

CELT (Centre for Environmental Living & Training) call for a complete ban on the use of cypermethrin in Ireland.

The health of the environment in Ireland is of the utmost importance regarding the continued good health of the people, animals, birds and plants that inhabit this island and is directly related to the economy which is highly dependent upon agriculture and tourism. The use of toxic chemicals is to be avoided at all cost if Ireland is to maintain its status as a clean, green and healthy place to live or to do business with.

Regarding the Coillte /FSC request for a derogation to allow the continued use of the pesticide Cypermethrin for the control of pine weevil for the next 5 years is for:

- (1) a complete and immediate ban on the spraying of Cypermethrin in Ireland
- (2) a complete and immediate ban on the dipping of plants in Cypermethrin in the nurseries

In section 3.10 on the 'Longterm management of Publicly owned Forests' of the Environmental Pillar Tree Cover Policy document 2010, there is a call for a tight restriction on the use of pesticides and herbicides in the context of phasing out Clearfelling and increasing the proportion of stands managed under Continuous Cover Forestry (CCF) Tree Cover Policy | Environmental Pillar <http://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=0CCcQFjAB&url=http%3A%2F%2Fenvironmentalpillar.ie%2Ftree-cover-policy%2F&ei=EhqRveDeNrOv7Ab5zpGoDA&usg=AFQjCNESaohlsgbEPnbIVBJuZgaMgVjUOQ&sig2=Lj5Y3TaQRI8REwcy6Ezw-Q&bvm=bv.96783405,d.ZGU>

Some of the benefits of ending the use of Cypermethrin could be:

- ☐ Delayed replanting, allowing time for some diverse species natural regeneration to occur
- ☐ A reduction in the size of plots where clearfelling is applied
- ☐ A major increase in the application of Continuous Cover Systems
- ☐ More Structural and Species diversity in the design and management of future stands for both afforestation and reforestation
- ☐ A re- evaluation of optimum log size and rotation lengths combined with timber product innovations
- ☐ Healthier working conditions for manual labourers/ operatives
- ☐ Reduced harm to bees and other pollinators
- ☐ Reduced threats to Aquatic organisms
- ☐ Further innovations in biological controls and nontoxic inhibitors

The above is based on the information in the consultation documents:

http://www.coillte.ie/aboutcoillte/about_coillte/fsc_pefc/application_for_cypermethrin_derogation

And compared with a recent Welsh report: Cypermethrin Presentations - Natural Resources Wales
<http://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&cad=rja&uact=8&ved=0CDgQFjAC&url=http%3A%2F%2Fnaturalresources.wales%2Fmedia%2F2738%2Fcypermethrin-presentations.pdf&ei=KhKRVcPiNsiX7Abdz4HwCg&usg=AFQjCNEgL9I4NxSxHIYcZxIGUYrCB3XS4g&sig2=I9g6xZO6B5cM-481WNf7IQ&bvm=bv.96783405,d.ZGU>

And looking at the description of Cypermethrin on the FSC 'highly hazardous list';
<http://www.fsc-uk.org/technical-updates.99.246.htm>
Plus a reading of links about harm to bees and other pollinators, in Appendix 1

Appendix 1: further information

Further information has been requested, from the Forest Service (FS), under the Freedom of Information on the Environment Act, to clarify how the use of Cypermethrin is governed by the Biodiversity Guidelines of the FS and how Coillte Teo and IFORUT, (the parties seeking another 5 year derogation), are being monitored and assessed for compliance by the Forest Service.

Greenpeace put out a press release on 17th April 2014, calling on the European Commission to fully ban all pesticides harmful to bees and other pollinators, including Cypermethrin, See detail in link below

The Bees' Burden New Greenpeace report reveals pollen ...
<http://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=70&ved=0CGQQFjAJODw&url=http%3A%2F%2Fwww.greenpeace.org.uk%2Fmedia%2Fpress-releases%2Fbees%25C2%25B4burden-new-greenpeace-report-reveals-pollen-collected-bees-contaminated-cocktail-toxic-pesticides-2014&ei=OF6NVdLMNIXOUOHPoRA&usg=AFQjCNEbXEqK-fJa8J0EOqc8DCGyLjHPzA&sig2=FohFJqGfBJpKNYY5XA37w&bvm=bv.96782255,d.d24>

The Guardian carried an article on 28th January 2014, with many additional links :
London bee summit: pesticides or no pesticides? - The ...
http://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=81&ved=0CB8QFjAAOFA&url=http%3A%2F%2Fwww.theguardian.com%2Fenvironment%2Fworld-on-a-plate%2F2014%2Fjan%2F28%2Fhoneybee-neonicotinoids-pesticides-bee-summit-colony-collapse-disorder&ei=rWGNVcy2FonBU-jwnqgN&usg=AFQjCNHaGRfiOZ1io47cwqM7bWCLLXUg0A&sig2=9ykVxQK4NJRyTI_5hfc0tw&bvm=bv.96782255,d.d24

Our contact on the EU Forum of expert group on 'sustainable use of Pesticides' List of participants attending on 20 June 2012, Brussels is :

gordon.rennick@agriculture.gov.ie

The EU legislation governing this area is: Sustainable Use of Pesticides Directive – EGA
http://www.google.ie/url?sa=t&rct=j&q=&esrc=s&source=web&cd=8&ved=0CEgQFjAH&url=http%3A%2F%2Fwww.ega-golf.ch%2F070000%2Fdocuments%2FSustainable_use_of_pesticides_Directive.pdf&ei=6h-RVZeICNKQ7Abp56mQAQ&usg=AFQjCNTrMBUgHPaIRhI0BjYVCDEhvPS8w&sig2=wBUXvUdi9JEmC4kPIfRkmA&bvm=bv.96783405,d.ZGU&cad=rja

Signed : Robert S Wilson

CELT (Centre for Environmental Living & Training), Gleann Glas, Tuamgraney, Co.Clare, Ireland