

13th August, 2020

Response to the Austrian proposal re. Prohibition of the placing on the market of plant protection products containing the active substance Glyphosate.

The Irish Farmers' Association is the largest national farm representative organisation in Ireland, with over 72,000 members. We represent farmers in all sectors through our democratic structure of 29 County Executives and our ruling body the National Council, on which each county and each commodity is represented. IFA represents farmers with Government, agri-business and retailers. Through our Brussels office and affiliation with COPA-COGECA, we maintain a full-time presence at EU level on behalf of Irish farmers.

The EU Commission has published a notification of the Austrian government's intention to legislate regarding "The placing on the market of plant protection products containing the active substance glyphosate is prohibited in accordance with the precautionary principle."

Glyphosate based herbicides are one of a number of important tools for weed management in Ireland and across the EU. They are used by farmers, as an effective, safe and economical way of managing weeds. It is particularly important regarding the use of min -till systems in the tillage sector, which are promoted as being of environmental benefit.

The proposed Austrian legislation risks undermining the work of EFSA and potentially other EU institutions without evidence to support a ban. There is no scientific basis for the Austrian governments proposal of a prohibition based on the precautionary principle. In addition, to our knowledge, the proposal from the Austrian government does not contain any new facts or scientific basis to justify their intention to prohibit use of the product.

IFA object to such legislation on the grounds of the precedent it sets and the departure is representing from a common, science based regulatory system for plant protection products in the EU.

This unilateral action taken by Austria is in direct contravention to a number of EU regulations. IFA believe this proposed legislation represents a breach of the single market and common harmonised approach to regulating active substances in the EU. Such a ban is unjustified based on the conclusions regarding glyphosate of EFSA, ECHA and other EU regulators including the regulatory authorities here in Ireland.

The commission implementing regulation (EU) 2017/2324, granted approval for the registration of Glyphosate throughout the entire EU until December 2020. While the Austrian move is not related, we would be concerned that it could have undue influence on the re- registration process for the product.

In view of the vital importance of Glyphosate to the viability of Irish and EU agriculture and, the scientific process which authorised its reapproval in 2017, we therefore fully support the Austrian Chamber of Agriculture's appeal against a national ban of glyphosate in Austria