



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Deputy Director General for Food Sustainability Responsible for Directorates E, F and G

Brussels  
SANTE.DDG2/CB/

Dear Dr Romanazzi,

Thank you for your email of 27 December to President von der Leyen enclosing the position of the Italian Association for Plant Protection (Associazione Italiana per la Protezione delle Piante, AIPP) on the Commission's proposed Sustainable Use of plant protection products Regulation (SUR) to which I am pleased to reply.

I appreciate that you fully agree on the need to optimise the use of plant protection products. I acknowledge and understand the concerns you raise on the Commission's proposal.

On the issue of food security, the Commission has published on 4 January 2023 an analysis of the various drivers affecting food security and a consideration of the appropriate measures to be taken. Concerning the 50% pesticide use and risk reduction targets announced in the Commission's Farm to Fork Strategy, I would like to point out that the reference period for these targets is an average of the 2015-2017 baseline period. The latest available data for 2020 show that for the first target at EU level there has already been a 14% reduction from the 2015-2017 baseline period while for the second target there has been a 26% reduction. I hope you will agree that this represents good progress towards reaching these 50% targets by 2030.

I nevertheless acknowledge the concerns that have arisen as regards the calculation of Member State national targets and whether these targets can be realistically achieved by 2030, especially concerning the impacts of the war in Ukraine and the associated food security concerns which have arisen. The Commission is engaging constructively with Member States as regards their suggestions for potential alternative methodologies to calculate and allocate these national targets.

The Commission is working intensively with Member States and stakeholders on topics such as precision farming, integrated pest management, New Genomic Techniques and alternatives which can allow to reduce the use of more hazardous pesticides and candidate for substitution products. As regards sensitive areas, the Commission has produced in November 2022 a non-paper outlining options on how Member States might wish to amend this provision to safeguard agricultural production while still protecting health and the environment.

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As regards additional impact assessment work, the Council has adopted in December 2022 a Decision requesting further data and analysis from the Commission on various points linked to the legislative proposal. The Commission aims to respond constructively to this request.

Concerning increasing and supporting the use of alternative pest controls such as low-risk or bio-based plant protection products, the Commission has updated the rules to accelerate approvals and to increase the availability of micro-organisms, the biggest group of biological alternatives for farmers across the EU. As regards facilitating the approval of other biological solutions (e.g. pheromones and plant extracts), the Commission has already drawn up specific guidance documents, and discussion is ongoing on possible further relevant actions and regulatory initiatives. With the aim of increasing the capacity and expertise amongst Member States risk assessors and managers regarding risk assessment of bio-based plant protection products, training activities have been ongoing since July 2020, and specific additional grants will be provided by the end of 2023.

I would like to assure you that your detailed comments and concerns will continue to be taken into account by the Commission in the ongoing negotiation of this SUR proposal with Member States and the European Parliament.

Yours sincerely,

Claire BURY