

ANNEX

Response of the competent authorities of Greece to the recommendations of Report ref. DG(SANTE)/2015-7475-MR of the audit carried out from 14 September 2015 to 22 September 2015 in order to evaluate controls on the marketing and use of plant protection products

N°	Recommendation	Action Proposed by the Competent Authority
1	<p>Ensure that inspectors performing official controls on the use of PPPs, receive, for their area of competence, appropriate training enabling them to undertake their duties competently and to carry out official controls in a consistent manner as required by Article 6 of Regulation (EC) No 882/2004.</p> <p>Conclusions upon which this recommendation is based: 33, 81</p> <p>Associated findings upon which this recommendation is based: 11, 57, 68</p>	<p>According to article 8 of law 4036/2012, the Coordinating National Authority (Directorate of Plant Produce Protection) will set an official training program for the staff involved to official controls on plant protection products, as mentioned in the FVO audit report.</p> <p>The existing training program will be reviewed in a six month period according to the audit findings including on-job trainings.</p> <p>The Coordinating National Authority will review the specific procedure (check list) for on-site checks in the inspections of users of PPPs to verify that only authorized PPPs are used in accordance with their conditions of authorization as required by Article 55 of Regulation (EC) No 1107/2009 in a two month period.</p>
2	<p>Ensure the planning of controls is reviewed, taking into account risks specifically those relating to manufacturers, packers and re-packers of professional use PPPs, seed treatment plants and PPP users so as to ensure that official controls are carried out in line with an appropriate pre-determined frequency as required by Article 3 of Regulation (EC) No 882/2004.</p> <p>Conclusions upon which this recommendation is based: 34, 35, 39, 80</p> <p>Associated findings upon which this recommendation is based: 14,</p>	<p>The Coordinating National Authority (Directorate of Plant Produce Protection) will issue a specific procedure in a two month period to ensure that the planning of controls is reviewed, taking into account risks specifically those relating to manufacturers, packers and re-packers of professional use PPPs, seed treatment plants and PPP users so as to ensure that official controls are carried out in line with an appropriate pre-determined frequency as required by Article 3 of Regulation (EC) No 882/2004.</p>

	17, 18, 23, 64	The annual control program of the article 68 of Regulation (EC) 1107/2009 will include controls to manufacturers, packers and re-packers of professional use PPPs and seed treatment plants.
3	<p>Ensure that the system of controls is revised so that controls on end users examine if PPPs are used in accordance with the conditions of authorisation, as required by Article 55, Paragraph 1, of Regulation (EC) No 1107/2009.</p> <p>Conclusions upon which this recommendation is based: 81</p> <p>Associated findings upon which this recommendation is based: 70, 72</p>	The Coordinating National Authority will review the specific procedure in a two month period to ensure that the system of controls is revised so that controls on end users examine if PPPs are used in accordance with the conditions of authorisation, as required by Article 55, Paragraph 1, of Regulation (EC) No 1107/2009.
4	<p>Ensure that the official product register of PPP is enhanced to provide a solid foundation for the programme of controls by:</p> <p>Ensuring that the authorisation number changes when authorisations are amended or to implement other measures to facilitate controls under Article 46 of Regulation (EC) No 1107/2009.</p> <p>Conclusions upon which this recommendation is based: 60, 61, 82</p> <p>Associated findings upon which this recommendation is based: 41, 46, 56, 71</p> <p>Considering approval of artwork labels in line with Articles 31(4) of Regulation (EC) No 1107/2009 to facilitate more effective controls on PPPs placed on the market.</p>	The Coordinating National Authority will issue a specific procedure in a two month period to ensure that the authorisation number changes when authorisations are amended.

	<p>Conclusions upon which this recommendation is based: 62</p> <p>Associated findings upon which this recommendation is based: 40</p>	
5	<p>Ensure that the programme of official controls on formulation analysis is risk based to provide assurances that PPPs placed on the market comply with their conditions of authorisation/parallel trade permit, and as laid down in Articles 29(1) and 52 of Regulation (EC) No 1107/2009.</p> <p>Conclusions upon which this recommendation is based: 37</p> <p>Associated findings upon which this recommendation is based: 25</p>	<p>The annual control program of the article 68 of Regulation (EC) 1107/2009 on formulation analysis will include only accredited in accordance with the EN ISO/IEC 17025 laboratories with proper analytical scope.</p>
6	<p>Ensure that only laboratories that are accredited in accordance with the EN ISO/IEC 17025 for the scope of formulation analysis are used for the relevant official controls as required by Article 12 of Regulation (EC) 882/2004.</p> <p>Conclusions upon which this recommendation is based: 63</p> <p>Associated findings upon which this recommendation is based: 47, 48</p>	<p>The annual control program of the article 68 of Regulation (EC) 1107/2009 on formulation analysis will include only accredited in accordance with the EN ISO/IEC 17025 laboratories with proper analytical scope.</p>
7	<p>Ensure that the programme for testing pesticide application equipment is in place to achieve that equipment has been inspected at least once by 14 December 2016 as required by Article 8 of Directive 2009/128/EC</p> <p>Conclusions upon which this recommendation is based: 95</p> <p>Associated findings upon which this recommendation is based: 92</p>	<p>According to the competent' authority (Directorate for Land Improvement Works Development and Mechanical Facilities) estimation a testing station can accomplish up to 8 sprayer inspections per day. Calculating a minimum of 220 working days per year, would give us a number of 1760 inspections/ per station/ per year. Given the 40.000 pesticide application equipment registered, the system needs 22-23 stations in operation to fulfill the goal required by article 8 (1) and 8 (2) of Directive 2009/128/EC. Up to now 19 private stations have been certified by the coordinating Laboratory of Reference</p>

		(IAMC-NAGREF, N.A.P. article 23), of which 8 have also been authorized by DREVs to operate and 11 are pending for authorization. Additionally, there are another 15 private stations almost ready to request the certification by the Laboratory of Reference. We estimate that with this rate, the target is feasible.
8	<p>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</p> <p>Conclusions upon which this recommendation is based: 96</p> <p>Associated findings upon which this recommendation is based: 90</p>	<p>By the end of 2015 the pilot project will be finalized. By the end of 2016 a national program will be established to 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.</p>