



# Submission of the Environmental Pillar on the Coillte facilitated consultation on the use of Cypermethrin by FSC<sup>®1</sup> Forest Management Certificate Holders in Ireland.

3<sup>rd</sup> July 2015

The Environmental Pillar proposal 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 immediate ban on the spraying of Cypermethrin on re-afforestation sites**

**(2) an incremental phasing out to zero of the dipping of plants in the pesticide in the nurseries over the next 5 year period, to allow for the phasing in of alternative approaches to coping with the impact of pine weevil on Spruce and Pine species**

In section 3.10 on the 'Long-term 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 Clear-felling and increasing the proportion of stands managed under Continuous Cover Forestry (CCF) [Tree Cover Policy | Environmental Pillar](#)

**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 clear-felling 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 re-afforestation



- 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

**Some of the potential “negative” consequences from ending the use of Cypermethrin are:**

- A possible increase in the use of herbicides before replanting
- An increase in re-afforestation costs
- Unintended consequences of biological controls or other measures
- A reassessment of asset values in Coillte Teo., IFORUT and others
- A recalibration of timber supply forecasts on an all island basis

The above is based on:

- the information in the consultation documents:  
[http://www.coillte.ie/aboutcoillte/about\\_coillte/fsc\\_pefc/application\\_for\\_cypermethrin\\_derogation/](http://www.coillte.ie/aboutcoillte/about_coillte/fsc_pefc/application_for_cypermethrin_derogation/)
- Compared with a recent Welsh report: [Cypermethrin Presentations - Natural Resources Wales](#)
- The description of Cypermethrin on the FSC 'highly hazardous list'; <http://www.fsc-uk.org/technical-updates.99.246.htm>
- The evidence regarding harm to bees and other pollinators, in Appendix 1 below



## 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. The reply from FS may not be received before the consultation response deadline of 4th July next.

Greenpeace put out a press release on 17<sup>th</sup> 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 ...](#)

The Guardian carried an article on 28<sup>th</sup> January 2014, with many additional article links at:

[London bee summit: pesticides or no pesticides? - The ...](#)

The EU legislation governing this area is] [Sustainable Use of Pesticides Directive - EGA](#)



*This submission was developed using the Environmental Pillar processes but is not necessarily the policy of each member group in the Pillar.*

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