

**REPORT OF OFFICIAL CONTROLS ON
PLANT PROTECTION PRODUCTS**

Carried out in Greece during 2013

[Article 68, Regulation (EC) 1107/2009]



Coordinating National Authority:

***Hellenic Ministry of Rural Development and Food,
Directorate of Plant Produce Protection***

SUMMARY

This report describes the outcome of the official controls on plant protection products, made during 2013 in Greece under the provisions of Regulation (EC) No 1107/2009.

The control program was mainly affected by three different facts that happened in 2013:

- A. Implementation of Law 4036/2012 regarding the additional measures needed for the implementation of Regulation (EC) No 1107/2009 and also for the implementation of Directive 2009/128/EC. So as, a numerous Ministerial decrees, Presidential Decrees and circulars had to be published.
- B. Implementation of corrective actions for the recommendations listed to the 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.
- C. Implementation of the National Action Plan for the Sustainable Use of Pesticides
- D. A strong economic crisis affected also the pesticide controls system, by the means of lack of resources.

The control results are considered to be satisfactory.

LEGAL BASIS

Relevant EU Legislation

The legal basis is the Regulation (EC) No 1107/2009 of the European Parliament and of the Council of 21 October 2009 concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC

According to article 68 of Regulation (EC) No 1107/2009, Member States shall carry out official controls in order to enforce compliance with this Regulation. They shall finalize and transmit to the Commission a report on the scope and the results of these controls within six months of the end of the year to which the reports relate.

Relevant national legislation

The basic relevant national legislation is law 4036/2012 "*Placing of pesticides in the market, sustainable use and relevant provisions*" which was published in the Official Journal on January 27th, 2012. As mentioned in article 1, par. 1a, the scope of the law was among other to establish the necessary measures for the implementation of the Regulation (EC) No 1107/2009.

All implementing legislative actions are published in the Hellenic Ministry of Rural Development and Food website (www.minagric.gr).

ORGANIZATION COMPETENCIES OF THE CONTROL AUTHORITIES

A. Central authority

The Directorate of Plant Produce Protection (DPPP) of the Ministry of Rural Development and Food (MRDF) is designated as the Coordinating National Authority (CNA), to coordinate and ensure all the necessary contacts with applicants, other Member States, the Commission and the Authority and to supervise the control system.

Contact person for control measures

The contact person for control measures is: Mr. Dionysios Ch. Vlachos, Agronomist MSc, Department of Pesticides, Directorate of Plant Produce Protection, Hellenic Ministry of Rural Development and Food.

B. Onsite inspections

Directorates of Rural Economy and Veterinary Medicine of the Regional Unities (DREVM of RU) and the Regional Centers for Plant Protection and Quality Control (RCPPQC) are designated for the implementation of controls on the marketing and use of PPPs in Greece.

The structure of controls on marketing of plant protection products is described below:

Responsible authority	Control scope	Control item
DREVS of RU and RCPPQC	Placing in the market of non authorized products	Non EU authorized products Illegal parallel trade Phase-out products
DREVS of RU and RCPPQC	Guaranteed composition	Sampling and analysis of PPPs
DREVS of RU and RCPPQC	Labelling	Label inspections
DREVS of RU and RCPPQC	PPPs advertisement	Advertisement inspections
DREVS of RU and RCPPQC	PPPs sales	Inspections at retailers and wholesalers

C. Laboratories

The network of official control laboratories consists of the following laboratories:

1. Laboratory of Physicochemical analysis of pesticides of the Benaki Phytopathological Institute in Athens
2. Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Thessaloniki
3. Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Pireaus
4. Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Achaia

The Laboratory of Physicochemical analysis of pesticides of the Benaki Phytopathological Institute is designated as the **Central National Lab** for the controls on PPPs. The Benaki Lab conducts also comparative analysis of parallel import products.

The Central Competent Authority (CCA) is responsible for drafting the control program and assisting the local authorities for the implementation of the program. Local authorities which are the Directorates of Rural Economy and Veterinary Service of the Regional Units (DREVS of RU) and the Regional Centers for Plant Protection and Quality Control (RCPPQC) are responsible for the implementation of the program and the required inspections. In case of infringements, a case file is fulfilled by the local authorities and sent to Central Competent Authority for administrative sanctions and to Justice for punitive sanctions. For each case the Central Competent Authority prepares a proposal to the General Secretary of the Ministry of Rural Development and Food (MRDF), who impose the administrative sanctions.

CONTROL PROGRAM OF 2013

The control program for the year **2013** was issued with the Ministerial Decree num. 2101/22762/21-2-2013. According to the program, the following are planned:

- ✓ Intensification of the controls for non authorized plant protection products and for selling products after the expiry date
- ✓ Intensification of the controls for plant protection products of parallel trade.
- ✓ Sampling and comparative analysis of plant protection products of parallel trade by the Laboratory of Physicochemical analysis of pesticides of the Benaki Phytopathological Institute.
- ✓ Intensification of the controls of pesticide sales
- ✓ Inspections regarding labeling and composition according to the following table:

Plant protection products containing the following active substances:	Control Laboratory
Acetamiprid, 2,4D, captan, deltamethrin, fenoxycarb, fluazinam, cypermethrin, pendimethalin, phosmet & tebuconazole	Laboratory of Physicochemical analysis of pesticides of the Benaki Phytopathological Institute
Tebuconazole (WG, SC & EC formulations) & boscalid (WG & SC) Plant protection products containing only these active substances will be analyzed and not in mixtures with other active substances.	Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Thessaloniki
Dimethoate	Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Pireaus
Alpha-cypermethrin (EC formulation)	Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Achaia

PROCEDURES FOR PERFORMANCE AND REPORTING OF CONTROL ACTIVITIES

In 2013, numerous procedures were issued regarding control activities. All procedures are published in Ministry of Rural Development and Food website : <http://www.minagric.gr/index.php/el/for-farmer-2/crop-production/fytoprostasiamenu/elenxoifitoprostateytikonmenu/527-odigies-ele-arxes> in Greek language. A list of the national legislation regarding official controls on marketing and use of plant protection products in English language is also published in Ministry's official website: <http://www.minagric.gr/index.php/en/farmer-menu-2/plantprotection-menu/control-distr-useplantprotprod-menu/2438-officialcontrolsplantprot> .

In particular the following procedures were issued in 2013:

Type of measure	Num.	Subject	Official Journal
Ministerial Decision	334/3099/ 10-1-2013	Establishing the specifications and procedures for registration in the Pesticide Facilities Register	B'132
Circular	3575/40028/ 1-4-2013	Guidelines for plant protection products labeling according to Regulation (EC) No 547/2011	
Circular	7254/79263/ 26-6-2013	Guidelines for plant protection products labeling according to Regulation (EC) No 547/2011	
Common Ministerial Decision	8503/94606/ 30-7-2013	Fees for plant protection products and pesticide residue control	B'2016
Circular	11893/1374969/ 11-11-2013	Placing on the market of plant protection products stocks that their authorization have been recalled or modified (grace period)	
Circular	7915/87546/ 12-7-2013	Employment of trained personnel in pesticide sales	--
Ministerial Decision	8040/88923/ 17-7-2013	Procedures for initial and additional training of pesticide distributors and their certificate recall	B'1849
Common Ministerial Decision	8503/94606/ 30-7-2013	Fees for plant protection products and pesticide residue control	B'2016
Presidential Decree	159/2013 (18-11-2013)	Establishing the specifications and procedures for the pesticide sales operation start announcement and functioning pesticide sales shops	A'251
Ministerial Decision	2519/28169/ 5-3-2013	Defining the body for making, keeping update and operating the electronic register of Special Pesticide Sales Forms and every relative matter.	B'649
Ministerial Decision	9632/109344/ 11-9-2013	Modification of Ministerial Decision Num. 2519/28169/2013 (B'649) relating date of entry	B'2372
Common Ministerial Decision	8503/94606/ 30-7-2013	Fees for plant protection products and pesticide residue control	B'2016
Common Ministerial Decision	8197/90920/ 22-7-2013	Establishing the National Action Plan for the implementation of Directive 2009/128/EC of the European Parliament and the Council and the protection of human health and the environment.	B'1883
Common Ministerial Decision	13631/159106/ 20-12-2013	Establishment of fees for the participation in tests for obtaining the certificate of knowledge on sustainable use of pesticides and operation start announcement of bodies for initial training for pesticide sales.	B'3410
Circular	10608/121856/ 8-10-2013	Establishment of form for informing persons who could be exposed to the spray drift.	
Circular	7923/87577/ 12-7-2013	Implementation of classification, labeling and packaging of plant protection products and biocides according to the provisions of Regulation (EC) No 1272/2008 of the European Parliament and the Council, as modified and valid.	

RESULTS OF CONTROL ACTIVITIES ON PLANT PROTECTION PRODUCTS FOR THE YEAR 2013**Controls on composition**

In 2013, a total number of 257 samples were analyzed for the needs of the official controls on plant protection products and 5 infringements were detected.

The samples include authorized plant protection products, plant protection products for which a parallel trade permit has been granted, plant protection products suspect for phytotoxicity, non authorized plant protection products, spray solutions and also soil samples for the detection of the plant protection product used by professional user.

The report on control measures on composition of plant protection products undertaken is the following:

- A. Laboratory of Physicochemical analysis of pesticides of the **Benaki Phytopathological Institute**

TABLE I Samples per control scope

Control Scope	Number of samples
2013 Annual program	199
PPPs used for the 2013 National program for olive protection against <i>Bactrocera oleae</i>	65
PPPs suspect for phytotoxicity	1
Non authorized PPPs	21
PPPs for which a parallel trade permit has been granted	16
Spray solutions	5
Soil samples	18
Second analysis (appealing first analysis results)	4
TOTAL	329

TABLE II: Samples of 2013 annual program

Active substance (s)	Number of samples	Infringements
Acetamiprid	18	0
2,4D	12	0
Captan	18	0
Deltamethrin	47	5
Fenoxycarb	6	0
Fluazinam	1	0
Fluazinam & metalaxyl-m	1	0
Cypermethrin	31	0
Pendimethalin	27	0
Phosmet	10	0
Tebuconazole	10	0

Alpha cypermethrin	13	0
Dimethoate	2	0
Boscalid & Pyraclostrobin	1	0
Boscalid & kresoxym methyl	1	0
TOTAL	199	5

- B. Laboratories of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control (PPPQC-RCPP & QC lab)

Laboratory	Active substance (s)	Number of samples	Infringements
Laboratory of PPPQC-RCPP & QC of Thessaloniki	Tebuconazole & boscalid	24	0
Laboratory of PPPQC-RCPP & QC of Achaia	Alpha-cypermethrin	3	0
Laboratory of PPPQC-RCPP & QC of Pireaus	Dimethoate	31	0
TOTAL		58	0

Official controls on labeling and packaging of plant protection products:

In year 2013, the official controls on labeling and packaging of plant protection products in the market were conducted by the comparison of labels on pesticide sales shops with the relevant authorizations. The results are presented below:

Total number of controls	Infringements
481	14 cases investigated 1 sanction case (batch number missing)

Official controls on sales of plant protection products:

In year 2013, the official controls on sales of plant protection products are presented below:

Official controls	Total numbers
Inspections	818
Cases investigated	72

Infringements	55
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Infringement	Number per infringement type
Unauthorized products (recalled)	16
Unauthorized products (without authorization)	2
Unauthorized selling	11
Inappropriate storage conditions	3
Other (plant protection products after expiry date)	23

Official controls for unauthorized products (counterfeit, recalled authorizations etc)

In year 2013, the control authorities in cooperation with the central authority, customs, police etc conducted numerous controls in suspected facilities, vehicles, shipments and the results are presented below:

Total number of controls	Infringements
226	40 cases investigated 15 sanction cases

Official controls on plant protection products advertisement

In year 2013, the official controls on plant protection products advertisement are presented below:

Total number of controls	Infringements
171	3

Official controls at user level

In year 2013, the official controls regarding the proper use of plant protection products at user level were conducted by the following ways:

- 1) On site controls of professional users and, where required, sampling of soil, leaves or spray solution
- 2) Sampling of harvested fruits and vegetables and residue analysis.

Type of control on professional user of plant protection products	Total number
On site controls	675
Sampling and residue analysis	1939
TOTAL	2614

The results of the official controls regarding the proper use of plant protection products at user level are presented below:

Infringement type	Total number
Improper use of authorized plant protection product	122
Use of unauthorized plant protection product	12
TOTAL	134

Official controls on parallel trade plant protection products

In 2013, the official controls on plant protection products for which parallel trade permits have been granted, resulted to infringements that are presented below:

Analysis report	Formulation	MS of origin	Infringement
BFI 51/2013	Deltamethrin 2,5EC	UK	a. Different qualitative and quantitative characteristics of chromatographic peaks b. Presence of endosulfan alpha and beta concentrations
BFI 160/2013	Deltamethrin 2,5EC	UK	a. Increased concentration of R-isomer deltamethrin b. Decreased concentration of active substance deltamethrin (1,086% instead of 2.5% w/v) c. Different qualitative and quantitative
BFI 161/2013	Deltamethrin 2,5EC	UK	a. Increased concentration of R-isomer deltamethrin b. Decreased concentration of active substance deltamethrin (1,855% instead of 2.5% w/v) c. Different qualitative and quantitative characteristics of chromatographic peaks
BFI 260/2013	Acetamiprid 20SP	UK	Different qualitative and quantitative characteristics of chromatographic peaks
BFI 275/2013	Deltamethrin 2,5EC	UK	a. Increased concentration of R-isomer deltamethrin b. Different qualitative and quantitative characteristics of chromatographic peaks
BFI 271/2013	Abamectin 1,8EC	UK	a. Different physicochemical properties (pH, specific gravity,

			color) b. Different qualitative and quantitative characteristics of chromatographic peaks
BFI 272/2013	Abamectin 1,8EC	UK	a. Different physicochemical properties (pH, specific gravity, color) b. Different qualitative and quantitative characteristics of chromatographic peaks
BFI 273/2013	Abamectin 1,8EC	UK	Different qualitative and quantitative characteristics of chromatographic peaks
BFI 277/2013	Deltamethrin 2,5EC	UK	Different qualitative and quantitative characteristics of chromatographic peaks

CONTROL PROGRAM OF YEAR 2014.

The control program for the year **2014** was issued with the Ministerial Decree num. 1320/17878/7-2-2014 as modified by the Ministerial Decree num. 6873/72437/3-6-2014. According to the program, the following are planned:

1. Controls on the placing of plant protection products in the market aiming to the provisions of article 28 of Regulation (EC) No 1107/2009 and especially:
 - The placing of non-authorized plant protection products on the market with labels not in the Greek language. The control authorities will immediately inform customs, in case of third country origin products.
 - The placing of non-authorized plant protection products on the market and especially those that their authorization has been recalled. Those products are mention in the website of the Hellenic Ministry of Rural Development and Food (<http://www.minagric.gr/greek/2.2.5.8.2.2.html>).
 - The placing on the market including storage of non-authorized plant protection products that had an emergency authorization of 120 days, according to article 53 of Regulation (EC) No 1107/2009 and the period of authorization has expired.
2. The placing of plant protection products on the market, which have granted a parallel trade permit. Especially for parallel trade products:
 - A. Controls will be conducted in the retailer level for products that the parallel trade permit had been recalled during 2013. These parallel trade permits are listed in the following table. Control criteria are whether their sale from the PI permit holder and their sale from retailer to professional users were before the prohibition dates.

Num	Tradename	PI permit holder	Date of sale prohibition from PI permit holder	Date of sale prohibition from retailer
1	Abamec Extra 1,8EC	Ypsilon SA	21/5/2013	21/11/2013
2	Abamectin–Alfa 1,8EC	Alfa Agricultural Supplies SA	21/5/2013	21/11/2013
3	Abastarmax 1,8EC	Plantfer Ltd	21/5/2013	21/11/2013
4	Belaz 2,5EC	Farma-chem SA	31/8/2013	28/2/2014
5	Clodinafop propargyl Anorgachem 24EC	Anorgachem SA	5/2/2013	5/2/2013
6	Deltamethrin Agrotechnica 2,5EC	Agrotechnica SA	31/8/2013	28/2/2014
7	Deltastarmax 2,5EC	Plantfer Ltd	31/8/2013	28/2/2014
8	Etylit 80WP	Elton International Trading Company SA	7/6/2013	7/12/2013
9	Fatal 1,8EC	Farma-chem SA	21/5/2013	21/11/2013
10	Milagro-Agro 4SC	Agro SA	5/2/2013	5/8/2013
11	Mostra EC	Farma-chem SA	5/2/2013	5/2/2013
12	Nicosulfuron-Magma 4SC	Magma Ltd	11/3/2013	11/9/2013
13	Safran Gold 1,8EC	Hybrids Hellas SA	21/5/2013	21/11/2013
14	Topik-Agro 240EC	Agro SA	5/2/2013	5/2/2013
15	Triclopyr – Anorgachem 48 EC	Anorgachem SA	30/11/2013	30/5/2014
16	Tristarmax 48EC	Plantfer Ltd	30/11/2013	30/5/2014
17	Vertimec-Agro 1,8EC	Agro SA	21/5/2013	21/11/2013
18	Anodelta 2,5EC	Anorgachem SA	31/8/2013	28/2/2014

- B. Sampling of products holding a parallel trade permit in valid and equivalence control in comparison with two samples (two different batches) of the relative reference product in the Laboratory of Pesticides Chemical Control of Benaki Phytopathological Institute.
3. Controls on plant protection products sale and especially:
- A. Controls on illegal wholesalers or retailers.
- B. Controls on legal wholesalers or retailers concerning the specifications of sale. The selection of wholesalers and retailers to be controlled will be made on a risk basis according to the provisions of article 14 of Presidential Decree 159/2013 (Official Journal A' 251). According to Presidential Decree 159/2013, wholesalers and retailers who started pesticide sales after the date of issue of the Presidential Decree 159/2013, should fulfill all the specifications provided by the Decree while wholesalers and retailers who had already started pesticide sales before the date of issue of the Presidential Decree 159/2013 should fulfill those with one year grace period.
4. Controls on plant protection products guaranteed composition after sampling by the competent authorities and analysis by the official Labs. The distribution of plant protection products which will be analyzed during 2014 per official control is according to the following table:

Plant protection products containing the following active substances:	Official Laboratory
Glyphosate, Chlorpyrifos, Chlorothalonil, Deltamethrin, Iprodione, Quinalofop-P-ethyl, Imidachloprid, Folpet, Abamectin, L-cyhalothrin, Alpha-cypermethrin	Laboratory of Pesticides Chemical Control of Benaki Phytopathological Institute, Kifissia Athens
Tebuconazole (formulations WG, EW & SC), boscalid (formulation WG) & pyraclostrobin (formulations WG & EC) in plant protections products containing only these active substances and not in mixture with other active substances	Laboratory of Plant Protection Products Quality Control of Regional Centre for Plant Protection and Quality Control of Thessaloniki
Dimethoate	Laboratory of Plant Protection Products Quality Control of Regional Centre for Plant Protection and Quality Control of Pireaus

5. Controls on plant protection products labeling. The labeling of plant protection products containing the active substances of the above table will be controlled.
6. Controls on plant protection products advertisement and especially on the advertisement material distributed in the retailer level.
7. Controls on the proper use of the plant protection products. These controls will mainly consist of:
 - a. On site controls of ppp professional users and
 - b. Sampling of leaves and sprouts. The sample will be sent to the Residue Laboratory of Benaki Phytopathological Institute after communication.
8. Controls on electronic pesticide sale register which will start 3 months after the date of the mandatory application of the register.
9. Controls on holding and use of products that have expired according to their label.
10. Risk based controls for the implementation of the General Principles of Integrated Pest Management from the professional users of plant protection products, listed in Annex D of law 4036/2012 (O.J. A'8) [transposition of Directive 2009/128/EC] and num 8197/90920/22-7-2013 (O.J. B'1883) Common Ministerial Decision [National Action Plan for the sustainable use of pesticides].