

ANNEX

Response of the Competent Authorities of Greece to the recommendations of Report ref. DG(SANCO)/2012-6285-MR of an audit carried out from 02 to 09 May 2012 in order to evaluate controls of pesticides

N°.	Recommendation	Action Proposed by the Competent Authority
1	Ensure that staff receives appropriate training, and are kept up-to-date in their competencies, as required by Article 6 of Regulation (EC) No 882/2004. This applies in particular to the safe storage of pesticides.	According to article 8 of law 4036/2012, the Coordinating National Authority will set an official training program for the staff involved to official controls on plant protection products, as mentioned in the FVO audit report. The program is expected to begin in 6 months and will cover the appropriate training including safe storage of pesticides.
2	Ensure that professional users and distributors of PPPs have access to appropriate training by bodies designated by CAs. This shall consist of both initial and additional training to acquire and update knowledge as appropriate, as required by Article 5(1) of Directive 2009/128/EC.	The establishment of training for all parties involved in the marketing and use of PPPs is covered from the terms of reference of the Commission for the Submission of the Proposal for the NAP (article 32 of law 4036/2012). The ministerial degree regarding the participants to this Commission is about to be finalized.
3	Ensure that professional users shall conduct regular calibrations and technical checks of the pesticide application equipment as required by Article 8(5) of Directive 2009/128/EC. Pesticide application equipment in professional use shall be subject to inspections, and be inspected at least once by 26 November 2016, as required by Articles 8(1) and 8(2) of the same Directive.	As above point. Also: The competent authority has attended four SPISE meetings where were presented all the aspects of technical inspections and of regular calibrations of spraying equipment that take place in other European countries. They have also attended the inspections carried out under the pilot program Life that occurred in Boeotia and they now evaluate the results to draw conclusions about the state of spraying equipment existing in the country. Also the competent authority prepares the necessary regulatory documents on the control of spraying equipment which will submit to the Committee for the National Action Plan
4	Ensure that the recovery and disposal of pesticide remnants and their packaging by professional users and distributors do not endanger human health or the environment, as required by Article 13(1)(e) of Directive 2009/128/EC.	The Coordinating National Authority will issue a specific procedure for the recovery and disposal of pesticide remnants and their packaging by professional users and distributors in order not to endanger human health or the environment, after discussing with interested parties. The procedure is expected to be finalized by December 2012.

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5	Include documentary checks in the inspections of users of PPPs to ensure the effectiveness of official controls, as required by Article 4(2)(a) of Regulation (EC) No 882/2004.	The Coordinating National Authority will issue a specific procedure for documentary checks in the inspections of users of PPPs to ensure the effectiveness of official controls in two months time.
6	Ensure that official controls of users of PPPs are carried out without prior warning, as laid down in Article 3(2) of Regulation (EC) No 882/2004.	The Coordinating National Authority will issue a specific circular for the inspections of users of PPPs to ensure that they are carried out without prior warning in two months time.
7	Ensure that staff have access to premises of and documentation kept by users of PPPs, as required in Article 8(2) of Regulation (EC) No 882/2004.	Article 8, paragraphs 2 and 3 empowers the access to premises of and documentation kept by users of PPPs. The Coordinating National Authority will issue a specific circular for the inspections of users of PPPs to clarify the above provisions in two months time.
8	Ensure that all designated pesticide residue laboratories have LC-MS/MS and GC-MS/MS equipment to ensure that staff can perform official controls efficiently and effectively, as required by Article 4(2)(d) of Regulation (EC) No 882/2004.	EU regulatory requirements (Regulations, SANCO document) ask for GC-MS equipment, not GC-MS/MS. Nevertheless, the Coordinating National Authority is planning rearrangements in order to ensure that that all designated pesticide residue laboratories have LC-MS/MS and GC-MS/MS equipment. The whole procedure is expected to be finalized by the end of January 2013.
9	Ensure that official controls are carried out regularly, on a risk basis and with appropriate frequency, as required by Article 3(1) of Regulation (EC) No 882/2004.	The Coordinating National Authority will issue a specific circular for the inspections of users of PPPs to ensure that they are carried out on a risk basis and with appropriate frequency in two months time. A Presidential Decree will be issued by December 2012 for the inspections of retailers and wholesalers to ensure that they are carried out on a risk basis and with appropriate frequency.
10	Ensure that documented procedures contain sufficient information and instructions for staff to perform effective official controls, as required by Article 8 of Regulation (EC) No 882/2004.	The Coordinating National Authority will issue a specific circular supplying sufficient information and instructions for staff to perform effective official controls for the inspections of users of PPPs. A relevant circular will be issued two months of the above mentioned Presidential Decree
11	Ensure effective co-operation between the authorities performing controls on pesticide use, as required by Article 4(3) of Regulation (EC) No 882/2004.	Effective co-operation is established between Coordinating National Authority and all authorities performing controls on pesticide use. Horizontal co-operation between the CAs performing controls of pesticide use was established with the exception of the authority responsible for controls at

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		growers for the purposes of cross-compliance, as mentioned in the audit report. The authority responsible for controls at growers for the purposes of cross-compliance has already started the cooperation and the Coordinating National Authority will issue a specific circular in two months time supplying the procedure of the common beneficial use of control data.
12	Ensure that procedures are put in place to verify the effectiveness of controls that they carry out, as required by Article 8(3)(a) of Regulation (EC) No 882/2004.	An internal audit system will be established to ensure that audits are carried out (Article 4(6) of Regulation 882/2004) and procedures are in place to verify the effectiveness of official controls and to ensure that corrective action is taken when needed (Article 8(3) of Regulation (EC) No 882/2004). The inspections will be carried out at Regional level by specifically designated and dedicated staff members of each Regional Centre for Plant Protection and Quality Control (RCPQC). The area of jurisdiction of the inspectors will be the Directorates of Rural Economy and Veterinary Service (DREVS) of the Prefectures of each particular Region and as well as their own RCPQC.
13	Carry out internal audits or have external audits carried out, as required by Article 4(6) of Regulation (EC) No 882/2004.	An internal audit system will be established to ensure that audits are carried out (Article 4(6) of Regulation 882/2004) and procedures are in place to verify the effectiveness of official controls and to ensure that corrective action is taken when needed (Article 8(3) of Regulation (EC) No 882/2004). The inspections will be carried out at Regional level by specifically designated and dedicated staff members of each Regional Centre for Plant Protection and Quality Control (RCPQC). The area of jurisdiction of the inspectors will be the Directorates of Rural Economy and Veterinary Service (DREVS) of the Prefectures of each particular Region and as well as their own RCPQC.