



THE FAMILY FARM ORGANISATION

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**Re: Veterinary Medicinal Products Medicated Feed and Fertilisers
Regulation Bill 2022.**

Dear Sir/Madam,

Thank you for the opportunity to provide our comments and concerns in relation to the above Bill. On a general comment, ICMSA's view is that the Bill if implemented as proposed will result in further additional regulation on farmers that will do little for environmental improvement or veterinary medicine usage. For example, a farmer will now be required to register with the Department to purchase fertiliser, the Department already has all farmers details so why the necessity to register and impose more bureaucracy on farmers? The current Bill is complex and ICMSA believes that it needs to be simplified considerably. ICMSA as previously discussed with the Committee is deeply concerned at the direction of policy on these matters and the proposed Bill again justifies our concerns.

ICMSA strongly believes that the Terms and Conditions of the National Fertilizer Database need to be kept simple for both the merchants who must register the chemical fertiliser and for the farmer. The register must be farmer friendly and should be similar to the AIMS system where the farmer has access to their information at any time and the merchant should also be obliged to update the farmer when they are approaching their limit.

The family farm structure has dominated Irish farming delivering huge benefits for Ireland and rural areas in particular. The family farm structure has never been under greater threat with greater regulation under a number of headings adding significant costs and red tape.

The following are ICMSA comments on specific aspects of the Veterinary Medicinal Products Medicated Feed and Fertilisers Regulation Bill 2022:

Page 7, Section 5 (1)

ICMSA believes greater clarification is required around this matter and there is a need to take into account the practical reality facing farmers and vets on a daily basis. Given the pressures on farmers and vets in particular in the spring period, the Bill needs to allow for a sensible and practical approach in relation to the issuing of prescriptions.

Page 7, Section 5 (4)

It is absolutely essential that licenced merchants remain available to farmers to supply veterinary medicines in terms of ensuring competitive prices and also ease of access to essential veterinary medicines. ICMSA believes that licensed merchants should be included under Section 5 (3).

Page 8, Section 6 (1)

ICMSA strongly believes that a farmer should be able to get a prescription for as long as one year. The Bill needs to recognise the realities of farming and veterinary practice in terms of the availability of vets in some areas and thus should allow for a prescription of up to one year for specified veterinary products.

Page 9, Section 7 (3)

Greater clarification is required in relation to the GDPR aspects on this matter. Permission should also be sought from the farmer prior to any of their information being shared.

Page 14, Section 11

All veterinary medicines should be available to a farmer from a pharmacy, veterinary or a licenced merchant.

Page 14, Section 11 (3)

Further clarification is needed in relation to this matter. It is essential that antiparasitics continue to be available from licensed merchants.

Page 15, Section 13 (1)

ICMSA believes that the practicality of this measure needs to be established given the size of the bottles/containers containing medicines.

Page 19, Section 18 (1)

It is absolutely essential that the management of this does not undermine the operations of a single veterinary practice compared to a corporate veterinary practice and secondly, that licensed merchants are not disadvantaged in any way.

Page 29, Section 24

Clarification is required regarding the postage/courier of a veterinary medicine from a legitimate veterinary service. Given that Ireland is part of the single market and there is evidence that veterinary medicines are more competitively priced in other member states, the Department need to explain the basis for excluding purchases from approved sources. Clarification is also required where a farmer is farming land on both sides of the border with Northern Ireland.

Page 30, Internet retail

ICMSA believes that a farmer should be able to purchase veterinary medicines from a legitimate source online e.g., online co-op stores whether in Ireland or within the EU. The legislation allows a veterinarian to purchase online outside of Ireland so there is no reason that a farmer should not also be allowed to do so.

Page 35, Section 29 (1)

The basis in which such restrictions would be put in place must be specified.

Page 41 Part 3 Enforcement

It is important that the powers under this section are used in a fair and balanced matter. A complaints procedure must be available for people that feel they were unfairly treated.

Page 66, Section 56 (b)

ICMSA is seeking clarification for the inclusion of a dwelling house under this section.

Page 70, Section 7B (1)

ICMSA is of the view that a farmer should not have to apply to be on the register, they should automatically be on it. Clarification is required on the requirements for a farmer to become a professional fertiliser end user.

Page 70, Section 7B (2)

Clarification is required in relation to this issue.

Page 70, Section 7B (3)

ICMSA believes that the Department of Agriculture needs to clarify its basis for this proposal, for example, what has a farmer to do to apply to the register and why would a farmer provide misleading information?

Section 7B (4)

ICMSA is of the view that to minimise confusion, a farmers unique professional fertiliser end user registration identification number should be their herd number or some other existing ID number.

Page 70 Section 7B (8)

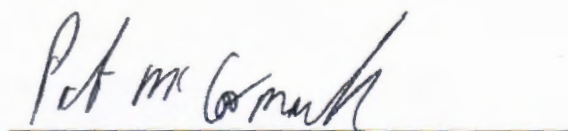
ICMSA strongly believes the responsibility should fall on the Department and merchant to ensure the person they are selling fertiliser to is entered in the register. It is ridiculous that a farmer has to make an application to be part of the register.

Page 74, Section 7D (6)

ICMSA is very concerned of the level of detail required here and believes the Department of Agriculture needs to ensure the National Fertiliser Database is as simple as possible. Most of this data should be provided at the point of purchase and the onus should not be on the farmer to provide this data.

The above are comments on specific aspects of the proposed Bill and ICMSA believes that the Bill needs to be amended to reflect the practical realities of farming and indeed veterinary practice while respecting the objectives of the Bill. ICMSA believes that the Bill is overly complex and needs to be simplified.

Your sincerely,

A handwritten signature in black ink, reading "Pat McCormack", is written over a horizontal line.

Pat McCormack,

President of ICMSA.