



ITALIAN ASSOCIATION FOR PLANT PROTECTION
(ASSOCIAZIONE ITALIANA PER LA PROTEZIONE DELLE PIANTE.
AIPP)

Ancona, 12 December 2022

To the President of the European Commission
To the President of the European Parliament
To the President of the European Council
To the Italian Ministry of Agriculture, Food
Sovereignty and Forests
To the Italian Ministry of Health
To the Italian Ministry of Environment and
Energy Security
To the Italian Regional Agricultural Counsellors

Position of the Italian Association for Plant Protection on the proposal for a Regulation on the sustainable use of pesticides

The proposal for a Regulation on the sustainable use of plant protection products (Regulation of the European Parliament and of the Council on the sustainable use of plant protection products and amending EU Regulation 2021/2115) provides for a series of measures which are aimed at pursuing some of the objectives of the Farm to Fork Strategy of the European Green Deal, including at least 25% of the EU agricultural land under organic farming, halving per capita food waste at retail and consumer levels by 2030 and reducing the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030.

Among these worthy objectives, the measure concerning the 50% reduction in the use of plant protection products may risk creating considerable difficulties for the agricultural sector in various European Countries, including Italy. Farmers apply plant protection products to protect plants from pathogens and pests, which in the absence of treatments would lead to heavy production losses. In our country, Integrated Pest Management (IPM) with a low environmental impact has been developed since the 1980s and applied on a large scale through the regional “Guidelines for Integrated Production” leading to a more recent system of national certification (SQNPI). This has allowed, among other things, a significant improvement in plant protection strategies, both in the use of active substances of plant protection products, and in the implementation of more innovative defense

**ITALIAN ASSOCIATION FOR PLANT PROTECTION (ASSOCIAZIONE ITALIANA PER
LA PROTEZIONE DELLE PIANTE. AIPP)**

c/o Department of Agricultural, Food and Environmental Sciences, Università Politecnica delle Marche
Via Breccie Bianche, 10 - 60131 Ancona, Italy – e-mail: presidenza@aipp.it

Secretary: e-mail segreteria@aipp.it



ITALIAN ASSOCIATION FOR PLANT PROTECTION
(ASSOCIAZIONE ITALIANA PER LA PROTEZIONE DELLE PIANTE.
AIPP)

strategies and systems which have led to a certified decrease in the use of plant protection products. Furthermore, generalized and indiscriminate measures for the limitation and reduction in the use of plant protection products, if not carefully considered, could be incompatible with the quantitative and qualitative production that Italy is able to guarantee, both for internal consumption and for export, with serious damage to the sector and the entire Italian economic system. The major critical points that we want to highlight in the measures planned by the proposal of the Regulation concern the issues listed below:

Reduction targets for Plant Protection Products

The reduction targets defined for the European Union and for the Member States are not based on a thorough impact assessment. For Italy, a 62% reduction in the weighted quantity of plant protection products used compared to the period 2015-2017 and a weighted reduction of 54% in the plant protection products classified as the most dangerous, are indicated.

These objectives should be proportionate and realistic and accompanied by applicable and effective alternatives. The calculation methods proposed for the reduction of national targets are highly penalizing, as they do not take into consideration important factors, such as: agro-climatic conditions, crop intensity and variability, growing adversities caused by pathogens and pests (also of invasive alien species), the increase in populations of pests, pathogens and weeds with ever higher levels of resistance to plant protection products which are increasingly difficult to manage due to the reduction in the number of available modes of action. Furthermore, the significant reductions in the use of plant protection products already obtained in the past in Italy thanks to the widespread application of integrated pest management are not taken into consideration.

If these measures remain unchanged, Italy would be one of the most affected countries and would face a real collapse in agricultural production. In the absence of adequate technical tools and valid alternatives, there would be a drastic decrease in production per hectare, with no warranties of a real improvement in terms of environmental impact and health protection. For this reason, it is essential that unjustified restrictions are not adopted as these would penalize farmers throughout the European Union, and in Italy in particular, with the real risk of abandonment of the activity by many workers. It should also be considered that the target of increasing organic surfaces could make the reduction in plant protection products even more difficult, as many of the plant protection products allowed in organic farming, such as copper and sulphur, are used at higher doses of active ingredient per hectare than synthetic chemicals.

It is therefore considered appropriate to review the general approach of the Regulation underlying the principle of reducing the targets set for plant protection products, so that the objectives to be achieved are proportionate to the structure and production sectors of the individual Member States, to guarantee economic and social, as well as environmental sustainability of the agricultural sector. It is also considered appropriate to define a European Union regulatory framework that favours

**ITALIAN ASSOCIATION FOR PLANT PROTECTION (ASSOCIAZIONE ITALIANA PER
LA PROTEZIONE DELLE PIANTE. AIPP)**

c/o Department of Agricultural, Food and Environmental Sciences, Università Politecnica delle Marche
Via Breccie Bianche, 10 - 60131 Ancona, Italy – e-mail: presidenza@aipp.it

Secretary: e-mail segreteria@aipp.it



ITALIAN ASSOCIATION FOR PLANT PROTECTION
(ASSOCIAZIONE ITALIANA PER LA PROTEZIONE DELLE PIANTE.
AIPP)

the availability and accelerates the adoption of innovative technologies such as digital and precision tools, as well as products for biocontrol.

Use of plant protection products in sensitive areas

Although the formulation of specific rules aimed at the protection and/or restoration of natural elements in sensitive areas is desirable, it is considered harmful for the entire European agricultural sector, as well as unjustified from a scientific point of view, to place an absolute ban on the use of plant protection products in these areas. It seems obvious that a ban of this magnitude will jeopardize the good state of cultivation and protection of important European agroecosystems, such as for example the rice-growing ones, which occupy around 25% of sensitive areas in Italy. The current proposal for a Regulation would mean that it would no longer be possible to use any plant protection products for the management of adversities, with consequent reductions in production that could amount to more than 80% in the case of Italian rice. For this reason, it is essential that any measures adopted take in account the scientific evidence available today for the definition of concrete actions, which protect the environment and, at the same time, allow agricultural production to continue.

Integrated Pest Management implementation

The crop-specific rules implement the principles of IPM and are set out in a binding legal act. The proposal for a Regulation does not seem to take in account the differences between mandatory and voluntary integrated pest management, currently planned by Directive 128/2009 on the sustainable use of plant protection products, making it mandatory for all farms to adopt “Guidelines for Integrated Production”. In this context, the figure of the Independent advisor, already envisaged in the Rural Development Programmes (RDPs), is often hindered in its practical application by significant bureaucratic issues.

Given that phytosanitary products, like “drugs” in human and animal medicine, are mandatory and essential tools for taking care of plant health and allowing healthy, good quality and economically, socially and environmentally sustainable agricultural production,

we ask to:

1. Carry out an accurate scenario analysis that evaluates the impact of the proposed rules for the sustainable use of plant protection products on the crop production in the single Member States, taking into account the availability and levels of effectiveness of alternative pest management tools, before adopting a binding legal instrument such as the Regulation;
2. Reconsider the quantitative limits for reducing the use of plant protection products, subjecting them to an assessment of the impacts on the various supply chains, avoiding considering algorithms that do not take into due consideration the variability between the different environmental and crop growing conditions;

**ITALIAN ASSOCIATION FOR PLANT PROTECTION (ASSOCIAZIONE ITALIANA PER
LA PROTEZIONE DELLE PIANTE. AIPP)**

c/o Department of Agricultural, Food and Environmental Sciences, Università Politecnica delle Marche
Via Breccie Bianche, 10 - 60131 Ancona, Italy – e-mail: presidenza@aipp.it

Secretary: e-mail segreteria@aipp.it



ITALIAN ASSOCIATION FOR PLANT PROTECTION
(ASSOCIAZIONE ITALIANA PER LA PROTEZIONE DELLE PIANTE.
AIPP)

3. Facilitate the authorization process for plant protection products for minor crops, in order to limit exceptional uses, which have a high coefficient (HR1 value equal to 64) for the purpose of determining the amount of reduction required;
4. Promote the activation and diffusion of Independent advisors, limiting the bureaucratic aspects so as to facilitate practical application, and hence favour the adoption of the most sustainable and updated protection strategies;
5. Reconsider the ban of preventive treatments, which for some biotic factors (e.g. fungal and bacterial diseases), often represent the most rational integrated management strategy (prevention is better than cure), because curative applications are not always effective and can favour the selection of resistant strains to plant protection products;
6. Adopt the Leaf Wall Area and/or the Tree Row Volume in the expression of the dose of use of the plant protection products, as indicated in the EPPO guideline PP1/239;
7. Reconsider the ban on the application of plant protection products in sensitive areas, not underestimating the harmfulness of pathogens and pests and the need to protect crops even in these areas;
8. Contribute to the development of innovative defense technologies that can integrate plant protection products in crop protection programmes.

List of subscribers at the link [documento aipp sulla proposta di regolamento sull'uso sostenibile dei prodotti fitosanitari – AIPP](#)

The AIPP President
Prof. Gianfranco Romanazzi

**ITALIAN ASSOCIATION FOR PLANT PROTECTION (ASSOCIAZIONE ITALIANA PER
LA PROTEZIONE DELLE PIANTE. AIPP)**

c/o Department of Agricultural, Food and Environmental Sciences, Università Politecnica delle Marche
Via Breccie Bianche, 10 - 60131 Ancona, Italy – e-mail: presidenza@aipp.it

Secretary: e-mail segreteria@aipp.it