

European Golf's position on the Sustainable Use of Pesticides

(SUR 2021/2115)

19 September 2023

The European Golf Association (EGA), with the support of The R&A, Federation of European Golf Greenkeepers Associations and European Tour Group, welcomes and supports the EU's ambition to minimise human exposure to plant protection products (PPPs) and the Commission's proposal for the Sustainable Use Regulation (SUR 2021/2115) in Pesticides.

We see the ongoing discussions on the SUR as an opportunity for the turf sports industry to cooperate closely with the EU institutions to be a part of the necessary paradigm shift, while maintaining a flourishing European turf sports sector as enjoyed by millions of European citizens.

We outline a set of recommendations below which we hope will be a valuable contribution to developing this ambitious and effective policy framework.

1. Achieving progress towards a drastic reduction approach for sensitive areas

Our concerns:

The definition of sensitive areas, including "urban green spaces", "sports grounds" and with that golf courses, as currently spelt out, foresees a sudden and non-transitional prohibition of PPP use across all turfgrass sports. Given the nature of the proposal (a Regulation), this ban would be directly applicable in all 27 Member States, regardless of specific geographical conditions and current national legislation.

We believe that the proposed ban on PPP use in urban green spaces and sports grounds will lead to unintended economic, social and environmental consequences, including an industry-wide disruption with a drastic decrease in sports participation and tourism, thereafter, followed by a loss of employment and know-how, innovation and loss in biodiversity as a result. Moreover, a total and immediate ban on the use of PPPs in urban sensitive areas such as sports pitches and golf courses leads to a significant threat to existing business models of grassroots facilities.

Our actions:

The golf sector is committed to further minimising the use of and exposure to PPPs. We have been actively involved in chemical PPP reduction and minimisation strategies since the 2009 SUD and we look forward to continuing working both at the national and European levels to continue to improve the environment and human health.

The golf industry has undertaken a number of actions to sustainably manage turfgrass areas and to minimise human exposure to PPPs.

- I. **Human and health protection** - golf courses in Europe operate to maximize the protection of human health, through no access periods after PPP spraying, buffer and no spray zones.

- II. **Universal application of Integrated Pest Management (IPM)** – emphasis on plant health, mechanical and cultural practices, good diagnosis and setting of damage threshold are only a few of the several IPM techniques the sector has undertaken and implemented.
- III. **Monitoring and reporting** – golf has invested in the development of a range of internationally applicable and nationally focused tools to track IPM, associated chemical use as well as a range of other sustainability and climate indicators.

Our proposal:

As an alternative approach, the EGA calls on the Council to propose a **transitional phase-out schedule**, which would foresee a drastic reduction in chemical substance use on golf courses over the coming years, but would avoid leaving golf course greenkeepers without the tools to address specific situations which vary across the EU according to climate and geography. This would allow the sector to minimise the potential negative consequences and to further develop innovative techniques in turfgrass management.

In order to further minimise human exposure to PPPs, the sector is committed to develop complementary protocols. For this reason, the EGA with its national members in consultation with the GEO Foundation for Sustainable Golf and supported by the organisations to this position, has developed a **European Golf's Turfgrass Sustainability Roadmap 2023 - 2030**. This document lays out a series of voluntary, sector-specific commitments towards the safe, responsible and sustainable management of golf turfgrass.

With the Roadmap, the EGA and its member federations as well as the wider golf sector aim to deepen the current practices as key priorities to protect human health and the environment. We are committed to working with regulators to co-create a workable and sustainable solution for human health, the environment and the European turfgrass sports industry and agree to implement sizeable, drastic reductions in chemical PPP use. In this context, the EGA would welcome any comments Member State representatives may have on the roadmap.

2. Ensuring a practical derogation system

Our concern:

As currently stated, the ban on the use of PPPs in sensitive areas (Art. 18) includes only one time-limited and a strict derogation for invasive quarantine species. The EGA believes that this derogation does not reflect the needs of the sector which still relies on the very limited use of PPPs to solve problems relating to turfgrass pests, diseases and weeds, although great strides have been made to minimise the dependence on these substances over the last fourteen years since the SUD was implemented.

Our actions:

Plant protection products are still key to defend golf turfgrass and to ensure that fair playability standards are maintained. In particular, emergency spraying in targeted areas of short turfgrass playing surfaces that make up a small percentage of a whole golf course is fundamental, for instance to tackle fungal diseases, an example of which is dollar spot, the most widespread turfgrass disease around Europe.

Our proposal:



For this reason, we call on the Council to open up the derogation system to additional but minimal turfgrass sports' challenges and ensure that a "medicine cabinet" can be used by the turfgrass sports sector when necessary.

The EGA is ready to work together with the Council and other relevant stakeholders to co-create a functional, practical and sustainable derogation system, which would decrease the administrative burden on national governments and on the sector and would facilitate a further transition towards a sustainable European turfgrass sports industry.

We would appreciate the possibility of discussing the above-mentioned points to further explore how the turfgrass sports sector can contribute to the sustainable use of PPPs in Europe.

About the European Golf Association

The European Golf Association (EGA) is a non-profit organization which was founded in 1937. It is an association of 49 national golf authorities in the European Zone and concerns itself with matters of an international character. The EGA organizes and coordinates over 20 European amateur golf championships and international matches for elite amateur golfers in collaboration with its member federations.

On behalf of its members, the EGA acts as the official representative body to the European Union in environmentally sustainable golf and other legislative matters. The EGA also oversees the application of the World Handicap System in Europe.

The EGA recognises the complete independence of its affiliated members with regard to their respective domestic affairs. For further information, please visit www.ega-golf.ch.

With support from:

The Royal & Ancient (The R&A)

Federation of European Golf Greenkeepers Associations (FEGGA)

European Tour Group (ETG)

