 2011, 2012 and 2013. Methods to calculate indirectly these figures might be developed. When a hard and legally binding risk reduction target is considered politically appropriate, the risk from the use of plant protection products must be quantifiable to measure the achievement towards those targets. The draft SUR builds further on the “Harmonised Risk Indicators” (HRIs) from the current SUD. These HRIs do not quantify risk in any way. The indicators are based purely, and without ambition, on the simplest available data: hazard classifications and categorisations, kilos of used active substances, numbers of authorisations for certain uses. None of the parameters of the HRIs bear any relationship to the actual risk from the use of plant protection products. Calling these indicators “Harmonised Risk Indicators” is not only misleading to the public, it leads to regulatory actions that solely aim to reduce the HRIs rather than to reduce the actual risk from the use of plant protection products. We appreciate the intention expressed in Article 35, paragraphs 4-6, to evaluate the HRIs 1, 2, and 2a within 12 months after the future entry into force of the draft Regulation, based on “scientific research from the Joint Research Centre and extensive consultation of stakeholders, including Member States, scientific experts and civil society organisations ” Nevertheless, within the timelines of the 2030 reduction goals the eventual introduction of any future real risk indicators will be too late to provide information on the real risk reduction between the reference period 2015-2017 and 2030, because no statistical information for such real indicators will be available for the major part of that period. Moreover, although the ambition of the timelines in Article 35, paragraphs 5 and 6 for the eventual establishment of new Risk Indicators is appreciated, it is likely that longer periods will be needed to create and introduce a functioning system of real meaningful HRIs. Setting hard “legally binding” risk reduction targets, without any means to measure the real reduction of risk is therefore both politically and socio-economically undesirable. Only the existing and proposed HRIs will be available, and regulatory action in National Action Plans will focus on reducing those misleading indicators, resulting in the reduction of a nonsensical number, targeting virtually randomly products and uses without regard to actual risk. It may be politically embarrassing to admit that the statistical information needed to populate scientifically sound risk indicators is currently simply not available. Regulation 1107/2009, this draft Regulation, and the upcoming SAIO (Statistics on Agricultural Inputs and Outputs) Regulation provide every opportunity to build a system that does provide the required information on the use of pesticides. With that information, and the information submitted for the approval of substances and products, a meaningful system of Risk Indicators can be created. It is however not only misleading, but even irresponsible to use the current “harmonized risk indicators” that do not indicate any form of risk. The draft SUR forces Member States to set legally binding targets that rely on meaningless

indicators. The only purpose this can serve is the reduction of those “Harmonised Risk Indicators”, not the reduction of risk from pesticides. We welcome the attention given to the implementation of IPM. A broad and correct embracement of IPM is the best way to ensure a sustainable use of pesticides. The publication of IPM crop-specific rules is perceived as an important tool to provide farmers and professional users with the basic guidelines on how to implement IPM in practice. However, we believe the timelines set in the draft proposed Regulation are unrealistic. Unfortunately, there are multiple examples, also in the pesticides legislation, of setting unrealistic timelines in new legislation for procedures, only to see them systematically exceeded in practice, or to see tricks being used to circumnavigate them. Instead of setting realistic timelines, time and again the legislator has set unrealistically short timelines, presenting the new procedures as “ambitious” and “efficient”, as if reality will then follow the desire. Time and again, reality demonstrated the opposite. This draft Regulation shows that no lessons are learned from the past. According to the proposed Article 15 of the draft Regulation, within 2 years after the entry into force each Member State shall have in place crop specific IPM rules. But within 15 months after the entry into force, each Member State needs to publish a draft for public consultation. Furthermore, Member States still need to send to the Commission, a draft addressing the comments received. Considering that: Members States need to appoint a competent authority. The appointed competent authority needs to organise the structure to manage this work. The number of crops for which rules are required, can be significant, since they need to cover 90% of its utilised agricultural area. The significant amount of data that needs to be collected for each one of the crops. The consultation required with relevant stakeholders with existing work in the development and implementation of IPM programs such as, farmers organisations, universities, etc., a period of 15 months to present a first draft seems impossible to comply with, especially when these rules are to be “scientifically robust”, as required in point 2 of Article 15. If these unrealistic timelines are adopted in the SUR, we doubt that even a few Member States will comply; the majority will fail to have the first draft available within the prescribed 15 months. Ambition is good, unworkable timelines are not. Why not set timelines that a majority of Member States will be able to adhere to? While we agree with the emphasis placed on implementation of IPM, we disagree with the definition of integrated pest management and the emphasis placed in this legislation on reducing the use of chemical pesticides. We endorse the FAO definition of IPM: IPM is the careful consideration of all available pest control techniques and subsequent integration of appropriate measures that discourage the development of pest populations. It combines biological, chemical, physical and crop specific (cultural) management strategies and practices to grow healthy crops and minimize the use of pesticides, reducing or minimizing risks posed by pesticides to human health and the environment for sustainable pest management. The focus of this definition is placed on the integration of all pest control techniques to grow healthy crops. The minimization of the use of pesticides (without distinction of them being of biological or chemical origin) comes as a consequence of the combination of all management strategies. But it is not the primary target of IPM. On the contrary, all the focus given in this proposed Regulation, is on the use of chemical pesticides as last resort, only “when all other control means are exhausted”. The

	<p>main focus and objective are the reduction of the use of chemical pesticides. Using chemical pesticides only as last resort, instead of having them pragmatically integrated in a coherent management strategy, can lead to an unsustainable crop protection and unhealthy crops. This is the opposite of what this legislation intends to achieve. Again, we take note of the political desire to reduce the use and risk of pesticides by 50%. The proper implementation of true IPM systems has the potential to reduce the use and risk of pesticides by 50% or more. With “proper implementation” it is meant a broad adoption of IPM by farmers, with a solid network of field technicians providing independent advice on IPM implementation at farm level. And with “true IPM systems” it is meant the full use of all the tools that are today available to farmers, including digital tools and precision farming. But we acknowledge that a significant I&D will be required at national and local level to develop the biological, physical, and cultural techniques that combined with the chemical will minimize the use of pesticides. However, instead of concentrating on the way forward for farmers to achieve that 50% target, by means of the development and proper implementation of IPM, the draft Regulation focuses on setting blind cuts and calls for penalties for those who don’t achieve the target. Without providing farmers the adequate tools, a blind reduction on the use of pesticides risks having counterproductive effects. We propose to step away from using the misleading current (and proposed) Harmonised Risk Indicators, and to concentrate on the development of meaningful real indicators, and on establishing systems to provide the information needed for real indicators. To abandon the current reference period and deadline for achieving the desired reductions, because there is no information available, nor are there real indicators available, to measure the use and risk of pesticides in a realistic and meaningful manner. To reconsider the timelines for the accelerated introduction of IPM, and to establish timelines that are both ambitious and realistic. To reformulate the definition of IPM, and to embrace all available techniques in a balanced system, including a minimal but effective use of chemical pesticides.</p>
242	<p>I would love to farm without pesticides, hand on heart, but the truth is it is impossible, some years you don’t see the harm being massive, but there is always harm, if u don’t use pesticides, I grow beet, and make money selling to beef and dairy farmers, home grown feed. In 2018, I had a 70 percent reduction in yield cause I tried to grow it with pesticides. Please consider the harm of not using pesticides, in our mix we love the land and only want the best for nature.</p>
243	<p>We are entirely dependent on the availability of safe, legal and effective pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make out business nonviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. The result of this lower production will see increased imports of produce of unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes. I urge you to you reconsider.</p>

244	<p>Here in the southwest corner of Ireland it will become completely unviable to grow cereals and potatoes due to our high levels of damp, humid misty conditions that we experience due to being so close to the sea. These conditions are more of the norm than the exception around here and are conducive to the spread of many diseases and funguses. We heavily rely on these chemicals to fight these diseases. If crop production ceases around here it will just mean more grain imports, which contribute even more to carbon emissions and food miles. Is locally grown not the best approach from an overall environmental and marketing point of view? Just look at the scrapping of the sugar industry.</p>
245	<p>I am calling for an urgent assessment of the impact that furthering these proposals will have on crop yields and food security. We on this island are susceptible to weather pressure with the maritime air which puts pressure with blight and septoria in our crop dropping of protection products will seriously affect our business and the food supply with serious implications for the availability of food with yield reductions of 50% I would ask that an assessment is done before any move is made. Lastly, I am a father of four and do my very best for the environment and hope to have a working farm producing Irish food to hand on to the future farmers.</p>
246	<p>We are entirely dependent on the availability of safe, legal and effective pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make our business unviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. The result of this lower production will see increased imports of produce of unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes. I urge you to reconsider.</p>
247	<p>Growing these crops in this temperate, maritime climate is not without many challenges, including disease control. Blight cannot be kept out of the potato crop without serious chemical intervention. Likewise, Septoria and most of the common cereal diseases cannot be prevented without chemical intervention. I understand the need for farming to be carried out in a sustainable way, but reducing the amount of pesticides available to farmers without providing any alternative options is not sustainable, it is detrimental to the viability of Irish produced food. Bearing in mind sustainability has three pillars, the environment, economy, and society, this proposal will have a detrimental effect on both Ireland's economy and society. The economy will suffer due to reduced production numbers, reduced rural employment, reduced quality of crops leading to reduced prices, and an increase in food imports. Society will suffer due to reduced stability of food supplies, increased reliance on imports, reduced career opportunities in agriculture and food production, and possibly empty supermarket shelves. While the environment will benefit from pesticide reduction, there will be other negative environmental effects such as increased food waste at the farm gate, increased food miles and an increased carbon footprint of our food in the future. The varieties of potatoes I grow, British Queens, developed in 1894, and Roosters, developed in 1990, are not blight tolerant. The market here in Ireland demands these traditional delicious floury potatoes, not waxy varieties. There will be no way for growers in Ireland to produce British Queens and Roosters to the standard we currently enjoy, in the volume we currently rely on, without blight control measures. Over the last 8 years we have started growing salad</p>

	<p>potatoes (up to 50 acres at the moment) which would have previously been imported. The reductions included in this proposal will result in reduced skin quality, which will mean this product will be rejected by supermarkets, who will ultimately return to importing this product from countries with different growing conditions or different pesticide regulations. I also grow a large quantity of cauliflower (previously this was imported from France). In recent years we have significantly reduced our fungicide use in this crop through the use of biostimulants. As we have already made significant reductions here it is hard to see how we can make further reductions as outlined in the proposed regulations. As a cereal grower on the coast of Ireland we are prone to aphid attacks and BYDV as a consequence. We try to monitor our aphid numbers and only spray if required. In this climate Septoria and Fusarium can be detrimental to our wheat crops. If weather conditions are unsuitable at certain growth stages, we need pesticides and fungicides to prevent crop yield and quality loss. While pesticides and fungicides should only be used as required, if they are eliminated from our tool kit our crops will suffer. We already work with our Teagasc and private advisors to reduce our pesticide and fungicide use as much as we can (depending on conditions). This is important to us as careful use of an expensive product increases our profitability, and as custodians of the environment for future generations we understand that careful use of these products is essential. However, the serious restrictions set out in the proposed regulations will be detrimental to the future viability of our farm. I would strongly suggest that this proposal is rejected, or at the very least postponed to allow agricultural science and food science time to provide farmers like me with more sustainable options to protect my crops against pests and disease.</p>
248	<p>I believe the Sustainable Use Regulations will cause considerable damage to arable farming in Ireland. Due to our geographical location, we have a mild damp climate which gives us advantages and disadvantages. One of the major disadvantages is exposure to wet weather disease pressure. As a result, many pesticides are tested and trialled in our climate before being launched across the world. Reducing our ability to control these wet weather diseases will have significant impact on the viability of the arable sector. Apart from the obvious reduction in yield and income, this will also have a negative impact on farmers mental health due to the added stress of control being taken away. Going forward the government has made an active commitment to increase the arable area in Ireland. However, implementing these regulations can only have an adverse effect on the government's plans. Currently more and more land is being lost to the dairy expansion due to increase in the national dairy herd and also through the new Nitrates regulations which is inadvertently causing dairy farmers to seek out additional land through the rental market so as to sustain their current numbers. This land which was being used by arable and other livestock farmers was managed in a less intensive manner and as a result will be managed more intensely by dairy farmers. The dairy expansion is currently making it unviable for arable farmers to compete with the money being offered by dairy farmers, so how can the government hope to increase the arable area if the arable sectors viability is further reduced by these regulations. The arable sector is currently seen as the forerunner in carbon emission targets as it is almost carbon neutral compared to the significant carbon emissions coming from the other sectors in farming. If the area in arable farming reduces how will the government be able</p>

	<p>to realise its climate targets if land switches to the more intensive, higher carbon emitting dairy sector. Currently Ireland is a net importer of food and animal feed. These regulations will put further pressure on our yields resulting in an increased reliance on imported goods. Currently genetically modified maize and soya beans are being imported here for livestock feed grown in areas directly linked to deforestation and using pesticides which have been banned by the E.U. yet we have to compete with them on a world market on an un-level playing field. If our yields here reduce, how can we justify importing such environmentally destructive alternatives? It is imperative that prior to a reduction in pesticide usage that a state funded agency in charge of trialling should be investing in alternative methods of disease control and use of nutrition in disease prevention rather than prescription. Teagasc being the state funded agency has the majority of its vast resources tied up in pesticide trials. In order to have effective pesticide reduction there needs to be a robust, scientific based approach spanning many years into how nutrition can be used in place of pesticides, yet we currently face a scenario of the regulations being brought in and farmers and researchers left without appropriate guidance or scientific based evidence to support these reductions. Legislation drafted without fully researching potential impacts is likely to do much more damage than what currently exists.</p>
249	<p>We are entirely dependent on the availability of safe, legal and effective pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make our business unviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. The result of this lower production will see increased imports of produce of unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes. I urge you to reconsider.</p>
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253	This is an email in support to the use of Pesticides for the golf industry. We rely on the use of the following: - Plant Growth Regulators - to keep our playing surfaces in good condition throughout the year. Herbicides - are used to help us control the weeds in and around the course and surrounding areas such as pathways, walkways etc. Fungicides and pesticides - are used to help reduce the risk of fungal diseases and other pathogen attacks, helping us to maintain full grass coverage throughout the year to enable us good playing surfaces. As you can see, we rely on these products to produce the best for our customers
254	Against the proposal for a sustainable use of pesticide regulation. With the increase in population comes the increased demand for food production. Targets one and two set out would mean the reduction in food production at its current level. Therefore, it would mean more area is needed to only produce the same at a higher cost. This would also mean further emissions and environmental damage is caused. In essence 'robbing peter to pay Paul' scenario will develop. Introduction of these targets would also mean farmers would not be able to compete with imported goods which will be produced cheaper due to different climates and less disease, virus and pest pressures. Organic production also isn't viable for farmers due to reduced yields and poor prices in comparison to traditional farming in 2023. These targets will also mean the island of Ireland will then become dependent on imported produce also. Top quality produce is now required by supermarkets and consumers. The introduction of these targets will mean farmers will not be able to produce there product to this same high standard. Food waste is a major problem which would greatly reduce the environmental impact of farming if this was addressed first. The amount of food waste off crops is criminal when we talk about impact on the environment. Getting a handle on food waste would mean less would need to be produced for the same output. Therefore, reducing emissions without major change. The economic knock-on effect from target one and two would be enormous in Ireland. As farmers would struggle jobs would be lost.
255	Farmers use pesticides to burn off grasses and weeds when re seeding with more efficient grasses and clover (which reduces artificial nitrogen use). Farmers need to use pesticides to control weeds in established grassland and invasive species of weeds around the farm. The proposed reductions in pesticides use are too severe especially when there is little alternative to glyphosate use.
256	We are entirely dependent on the availability of safe, legal and effectives pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make out business unviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. The result of this lower production will see increased imports of produce of unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes. I urge you to you reconsider.

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258	<p>We would like to make a submission with regards Sustainable Use Pesticides Regulation (SUR) consultation process. We would like to take this opportunity to thank your department for implementing a protein aid scheme and therefore the introduction of a straw chopping scheme for tillage farms which has been a very welcome support to the tillage industry. The straw chopping scheme is viewed by tillage farmers as an eco-scheme which financially rewards farmers to incorporate straw back into their soil with the benefits of improving our soil organic matter, increasing our soil carbon levels, improving our soil structure, providing protection from soil erosion, increase microbial activity in the soil and return nutrients to the soil. It is irresponsible to take away means of growing sustainable crops within Ireland by reducing the availability of pesticides without real alternatives via means such as new varieties from gene editing. By all means taking pesticides away from non-professional trained people is always welcome. Tillage farmers are trained professional users and as such use pesticides as part of an Integrated Pest Management process. If the EU Tillage industry loses 30 to 50% of the available pesticides without any real and meaningful alternative, we will see the following happen. The reduction in yield due to poor disease control. This will also impact on the grain quality and will eliminate grains from premium markets which will have a wider economic impact than just the tillage sector, it has the potential to destroy the native drinks industry. The above will impact negatively on food security. There is a serious issue around "candidates for substitution" as in there is the potential of Loss of critical Chemicals that won't be replaced. A serious reduction in pesticide availability without any alternative will lead to a reduction in the tillage areas which is in direct contradiction to the government directive to increase tillage area under climate action plan/no point in promoting industry on one hand and completely hamstringing it on the other. This will lead to increasing our reliance on imported grain in context of reduced domestic yield/ grain will be entering food chain that has significantly less traceability and quality controls from 3rd countries. How can the government reconcile this policy? Reducing capacity of tillage industry will have long term impacts on carbon sequestration and footprint for country as a whole/land lost to tillage and going into dairy will directly contravene the country's climate action targets. As Tillage farmers we need clarification around the implementation and interpretation on new proposed IPM strategies and clarification around independent advisory/ requirements' many farmers have long established relationships with merchant agronomists etc. We feel that Tillage farmers need to be involved directly in any proposed change to the current legislation as any drastic changes will have a massive negative impact on our business and survival.</p>

259	<p>I am writing in relation to the proposed Sustainable Use of Pesticides Regulation. Pesticides are used in crop production in conjunction with IPM and are used at rates required to do the job which they are intended to do. They are too expensive to use at rates higher than required and won't be effective if used at lower rates. Pesticides go through a rigorous R+D programme before they are brought to market, which gives us a user rate appropriate to the efficacy of any particular pesticide. Therefore, in the absence of alternative developed control methods, it is counterproductive to propose a 50% reduction in use of all pesticides by 2030. This proposal will likely take crop yields back to where they were decades ago, and most likely won't be sustainable to provide a margin to continue crop production. Control of fungi such as Septoria in Wheat, Blight in Potatoes, Rhynchosporium in Barley, to name but a few, currently require robust pesticide rates for their control, and at the proposed 50% reduction in pesticide use, these fungi will become impossible to control in our climate, in the absence of alternative control methods. Nobody wants to see crop failures similar to the potato crop failure in this country in 1845, which resulted in famine, and is currently entirely preventable by using robust pesticide rates. We, as farmers, and custodians of our countryside, have no interest in using more pesticides than required, but to be sustainable at farm level, we need to maximise crop yields/production, through the continued use of pesticides as they are required. The current thinking is that more food needs to be plant based, to feed an ever-increasing population. If this is reality, then Europe cannot reduce pesticide use by 50% by 2030. The alternative is to import plant-based food from outside of Europe where it is not subject to these regulations, and increases staple food insecurity within Europe, resulting in increased consumer food prices, and increased food poverty among the less well off in society.</p>
260	<p>We would like to object vigorously to the sustainable use proposal. The last thing we need going forward is a reduction in the armoury to produce quality food to EU Standards. We have been already subjected to major withdrawals of Plant Protection Products (PPP's) in the last 20 years. This has made it very difficult to control disease and pests in crops. These crops must meet the exacting standards of the major multiples. This has resulted in our waste levels becoming unsustainable. A lot of questions have to be asked going forward around the following: Food security, Sustainability, Seasonality; Supermarkets must reduce their standards and grades. If the industry is to remain viable. Food producers in this country are at 11th hour crisis. Please do not put the final nail in our coffin.</p>

261	<p>Our competition is where we are constantly threatened by low-cost imports, low light levels and in more recent years the extraordinary cost of natural gas. While reducing Pesticides may seem like a good thing, in reality we already have reduced them as much as we can financially do so. We control the climate as much as we can, the heat, humidity, airflow. We monitor the plants to ensure exact nutrients is applied and we introduce beneficial insects to target specific pests. This IPM strategy is just day to day growing. Even though we do as stated above mildew, powdery mainly is our biggest challenge. If we lost 50% of our chemicals, we could not continue to grow. It would be too risky as mildew is very hard to control as it is. Even with a well-designed biological control program for pests sometimes we need to spray if pest populations breach certain thresholds. I have very limited insecticides as it is as I need to consider what harms the beneficial insects so a 50% reduction would be disastrous. Our glasshouses are alongside a GAA pitch, I find it concerning that I may not be able to spray this area and it could result in pest build up which could destroy crops. Electronic systems are in place to record a lot of what we do. But I feel it would be very difficult to continuously record everything we do as IPM is really at the heart of the business. It seems a little excessive to have to record every time I look at sticky trap, I could do this 100 times in the space of an hour. If I was to record everything, I feel like I would be missing out on precious time with the crop which could result in problems down the line. These are no specific glasshouse advisers in Ireland. Is the department of agriculture going to provide these? Will they be useful? I can't see how someone without extensive knowledge of the industry can come in and advise. Growing in glasshouses is a science and experience is a must. I hope this submission is well received and consideration is given to it. Irish Horticultural industry is at a crossroads, we need as much support as we can get. Too many growers are leaving the industry and with that goes generations of knowledge. When it's lost its gone. We need to think seriously about food sovereignty and try to grow as much crops as we can in Ireland. For this to happen, growers must be supported and encouraged not burdened with extra bureaucracy and reduced resources.</p>
262	<p>I would like to make a submission with regards Sustainable Use Pesticides Regulation (SUR) consultation process with respect to a Tillage farmer. I would like to take this opportunity to thank your department for implementing a protein aid scheme and therefore the introduction of a straw chopping scheme for tillage farms which has been a very welcome support to the tillage industry, The straw chopping scheme is viewed by tillage fanners as an eco-scheme which financially rewards farmers to incorporate straw back into their soil with the benefits of improving our soil organic matter, increasing our soil carbon levels, improving our soil structure, providing protection from soil erosion, increase microbial activity in the soil and return nutrients to the soil. It is irresponsible to take away means of growing sustainable crops within Ireland by reducing the availability of pesticides without real alternatives via means such as new varieties from gen editing. By all means taking pesticides away from non-professional trained people is always welcome. Tillage farmers are trained professional users and as such use pesticides as part of an Integrated Pest Management process. If the EU Tillage industry loses 30 to 50% of the available pesticides without any real and meaning alternative, we will see the following happen: The Reduction in yield due to poor disease control. This will also</p>

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263	<p>I believe that both the European Union and also Ireland needs to take an approach to the review and implementation of the SUR which is very much in adherence with the most up to date and relevant scientific information on sustainable pesticide use and the role of pesticide use in sustainable and competitive food production whilst meeting high environmental standards. Some of the ambitions outlined by many advocates and opinion leaders within the EU on pesticide reduction targets of the magnitude of 50 percent and higher are in my scientific opinion unrealistic, dangerous and reckless to the security of food production, to sustainable family farming and also carry great risks to the principles of integrated pest management practices and integrated crop management being correctly practiced across the EU and specifically within Ireland. I do think a modest reduction in Pesticide Use of 10-25% in Ireland is achievable in the period to 2030 and farmers, advisors and the wider Ag industry will be found to be very willing to achieve this target whist achieving good sustainable pesticide practices and maintaining food security to a satisfactory level.</p>
264	<p>I wish to respond to EUs proposed way in which way it will go in relation to impact of pesticide use in human health. Firstly, I would say a lot has been done by Irish Cereal farmers to this effect and are to the forefront to achieving this goal. We are fully compliant regulations and are professional users and our equipment is at the highest standard through the aid of Department of Agriculture. IPM is another strategy which is evident on every tillage farmer's mind in this country and also through our advisors. Pesticide is part of the farmers toolbox to grow crops. But I do have deep concerns about these new proposals and I think it will Irish grain growers at a distinct disadvantage to other countries. Our climate is different to most and we have disease problems which some of the bigger grain producers don't have to worry about. A lot of pesticides have already gone off the market in Europe but yet readily available in competing markets. As our country is an importer of grain to feed dairy/beef/pig and poultry</p>

	sector these proposals will leave Irish tillage totally uncompetitive and will lead to job losses. Also, we have to look to the future of the industry and what might be available but maybe not yet proven in terms of new chemical technologies. I think Ireland and the EU have a rigorous testing of pesticides and when had to make the hard decisions on taking some off the market they have. While I understand there is huge political pressure about this, I think the current proposal will have a determinantal effect on Irish tillage farming and will no longer be viable.
265	With regards to the proposed Sustainable use of Pesticide Regulation, see below our worries and objections to the proposal. 1. As it stands, our cereals are heavily regulated and restricted in their use and appliance with respect to EU policy. However, our feed wheat and feed barley can be mixed for animal feed along with wheat and barley from regions as far as South America. These cereals do not have the same pesticide regulations as the EU but yet are imported and undermine our product. 2. Our pesticides have been tested rigorously over the past two decades and are now applied safely at minimal rates. Reduction of these necessary products will ultimately reduce crop yields, sustainability of tillage (the most sustainable farming practice), family farms and livelihoods. These reductions will ultimately pave the way for more dairy and beef farming in Ireland via the importation of cheaper, often genetically modified cereals from outside Ireland with little or no resistance from governing bodies. This proposed act of 50% reduction of pesticides undermines the great work that has been done in making the tillage sector as sustainable as it is today and will merely serve as another reason for farmers to leave this sector.
266	I agree with the safe use of pesticides, and continuous safe use of pesticides.
267	I would like to object to the 50% reduction of pesticides by 2030 as in Ireland we are not privileged to have the warm dry summers to reduce the pressure of disease on our grain crops. If we have no protection against predominantly wet weather diseases, we are looking at a serious reduction in yield and quality of grain produced for the brewing and distilling industry here in Ireland. In short this is going to lead to a food shortage as we have seen recently with the shortage of flour during the coronavirus pandemic. With GPS technology and low drift nozzles growers are applying chemicals to crops efficiently.

268	<p>I am writing to make the following observations in relation to the EU Commission's proposal for a sustainable use of pesticides regulation. Climate change and environmental degradation is the single greatest threat posed to humanity, and there can be no doubt that we need to do more to protect the environment across all areas of society. The Paris agreement on climate change sets out the target to reduce Greenhouse Gas emissions and limit global warming to 1.5C but emphasizes that this ambition must not be at the expense of food security. The global population is projected to reach 9 billion people by 2050 and with climate change putting an increasing strain on natural resources, ensuring food security for this population will pose a major challenge. The war in Ukraine has further highlighted the vulnerability of global food systems and supply chains, particularly grain. Russia's invasion caused a huge increase in global commodity prices and threatened global food security particularly in low-income countries reliant on Russia and Ukraine for their consumption needs. The war highlighted the importance of protecting supply chains and ensuring food security, and this proposal will have the opposite effect by reducing yields, increasing commodity price and the threat of supply chain disruption and food insecurity. Integrated Pest Management (IPM) is essential in ensuring sustainable crop production and the sustainable use of chemical pesticides. IPM not only has environmental benefits, but also protects the chemistry that is available and avoids the build-up of resistance in crops. IPM should be promoted and implemented by all tillage farmers as a means of reducing chemical usage, rather than imposing blanket regulations to reduce chemical usage that will severely impact crop yields, profitability, and in turn food security. Climate change is making weather much less predictable. Extreme weather events such as flooding and droughts will become a more common occurrence in the coming years. The last 7 years have been the warmest on record, Summer 2022 saw record temperatures hit across Europe causing wildfires and droughts that devastated crop yields. These events, added to the uncertainty of war, mean that we are in an extremely volatile era in maintaining food security especially with an increasing global population. This proposal is an additional threat to global food security at a time when we should be doing everything, we can to maintain it. Imposing regulations to reduce chemical pesticides by 50% will severely impact on crop yields in Europe. This will only have the effect of threatening European food security and increase our reliance on crop imports which will have a negative environmental impact – a clear contradiction to the aims of this proposal. If this proposal is approved, and pesticides are to reduce by 50%, The EU must allow for the adoption of gene editing of crops in Europe. This will result in the production of crops that are more resistant to disease and therefore less reliant on chemical pesticides. It will also allow farmers to produce crops that are less susceptible to drought at a time when high temperatures and droughts are to become a much more familiar occurrence in Europe because of climate change.</p>
269	<p>I welcome the introduction of the SUR. I would like to request that anyone who needs to use a knapsack sprayer or boom less than 3m undergoes specific training. That is that the system of allowing farmers to use such equipment if they have the boom sprayer training completed should be discontinued. There is much about the knapsack sprayer that is not generally well understood by boom sprayer operators. I refer to the availability of knapsack specific nozzles, the incredible efficiency of vlv</p>

	<p>nozzles (very low volume nozzles) the absolute necessity to use low pressure (1bar), to avoid drift with herbicides. Most quad sprayers are thus not optimally set up. Many knapsack sprayers on the market generate between 3 and 5 bar and cannot be adjusted. They should be banned especially for application of a professional product by a professional user. The fundamental of calibration of a knapsack sprayer is adjusting chemical amount to the users walking pace, spray pattern etc. For the boom sprayer it is about adjusting the speed and other parameters to achieve a specific application rate. Again, this is not generally understood amongst boom sprayer operators.</p>
270	<p>Against the proposal for a Sustainable Use of Pesticide Regulation. Both target one and Target 2 within the Farm to Fork Strategy will have a catastrophic effect on Potato and veg production in Ireland. The viability of potato and vegetable production in Ireland will be ultimately undermined by the reductions set out in Target 1 and Target 2. The temperate Irish climate has been producing some of best and world's leading produce along with some of the highest food producing standards with the Bord Bia accreditation however this climate come with its challenges. The likes of diseases, virus and weed pressures throughout the growing season. 90% of the varieties that we are producing have been grown in Ireland since the 1980s and 1990s with very limited development in new varieties that may have resistance to some of our challenges, even when new potato varieties are available for example, we cannot get them listed in retailers as the Irish consumers demands traditional Varieties such as Rooster, Maris Piper and Golden Wonders. Over the past decade we have been growing crops to eliminate our reliance on imports, two examples that have been well covered in the national media along with the Department of Agriculture, Bord Bia, Teagasc and the IFA are the Salad Potato project and the Chipping Potato project. Both projects have the ultimate outcome of growing these crops locally and eliminate our reliance on imported produce. The reduction of these imports will reduce our reliance on imports from other countries, increase our own food security and reduce the carbon footprint / food miles drastically. The reduction set out in Target 1 and 2 will force growers out of the industry due to them not being able to compete with imported produce from countries that either don't have the same diseases, virus and weed pressures we have or from outside the EU as farm gate prices. We cannot produce organic produce at commercial prices, if the industry is forced down this road it will make growers unviable. The demands from consumers for top quality product on the shelf have been increasing every year. Retailers and consumer in the country promote 'reduction in cardboard, reduction in plastic and biodegradable packs' however nobody speaks about the fact a third of everything we produce is waste as it doesn't meet the product criteria. Food waste at farm gate level is not spoken about and our goal is to reduce this production waste, pesticides are a tool we can use to increase nett yields and overall be more sustainable. The overall outcome will be the demise of potato and vegetable in Ireland, a country that despite its history of potatoes and vegetables is only 70% self-sufficient in potatoes and vegetables.</p>

271	<p>I am writing to give my concerns in the proposed SUR. I feel the passing of the SUR would be the final nail in the coffin of an ever-depleted horticulture and tillage sector. On my farm we have (like many others) took our own actions in the past years to reduce our pesticide and chemicals use through a great number of techniques. Gps machinery, crop rotation cover crops IPM techniques etc all of which have helped. But I warn you all of these techniques need the assistance of chemicals and acts as a three-legged stool. If you decide to take away a leg of this stool you will be causing more damage to the environment than good. Our tillage and horticulture land will be replaced with dairy having a further devastating effect on the environment. We are down to less than 100 horticulture farmers in this country now and only this week we see veg shortages across our supermarkets both here and the UK. I can guarantee this number will be halved if you take away the most essential tool. Imports to this country are not produced to the same chemical and environmental standards as we have to follow, making it ever more challenging to compete with imports. How can we ask an Irish farmer to not use a chemical but allow food to be imported from all over the world with different rules. I really don't take lightly to applying chemicals and I certainly put the environment at the foremost of every decision on my farm, so please don't fall into the false impression that we simply spray and fertilise for fun. I would however urge you to take chemicals away from everyday use, gardeners and households have no use for chemicals and they definitely are not educated on the safe handling and application of them. I'll end this submission by again stating that IPM and other techniques are a tool, but unfortunately not a silver bullet.</p>
272	<p>Against the proposal for a Sustainable Use of Pesticide Regulation. Both target one and Target 2 within the Farm to Fork Strategy will have a detrimental effect on spud production in Ireland. The viability of potato production in Ireland will be ultimately undermined by the reductions set out in Target 1 and Target 2. The temperate Irish climate has been producing some of best and word leading produce along with some of the highest food producing standards with the Bord Bia accreditation however this climate come with its challenges of diseases, virus and weed pressures throughout the season. 90% of the varieties that we are producing have been grown in Ireland since the 1980s and 1990s with very limited development in new varieties that may have resistance to some of our challenges, even when new potato varieties are available for example, we cannot get them listed in retailers as the Irish consumers demands traditional Varieties such as Rooster and golden wonder. Over the past decade we have been growing crops to eliminate our reliance on imports, two examples that have been well covered in the national media along with the Department of Agriculture, Bord Bia, Teagasc and the IFA are the Salad Potato project and the Chipping Potato project. Both projects have the ultimate outcome of growing these crops locally and eliminate our reliance on imported produce. We are delighted that we now have 12 months' supply of Irish Bord Bia approved salads potatoes for our customers and are driving the chipping project forward each year to the goal of full year supply. The reduction of these imports will reduce our reliance on imports from other countries, increase our own food security and reduce the carbon footprint / food miles drastically. The reduction set out in Target 1 and 2 will force growers out of the industry due to them not being able to compete with imported produce from</p>

	<p>countries that either don't have the same diseases, virus and weed pressures we have or from outside the EU as farm gate prices. We cannot produce organic produce at commercial prices, if the industry is forced down this road it will make growers unviable. It is extremely hard to make a living out of potatoes at the moment without the added competition of imports into the country. The overall outcome will be the demise of potato and vegetable in Ireland, a country that despite its history of potatoes and vegetables is only 70% self-sufficient in potatoes and vegetable.</p>
273	<p>The proposed regulations as they stand do not take into account food security within the union going forward. Any proposed measures would have to be carried out in conjunction with food security concerns and not at the expense of food security. I wonder what the citizens of Europe will think of the policy makers of today in 5-7 years' time when they are queuing for a loaf of bread for up to 4 hours at a supermarket or worst still a Soup Kitchen. Let there be proper and detailed analysis carried out on the possible consequences of such measures before any final decision. Intensive agricultural production cannot scale down that quickly without serious consequences for production.</p>
274	<p>Through public consultation, The Department of Agriculture, Food and Marine are currently seeking feedback from stakeholders regarding the EU Commission's proposal for a Sustainable Use of Pesticides Regulation. The Sustainable Use Regulation (SUR) proposes to prohibit the use of Plant Protection Products (PPPs) in sensitive areas and within 3m of such areas. The definition of "sensitive areas" includes the following description: '...areas used by the general public and vulnerable groups, human settlements/urban areas, public parks or gardens, recreation or sports grounds, non-productive areas (GAEC 8), specific areas under other legislation such as the Water Framework Directive (including nutrient-sensitive/nitrate-vulnerable areas), the Habitats Directive and the Birds Directive.' We assume that golf courses are included in the above description under 'recreation or sports grounds'. This clause seeks to prohibit the use of these PPP's on golf courses. PPP's include plant growth regulators (critical to fine turf health and performance), herbicides (for effective weed control), insecticides and fungicides (critical to preventing and controlling disease and grub infestation on fine turf). Any move to prohibit entirely the use of PPP's will have a detrimental impact to the presentation and performance of all golf courses in Ireland, and thus their viability. It highlights the potentially devastating impact a prohibition on the use of PPP's could have on golf courses and Golf Clubs in the Republic of Ireland, the associated knock-on effect to the economy and tourism potential. It also provides data which highlights the limited impact of such a prohibition, given that the agricultural sector will continue to have access to such PPP's. We support the proposition that golf be specifically excluded from the definition of "Sensitive Areas" for the following reasons: 1. Article 18 poses a significant threat to our sports turf professionals' ability to maintain courses to standards expected and course conditioning will deteriorate, 2. The fall in standards will likely cause a major shock to the industry as participation levels and rounds played will reduce. In Ireland, golf tourism will likely be affected given our proximity to the UK and competition with Scotland and England, particularly on links golf, 3. 8% of the European citizens that live in Ireland will be impacted by the deterioration in their golfing experience. For many older</p>

	<p>people, golf is their main outlet for exercising and socialising, 4. There will almost certainly be an economic impact in Ireland, likely to run to tens of millions of Euros and a reduction in employment levels in the industry. 5. With only 0.17% of the land mass of agriculture and with golf accountable for just 0.34% of active ingredient applied, the prohibition of the application of PPP's on golf courses will have little environmental impact should the agriculture sector continue to have access to and apply PPP's, albeit at lower rates under the new regulations. There is simply no cost / benefit argument to be made. 6. Ireland will be disproportionately affected given its location in the Atlantic, year-round golf season and access to the north American golf market looking to experience the links product and Irish hospitality. 7. An 18-hole golf course will use on average 11,000 litres of fossil fuel for equipment. The prohibition of PPP's such as plant growth regulators will increase mowing frequencies and the use of this equipment, which could adversely impact human health and environment from an increase in CO2 emissions perspective, two of the key objectives of the European Green Deal and Farm to Fork Strategy. 8. The proposed regulations outlines supports that Member States will be able to provide under the CAP to cover the costs to farmers of complying with all legal requirements imposed by this proposal for a period of 5 years, but no such supports will be available to the golf industry. 9. Should a full exemption for golf from the 'sensitive area' definition not be achievable or have enough support across Europe, it is vital that the Irish Government ensure that they can provide a suitable derogation as a competent authority to protect the golf industry in Ireland and mitigate the unique circumstances that apply to the Republic of Ireland. I believe there would be a significant commercial impact to golf in Ireland, if the regulation, as drafted proceeds. The Department, together with other State Departments with a beneficial interest in the Golf Industry should take every measure possible to protect the golf industry in Ireland.</p>
275	<p>I'd like to outline my concerns with the proposed regulation. The proposed regulation by the EU puts Irish tillage farmers, merchant businesses, Co-op's, Diageo, and Jameson amongst others at major risk to produce top quality grain to facilitate their products. For instance, Diageo will not be able to secure the quality local sustainable ingredient they're used to, this will now have to be imported at a greater cost to the environment and from an Irish perspective a big blow to our own homemade brand. Feed Mills would have to import more grains from less environmentally efficient countries due to the decreased yield because of the proposed regulation. The Irish tillage sector's USP is the fact that we can produce so much on one acre of land compared to the rest of Europe, our yields are some of the highest in the world but are also some of the most environmentally friendly. That's down to the fact that our output far outweighs our input, in terms of kg of food produced vs a kg of CO2 emitted, we are ahead of the pack. If the regulation is introduced our yields will significantly drop, a large part of this reason would be down to our maritime climate. The disease pressure in this country is higher than most other countries in Europe. They may be using less spray, but their yields pale in comparison so like I said above our Kg of food produced vs kg of CO2 emitted is better. Th EU needs to look at their member countries from this point of view, EFFIECENCY instead of whole cut approach. The EU's food policy now is quite frankly dangerous from a security point of view especially with what's going on in the Ukraine. We all have a responsibility to</p>

	<p>reduce emissions but just simply cutting key ingredients to produce food is not sustainable it will have the opposite effect. It will send our efficiency the opposite way and make the situation worse. Tillage farming is the one aspect of agriculture that can decrease global warming through regenerative farming practices, cover crops, straw chopping, Min-Till and rotation. Essentially, we are the ones who can make difference but by introducing these regulations it will decimate the sector. The technocrats in the EU need to understand what's happening on the ground in their member states, the lack of knowledge they seem to have is worrying. The policy's they're trying to introduce will have a detrimental effect on both the environment, cost of living and food security. We must protect our chemical programme to continue to be a sustainable nation if not, tillage farming will cease to exist therefore losing the most environmentally friendly aspect of farming in this country.</p>
276	<p>I suggest that Golf clubs be excluded from the restrictions proposed for the following reasons: 1. The use of PPP's is limited and can be strictly controlled and monitored. 2. Only small parts of the land in a club will be subject to treatment. 3. Use of a club is restricted to paying members and is not available for general access by the public. 4. Food contamination will not occur from the use of PPP's on golf courses. 5. Nature habitats are an integral part of courses and are not disturbed by grazing or cultivation. 6. Banning PPP's would require additional machinery work that would be contrary to the plan to reduce carbon emissions. 7. Ireland is a beneficiary for Golf tourism on a year-round basis. Reducing the quality of courses that would inevitably result from a ban on PPP's would impact on the visitor numbers. 8. The cost of maintaining courses would increase leading to increased fees that will set back the drive to make clubs less elite. These are some of the reasons why golf courses should be excluded from the designation of sensitive areas. We urge you to consider this proposal carefully and not use a broad brush to apply a policy that should be selective and appropriate.</p>
277	<p>I am writing to make the following observations in relation to the EU Commission's proposal for a sustainable use of pesticides regulation, and in particular the proposal the use of chemical pesticide use by 50% by 2030. Ireland's temperate climate means we have a higher requirement for pesticides than the rest of Europe and a blanket rule across all member states is not practical. High yielding crops sequester more carbon, therefore a reduction in crop yields will mean a reduction in the capacity of arable land to sequester carbon. Reduced yields will impact on the viability of the tillage sector in Ireland and to more land being transferred to livestock production. This goes against the 2030 climate action targets for an additional 40,000 Ha of tillage crops in Ireland. Pesticide regulations in Europe are higher than anywhere else in the world, Irish farmers take world commodity prices for their output but have to abide by higher production standards. These proposals will leave European farmers at a competitive disadvantage with the rest of the world.</p>

278	<p>I wish to respond to the submission. Public consultation on the EU commission's proposal for a sustainable use of pesticides regulation. We have been fulltime tillage farmers since the 1950's we have had no cattle on our farms since then which is unique in Ireland. We understand the environment and concerns for public safety as well as MRL's which are very important as we are producing food. Since the 50's we saw the progression of herbicide and fungicides in farming in Ireland products are now only used if they have to and are part of the IPM strategy. If we don't have a range of herbicides our production of food will be decimated it is not as simple as here is a herbicide that will do the job all herbicides have different strengths and weakness in weed control. There is no herbicide which gives total control of all weeds in each crop that is without even discussing the control of invasive weeds or noxious weeds. Fungicides are only used when needed to control fungus in cereals so without these range of products we will not be able to produce quality foods. Insecticides are used only once per season and some crops receive none but that cannot be replicated in every field. It is reckless to think that food can be produced organically to feed all people. We produce quality food people are living longer and having a better-quality life. Grain that is not sprayed with a fungicide turns black before harvest tastes bitter because of mycotoxins which will not produce bread as it will not rise and will be harmful to humans eating it due to the toxins. Regulated use is important but it is also important to have an anti-resistance strategy to protect these actives is in place. I hear discussions about some chemical products can produce cancer at inflated overuse rates that are not used every day in farming. I have a bigger concern that all food products are packaged with plastic which is an oil-based product. Petrol and diesel are carcinogenic, but no one mentions banning them because they want to have their freedom. I am deeply frightened if one looks under any kitchen sink and look at all the chemicals inside and these are used in place of food preparation. The drive to reduce chemicals in farming will only end one way the loss of food security and scarcity of food for mankind. We in Ireland are well placed to comment on this situation as Ireland had a potato famine in the 1850's where millions died for the loss of food and hunger due to potato blight and had to emigrate all over the world the population was dropped by 4 million due to this issue. Science has to play a part not people with agenda and how are these environmentalists going to feed the people they have no skills to produce food. Remember only farmers can produce food and we are good at growing it.</p>
279	<p>This proposal runs contrary to the stated desire of the Government to increase the area of tillage in Ireland. It would further our dependence on imported feed from countries outside the EU which already enjoy access to pesticides long banned in the EU. Tillage in Ireland suffers a number of disadvantages vis-a-vis our competitors, scale being one, in addition we have a maritime climate that is conducive to a heightened disease pressure, and then a high-cost base. In our favour we have the ability to produce very high yields but these need to be protected given the aforementioned disease pressures. This proposal would rob us of the ability to protect that yield and ultimately make tillage in Ireland uncompetitive.</p>

280	<p>We are very concerned that the current proposal will severely impact crop yields and contribute to food price inflation in the long term. The Sustainable Use of Pesticide Regulation raises a number of questions, comments and observations from young farmers including: Where is the extra funding coming from CAP for extra costs that admittedly will be occurred, from the implementation of this new SUR? What financial instruments will support farmers for this transition under the SUR? Implemented date in 2024, not clear if the SUR is proposing a gradual reduction? Strategic objectives of CAP don't clearly follow the recommendations of this SUR since it will impact food security through reduction in yields and extra costs incurred. SUR and current CAP proposals appear to be in conflict with one another re. food price inflation, food security – severe impacts on generational renewal. Importation of food/feed products treated with PPPs already banned in the EU receives no mention in the SUR – will these imports have to comply with the same standards as is in the EU? – we don't want a scenario to emerge where we are outsourcing the problem to other non-EU jurisdictions. As active's are withdrawn from the market, replacements are usually less effective and more expensive. The proportional use of remaining actives may increase and could contribute to further resistance/decrease in effectiveness. With the ambition to increase the use of non-chemical alternatives, the EU has to examine its stance on genomic technologies. PPPs are only used when essential and absolutely needed – they have a cost and efforts are taken to maintain their effectiveness. We would like to see more multi-site active's come on the market which are more effective, reduce resistance, and enable the stability of other actives with different modes of action provided they are safe to the user and a low-risk chemical.</p> <p>Commentary on Chapter 2. There is no differentiation between professional use of pesticides and non-professional use of pesticides. Non-professional use of pesticides should be severely restricted as at present there is little regulation in this area. Pesticide use should be focused on agriculture to ensure pesticides are used appropriately where they are regulated and where regulations can be enforced and to ensure food security. The Tillage area in Ireland was at its lowest in 2015, 2016 and 2017 the reference years for this study. Increasing tillage area in Ireland is a positive for food and feed security, reducing greenhouse gas emissions and improving environmental indicators from agriculture such as N and P balances. The increased tillage area will use pesticides in an efficient manner adhering to IPM, advice from trained advisors on appropriate product and rate, and this needs to be taken into consideration. For example, the cereal area in Ireland was 261,000ha in 2018 and in 2022 this figure was 288,000ha.</p> <p>Commentary on Chapter 4. Integrated pest management is widely used in the tillage sector and advisors are IASIS or equivalent approved meaning they keep up to date. Improved forecasting tools are needed for farmers for aphids and diseases like Septoria and Ramularia – not standard in high disease pressure zone like Ireland. In the Republic of Ireland, it is not practical to operate a system of independent advisory as there is a shortage of qualified tillage advisors. At present there are very few independent advisors. Those in Teagasc or working as a private agricultural consultant are already overrun with BPS and other scheme applications, bureaucracy. We ask the question who will be designated as the competent authority? Will training be provided to professional advisors/salesperson on chemical side effects and which pesticides carry the highest treat to human</p>
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	<p>health, non-target organisms and the environment. Maybe a star rating should be assigned to each pesticide to indicate its level of threat posed – based on weighted hazardous risk scores? People would become more aware of ingredients/risks involved. Many pesticides are designed to be used in a preventative nature. If the professional user is not able to access the electronic IPM record due to lack of internet access or inability to use the technology who can be nominated as a body to help such professional users. Impact of computer/ICT illiteracy. Commentary on Chapter 5. It is welcoming to read that PPP for “professional use” can only be used by trained professionals. How does professional and non-professional use differ as we believe that a lower concentration of the active ingredient is a more suitable measure than reduced packaging size, currently used. The mention of hazardous PPP is of concern as this suggests that they are being monitored and their use may require a derogation soon. What is classified as a hazardous active ingredient and is it expected that a phase out period will be implemented? With respect to the requirement for PA’s to inspect application equipment, how will DAFM require the pre-use checks to be recorded? Will a notebook in the tractor suffice and at what frequency should they be conducted. It’s important that this extra work doesn’t restrict workflow.</p>
280(a)	<p>Paragraphs 1-8 (p52) refer to sensitive areas. How does Ireland define sensitive areas, and will they be restrictive for productive Irish arable regions? Despite specific details not being presented, the proposed storage, disposal and handling measures do not present any greater workload for PU’s. Article 23 reiterates that advice on the use of PPPs can only be provided by professional advisors. While the committee agrees with this proposal, the need to obtain advice from BASIS trained consultants may be necessary for certain specialised horticultural crops. Hence, recognition of BASIS approved professional advisors is necessary and should not be limited to DAFM PA’s. Commentary on Chapter 6. System of certification/training/sales to professional users - These criteria must apply to all pesticides sold, including to the householder or for use outside of agricultural settings, such as golf courses, to local authorities, for railroad maintenance etc. Propose that purchasers be able to show proof of their qualifications to the distributor. The practicalities of accessing a professional user database may be difficult and will be difficult when it is not currently set up – setting up new IT system/who has access/who has ownership/GDPR? Commentary on Chapter 7. Current systems work effectively with acknowledgment of prior-learning and CPD rather than a once off training every 5 years. How will this competent authority educate the wider public to include household use and nonprofessional use? If pesticides are only associated with negative attributes the general public may not grasp the necessity and overall beneficial use of such pesticides - push back of PR campaign on the risks of PPPs? Need a well thought out information campaign. The general public need to be informed of the positive and professional use of pesticides and the level of detail for professional users alongside advisors use in firstly reducing the amount of pesticide used through IMP techniques and also the careful management in application of pesticides. Commentary on Chapter 8. We are satisfied with the proposal to maintain an electronic register of application equipment in professional use. There is no mention of a registration fee but that is likely to be up to each Member State to determine. Paragraph 2 is worded in an aggressive manner presenting auditors with excessive authority. As PU’s, we are open,</p>

	<p>honest and forthcoming with information and consider it disappointing that the EU deem it necessary to suggest such powers need to be given to auditors. This paragraph also gives auditors authority to request all electronic records. We agree to facilitate this where auditors can view all documentation on-farm, but we are opposed to auditors taking the electronic records off farm in fear of circulation with competitors. Grassland. Efficient grassland-based farming systems require a certain amount of chemical pesticides for the control of grass weeds particularly in the process of sward rejuvenation more commonly known as reseeding. Grassland reseeding allows for the introduction of new grass varieties, clovers and multi species swards to ensure productive, efficient and environmentally sustainable grassland-based farming. More efficient grassland swards not only ensure and protect our widely scientifically recognised grassland competitive advantage in Ireland in both beef and dairy systems, but it also allows for reduced chemical fertiliser applications and improved soil health, both of which have significant environmental benefits. Both total and selective herbicides are of crucial importance to ensure successful grassland reseeding programmes can be implemented on farms from both economic and environmental perspectives. Successful grassland reseeding is undoubtedly an integral part in implemented a meaningful and effective climate action plan at farm level in order to achieve progress in climate action targets and food production efficiency. Selective herbicides are particularly important where clover inclusion in grassland swards is desired similarly in multi species swards as broad leaf weeds such as docks pose a significant threat to the efficacy of the sward, therefore selective herbicides which allow for the protection of clovers in the swards are required, otherwise grassland environmental targets become unachievable. A combination of methodologies are used for the control of soft rush and scrub in farmlands. The controlled use of scrub and soft rush chemicals play an important role in achieving productive grasslands that contribute to climate action. There is a requirement for the correct and appropriate use of grassland pesticides; however, the removal of necessary pesticides in efficient and environmentally conscious grassland farming is wholly unacceptable.</p>
281	<p>Reducing pesticides by 50% with no viable alternative will really put my business under pressure as a full-time tillage farmer.</p>
282	<p>I am writing to you regards to pesticide usage and the reduction in its usage. While I agree pesticides need to be cut back on especially around waterways, without the use of some of these pesticides my farm is not viable, I have a family which I need to be able to provide for it, if I can't grow good crops with decent yields my farm is not viable and I will be forced to lease or sell the farm that has been in my family for several generations. Their needs to be alternatives, and proper research done, you can't just make these decisions without consulting farms, for years the dept of agriculture has been making decisions without consulting with farms, so when you are making these decisions, you really need to think of the family farms out there that you are putting out of business. Other points that need to be addressed are the quality and quantity of crops without some of these chemicals, while we would all love to live in a perfect world where these are not needed, unfortunately that is not the case and until either an alternative chemicals that are less hazardous are found or b. crops genetics improve to the point where they don't need these chemicals, the implications of this 50% could be detrimental on all European countries, we see at the minute how the climate is</p>

	<p>changing to more extremes and some of these chemicals help use deal with these extremes, otherwise we could very well be looking at shortage of food or worse a famine, Its all good and well wanting to cut the usage but without the proper infrastructure setup before it happens it could be a big mistake. Us farms don't take lightly to using these sprays, we use them sparingly and only when needed, people seem to think we are trying to poison them when we are trying to do the opposite and feed them, some of what you are suggesting like the sensitive areas is very reasonable I think and should be followed, maybe more ideas like this and better ways of utilising the chemicals we have would be more beneficial than just banning some of the products, thanks for taking your time to read this. I hope you take my views into consideration.</p>
283	<p>We are fully compliant with DAFM, the existing SUD regulations and IGAS. We are entirely dependent on the availability of safe. Legal and effective pesticides. Any reduction in the availability of safe and effective pesticides will make it unviable to work and potentially result in the loss of jobs and a loss of production of produce. The result of this lower production will see increased imports of produce of unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes. I urge you to reconsider.</p>
284	<p>I am very concerned on the new proposals regarding pesticide use. I fear that I will no longer be able to grow winter wheat which is the crop I grow the largest amount of. When I am considering which crop, I will plant I have to take into account what soil type I am planting the crop into. In my case winter wheat is the most suitable to our soil type. However, if I do not have all the required pesticides required to grow the crop available to me, I will not be able to plant that crop. Without winter wheat in my cropping plan, I will have to reduce my area of crops being sown. It would be a real shame to reduce our wheat area resulting in more imports from countries on the other side of the world who are growing GM crops in deforested plains, in total contradiction to government policy. I feel the tillage sector is in full support of protecting our environment and with the right tools available to us we can continue to grow crops in a sustainable way.</p>
285	<p>I wish to make my view known what will happen if these new measures come into effect by reducing pesticides by 50% by 2030.</p> <ol style="list-style-type: none"> 1. Crop yields will be greatly reduced as we need pesticides to control septoria rhynchosporium net blotch in our cereal crops which will make us rely more on imports. IPM will have no effect on the above diseases as our climate is ideal for the spread of these. 2. Grain quality will be dramatically reduced as we need pesticides for the climate, we have in Ireland. 3. Food security will be another factor as we will require more imported food stuffs. 4. Food traceability will be another factor as we will be importing grain and other agricultural products from other countries that are using products banned in Ireland. 5. Carbon emissions increasing due to importing food from 3rd countries. 6. Farms been made non-viable.

286	<p>In Ireland, we achieve very high yields due to several factors, our temperate climate, ample amounts of rainfall and the soils' ability hold nutrients. All these factors create plants with massive amounts of biomass which in turn creates other problems such as disease and pests. Reducing pesticide applications in a country where it has excessive rainfall WILL reduce yield. Also, it will put pressure on fungicide efficiency in a market where fungicide choice is limited. The solution is not reducing pesticides, it's to increase variety resistance to the wet weather diseases but all that said it takes over 10 years to bring a PPP or Variety to the market. Promote IPM and Alternatives instead of pesticides. IPM is being practiced each day by both farmers and agronomists throughout the country in hope that it can use alternative methods to combat weeds and pests. Unfortunately, every field and practice within farming is different and until such trials have been conducted on wider and more detailed scale there will still a need for PPP. In recent times Farmers and agronomists are using a lot more IPM, delaying drilling to help combat insecticide damage, take all etc. Farming practices won't survive unless IPM is introduced more but also IPM won't survive if PPP is removed. One example of this is Blackgrass. Independent advice and electronic recording of pesticide use. Electronic recording of pesticide use is a great idea, and we support this. The only issue here is that not all farmers are IT literate, and this will be hard to implement and will need serious thought. I think it's impossible for farmers to seek independent advice in a market where most of the agronomists in the country work for grain merchants and end users. Here the end users require specific grain quality standards. Which the agronomists walking the crops knows how to achieve this. Also, in Ireland would be impossible to prescribe PPP programs when the Irish climate changes daily. The whole structure of the Irish grain sector would have to change which would undermine the relationship between the grower and merchant which they have built up over a lifetime. Also, there would need to change in education sector, there would need to be a focus on recruitment into this sector as currently there's not enough trained Ag students finishing college now. Prohibition of pesticide use. Both farmers and agronomists across Ireland look after land and understand and can relate to the importance of biodiversity, wildlife, and prudent use of PPP. If SUR is implemented as stated, more arable land is no longer going to viable and hence will be laid down to grass. More grass means less biodiversity. In relation to the proposed SUR agenda, I think it's totally overstated and not in touch with current farm practices. The timeline for change is very aggressive, not considering training, education and decades of hard work and trials into implementing good agriculture.</p>
287	<p>The Irish tillage sector is made up of 10,000 growers with 5,000 of these being specialist producers. In 2020 the sector was estimated to contribute over €1.3 billion in direct economic output and supports 11,000 full time equivalent jobs. The Irish horticulture sector is a highly productive and specialised food production industry with farm gate production valued at €467 million in 2020. Despite the small land area dedicated to Irish Horticulture, it accounts for 11% of total agricultural jobs through direct and downstream employment and is the fourth largest contributor to Irish agricultural output. A mandatory requirement to reduce the use of pesticides by 50% by 2030 will have a very significant impact on all agricultural sectors across Ireland. This will be felt most</p>

significantly in the tillage and horticultural industries where viability and competitiveness will be severely undermined due to the unique climatic conditions and high plant disease pressure Ireland faces on an annual basis. In the climate action plan the tillage and horticulture sectors are described as the most carbon-efficient sectors of Irish agriculture and the importance that the areas under cultivation in these areas is increased. Irish governmental policy has set a specific target to increase the national tillage area to 400,000ha. These targets will not be met if a 50% cut in pesticide use is implemented. We believe a full impact assessment of the SUR proposals on Irish agriculture must be undertaken by a competent authority in Ireland before any national reduction targets are agreed to at EU level. A blanket 50% pesticide reduction policy implemented across Europe is far too simplistic, any reduction targets must be based on credible agronomic or scientific evidence. A 100% ban on the use of pesticides in areas deemed sensitive is an arbitrary and draconian target with little foresight given to the impact on food production. The areas defined as 'sensitive areas' must be revised and exemptions must be allowed for in certain scenarios. The prohibition of the use of plant protection products in all public areas is too ambiguous and would prevent many commercial activities on horticulture farms. Nitrate vulnerable zones (NVZs) must be removed from the list of areas classified as sensitive to avoid Ireland becoming severely disadvantaged in all forms of agricultural production. Full clarification is required on the determination of buffer zones between productive areas and the GAEC 8 space for nature areas. Mitigation practices should be allowed to reduce buffer zone requirements between space for nature and productive areas. 3m must be the maximum buffer zone requirement for agricultural scenarios. The use of 3-year average sales data to determine reduction targets for more hazardous pesticides is too narrow of a time frame. The EU Commission must seek to develop a wider range of indicators which reflect actual pesticide usage. The requirement for electronic registers monitoring the use of Integrated Pest Management (IPM) only serves to further increase the administrative burden on farmers. We have concerns about ownership and protection of farmers sensitive data generated in these registers. The mandatory requirement for farmers to receive independent advice will be challenging to implement due to a lack of independent agronomists practising in Ireland. For this objective to become feasible, we believe a long-term strategic plan with appropriate financial incentives is needed to encourage people into developing careers as independent agronomists. The use of plant protection products in Ireland forms an important part in producing food on the island of Ireland. Due to the cool, wet, Atlantic dominated nature of the Irish climate, pest pressure from a variety of weeds, disease and insect pests is exceptionally high and as result, Irish arable and horticultural crops require some of the most intensive levels of management in the world. Ireland has an extremely conducive climate for economically destructive diseases such as Septoria tritici blotch and Potato Late Blight amongst others. Plant protection products are therefore essential management inputs in protecting the yields and quality of our cereals, fruits and vegetables and enable Irish farmers to deliver safe, nutritious, and highly affordable foods. Despite the essential role plant protection products play in our unique climate, statistics from Eurostat show the quantity of pesticides used per hectare in Ireland is 32% below the EU-27 average. Similarly, Irish growers have also made significant efforts to reduce overall pesticide

usage as shown by the 20% decrease in pesticide sales in the period between 2011 and 2020. The primary objective of the Sustainable Use and Reduction of Pesticides (SUR) is a 50% cut in the use of pesticides. All the major impact assessments conducted on the SUR proposals to date have shown large declines in the yields/production of European arable and horticultural crops which poses a significant risk to European food security. The risk to European food security is further exacerbated by geopolitical events such as the war still taking place in Ukraine and the increasing weaponization of food supplies by Russia, none of which were present when the SUR proposals were initially constructed by the Commission. Moreover, none of the impact assessments modelled the effects of a 50% reduction in pesticide use on Irish crop production systems. At the outset, we wish to state that the SUR 2021/2115 proposals completely fail to consider the unique conditions and challenges that the Irish tillage and horticulture sectors operate within and consequently these proposals will have a much greater impact on Irish agriculture than in other European member states. The 50% reduction target is not based on any sound agronomic or technical basis and simplistic target-based policy approaches such as these proposals will be extremely damaging to Irish agriculture. The yield potential of Irish arable crops is some of the highest in the world and particularly for barley, this is the only competitive advantage which Irish tillage farmers have on the European and global playing field. However, despite this huge potential, the yield variation between years is often high due to unpredictable nature of the Irish climate. Yield variation in mainland Europe is not uncommon, however, the requirement and necessity for inputs such as plant protection products does vary, this scenario does not apply to Ireland.

According to Irish crop protection experts, if the current proposals of a 50% cut in the use of pesticides materialise for tillage farms in this country it is highly probable that Irish wheat grain yields will decline by 25% (2.5t/ha decrease on a 10t/ha crop), with barley yields declining by 15-20% principally due to greater incidence of wet weather diseases like septoria tritici blotch and barley scald (Rhynchosporium). Within Irish potato production the lack of alternative chemistry is proving to be a major challenge following the withdrawal of key fungicide active mancozeb and desiccant diquat. Furthermore, a key fungicide, fluazinam is now showing resistance to the 37A2 blight strain. A mandatory requirement to reduce applications of plant protection products by 50% will seriously jeopardise control of late blight in Irish potato crops leading to significant losses in yield and quality at farm level. It is becoming increasingly challenging to produce Irish fruit and vegetables Ireland due to a lack of available control options across a wide range of high value crops. The horticulture industry has essentially already reached a 50% reduction of chemical pesticides through the loss of chemical actives and the introduction of intense biocontrol programmes. The availability of control options is already hindering the potential of growers to expand due to a heightened risk of pests and diseases of diminishing chemical control options. In terms of horticulture, our EU counterparts have a greater list of plant protection products available, this puts them at a distinct advantage and encourages the import of fruit and vegetables into Ireland. As Ireland currently imports at least 60% of its requirements for grain and feed, it is nonsensical to effectively sabotage the yield potential in our own cereals and further increase our reliance on imports from around the world. Currently the utilisable agricultural area (UAA) in Ireland devoted

to arable and horticultural crops is one of the lowest in the EU-27, at less than 8%. Irish governmental policy seeks to grow the national tillage sector to 400,000ha by 2030 to help agriculture meet legally binding climate targets, this represents an increase of 51,000ha on the area of crops planted in 2021. If the SUR proposals become reality, it will not make any financial sense for existing tillage farmers to expand as any economic competitiveness will be lost through lower yield potential. Furthermore, if our future tillage production systems fail to be profitable under these proposals, existing growers will simply leave or retire from the sector. Significant levels of funding will therefore be required to prevent any mass exit from the tillage sector. It is also important to note that tillage farmers are already worst affected under the CAP 2023-27, the downward convergence of direct payments will not be adequate to lessen the financial impact of the low to moderate output, unprofitable crop production systems that these proposals inevitably require. The EU pesticide regulatory framework is the most stringent and comprehensive in the world and the current SUD introduced the concept of legislating and assessing pesticides based on the actual or perceived level of hazard they pose. The use of pesticides classified as hazardous continues to fall across the European Union due to continual withdrawal of active ingredients listed under the 'candidates for substitution' of Article 24 in 1107/2009/EC. However, active ingredients have not been substituted with alternatives in many examples. Farmers do not set out to deliberately choose hazardous pesticides, they do so out of necessity and as a follow up treatment after non-chemical means which have been ineffective. Similarly, if a portfolio of lower risk alternatives were available, farmers will adopt them, however, product options under this category are extremely limited. Any reduction in the use of pesticides deemed hazardous will require alternative control strategies. Farmers in the EU must gain access to new plant breeding and genomic techniques in tandem with any attempts to legislate for a reduction in the use of pesticides. Without this, food production in the EU-27 will decline which will necessitate greater food imports from outside countries outside the Union, many of which do not have equivalent standards for pesticide legislation that are already in place in Europe. The use of sales data for active ingredients as outlined under the Harmonised Risk Indicator (HRI) protocols in the SUR proposals may not accurately reflect where plant protection product containing such active ingredients are used or most needed. Furthermore, the use of 3-year average sales data from 2015/2017 is too narrow of a timeframe to properly set any reduction targets. We believe this timeframe must be based on a wider range of 7 years, including data for the most recent years of this decade. The Commission must also seek to develop a wider range of indicators which reflect actual pesticide usage and not inferences from limited pesticides sales data. The Commission has stated under its EU 2021/2115 proposals that the preferred option is a complete ban on the use of pesticides in all areas classified or designated as 'ecologically sensitive'. This complete prohibition proposition is an arbitrary and draconian target, which appears to have given little thought to knock-on consequences on the production of arable and horticultural crops within areas that are deemed sensitive. A full impact assessment of the effects a 100% ban on the use of plant protection products in the areas classified as sensitive and discussed below must be undertaken before these proposals are agreed to at political level. The classification of special areas of conservation under Directive

2009/147/EC and other national, regional, or locally protected areas in the State as sensitive area(s) has significant implications. There is a not insignificant portion of many commercial farms currently classified with special protection areas or awaiting future classification as a Natural Heritage Site. Where prime arable farmland is designated as either a special protection area or proposed as a future natural heritage area and thus a sensitive area, which, as it stands, would be liable for a 100% ban in pesticide use. This would be hugely detrimental to the income of the landowners concerned but looking at the bigger picture, given the location and quality of the land concerned in many cases this would result in a not inconsequential decline in the amount of grain produced nationally. We have major concerns over the designation of nitrate vulnerable zones under Directive 2000/60/EC as a sensitive area under this legislation. Since Ireland is categorised as one NVZ and thus potentially open to a 100% pesticide ban, this classification has the capacity to totally undermine all forms of agriculture in the Republic of Ireland. A non-paper published in November 2022 by the Commission states that member States can remove references to nitrate/nutrient/urban wastewater areas in the SUR, it is vital that Irish representatives negotiate this change with the EU Commission as a matter of urgency. The classification of the GAEC 8 space for nature areas as 'sensitive' is understandable. However, we believe the interpretation and formula for determination of a 3m buffer zone between sensitive areas such as space for nature areas and productive areas needs clarification. Buffer zones between certain space for nature areas and productive areas (e.g., hedges or grass margins without watercourses) within fields must be able to be reduced using risk mitigation techniques. For farmland, 3m must be the maximum buffer zone required. Finally, permits must be easily obtained for use space for nature areas should chemical intervention be required e.g., to control invasive or noxious grass weed species. In the horticulture sector, some farms and nurseries are open to the public in certain scenarios e.g., nursery sites, 'pick your own' sites and farm shops. In these cases, the farm is open to the public at certain times, and the public are then within the farm. If this is defined as a sensitive area, then it will not be possible to use plant protection products and consequently they will not have crop to sell. The areas defined as 'sensitive areas' must be revised and exemptions must be allowed for in certain scenarios. The prohibition of the use of plant protection products in all public areas is too ambiguous and would prevent many commercial activities on fruit and vegetable farms. The ease of which pesticides can be purchased and used by non-professional users in a totally unregulated manner is concerning for professional users like farmers. We believe better regulation is required for the sale of pesticides for use in urban, public places which in turn will help to reduce any adverse effects pesticides are having in such areas. Any national action plan which will be developed in view of reducing pesticide use nationally needs to put the interests of Irish farmers and Irish farming first and foremost and not the interests of European policy makers. In the period 2013-2018, Irish pesticide use was 31% lower than the EU-27 average. Under the 2021/2115 proposals, where a member states intensity of use of plant protection products is less than 70% of the Union average, the reduction target shall be 35%. It is imperative that any national reduction plan does not undermine the commercial viability of agriculture in Ireland and particularly for smaller, vulnerable sectors like tillage and

horticulture which have an inherent requirement for plant protection products. Irish tillage growers have already adopted Integrated Pest Management (IPM) techniques at a high level with even higher levels of adoption by the horticulture sector. IPM techniques listed in the SUR proposals such as crop rotation, sowing date and the use of tolerant/resistant cultivars are now almost essential for the successful production of winter cereals in Ireland. However, despite the above, the need for use of specific plant protection products as an intervention thereafter is almost guaranteed in Ireland due to the uniquely high plant disease pressure faced by growers nationally. The suggested options of reduced rate and or a reduced number of applications for plant protection products are not realistic for Irish tillage farmers. The horticulture sector has been one of the earliest adopters of IPM. This has resulted in benefits for growers, the environment, and consumers, but it also means that most of the “low-hanging-fruit” has been tackled. Further progress in IPM and will be more costly and will result in smaller reductions in use of plant protection products, in particular fungicides. The requirement to design and implement electronic registers monitoring the use of IPM and plant protection products will only further increase administrative burden on farmers with little or no obvious benefits arising from the creation of such databases. Additionally, questions must be raised about data protection and ownership of farmers sensitive data by the third operators which will be employed to develop and operate such registers. Farmers already record - in either written or electronic form - the use of plant protection products and any nonchemical measures undertaken for both cross compliance and as per the mandatory requirement under Directive 1109/2009/EC. We believe any duplication of existing on-farm records onto an official electronic register is an excessive bureaucratic requirement. Mandatory electronic reporting will also place extra stress and burden on older farmers who are often less comfortable with electronic systems. For farmers are who already comfortable using electronic systems for on-farm recording, universal templates to record preventative measures must be compatible or easily integrated into existing platforms. Duplication of records across multiple platforms must be avoided. The proposals call for further crop specific rules to be developed for relevant crops grown. We believe that is it important that these specific rules are developed for crops on a regional, localised basis with due consideration given to agronomic, soil and climatic conditions for these areas. It will be very difficult for growers to legally adhere and implement crop specific rules as an IPM practice if these rules do not consider regional differences in climate, geography, and pest pressures. Agronomists and crop researchers working in both the public and private spheres and farm representatives should be fully consulted in the development or updating of any crop specific rules. The existing role of independent advisors in the provision of agronomic advice is important in Ireland but presently most farmers procure agronomic advice and information through representatives of agri-input suppliers and distributors. A mandatory requirement for Irish farmers to seek independent advice annually will be challenging as there is simply not enough independent advisors working in Ireland. This is especially true for the tillage sector where a lack of scale and limited financial opportunity has restricted existing career paths for industry members to progress as independent agronomists compared with neighbouring countries like England and Scotland. This is mirrored in the horticultural sector with many growers

	<p>already having to source agronomists overseas for specialised consultations. Of those independent advisors already practising, the age profile is older, with many approaching retirement age in the next 5 years. For this objective to become feasible and realistic, a significant increase in the number of independent agronomists is required. We believe a long-term strategic plan, with appropriate financial incentives, is needed to encourage people into developing future careers as independent agronomists in the arable and horticultural sectors. Consultation with independent agronomists is expensive especially when they must be sourced from overseas, which is the case for many horticulture crops. Advisors must be competent in their bespoke sectors and must not come at an additional cost to growers. Application equipment used by professional users is already registered and recorded through the sprayer testing scheme. Since November 2016, sprayers are required, by law, to pass a pesticide application equipment test every 3 years. This system has worked well to date at farm level. Another register or central database in addition to the others for the IPM measures discussed above is yet another excessive administrative requirement for farmers which will cause confusion. Any changes to existing pesticide legislation will have significant implications for Irish farmers and particularly for highly dependent smaller sectors such as tillage and horticulture. The current SUR proposals do not consider the climatic conditions and disease pressure environment that Irish tillage farmers operate under. Both the commercial viability of tillage farming and the national output of cereals, fruit, vegetables, and other protein crops will be severely threatened if legislation is implemented requiring a 50% cut in pesticide usage at farm level. As discussed throughout the document, the horticulture industry has essentially already reached a 50% reduction primarily through the introduction of intense biocontrol programmes. The availability of control options is already hindering the potential of growers to expand due to a heightened risk of pests and diseases of diminishing chemical control options. We trust that the above comments are useful and will be taken on board.</p>
288	<p>We support 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</p>

	<p>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.</p>
289	Reducing pesticide use on our tillage farm with no viable alternative will decimate my business.

290	<p>We appreciate the drive to reduce risk of harm from the use of plant protection products. The term “chemical pesticides” as a source of harm is not particularly helpful since product manufacturers are constantly looking to find ways to ensure product efficacy while improving safety profile of our products. Increasing IPM use is a welcome goal, though it should be acknowledged that the majority of growers are already practising it in some form before taking decisions to apply Plant Protection Products (PPP). Because of the costs associated with product use, it is clear that growers are looking at alternative options before applying PPP. We support the use of new technologies to reduce the risks from pesticide applications. When the use of these technologies enables products to be applied in a way that reduces risks to human health and the environment then these should be available for inclusion in product application to allow risk assessments to be passed when these are used as possible mitigation options. The existing PPP regulations require applicants to demonstrate that the risks from the use of any PPP are acceptable to human health and the environment before any authorisation can be granted. Therefore, when IPM is conducted properly, the decision to apply any product may be taken having concluded that proportionate cultural, physical and alternative pest control methods are insufficient to control the problem and with the knowledge that the proposed application method can be carried out with an acceptable risk. Setting a blanket ban on the use of chemical controls in certain situations restricts growers from using what IPM may indicate as the most appropriate method of control. Companies are continuing to invest in supporting new technologies e.g., closed transfer systems, improved sprayer and product formulation technology to enable more targeted applications in order to reduce the risks associated with the use of Plant Protection Products. The restriction of all chemical pesticides in what are defined as “sensitive” areas is a concern since this removes a key option for protection of landscapes and in particular for the amenity sector when it comes to maintenance of areas such as turf/sports pitches, public amenity areas etc. In many of these situations, the alternative means of pest control are not currently viable without impacting the purpose of the land. This also fails to consider that the appropriate use of plant protection products can reduce the overall levels of agricultural inputs in some situations e.g., weed control to aid the establishment of new sown grass. Companies are keen to support stewardship schemes to ensure that our products are used in a sustainable way that minimises their impact on non-target species. We are actively promoting IPM approaches and cultural controls to ensure that when our products are used, this is because this is the most appropriate means of pest control in the situation. We are also engaged in monitoring schemes to identify issues with the use of our products in order to refine and improve to existing practices where necessary.</p>
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291	<p>I wish to express my concern at forthcoming targets as part of the food to fork strategy. The proposals outlined will have a massive impact on the Irish tillage industry and also on the wider agricultural industry. Target 1 aims to reduce by 50% the use and risk of chemical pesticides by 2030 from a 2015-17 baseline. I feel that this target is totally unworkable and would make the commercial growing of most arable crop uneconomical in this country. As part of my job, I work with pesticides in evaluating their performance in field trials as part of their continuing registration. Over the course of my career there has been a massive reduction in the number of active ingredients on the market for various reasons. What has been lost has not been replaced as the development of new chemistry has not kept pace. To reduce pesticide use by 50% would in some circumstances put the remaining chemistry that we have available to us at a greater risk particularly in terms of disease resistance. An example as such would be septoria in winter wheat. If we were to apply reduced rates of a fungicide, we would be speeding up the development of pest resistance. Pesticides are an important tool and need to be managed accordingly as part of an integrated pest management strategy. I feel that there is no scientific basis for the proposed level of reduction, and see it is an arbitrary measure for political gain rather than a long-term strategy to meet climate change goals. To conclude I do feel we need greater stewardship in the industry to get the best use out of pesticides and to ensure that they are used appropriately and to avoid any adverse environmental impacts. I feel that since the SUD was adopted, we have made some progress in this as an industry but there is room for further improvements.</p>
292	<p>Tillage farming in Ireland. It is the closest of our Agri sectors to meeting its climate targets. Grains and pulses produced in Ireland and used in animal rations are shown to have lower Co2 equivalent than imported feeds. Our yield per hectare is one of the highest in the world, the quality of our grain is exceptional as well. We can do so because our location lends itself to it, long bright days, not too hot, not too cold, and adequate rain to sustain growth, but our place in the world also has drawbacks regarding disease pressure. To commit to making a 50% reduction target legally binding at EU and member state level without providing access to alternative plant protection technologies is very short-sighted. High quality grain is also what is demanded by those in the food and drink industries. Applications of pesticides are never taken lightly; they are an expensive input but when needed they are done on the advice of qualified agronomists and applied using the best technologies to minimise contamination to the environment. They improve our yield and help maintain our super quality, if we have fewer active ingredients available to combat disease pressures the likelihood of resistance increases massively. This will in turn make meeting the high specifications of our end users extremely difficult if not impossible to meet and will make tillage farming uneconomic. One can only hope a common-sense approach to these SUR Proposals will emerge, but unfortunately common sense is just not that common.</p>
293	<p>I wish to make a submission with regard to reducing pesticide usage. Reducing pesticide usage by 50% with no viable alternative will result in my farm being nonviable. As a young farmer I care greatly about our environment but equally, so I care about our food production. Viable alternatives must be achieved before any actions are taken.</p>

294	<p>In recent years, the reduction in access to Crop Protection Products has had a serious economic impact on our business and is not only a barrier to the expansion in the areas of these crops but, also threatening the viability of the current cropping output. We have adopted IPM practices involving among other things, the use of biological controls, however, they only work best in combination with chemical controls. For example, last season, we had a serious infestation of aphids which the biologicals were unable to control. Due to the lack of approved CPP's for these crops, we incurred huge losses. Due to the continued absence of a control for leaf curling midge we no longer double crop Raspberries which leaves Irish production at a considerable disadvantage to imports where controls are available. Both national and regional policies articulated in government documents such as Food Vision 2030; Ag Climatise (A Roadmap towards Climate Neutrality) and Opportunities for the Irish Horticulture Sector - report by KPMG, July 2022 advocate for the expansion of the horticulture sector. Therefore, if the SUR further reduces the access to vital CPP's in the fruit sector then there is little prospect of sustaining never mind expanding to meet the opportunities in the sector.</p> <p>Views on the Consultation: Please see some points below in response to both Target 1 and Target 2 of the Farm to Fork Strategy. Ireland already adopts one of the strictest regimes in the EU in relation to the use of PPPs in horticulture. Other countries such as Holland which are in a similar regulatory zone as we are more lenient when it comes to the interpretation of EU MRL's and their Soft Fruit Producers have access to more active ingredients than here in Ireland which gives them a considerable competitive advantage. In this respect we would welcome the harmonisation of national pesticide-use policies which could help improve the functioning of the internal market and reduce trade distortions between Member States. Irish soft fruit growers have already suffered significant crop losses due to an absence of PPP's e.g., the cane fruit sector in the 2022 season. Access to new crop breeding techniques such as gene editing must be introduced in tandem with any attempts to legislate for any reduction in PPP use. The practice of IPM can only be maintained in combination with the use of PPP's as per the definition of IPM. In relation to organic production this is very difficult in the soft fruit sector as the rules do not allow crops to be grown in a substrate. Therefore, the rules for organic fruit production within the EU would have to be changed. Due to the size of the market, we also have less access to PPPs in general as companies do not register some of their products here. Therefore, we are starting from a position where we have less access to PPP's than our EU counterparts before any new regulations are imposed. The issue of competition from third countries is a major issue. We already have less choice in relation to PPP's than third countries which is putting us at a competitive disadvantage compared to these countries particularly in the horticulture sector. The UK is now a third country and a major competitor in the area of horticulture with the retailers often bench marking Irish farm gate prices against UK production. They are already moving to a different regulatory PPP regime than the EU. This is a major issue for our competitiveness, and it must also be considered whether Northern Ireland will still operate under the UK rules or a blend of both EU/UK regulations The UK is also moving ahead in new breeding techniques such as gene editing while the EU remains in limbo on the issue. Finally, any decisions made on the SUR must be made based on proper impact assessments for each sector and cannot be based on</p>
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	<p>political expediency at national or EU level. We also agree that given the different levels of historical progress and differences in intensity of pesticide use between Member States, it is necessary to allow Member States some flexibility when setting their own binding national targets.</p>
295	<p>We are entirely dependent on the availability of safe, legal and effective pesticides to run our business. Any reduction in the availability of safe and effective pesticides will make our business unviable, potentially resulting in the loss of jobs from our business and also a loss in production of produce. The result of this lower production will see increased imports of produce of unknown provenance grown with unknown pesticides. In short, the proposals have all negative effects with no positive outcomes. I urge you to reconsider.</p>
296	<p>We urge that Golf Clubs be excluded from the definition of Sensitive Areas. The use of our course is limited to members and is not available to the general public. The sustainable use of PPPs is readily accepted, proper recording and inspection can be organised. Without minimal use of herbicides, insecticides, fungicides and plant growth regulators, the condition of our course will deteriorate. This will result in more mechanical intervention which will have a detrimental carbon downside. Golf is an activity that provides outdoor exercise and entertainment to many, particularly older people who should be encouraged not deterred. If our course quality is reduced it will result in less use, which will increase the burden of cost over fewer people. We operate a course that maintains the natural habitat of diverse wildlife and is kept as natural as is feasible. However, we do require the use of PPPs and request that you seriously consider the exclusion of Golf Clubs from the definition of Sensitive Areas.</p>
297	<p>The Irish tillage sector plays a vital role in Irish agriculture and our national economic output. The sector supports rural areas and is an integral part of many communities in Ireland especially in the southeast where much of our business is carried out. The tillage sector produces a wide range of raw materials for the drinks and food industry. The green image of the crops grown here is a key part of many world-famous brands throughout the world such as Jameson and Guinness. Ireland's temperate oceanic climate provides ideal growing conditions for high yielding/quality cereal crops. However, this climate also results in increased pressure from diseases such as Rhynchosporium, Net Blotch, Septoria and Fusarium. The aforementioned diseases have a negative impact on both grain quality and yield. In the absence of chemical intervention, both the yield and quality of the crop will suffer greatly. As a result, the grain harvested from a diseased crop may be regarded as unsuitable for use in the food or drinks industry. Additionally, a reduction in yield will result in a significant increase in carbon output per ton. A lack of domestically produced cereals for these expanding markets will lead to an increase in the volume of imported grain which will be accompanied by a higher associated carbon footprint. A shortfall in domestically produced cereals will also increase our dependency on volatile world markets. Recent events in eastern Europe have highlighted how fragile the supply chain of this produce is due to the location of one of the world's largest grain producers. Delicate agreements underpin the ability to transport relatively large amounts of such cereals via the Black Sea. The resulting increase in the price of such produce has left many underdeveloped</p>

regions unable to afford basic forms of nutrition. A reduction in crop yields can only reduce the availability of affordable food to these regions. Without undermining the importance of protecting our environment, I believe a more balanced approach is required in order to guarantee a sufficient level of food security for an ever-increasing world population. It is essential to provide proven solutions to these concerns before introducing the actions proposed. Independent agronomists are only available primarily through Teagasc which are already experiencing a stretched workforce due to the ever-increasing levels of paperwork required. The Irish model of merchant-based agronomists works well and there is already a solid relationship cultivated between the merchant and their customers. In relation to chemical usage, only the required amount is used for crop protection depending on weather conditions and pressure from disease. I.P.M and useful tools such as the Syngenta BYDV assist app are used in order to reduce chemical usage where applicable. The current model works well as agronomists know in detail what specific areas and fields historically need less herbicides and are less susceptible to aphids. For example, in windy area where they do not normally attack. I.P.M methods like crop rotations and sowing dates are being improved continually. Our chemical use per ton of grain produced is less than most our EU counterparts due to our high yielding potential. Furthermore, high yielding crops will be impossible to attain without chemical intervention. A reduction in crop yields would result in grain production in this country proving to be uneconomical, resulting in a drop in crop production. This scenario would be conflicting with the governments ambitions to increase the total area of land under cereal production. More carbon friendly methods of arable farming such as min-till also depend on glyphosate to work successfully. This chemical is required for the continuous development of more carbon friendly cultivation systems such as minimum tillage or direct drilling. Regarding candidates for substitution, it is essential to be careful that we possess a substitute prior to banning certain chemistry. Alternative options when certain chemistry has been prohibited historically proved to be limited to say the least. In conclusion, I feel the proposed directive will have a negative impact on tillage farming in Ireland. Tillage farming in Ireland is almost carbon neutral and is continuously striving for improvement through regenerative practices and IPM. I feel we need all the available tools at our disposal to ensure sustainable food production and to achieve an adequate level of food security. Pesticides are an integral component of grain production in Ireland. I ask you faithfully to amend this proposal to provide a better future for us all.

298	<p>I have outlined a range of key points below which I feel are major bones of contention with this draft proposal. 1. Loss of Yield and Economic Impact. Irish tillage farms can produce some of the biggest yields in the world. In fact, we can produce 50% more wheat per hectare than most of our EU counterparts and while our chemical use per hectare is very high, our chemical loading per tonne of grain produced is very low with an excellent carbon footprint profile. Diageo are currently running a pilot scheme for which I am involved which proves this point. Our high yield capacity and favourable climatic conditions ensure that we are one of if not the most efficient producers of grain on a per ton basis in the world. Our ability to produce big yields needs to be given special consideration as a "one size fits all" approach across the EU would be unfair to Irish growers. Our cool temperate maritime climate provides the foundation for record yields but as a consequence also provides the challenge of growing crops with some of the highest disease pressure in the world. This means our chemical usage is high but on a per ton basis leaving the farmgate is quite low. Due to our high-cost base the only competitive advantage Irish growers have against our competitors on the world market is our ability to produce very high yields. This is what sustains our business model and what makes us viable as an industry. Any enforced reduction in pesticide usage across the EU will impact more on Irish growers than anyone else. Our yield potential will suffer, quality will deteriorate, and farm incomes will be decimated. The land base used to produce crops will most likely move to the dairy industry as the only viable alternative for food production. Dairy farming has a significantly heavier carbon footprint than crop production and will only serve to exacerbate the problem the commission is trying to solve under the green deal and will not improve it in any way shape or form. This is a huge unintended consequence of this draft regulation and one which we feel the commission hasn't fully thought out when formulating these draft proposals. A 30-40% yield reduction renders the Irish Tillage industry unviable. This will present a host of environmental, social and economic problems for Irish Society and policymakers for the next generation. We cannot let this happen. 2. Impact on Grain Quality. The proposed reduction in pesticide usage by 50% by 2030 will have a profound devastating impact on grain quality in this country. Our cool temperate maritime climate makes our growing conditions ideal for high yields and quality but also favours the proliferation of wet weather diseases such as Rhynchosporium, Net Blotch, Septoria and Fusarium. All these diseases have major negative impacts on grain quality and infected crops are deemed unsuitable for food grade cereals due to mycotoxin production from said diseases. The Irish market has developed exponentially in the past decade or so with a massive increase in demand for grain to the Irish Drinks industry. Our Oats are world renowned for their quality be it Porridge Oats for Flahavans, Gluten free oats for the US market or Connolly's Red Mills world renowned equine rations. It is now estimated that the drinks industry is worth 2 billion to the Irish economy and growing. Huge global brands such as Guinness and Jameson are synonymous with the quality and reliability of Irish barley as a raw material. In order to supply these premium markets, all grain must meet certain quality criteria in terms of KPH, protein, moisture, be free of mycotoxins and ultimately sweet and sound. Due to our climatic conditions which provide these global brands with their renowned authentic provenance and flavour the Irish drinks industry has boomed. It is now one of our most valuable</p>
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exports and provides a host of quality jobs. The fact of the matter is without the current supply of Plant Protection products the quality of grain required by this valuable industry will be impossible to achieve. It will be a huge opportunity lost for the Irish Ag Food Sector, Economy, and Society as a whole. 3. Food Security. In light of recent developments in world geopolitics since this proposal was first drafted the issue of food security has become a massive concern. The Russian invasion of Ukraine a key world food producer and major exporter into Europe has seriously exposed the fragility of the global food supply chain. Markets have spiralled in terms of input costs and the market price for grain. Record prices were achieved in 2022 primarily on the back of issues around Black Sea Exports. This has fuelled inflation to record levels and made food very expensive for the consumer. We are lucky as Europeans as we can by and large afford to purchase expensive food but most of the developed world will struggle to afford and secure expensive food. This will and has plunged millions of people into hunger. This surely flies in the face of the EU farm to fork strategy. The European union as the most developed trading block in the world also has a moral obligation to feed its citizens and not to contribute to world hunger on humanitarian grounds. The reduction in the yield which will inevitably come about as a result of these proposals will only serve to exacerbate these already very real problems. We must not forget that one of the four key pillars of the Common Agricultural Policy from its inception was “to provide certainty of food supplies to the citizens of Europe and to ensure that those supplies reached consumers at reasonable prices”. This draft proposal seems to directly contravene these stated aims by directly inhibiting farmers ability to produce high quality food for the people of Europe and beyond. EU policy seems to have drifted from food security to more lofty environmental aims. The environment and how our food is produced is clearly important, but the green agenda needs to realise that world population is continuing to increase with a 55% increase in output by 2050 required to meet global demand. The draft proposal also includes an aim to produce 25% of European food organically. Due to poor yield and quality from organics this will take 50% of the land area to achieve. This will accelerate food scarcity and increase inflation pressure. Surely the Commission can see that this will be a massive unintended consequence of the draft proposal. A fairer balance needs to be found between the green deal and ensuring food security for all the citizens of Europe than is contained in this draft proposal. It should be remembered that in order to move forward we must first and foremost refrain from prohibiting until alternative solutions have been found. It is only science that can respond to these challenges.

298 (a)	<p>4. Issues around Candidates for substitution. I have significant concerns in relation to products that are deemed candidates for substitution. Candidates for substitution should mean what it says, and no active ingredient should be substituted until a replacement, which is at least as effective, is found. From my reading of the draft proposal this does not appear to be the case. It appears to us more like a list for removal with no clear alternative proposed. Take chlorothalonil for example, the most high-profile casualty from this list in recent years. It was one of the only multisite modes of action preventative fungicides, and most effective. It formed the cornerstone for resistance management in fungicide programmes for a generation. It was revoked in the EU (and granted an extension in Canada) in 2019. The replacement product for chlorothalonil is folpet with a recommended rate 50% higher than chlorothalonil. It is also less effective than chlorothalonil, so the partner products also need to be used at 20% higher rates. With chlorothalonil, a typical T1 on Spring barley was 1.0l/ha chlorothalonil, 0.5l/ha pyraclostrobin and 0.4l/ha prothioconazole (700 grams active/ha). With Folpet a typical T1 on Spring barley is 1.5l/ha folpet, 0.6l/ha pyraclostrobin and 0.5l/ha prothioconazole (995 grams active/ha). This equates to a 40% increase in chemical loading yet still has reduced efficacy on the target disease in this case ramularia. If this is how the “candidate for substitution” process will work, we cannot see how the commission can achieve any reduction in pesticide usage under this proposed regulation. I feel there is a lack of clarity and joined up thinking around the whole concept of reducing pesticide usage under current guidelines. Any removal of active ingredients should be science based only. Political trade-offs have no place in food security issues. The removal of epoxiconazole in 2020 was forced by three dominant member states, even though evaluations of the active were not fully completed. Most remaining triazoles are candidates for substitution. This is a huge concern for Irish Growers as losing any more of them will accelerate resistance development and directly contradicts scientifically proven Agronomy best practice.</p> <p>5. Implementation and interpretation of IPM Strategies. The draft proposal has a large emphasis on Integrated Pest Management. I am fully behind IPM and feel it is essential to sustainable crop production. The tone of the draft proposal suggests that farmers are disregarding IPM strategies and instead blanket overusing pesticides to produce crops. Nothing could be further from the truth in terms of everyday practice on Tillage farms in Ireland. IPM is the toolbox from which crops are produced and pesticide use is just one very important tool in that toolbox. Farmers always use a number of strategies prior to using pesticides i.e., crop rotation, seed and variety selection, cultivation practices, planting dates and planting densities. In recent years farmers have wholly embraced cover cropping to reduce fertiliser usage, promote soil health and biodiversity and improve water quality. Significant investment has been made by Irish farmers in machinery to reduce reliance on ploughing and adopt minimum tillage, strip till and no till methods to reduce soil disturbance and carbon release. Pollinators are actively promoted on Irish Tillage farms and beehives are seen in most crops of oilseed rape. To adequately fight against pests and diseases a wide range of solutions is required, including pesticides. This will in turn aid resistance management. As stated in European and Mediterranean Plant Protection Organization PP 1/271 (3) Guidance on efficacy aspects of comparative assessment, if there is evidence of medium risk of resistance in the target organism,</p>
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at least three modes of action are recommended. With evidence of high risk, at least four modes of action are recommended. Maintaining a broad range of crop protection modes of action is therefore essential to reduce the risk of resistance. Without pesticides there will be reduced availability of solutions, potentially an increase in resistance and in turn reduced yield. Pesticides are an integral part of a holistic approach to IPM on every viable Tillage farm.

6. Clarification around Independent Advisory requirements. The draft proposal contains some specific proposals around the use of independent advisors for plant protection products. It is stated in the proposal that there is a conflict of interest between plant protection advisors who also sell plant protection products. In the context of the Irish market this may present considerable challenges. Teagasc as our state advisory body do valuable work but lack the manpower to commercially walk crops to the levels currently provided by technical sales agronomists. Agronomists are a very scarce commodity as it is and many growers have long standing relationships with their merchant agronomist build up over years and in whose advice, they rely on and trust. The Irish market may be unique in this regard but relies very much on a collaborative approach between growers and commercial agronomists. The notion at policy level that many plant protection products are being used at excessive levels to boost sales is a falsehood. Many commercial agronomists like me often use reduced rates to try adding value to their customers in a competitive marketplace. The blanket approach is not taken and great effort is made to only use products as required. It is the weather and not commercial interests that dictate levels of usage of plant protection products in this country.

7. Impact of draft proposal in context of increasing Tillage area. The government has committed in principle under the climate action plan to increase the area under Tillage by 50,000 ha to 400,000 ha. This has been done in the context of mitigating our carbon emissions as a country and using crop production as the vehicle which the country uses to reach its emissions reduction targets and combats climate change. This is a massive positive for our industry and wish to commend the government for realising that crop production can be part of the solution for all of society. However, we feel this draft proposal will directly scupper that stated aim. If crop production is unviable then despite all the ambition to increase the Tillage area it will not happen on the ground. We need land to achieve this production increase and we are currently in the highest demand cycle for land in the history of the state. We feel the government has failed to calculate the unintended impact of the new Nitrates regulations. Dairy farmers are not reducing stocking numbers they are actively seeking to increase their farmed area to dilute stocking rates. They are willing to pay exorbitant land rents to achieve this and are being actively encouraged to do so by state bodies. Tillage farmers for which a significant portion of their cropped area is derived from rented land cannot compete at figures of up to 500 acres for land. This is in direct opposition to what the government wants to achieve under the climate action plan. So why is it being actively encouraged by Nitrates policy? Farmers cannot be expected to produce crops at an economic loss. Without plant protection products we cannot remain viable as an industry due to inevitable yield and quality losses as a direct consequence of this proposal. We urge the government to reject this proposal in its current form and produce a fairer solution for Irish farmers and all food producers in the EU.

298(b)	<p>8. Increased reliance on Imported grain from Third Countries. The proposal states in its impact assessment that yield will be reduced and costs will go up as a result of its implementation. The direct result of this is a reduction of Irish and EU grain crops. If this proposal is designed to reduce the risk of dangerous chemicals in the food chain, I genuinely fear this proposal will achieve exactly the opposite. As nothing has changed in terms of demand for grain, more unregulated imported grain will be needed as a reduction in regulated, carbon neutral Irish produce becomes less available to the market. Non-EU countries, from which we already import grain, use hundreds of active chemicals which have long been banned in the EU. The direct result of this proposal is an increase in imported grain and therefore an increase of dangerous active chemicals used on grain consumed in Ireland. Ireland is the highest yielding country in the world per acre for wheat barley and oats, this means that chemicals per ton of grain are lower than other countries. Pesticide controls inside the EU are already the best in the world, so why are we implementing a policy which reduces the amount we produce here? The unintended consequence of this policy is a net decrease of safely produced EU grain, to be replaced with less regulated 3rd country imports. This cannot be in line with the farm to fork strategy and in the best interests of EU Citizens.</p> <p>9. Reduced Tillage capacity would have negative impact on Country's carbon reduction targets. Irish grain is farmed with a very low carbon footprint. When taken into consideration against our EU counterparts and worldwide competitors it is probably the most carbon efficient grain in the world when all factors in production and supply chain are factored in. In fact, crop farming can be developed to be a useful source of carbon sequestration. Acting as a sink taking carbon out of the atmosphere and storing it into the soil. With the previously stated reduction in Industry competitiveness, we face as a result of the proposed SUR, more land will revert to dairy farming. Dairy expansion coupled with very strong Dairy markets has seen demand for land for Dairy farming explode exponentially. New Nitrates regulations in terms of stocking densities permitted mean dairy farmers must spread their herd over more land. Although the dilution of that sectors' footprint over more acres seems positive, if it takes carbon neutral crop farming out of production (due to impossibly high land rent rates for tillage farmers) it is counterproductive. SUR makes tillage farming less competitive and opens the door to more dairy and less tillage. As a result, this proposal will directly prevent us from meeting our stated targets under the climate action plan. The Irish Government have stated that their aim is to increase the area under tillage to reduce the overall carbon output of agriculture. Again, why introduce policy that stops us from meeting our climate targets? The change in land use from tillage to dairy would increase carbon emissions of the country, in addition to the added carbon emissions from an increase in imported grain. The carbon footprint for imported grain is as much as 24 times higher than grain produced in Ireland. Any increase in imported grain is importing huge carbon emissions. This increase undermines the credentials of Ireland's food and drinks sectors as well as animal feed. A broader holistic approach is essential here to evaluate the consequences of this proposal. Conclusion. This directive will have a hugely detrimental impact on tillage farming in Ireland. While I recognise the need for a reduction in overall pesticide use, I feel that this needs to be concentrated on other users of these products. The use for food production must be maintained or it will have a detrimental impact</p>
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	<p>on both the tonnes per acre produced and the quality of the grain produced. Tillage farming is almost carbon neutral and is always improving itself environmentally by using the latest technology, farming practices, regenerative agriculture and IPM. If this directive is passed in its current guise, it will only have the effect of reducing the acreage under tillage farming rather than increasing it. In terms of our national carbon output this can only have a negative impact. Tillage farmers have always been at the forefront of Agricultural innovation. In that spirit I wish to be part of the solution to reduce carbon emissions and produce safer more sustainable food. Pesticides are an essential piece of this jigsaw, and I would plead with the Irish Government and the Commission to amend this draft proposal to ensure a fairer future for all.</p>
299	<p>This proposal to cut pesticides by 50% or more will have a devastating effect on my farm. You cannot grow good quality high yielding crops without the use of pesticides in a damp climate like ours in Ireland. Diseases like Septoria, Rhynchosporium and blight can literally half yields. With the world population rising so fast and food quality and yields impacted due to your short sightedness this will only lead to starvation and famine in the future.</p>
300	<p>If the prohibition of Plant Protection Products (PPPs) goes ahead on Irish Golf Courses, then it will mean the end of golf in Ireland, Ireland has some of the highest rainfall and humidity in Europe, it will not be possible to grow grass without the use of PPPs. If and when Genetic Manipulation is allowed as in CRISPR then it is possible some varieties of grasses might become available that will not require the use of PPPs'. In our golf club we have an extensive programme of rewetting, rewilding and tree planting over the course.</p>
301	<p>We work in collaboration with industry to problem solve for both industry and wider society. One of our projects we engaged with has an aim to use innovative and detailed analysis to test our hypothesis in the lab and in the field, which will contribute to optimizing current technology and opening up new avenues for the development of technology that could prove vital for feeding everyone on Earth in the coming years. Recent projects we engaged with in the area of pesticides have included the quest for more efficient and environmentally friendly agricultural spray technology. This technology initially introduced by industry in the area of magnets is now through collaboration with researchers seeking to innovate this technology to reduce the area of crop spraying, making it more sustainable and effective. This in turn limits the environmental impact of pesticides and as the sector evolves to reduce the use of pesticides will still continue to provide targeted and cost-reducing spraying of crops, regardless of the type of spray being utilised. This ongoing research project, a collaboration between industry and researchers aligns with the EU Farm to Fork Strategy which this Regulation seeks to give a statutory footing to, as in Farm to Fork there is a call for the “Commission to inter alia set European Union-wide mandatory reduction targets for pesticide use” this technology can reduce spray drift by more than 70% compared to conventional spraying technologies – which is highly beneficial for the environment and people. By targeting the plant canopy and creating the ideal droplet size, pesticide run-off is minimised, and chemical costs for farmers reduced while yield stays high. In this system, pesticides pass through a magnetic field at a specific rate of flow so that</p>

	<p>the resulting spray-fluid has a droplet profile that targets the plant canopy, and results in reduced spray drift and run-off. Ongoing funding of researchers to collaborate with industry in various fields, including agriculture can only strengthen the opportunity for innovation and accelerate progress in the areas of sustainability. This in turn can only serve to benefit people and planet. From 2023 onwards, we intend on focusing on excellence in fundamental science with a focus on sustainable growth development.</p>
302	<p>At fifty years of age, a lifetime spent growing tillage crops to the best of my ability I find as farmers we are at somewhat of a crossroads others will send far more detailed submission than I, my thinking is this, take our chemistry defence away from reaching grain yields needed to survive on this expensive island we call home, GAME OVER.</p>
303	<p>We recognise that some pesticides are currently critical to our approach to farming. It is also our opinion that the blanket and arbitrary reduction targets set out in this proposal lack sophistication and reduce farmers' ability to react to situations where their use is necessary to preserve our methods of sustainable crop production. In short, while we find it possible to successfully reduce synthetic input use, in certain seasons, certain climatic conditions and certain circumstances the judicious use of pesticides enables our members to react to situations where to not use these products would result in significant financial loss. When we consider true farm sustainability, we must recognise that financial stability enables our members and farmers in general to better care for the environment and deliver a broad range of goods for the food chain. A careful use of certain pesticides supports this financial stability enabling our members to continue their efforts in environmental conservation and soil regeneration through their wide range of environmentally protective farming practises noted above. Some difficulties that we have with the proposals, and some proposed solutions. A lack of professional capacity within the agriculture industry to deliver both the IPM (integrated pest management) education, and independent agronomic advice contained within the proposals in a meaningful way. While the aims of this aspect of the proposal are clear and to be welcomed, there are not enough trained professionals in this field to deliver anything beyond box-ticking exercises for farmers. Neither the national advisory body for crop production, nor the sphere of private advisory services have the human resources available to deliver what is required in the proposed regulations. Having a keen interest in farmer education as a means to deliver real and positive change, we propose the following: That provision be made, and funding models be developed for a more varied ecosystem of peer-to-peer education in IPM among farmers. This might take the shape of a practitioner devised IPM module, delivered by farmers for farmers, administered through the QQI system, and made locally available through either Community Education services at Education and Training Board (ETB) Level or through the Skillnet continuous professional development system. This approach would have much to recommend it, in terms of meaningful learning for farmers, and could draw on the experience of organisations such as NOTS (National Organic Training Skillnet) and other organisations who have expertise to share in IPM. The special role of some chemical actives in delivering other environmentally beneficial goods and services. There is a lack of sophistication in some aspects of the debate on the use of pesticides that has carried on into these proposals. This is of particular concern to our members. The benefits of minimal soil</p>

disturbance while establishing crops are clearly demonstrable and have gained widespread acceptance. Increased water infiltration, preservation and recovery of soil biota, less nutrient run-off and water pollution, better nutrient cycling and nutrient efficiency are among the key environmental benefits delivered by no-till and minimal disturbance crop establishment techniques. However, the ability to produce these benefits from this system of crop establishment depends largely on our ability to utilise glyphosate for weed control and destruction of cover crops. While we have developed techniques (lowering solution pH etc) to reduce overall glyphosate use, it remains an integral part of no-till crop establishment. Should we lose the facility to apply this active, we would be forced to return to ploughing, which largely undoes all of the aforementioned benefits. Thus, the proposed regulation must balance the benefits of this chemical's use in this situation, against the notional environmental dividend of forcing reductions in its use, or displacement of it for the use of other possibly more harmful chemicals in the preservation of this crop establishment system. In summary, no-till crop establishment allows for the some of the following environmental goods and services, all of which are largely dependent on glyphosate - carbon sequestration, increased soil organic matter, diverse crop rotations, use of cover crops for nutrient cycling, habitat creation and preservation for soil-based organisms, which in turn feed birds and small mammals and are the building blocks of a biodiverse eco-system, allows for beneficial insect build up supporting IPM through a more balanced insect ecosystem, healthier soils, which in turn lead to more healthy plants, which in turn require less chemical inputs. All of these benefits are congruent with the EU Farm to Fork strategy. If we go down the route of a kg/ha of active ingredient allowance for farmers, it can be seen that glyphosate is quite a "heavy" g/l formulation. The use of a recommended rate for cover crop destruction for example, would easily throw a grower over their allowance, if a low bar or reducing bar is set for the use of plant protection products. Thus, we hope to have shown that the problem is not as simple as removing or reducing products without considering the effect on other sustainable environmental practices. In this light, we propose the following critical distinctions and recommendations are considered and made in relation to all discussions on the proposal: The stressing of the special role of glyphosate in no-till/minimal disturbance crop establishment in all negotiations on this proposal. The explanation that the use of glyphosate in conservation agriculture systems does not occur on growing crops for food or animal consumption, but instead is used for cover crop destruction pre crop planting. That a mechanism be devised, that where growers should become subject to a grammes of active/hectare allowance, then a further allowance be available in relation to glyphosate for practitioners of no-till/minimal disturbance crop establishment techniques. The evidence necessary for verification could be devised from participation in optional directed measures in future environmental schemes or be verified by geo-tagged photographs. Ireland's maritime climate can provide seasonably variable levels of rainfall, which have a direct impact on fungicide use in the growing of crops. Our members are achieving substantial reductions in fungicide use and, in some cases, managing to grow profitable crops with zero fungicide use, by paying close attention to plant nutrition with sap and tissue analysis. However, it must be noted that this happens in conjunction with favourable weather conditions and as part of a decision-making system that

evolves through the season, based on a matrix of information gathered and issues observed. If for example, the weather becomes persistently wet and humid at the time a cereal crop is flowering, it will be exceedingly difficult to prevent build-up of mycotoxins in grain through the application of foliar nutrition and a fungicide application will be required. This scenario points to a couple of problems with prescriptive rather than reactive IPM. Firstly, if we are to react to threats to crops within an overall context of reduction, then we as farmers need the freedom of judgement to make these decisions. In the model of binding IPM contained within the proposals, this would seem difficult to facilitate. As an adjunct to this, it is of note that the reference years for pesticide use in the proposals are 2018-2020. These were very dry years across Europe, and likely do not give a fair reflection of overall pesticide use. Thus, a false premise on which to base reductions has been established. It would perhaps be of greater value to extend the reference period to 5 years, in order to obtain a more accurate dataset on which to base the desired reductions. In response to this we propose: A rolling system of pesticide reduction assessment be made over a number of years, that allows for flexible decision making, within an overall trend of reduction. As an example, a particularly wet growing season may require growers to use more fungicides to protect crops, but once that falls within an overall downward trend across a number of seasons, there should be no compliance issue. If we examine some of the statistics behind pesticide use in Ireland, we can surmise that the most dependent sector on pesticides is the arable sector of commercial crop production. However, within the overall context of Irish Agriculture, CSO 2022 figures reveal that there are 350,000ha of cropped land in Ireland (11% of agricultural area). This, set against 2 million ha of grassland (58% of agricultural area). This is unlike our European neighbours whose percentage of arable land and associated pesticide use is much higher. Blanket reduction targets at EU level do little to address this Irish anomaly. Despite the stated aim of government policy of increasing arable production area (Climate Action Plan 23), blanket pesticide reductions will disproportionately affect the arable sector in Ireland. This is problematic, as the rationale for increasing the arable area is to reduce our dependence on imported feed sources. Home grown cereals, oilseeds beans and peas directly displace protein sources from other countries where production standards are not as high and may also cause greater environmental damage in jurisdictions outside the EU. In response, we propose: That the special strategic position of the Irish arable sector, and the disproportionate effect on the sector from blanket reductions be borne in mind in any implementation of these proposed regulations. Space for nature proposals should include hedgerows, which are a distinguishing feature of the Irish landscape, when broadly compared with our European neighbours. There already exists a voluntary code of practice for sprayer operators which prescribes the use of appropriate nozzles for boundaries and drift reduction. If the electronic record keeping burden on farmers is to be increased for the use of pesticides, then a software solution should be devised that it is freely accessible to farmers and publicly funded. Another situation where nutrient management planning software developed by a public body which cannot be accessed by all, freely, must not be allowed to occur again. If the aim of regulation is reduction in use, rather than the generation of penalties, then record keeping compliance should be made as easy as possible for end users. Food security and

	<p>stability of supply must form part of the considerations on pesticide reductions. Rather than reduce the number of available actives, a more constructive approach would be to encourage more judicious use of those actives in order to achieve the overall reductions required.</p>
304	<p>SUR Consultation proposal: 1. There are many facets of the Regulation which many of us would agree with and as an industry we are all in favour of reducing our reliance on pesticides, but we must be very careful in how we deal with this and it is imperative that we don't leave ourselves open to the risk of not having the required armoury/products to tackle the many issues i.e. weed problems disease etc that arise on farm in order to produce enough food quality food to feed the population. 2. We need a level playing and that all farmers and food producers are working from a similar set of rules as it can be very frustrating to see products banned here but allowed to be used in other countries and yet we see fit to import this food into the European Union. 3. We very much need to have alternatives available in the marketplace before products are banned from use as this could blindside us and put us at risk whether that's through new safer chemistry, biologicals or genetically through plant varieties. 4. We currently through the old SUD have developed an excellent Farm advisory service mainly through the merchant trade and monitored by IASIS where all these advisors are continuously trained and upskilled in all aspects of IPM. I strongly believe it would be putting a huge extra cost on farmers to have an independent advisor and just not practical. Secondly there would not be enough advisors to carry this out in the country. I would suggest that maybe they would be expected as advisors to provide a proper script before any product is sold and not just handed out over a counter. Much of the objectives are practiced but not really getting credit for it. 5. As regards Sprayers which are fundamentally one of the most import pieces of the whole jigsaw as these actually apply the product. We must keep monitoring and upskilling farmers as to how properly use these pieces of equipment and make sure they are applying the product the way they are designed to. TAMS has helped greatly and need to keep this going. 6. Tighter restrictions on amateur use needs to continue and even strengthen and even where these products are sold.</p>

305	<p>It is worth noting that much publicity and commitment in recent times by numerous government bodies and figureheads, including minister for agriculture Charlie McConalogue, has been given to the Irish arable sector and the greater role it has to play when it comes to Irelands 1. 'Climate Action Plan' and 2. maintaining and improving our image as a low carbon footprint and sustainable producer/exporter of meat and dairy products. Should the SUR be implemented as is proposed, then it is essentially impossible to see how the arable sector can play the role that is envisaged by the policy makers and marketeers of our produce over the coming years. The SUR proposal aims to; 1. Achieve pesticide reduction targets, 2. Promote IPM and alternatives instead of pesticides, 3. Make it mandatory for farmers to seek independent advice and move to electronic recording of pesticide use, 4. Prohibition of pesticide use in sensitive areas. 1. Achieve Pesticide reduction Targets. There is no stakeholder in the Irish arable sector that is opposed to a reduction in pesticide use, provided it is achieved in a sustainable and targeted manner. It seems that the reduction targets set out in the SUR are completely baseless, with quite significant reductions in use, in quite a short space of time. Without a scientific impact assessment on what benefits a targeted reduction will bring, it could be described as a pointless and dangerous (in terms of food security) regulation; and if it is found five or so years after implementation that the SUR is not having the desired effect, what stops the EU from going a step further, increasing the restrictions around PPP's, again with baseless reasons. The increase in agricultural output across the world essentially correlates with two things; 1. the requirement for more food by a growing population, up to 8 billion today, and 2. the commercialisation of pesticides for use in agriculture, both of these instances coincide with the end of World War II, or the 1950's. The world and Europe have become dependent on plant protection products to produce enough food to feed the world's population through specific production evolutions in technologies and genetics over a 70-year period and now the EU wants to cut its dependency by 50% in seven years, without having an effect on production, in a region that is already more regulated for pesticide registrations than anywhere else in the world. The Irish arable sector is vital to a sustainable Irish agricultural industry, it is the lowest carbon emitting sector as well as being a vital cog in the sustainability narrative for out livestock feed sector. There are a variety of crops grown across the country which in their own way add to Irelands biodiversity with many native species of wildlife and plants benefiting from current arable practices, which no doubt could be improved further, without having to introduce a blanket ban/reduction on pesticide use. In Ireland we achieve exceptionally high yields which make the production of grains a viable option for farmers. These yields are mainly achieved through a combination of factors; our temperate climate, long hours of daylight through the growing season and our soils unique ability to hold moisture and at the same time be free draining. However, these three factors provide quite a good environment for pests also, and if not managed appropriately, growing crops in Ireland can become unviable. Wet weather diseases and weeds in the two largest arable crops in Ireland, barley and wheat, are managed with the use of pesticides in a programmed approach, if this programme is altered or reduced then the level of output and the high yields required are simply not achievable. However, history has shown that humans have adapted to situations in the past, and over longer periods of time new technologies and genetics can lead to</p>
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	<p>new production methods. One would question our ability to reverse everything that has led us to where we are today over the last 70-year period, in just seven years, especially considering it takes ten years or more to bring a new plant variety or plant protection product (PPP) to the market. 2. Promote IPM and alternatives instead of pesticides. With the loss of many PPPs from the toolbox over the last 20 years due to EU restrictions, it is becoming more apparent to the Irish arable farmer that IPM is having a much greater role to play in the production of grains in Ireland. This has stemmed from a cumulative approach by both the farmer and advisor. However, this is far from a perfect science with much more research and development being required in this area before we can simply introduce a blanket reduction on pesticide use. IPM will have a significant role to play in the production of arable crops into the future, provided we are still growing arable crops in the future. Providing the right management practises to any crop at the right time is crucial to reducing crop stress, weed infestation or the onset of disease; this starts with timely sowing dates, adequate and timely nutrition and in this country, due to our climate, it also requires a programmed approach of PPPs (mainly herbicides and fungicides). Arable farmers and advisors are moving more and more in the direction of IPM by default, but as mentioned above, we are quite a way from having the perfect IPM model. However, with further advancements and knowledge in IPM, more widespread implementation of specific practices will occur when the tools are there i.e., new technologies, new PPP and new plant varieties.</p>
305(a)	<p>3. Make it mandatory for farmers to seek independent advice and move to electronic recording of pesticide use. Independent advice is currently far from the norm for arable farmers, this is predominantly a result of the current structure of the arable industry in Ireland, whereby the agronomist that is giving the advice is predominantly employed by the end user of the grains. This is quite an important arrangement, as the end user of the grains needs to have oversight as to how a crop has been managed throughout the growing season. This oversight by the end user allows for prudent and sustainable use of arable inputs by a qualified and experienced agronomist, who ensures that the end product will be in the best possible condition at harvest, and free from toxins and other potential hazardous issues when entering either food grade produce such as malt/distilling or livestock feed. The description around how a farmer seeks independent advice in the regulation is also quite vague, with little understanding of how such an arrangement will work. It is fundamentally impossible to prescribe a full arable production programme in a country like Ireland, where the climate dictates what the best practice is on a given day, never mind a given month or even season. The successful and prudent production of crops in Ireland depends heavily on the close relationship that is built up over time between a farmer and his/her agronomist. The structure of the current arable industry and supply chains would require a complete overhaul, with many businesses having built up their viability on providing inputs and advice to farmers in turn for a consistent supply and quality of grains among their farmer customers. It is also hard to comprehend the capabilities of any organisation in Ireland that has the capacity to service the entire arable sector with independent advice. A move to electronic recording of pesticide use is a good idea in theory and would be welcome by all stakeholders in the industry, however, there are still a</p>

	<p>significant number of farmers that are not IT literate, this measure will likely prove challenging and cause resentment and poor record keeping should it be a compulsory requirement. 4. Prohibition of pesticide use in sensitive areas. The reduction of pesticides in 'some' sensitive areas is understandable, however, with the parameters of the original SUD much of the problems have been addressed in sensitive areas. This raises the question, did the parameters of SUD implementation have the desired effect or was it more aimless solutions to what was envisaged to be a problem. If it was the latter, one would have to question the current parameters of the proposed SUR, will it have the desired effect or is it just baseless solutions to what is perceived rather than proven to be a problem. The use of PPPs; by amateur users, on areas that are for aesthetical purposes, and even using a specific product in specific scenario are areas that could be targeted by this SUR, but the blanket reduction across an industry is a blatant lack of understanding to the fundamentals of food production. The farmers of Ireland are custodians of their land, that understand and relate to the importance of biodiversity and prudent use of PPPs. If the SUR is implemented as proposed, there are huge areas of land currently in arable production that will no longer be viable for this purpose, these lands will end up in grass production which as mentioned earlier does little for biodiversity if all crops in Ireland are grassland. Summary. The proposed SUR is an agenda that stems from the Green Deal and Climate Action commitments set out by the EU. It seems clear that the targets set out in these agendas are aggressive, overstated and essentially out of touch with the realities of what happens on the ground, furthermore the timelines for these changes to be implemented is totally disregarding the time and resources required to establish alternative tools to achieve the same levels of production. It seems apparent that the EU are on a mission when it comes to these agendas, with little regard given to the unintended consequences of such drastic measures. The proposed SUR came to light in summer of 2022, though it was actually due to be publicised in February 2022, however, the Ukraine war suspended its publication due to the sensitivities of the issues it raises. With the benefit of hindsight and the unfortunate circumstances in the Ukraine, it seems apparent the governance within the EU is paying little homage to Europe's ability to be self-sufficient in food production for an ever-growing population, with our dependencies on third countries is becoming great and greater as the EU increasingly becomes more stringent in its approach to the rules and regulations that our farmers must abide by. This proposed SUR will have detrimental impact to the production of arable crops in Ireland, which will then have significant consequences for the industries that these crops support i.e., sustainable livestock production and the Irish drinks sector. Ireland's location in Europe is favourable when it comes to our climate, which directly results in our ability to be among the most sustainable and carbon efficient producers of food in the world. It seems we are unable point out the unique advantages that we have at EU level, and our policy makers seem content in reducing our output of sustainable production for it to be only taken up by less sustainable and less carbon efficient countries, predominantly outside of the EU.</p>
306	<p>I would just like to have my voice heard on the matter of the new pesticide rule. I think that this change would be absolutely detrimental to my career and would be another nail in the coffin for tillage in Ireland. My dad, uncle and I are already struggling</p>

	massively to compete with the dairy industry and not to mention the massive input costs that we face. This new rule would ruin our ability to farm productively and would leave us unable to sustain 3 full time jobs.
307	I wish for my concerns to be noted in relation to the reduction of pesticides available to Irish Tillage Farmers. As you are aware these products are rigorously tested and farmers do not use these products unless necessary. Farmers are trained professionals and are very conscious to only use the minimum required. In our mild maritime climate this proposal will affect grain quality. These products are very important to control many diseases in Wheat, Barley and Oats. I think most people will agree that we need to have a stable food supply in Europe and in order to do so we need these products. We all saw what happened when the War broke out in the Ukraine last year, prices increased by 30% in a short number of weeks because we had to depend on grain imported from outside of the EU. There is little point in importing grain of a lower quality that was treated by chemicals that are no longer in use in the EU. If these chemicals are no longer available to tillage farmers in Ireland, the amount of grain that can and will be produced will fall dramatically over the next very short while. We will not need a review as to what has happened, if this proposal is implemented it will destroy a whole sector of Irish farming.
308	I strongly object to the SUR proposal. It will introduce more unnecessary paperwork to an already highly regulated industry.
309	We already have a serious decrease in available pesticide to protect our crops in particular winter wheat, given the nature of our climate we are more at risk of pest and disease than other countries. If we can't control disease to an acceptable level, it will follow that we will have significant yield reduction so making the crops non-viable, therefore putting our business and livelihood at serious risk, then what do we do? If it becomes unviable to produce our own crops then we won't have our own food source so putting our Island Country at risk to food security. Where does it come from then? We have an increasing population; we need to produce more food to feed this. With wars and natural disasters (i.e., earthquakes, climate change, etc.) food security and availability need to be protected and promoted. The economic risk also has to taken into account, i.e., job's, local business, having to import food, will it be available and at what price, money going out of our country.
310	We are very concerned about the reduction of pesticides available to Irish Tillage Farmers. All of these chemicals are rigorously tested and farmers do not use these products unless it is very necessary. Farmers are trained professionals and are very conscious to only use the minimum required. These products are very important to control many diseases in Wheat, Barley and Oats. Now more than ever we need to have a stable food supply in Europe and in order to do so we need these products. Prices increased by 30% in a short number of weeks last year when the war broke out because we had to depend on grain imported from outside of the EU. There is little point in importing grain of a lower quality that was treated by chemicals that are no longer in use in the EU. If these chemicals are no longer available to tillage farmers in Ireland, the amount of grain that can and will be produced will fall dramatically over the next very short while. We cannot stand by and let a whole sector of Irish farming be destroyed by this decision.

311	<p>It is with interest and concern that I have watched the proposal for a 50% reduction in pesticide use emanate from the EU. As a parent and someone with a lifelong love for the natural world, I care greatly for the protection of our natural environment. I enjoy showing my daughters the local wildlife and explaining to them how nature works and the science behind it. The current proposal to reduce pesticide use in the EU is what I consider a blunt and ill designed ruling designed to satisfy those who think that pesticides are intrinsically bad. These very pesticides are essential for producing the very food on which we rely. Without this ability to use chemicals to control diseases, pests and weeds, we will expose our populations to food shortage. We have seen in the past 12 months just how little surplus food there is in our production systems, anything that we would do to further threaten these production systems is at a minimum, fool hardy. As part of my professional role, I work with international plant breeders. These plant breeders are our greatest hope of maintaining sufficient food production. Technologies such as Gene Editing are very welcome and to my mind essential but they are not a silver bullet. Through my interactions with crop genetics and chemical plant protection, I have learnt that pesticides and plant genetics are needed to work mutually together and to protect each other from the development of resistance in a given disease or pest. I also work with organic farmers in my professional role and I can see just how unproductive a lot of these farms are. They require more land to produce the same amount of food as conventional agriculture.</p>
312	<p>I disagree with the proposal to impose a 50% reduction in pesticide use. Firstly, there is no science or research to show any environmental benefits to support these proposals, in fact the proposed figures are based on the ideology of the green agenda. The SUR will reduce the sustainability of both tillage and low carbon grass-based livestock production systems. Sustainability should encompass 3 key pillars: environmental, social and economic. These proposals have no science to support environmental sustainability. In fact, the proposal states that it will have a negative effect on the economic output for farmers and from a social point of view increase the cost of food and decrease food security for the consumer. We have recently seen implications of the Ukraine war and the lack of European policy in terms of food and energy security. The European pesticide registration process is the strictest in the world, which is great because it ensures safety for product users and consumers of food. These high standards already leave European farmers at a severe competitive disadvantage when compared to the rest of the world, particularly in terms of the tools available to produce food. European farmers produce food to higher standards than anywhere else in the world but have to take world market prices. We do not have access to genetically modified crops. Gene editing is one proposal that may help reduce our requirements for pesticides. However, Irelands climate is very different from the rest of Europe so the same gene edited varieties will not be suitable for growth all across Europe. In fact, due to Irelands relatively small area of tillage crops, it may not be economically viable for seed companies to develop varieties suitable to our climate. These proposals will reduce EU agricultural output, therefore increasing Irelands and EU reliance on imported grain and feed, which has a higher carbon footprint and environmental costs. This imported feed is produced in countries where pesticides which are banned in the EU can be used,</p>

	<p>this results in higher levels of pesticides and non-EU registered pesticides in the food chain. Irelands temperate climate means we have a high yield potential and a higher requirement for pesticides versus the rest of the EU, therefore these rules will have a greater impact on the sustainability of the Irish Agri sector. High yielding crops sequester more carbon into the soil, a drop in crop yields will lead to a reduction in the capacity of arable and grassland to sequester carbon. The loss of pesticides will reduce tillage farm incomes and increase the amount of labour required to grow crops. This additional labour is currently not available all across Europe. A drop in incomes will lead to a decrease in the area of crops grown in Ireland. This goes against Irelands climate action target of having an extra 40,000 Ha of tillage by 2030. Regarding Sensitive Areas pesticides go through a rigorous registration process which covers the correct use of products by professional users. Buffer zones, appropriate dose rates and other restrictions already apply. Pesticides are an expensive input for farmers and are only used when necessary for food production. I agree with heavier restrictions on their use in public or amenity areas but not for farmland. In general, farmers main source of advice is from agronomist retail or independent, all of whom are qualified pesticide advisors and are obliged to complete continuous training. The best person to provide advice on integrated pest management is the person who is most familiar with the farm and farmers business. There are not enough independent advisors in the country to give the informed advice to individual growers. Many of the independent advisors spend most of their time in offices completing paperwork so are unavailable to carry out crop walking at the peak growing season when the main IPM decisions are made. All pesticide advisors complete regular IPM training to stay registered as advisors.</p>
313	<p>I am availing of the opportunity to respond to the Public Consultation on the European Commission's proposal for a Sustainable Use of Pesticides Regulation. I fully support the measures that aim to protect the environment from the possible risks of pesticides and also human health. However, I advocate that this should be achieved without compromising farm productivity. The Climate Action Plan 2023 outlined by Government aims to increase tillage to 360,000 hectares by 2025 and to see a further increase in tillage area to 400,000 hectares by 2030. This aims to encourage farmers to help reduce overall emissions by improving carbon sequestration. We see that this will be a significant challenge to achieve these targets due to the demand for productive land in the area. At a time when we are trying to encourage farmers to move towards tillage the Sustainable Use of Pesticides Regulation will limit the access to plant protection products available to them to farm that land efficiently and productively. If farmers do not have access to the plant production products required to grow crops the volume and quality of the product could be reduced. Decreasing yields and reduced productivity of land will ultimately result in more land needed to grow the same amount of food. The exports of dairy produce and meat are hugely important to the Irish exchequer. The basis for our dairy, beef and lamb farms is the production of high-quality grass and forage products. Grassland productivity has increased greatly in the last decade and this is due to better grass management at farm level, more reseeding and plant breeding. Controlling grassland weeds through appropriate use plant protection products has increased the production of grass per hectare</p>

	<p>and also improved the quality of grass silage. If grassland weeds cannot be controlled by the use of plant protection products it will ultimately reduce productivity of grass and increase Irelands reliance on imported feed products. Irish produced grains are vital for our animal feed sector and a large proportion of the grain grown in Ireland is used by companies like Brett Brothers and other feed companies. The animal feed sector is part of the human food chain as we feed the food producing animals. We take in tons of Irish produced grain that is used in the manufacture of animal feed. 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. Recent events in Ukraine have highlighted EU food security and further regulations could make it more challenging to produce our food. The measures to reduce the risks of pesticide use are necessary but we do not want to find ourselves in a situation where we are even more reliant on feed and food imports because regulations lead to reduced productivity at home.</p>
314	<p>I must object to a lot of the proposed changes to the sustainable use directive reported. Whilst I fully support measures to increase training requirements and awareness of IPM, and increased regulations around equipment used to apply Crop Protection Products, I am against a dramatic reduction in available pesticides without alternatives being in place. We are living in a period of food shortages around the world and in most cases, a reduction in Plant Protection Products would result in reduced yields. In our climate there is no meteorological control of fungal diseases, very little natural control of weeds and limited crops to choose from. Without genetic help and biological control products we are left trying to maximise yields with a limited arsenal of plant protection products.</p>
315	<p>I feel we are under enough pressure as it is to grow cereals using fungicides to control diseases and herbicides to control weeds without further restrictions upon us. Any reduction in the availability of these products will put our business at a serious competitive disadvantage over businesses using imported cereals from abroad where no such restrictions are being observed.</p>
316	<p>Reducing pesticide by 50% with no viable alternative will destroy my farming business for the future.</p>

317	<p>Prior to the advent of technology advances of 1970/90, Irish agriculture was based on a modest output mixed enterprise model. "REAL" value of output was considerably greater than that of today. Farmers could prevail despite sometimes catastrophic failure in individual enterprises precipitated by adverse weather, disease, weed competition and pest attack, in crop production such losses were manifested in lodging of crops, fungal disease attack, weed competition, insect infestation at various stages of crop development. Market pressures led to adoption of new technologies to minimise such losses. Specialisation became essential as competent labour supply reduced, necessitating investment in buildings and equipment. All the while the "REAL" value of output fell. Farmers could no longer sustain the risk of sub optimal outputs. Pesticides reduce this risk. Outputs had to increase to compensate for ever reducing real value as consumers clambered for ever cheaper food. Food expenditure as proportion of disposable income fell from 40% to as little as 10% in developed economies. Import price pressure further affected farm income. The current commission proposals further disadvantage EU producers especially vis a vis third country imports. In Ireland due to our geographical location, we operate in a mild moist climate, with good growing conditions ideal for plant development, however these conditions also favour the development of yield reducing weeds, pests and disease. Few other areas of the EU share these Atlantic maritime conditions. If crop production in Ireland is to be continued as part of agriculture, then special consideration will have to be given to the implications of the commission proposals. Failure for this to happen will undermine a very significant portion of our food and beverage industry. Consumers will lose as third country imports substitute very often with production at the expense of the wider world environment together with the application with unacceptable standards. Similarly, consumers have repeatedly shown that aspirations of revised standards rarely concur with a willingness to pay higher prices. While I appreciate that in the past pesticides which were highly persistent and sometimes toxic were used widely. Today's systems of testing, evaluation and monitoring offer a far greater level of safety than ever before. The example of glyphosate, the most widely used herbicide used in the world, is an example of how populist opinion is being manipulated contrary to scientific research. The classification of "probable carcinogen" pales to insignificance when compared to the proven carcinogenic effects of alcohol, processed meats, partial carbonized foods and tobacco among many other ingested and contact compounds encountered by people worldwide. If the same level of public concern were applied to the thousands of chemical compounds that are used outside of agriculture, populations would have to forgo a significant portion of their improved comforts and standards of living. Without various significant in bio engineering using techniques such as gene editing it would be impossible for farmers to profitably meet market demands under the regime proposed in the SUR especially in maritime Ireland.</p>
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318	<p>My future livelihood for the next 30 years depends on a sustainable and vibrant agri industry which I believe will require a blend of biological control agents and agri-chemicals with IPM at the core of our decisions. I believe the four main objectives outlined the SUD are very important for the future of a sustainable agriculture and food production and are in line with other European environmental Policies. However, I am not sure that the implications of reduced food production and food security have been fully calculated, especially in an Irish context where we will be importing a larger quantity of our cereals. There is no doubt that the prophylactic use of pesticides and chemical fertilizer in an unregulated market of the mid 1970's to early 2000's where the European mantra was for increased production using the latest technologies has had a negative environmental impact in some areas, possibly less in Ireland because of the fragmented nature of the farm structure, but the policies of the day were for more production of safe food at a cheap price. Farmers were and will always be very successful at achieving the goal if they are financially rewarded to do so- farming is about ethical food production, but it is also a competitive business where people need to survive, from one generation to the next. There is an added complexity in all of this in that the science, often not fully understood until years after a strategy is employed at farm level, generally at great cost to the farm and then we realise that there is a significant environmental impact that we did not foresee. These informed decisions are made after consulting several years of research by government & EU bodies. Policies will always change and evolve over time. The aspects of the new SUR that I feel need to be addressed as it stands at the moment are as follows: 25 % organic - I don't believe in Ireland that we will achieve the yields/ and hence the lower prices required to develop a sustainable and 'real marketplace' for organic products in Ireland. As a result of this, a viable family farm, and rural agri-business network and workforce, part of what is required to maintain the fabric of rural communities as outlined in many of the EU policies will not survive. The 25% organic target is outlined in many EU documents, but I am interested to see the long-term study that suggests this is the optimum level. Is it that 25 % of all EU or Irish citizens would buy exclusively organic products? Or is there a study to show organic produce is always in short supply in supermarkets? The vast majority of people buy in supermarkets based on price, otherwise why would shops advertise based on price. Is there a supermarket chain in the Western world that sells only organically produced products? I feel that the EU is chasing an ideal rather than something that the majority people want. People want safe, cheap food. Farmers and the agri-industry are expected to put the sustainable and environmental part to it for free, the Commission don't want to pay and the consumer don't want to pay, so it is being taken from the agricultural fund because they have always achieved what is expected. A common theme in my submission is that a lot of what is proposed is acceptable to a point, however we need to get increased funding from Brussels to achieve it, as there will be hugely increased production costs due to administration, consultancy, and research. We must also determine the carbon-footprint of organic systems in terms of how it compares to conventionally produced product per ton. The 50% reduction of total products is possibly achievable, as products coming to market now generally have lower conc. Of active, however, research and development are costing more and hence the products that we will have are very</p>
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	<p>expensive. The 50% reduction of more hazardous actives (candidates for substitution) will be more difficult- in most situations currently, there is no more sustainable alternative, it might require more intensive soil cultivation etc, or mechanical destruction of haulm which can lead to a requirement for other pesticides being applied to the grain/ tuber or to myco-toxins developing on the grains as a result of fusarium etc on grains- which can be prevented by the application azole fungicides. When the EU begin to analysis of annual reports and implementation- who decides or will advise them on progress? Will difficult weather seasons for disease control be considered, who will have the most technical people available, the NGO's or the food producers, we must give the power back to the scientists who understand food production and food security. IPM – this is already required by many end-users, and is already practised by most farmers already, especially within the tillage industry. We need to develop a system where IPM can be depended on, and this will require a larger effort by end-users to accept product that doesn't exactly conform to visual aesthetics, odd slug-hole or wireworm damage in a root-crop. There will need to be a lot of funding made available to bodies to complete research to try and determine over time the net gains/losses from accepting a certain level of damage in a crop and develop thresholds- crop-specific rules. This will require an increase in EU funding to research bodies and to develop a strong panel of consultants from both sides within Ireland, including farmers/ processors/ economists/ supermarkets/ food science and residue experts to explain our case to the European Commission, in the event that we can't reduce the pesticides enough. E.g., Fungicides for potato blight. At what point would it be determined that the IPM was not taken seriously, and we still used the chemical regardless? If the PU (farmer) decides to use a chemical intervention anyway, as an agronomy company, will we be allowed to offer advice on IPM? the current draft would suggest that we would have a conflict of interest. Will there be a standard fee developed that a farmer would pay to a consultant to explore all IPM measures? The best / most focussed agronomy minds in the fields in Ireland work in the retail of agrochemicals. Will Teagasc be able to provide the people to offer the advise? They have excellent people, but not enough of them. The electronic register is a good idea, but it will be slow to implement on a national basis, over time it will improve as technology will make it easier for people to record/ upload the decisions they are making on the move, however again there is a huge cost to this, more funding will be needed. However, how will it be operated, who will regulate it, large initial cost, will there be a bonus to a farmer to upload his application records on a monthly basis? All this requires more funding- remember most of the profits associated with tillage and dry-stock farms comes from the European Payments at the moment, if we develop the industry into a situation where the basic supports are dependent on the records the industry will falter.</p>
318(a)	<p>Ch5, 18. Use of plant protection products in sensitive areas... the whole of Ireland will be affected by this as a Nitrate Vulnerable Zone. Drinking water abstraction points- what is the meaning and implication of this? Will it be the catchment area of any abstraction point classified as a sensitive area. This could potentially eliminate the use of PPP in Ireland also. We have a target to increase our tillage area in Ireland and I don't see how this could be achieved under these proposals, it will be difficult to produce crops in Ireland without some small form of chemical intervention- our maritime climate with growth for 10 months of year is</p>

conducive to weeds and fungal attack to plants. Our network of farms and water abstraction is different to that on mainland Europe. I think the fragmented nature of our tillage farms and the wide range of drilling dates and crops will be a huge bonus in achieving concessions to the regulation as it stands. We need to break up the continuous grassland, most of EU has the opposite issue. I am assuming it won't be passed as draconian as it is at the moment, and then we have other issues. Would there be an annual derogation to allow use of a product if IPM isn't adequate? i.e., Assume the IPM won't work before we start, or will the derogation be available within 24 hours of decision to intervene with a chemical? Decisions to apply or not would be made depending on a weather forecast, and be acted upon within hours, could a competent authority deal with this? Who will be the competent authority? The agronomists of the area? Under what basis would they reject? I don't think this will work. There will need to be benchmarking between different farms/ farmers around the country for different crops, or possibly signpost farms to see what can be achieved over time in different parts of country. This would then be available on-line for all within that sector to view and make more up to date decisions for their own area. Would there be a legal liability to an advisor for poor IPM, or the opposite, prophylactic use of chemicals. There will need to be a lot of work here. I think there needs to be a fund created for the training of staff within the industry (chemical retailers/ co-ops) there is a big cost to companies having staff trained, in terms of the cost (IASIS and the downtime). We send staff almost every season and this costs money. This is the main point of contact for information for farmers at the time of use of these products, we can help farmers to think outside the box. I also feel that the training needs to be updated and improved considering the latest technologies and thinking in terms of sustainable agriculture, especially for older people (age 40 + as they have a large influence) within the industry because the concept won't always be funded by margin on sales of product, but the expertise of the industry is within these companies. The sustainability story needs to be sold and encouraged, not forced. These companies are on every farm in Ireland, Teagasc etc. are only present on some, where the farmer wants to learn. Independent Advisory System- the nature and scale of PPP industry in Ireland will dictate this won't work- In Ireland most companies have an account with all the different manufacturers and hence different active ingredients, so the best active for the job will always be recommended. Most of the recommendations here are acceptable and, in my opinion, necessary if we are to try and prove to the NGO's and the general public that as an industry, we are very responsible and serious about how we handle these products and that we will go to a lot of effort to prove that we want to produce safe food in an environmentally sustainable manor. History has shown several times that when Irish farmers and the agricultural industry are incentivised financially, they will achieve results. The European Commission needs to understand that the rural economies of which it uses as a brand across the world cannot survive if the general public continue to expect an abundant guaranteed supply of sustainable, healthy, nutritious, safe and CHEAP food. The only issue is the cheap food.

319	<p>I do not wish to see a restriction on the sale of glyphosate. It is an effective and safe herbicide which allows me to no till crops and grow covers which offers good soil and environmental health benefits. I'd rather see a IPM consultation performed by a CA that's farmer led and not by a CA that's not agriculture related. Any digital record keeping should not be at the farmer's expense. If there is a digital record to be kept, then it should from an open-source program and not from any advisory that will charge for its use. In an effort to reduce pesticide store and use and transport chemical companies should offer product in smaller can sizes of 1l as well as 5 and 10 litres can sizes. This will stop rounding up or down application rates. If a reduction in applied pesticides is required, it should be by volume applied and not by banning any more actives. A farmer should have options available to use should it be necessary. This I believe will have more environmental gains then removing an active and having to use more, of a less effective option. A buffer strip should also take in to account the width of a hedgerow. This is not continental Europe where they never enjoyed the benefits of the enclosure acts.</p>
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