

JOINT POSITION PAPER ON XYLELLA EMERGENCY AND THE PROBLEM OF OLIVE QUICK DECLINE SYNDROME (OQDS) IN APULIA REGION – ITALY

Following the adoption of the Commission Implementing Decision of 2015 as regards measures to prevent the introduction into and the spread within the Union of *Xylella fastidiosa*,

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urge to take action in order to protect the interests of organic operators, environmental and human health, social and economic interests in the territory that will be interested by the action plan on *Xylella* emergency and provide competent European and local Authorities with an active contribution by defining the required interventions to properly manage the emergency.

This Joint Position Paper is mainly focused **on three pillars**:

First Pillar: Large scale use of pesticides

General considerations

We are worried about the health and environmental consequences of the outbreaks of Xylella fastidiosa in the Apulia region. The European Commission implementing decision to prevent the spread of Xylella imposes the use of pesticide treatment in the areas where Xylella is diagnosed. It has been long proven that exposure of human beings to pesticides increases the probability to develop cancers or neurodegenerative diseases such as Alzheimer disease. Therefore, we urge European and local authorities to limit the use of pesticides and prefer biopesticides or low-toxicity pesticides. Before the scarcity of the knowledge on Xylella fastidiosa's mode of transmission and considering EFSA's report on the pest, we fear that a large scale use of pesticides will have a limited influence on the spread of the pest but disastrous consequences on human health and the environment. Therefore, we invite the Italian authorities and the European Commission to promote the development of more resilient modes of agricultural productions based on crop diversification, soil health and low-input farming in order to better cope with pests that regularly enter European agro ecosystems and benefit from our monocultures practices to invade the Union.

Taken into account the above General considerations and

A. whereas in many parts of the implementing decision there are references to compulsory phytosanitary treatments, also prior to the removal of plants;

B. whereas the “Eco-sustainable norms for crop protection” of the Apulia Region with regard to the organic farms specify, in the common management practices, clause 5 – products authorised in organic farming, that: “All active substances specified in Reg. CE 834/07 e 889/08 and s. a. and a. can be utilised, provided that they are regularly registered in Italy, except with regard to formulations classified as T and T +, which can be authorised only if specifically indicated in the crop technical norms”;

C. whereas at present, no active substance is duly authorised and registered in Italy (allowed in organic agriculture and not even in integrated agriculture) against the vector *Philaenus spumarius* L. (Meadow spittlebug) and *Xylella fastidiosa*; therefore it will be necessary to authorise some of them, notwithstanding the current regulations in the sector of crop protection;

D. whereas a number of active substances are available in the market, duly registered by the competent Authorities and authorised for use in organic agriculture (and by default also in the other eco-sustainable production methods, namely compulsory and voluntary integrated production methods). These technical means are effective also to control the vector and other pathogenic organisms that contribute to worsen the health of olive trees;

E. whereas from the elaboration of data of the Biobank Open Project system of the Apulia Region performed by CIHEAM-IAMB (Istituto Agronomico Mediterraneo) of Bari (Italy), it is estimated that, at 31st of March 2015, the total area covered by organic olive farms in the Lecce and Brindisi Province represents about 16% of the total area covered by olive groves in the Region, with the following distribution: province of Lecce 860 farms with about 15.199 ha, province of Brindisi with 700 farms with a cultivated area of 9.785 ha;

F. whereas the general conditions of the olive farms in the area, numerous and of small size, the proximity of the fields (as well as of settlements and touristic places), increase the risk of drift of phytosanitary products that are going to be used to limit the spread of the vector and protect olive groves;

G. whereas the detection of residues of substances which are not allowed in plant protection in organic farming, and also in eco-sustainable agriculture regime, would cause a very serious damage to the many organic (and not organic) farms, who sell certified product (it is useful to mention that the possibility to utilise active substances not included in the Reg. CE N. 889/2008 in case of “compulsory treatment” is provided for by Article 36 par. 4 of the same, above mentioned regulation and therefore there is no breach by the operator regarding the implementation of the “organic method” so to incur in suspensions or reductions of compensations coming from the Rural Development Programme);

H. whereas, in a recent scientific opinion on the risk assessment of *X. fastidiosa*, EFSA showed that ‘the intensive use of insecticide treatment to limit the disease transmission and control the insect vector may have direct and indirect consequences for the environment by modifying whole food webs with cascading consequences, and hence affecting various trophic levels. For example, the indirect impact of pesticides on pollination is currently a matter of serious concern (EFSA, 2013). In addition, large-scale insecticide treatments also represent risks for human and animal health’;

I. whereas the EU model of agriculture is increasingly based on unhealthy agricultural systems which are not resilient, with very limited attention to biodiversity and crop rotation in the case of non-perma-crop monocultures, a lack of beneficial organisms, and biodiversity declining in general, thus making it relatively easy for exotic plants and animals to establish themselves;

J. whereas resistance to pesticides used as insecticides is accelerated by the excessive and uncontrolled use of these products, thereby jeopardising any phytosanitary successes achieved;

K. whereas inappropriate and irrational use of pesticides provides favourable conditions for resistant bacteria to emerge, spread and persist due to antimicrobial properties, and leaves agro-ecosystems susceptible to the next wave of invasive pest attack;

L. whereas insecticide resistance is a phenomenon which clearly has cross-border implications, which would most probably not be manageable with the current resources and scientific knowledge, cannot be excluded and can have unpredictable medical, social and economic setbacks;

M. whereas the use of pesticides, even in small quantities, threatens the ‘biologic label’ owned by a number of Italian and European olive oil producers;

Our suggestions are as follow:

1. all actions and precautionary and curative agronomic techniques that do not foresee and/or limit the use of insecticides and pesticides, as well as the uprooting of olive trees and/or plants that are infected by the *Xylella fastidiosa* of not particular historical-cultural value are deemed useful and necessary; in the case of plants of particular historical and monumental value, ordained to be eradicated, because found infected after analysis, we suggest to isolate them with insect proof nets, as alternative compulsory measure;

2. the Authorisation to the use of all the active substances foreseen by the EU normative in organic production (Regg. CE N. 834/07 e 889/08 and l.m. and i.) for the control of the specific bacterial vector on the olive grove and other host plants is requested;

3. given the risks for health and the above mentioned considerations, it is furthermore requested to evaluate the obligation, as it is provided in DIRECTIVE 2009/128/EC of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides at art. 14 and Annex III (implemented in Italy by Legislative Decree N. 150/12), to give priority of application to techniques, substances and any other technical means compliant with EU, National and regional norms in organic agriculture, also in farms that are not organic but falls in the areas identified for the compulsory treatments as well as in the Protected Areas and in Natura 2000 sites;

4. the activities, agronomical practices and techniques that, at the state of the play, are considered useful and effective in limiting the spread of the vector *Philaenus spumarius* L. (Meadow spittlebug) and therefore the diffusion of the bacterium *Xylella fastidiosa*, as well as allowed in organic agriculture, according to the Regg. N. CE 834/07 and 889/08 and s. a. and a., should be integrated using active substances and products compliant with organic farm management.

Regarding the use of such activities, agronomical practices and techniques, some criteria for implementation should be followed:

a) to keep the full compliance with the organic production method, with special regard to both the farms with olive groves directly interested and also to farms at drift risk. In the case that these proposals will be adopted, there will be no need or requirement for these organic farms to exit from the organic certification system, neither to be temporarily suspended (art. 36 clause 4 of the Reg. CE 889/2008);

b) the necessity to control the vector in correspondence of key stages of its cycle/development;

c) to indicate actions whose efficacy could be easily monitored. This would allow to collect on-field information already in the first year of implementation, that can be used to better steer the actions to contain the bacteria in the years to come;

5. the actions proposed can be differently integrated, but they all are synergically effective in controlling the vector and the spreading of the bacteria, keeping an interdisciplinary and holistic approach, proper of the organic method. It is necessary to ensure that sufficient financial and human resources will be available to implement the relevant strategies, including financial support for farmers to apply appropriate agricultural practices for the fight against *X. fastidiosa* and its vectors, as well as ensuring adequate compensation for loss of trees, livelihood and income in the case of eradication of olive trees and other potential hosts.

Furthermore it is necessary to provide adequate funding for research, analysis and remedies against *X. fastidiosa* and its vectors.

6. Apulia Region should adopt the proposal presented in this document, so as to avoid also the risk of having to compensate organic operators (and not only them), forced to downgrade their organic olives because of the mandatory treatments and/or contaminations from drift of active substances not allowed by the Reg. EC No 834/07 and no. 889/08 and s. m. and i.

Second Pillar: Exclusion of *Vitis* from the list of plants known to be susceptible to the European and non-European isolates of *X. fastidiosa* (Annex 1)

Whereas, according to Krugner et al., ‘Evaluation of pathogenicity and insect transmission of *X. fastidiosa* strains to olive plants’ (California Olive Committee), RAPD analysis showed that the *X. fastidiosa* population infecting olive trees belonged to the A genotype group, which is known to cause leaf scorch disease in almond but does not cause Pierce’s disease in grapevine. Furthermore in different Apulian Research Centres (CNR, UNIBA) some infectivity tests on the Apulian most important grapevine varieties are now near to finish and the preliminary results shows that there are no evidence of infections form *Xylella fastidiosa*.

We suggest the Commission to exclude *Vitis* from the list of plants known to be susceptible to the European and non-European isolates of *X. fastidiosa* (Annex 1);

Third Pillar: alternative measures on art. 5 and art.6 of the Implementing Decision

A. **whereas some scientific sources (as the document of the Tuscany Regional Phytosanitary Service or the one of the Apulia Region Phytosanitary Observatory office) report that besides *Xylella* there might be other pathogens (wood vascular mycetes, wood leopard moth *Zeuzera pyrina*) contributing to the olive quick decline syndrome, also considered by EFSA;**

B. whereas, in a recent scientific opinion on the risk assessment of *X. fastidiosa*, the European Food Safety Authority (EFSA) showed that there are several elements that make eradication impractical; whereas EFSA stated, in particular, that ‘there are no indications that the option of eradication will be successful once the disease is established in an area’ and ‘so priority should be given to the prevention of the introduction’, while for containment strategies, which ‘are no longer possible when the disease is widespread’, effectiveness ‘varies from negligible to moderate’;

C. whereas, according to Article 5 of the above-mentioned Implementing Decision, the planting of host plants in the infected zones shall be prohibited;

D. whereas, as stated in Article 6 of the above-mentioned implementing decision, in the demarcated area, including the infected area and the buffer zone, ‘within a radius of 100 m around the plants which have been tested and found to be infected by the specified organism’, the Member State concerned is required to ‘immediately remove:

- (a) host plants, regardless of their health status;
- (b) plants known to be infected by the specified organism;
- (c) plants showing symptoms indicating possible infection by that organism or suspected to be infected by that organism’;

We suggest the Commission:

1. to revise the current implementing decision, in particular regarding Article 6 on the radius of 100 metre around the infected plants by giving priority to surveillance and isolation rather than eradication;

2. to revise Article 5 in order to allow the planting of potential host plants that must be duly tested to ensure they are free of the pathogen and monitored – this should be complemented with appropriate agricultural practices (e.g. weeding, pruning and correct soil management in full respect of its biological balance) and adequate and sustainable phytosanitary treatments;

3. to consider different measures to be implemented depending on the scope of the spread of the bacterium, the plants affected, the bacterial strain and the presence of other pathogens.

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