

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

Carried out in Greece during 2015

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



Coordinating National Authority:

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

SUMMARY

This report describes the outcome of the official controls on plant protection products, made during 2015 in Greece under the provisions of Regulation (EC) No 1107/2009.

The control program was mainly affected by three different facts that happened in 2015:

- 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.
- B. Implementation of the National Action Plan for the Sustainable Use of Pesticides
- C. 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 of 2012 "*Placing of pesticides in the market, sustainable use and relevant provisions*" which was published in the Government Gazette 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.

According to article 7 of law 4036 of 2012, the Coordinating National Authority is responsible for drafting annual or multi-annual control programs.

During 2014, law 4036/2012 was modified with law No 4235/2014 (Government Gazette A'32): "*Administrative measures, procedures and sanctions regarding the implementation of community and national legislation on food, feed and health and protection of animals and other provisions in the competency of the Ministry of Rural Development and Food*". The modification was mainly in article 35 about pesticide sales and establishing an independent committee to examine appeals against decisions imposing fines for PPPs infringements

All implementing legislative actions are published in the Hellenic Ministry of Rural Development and Food website (<http://www.minagric.gr/index.php/el/for-farmer-2/crop-production/fytoprostasi/menu/elenxoifitoprostateytikonmenu/523-nomo-elegxon>).

ORGANIZATION COMPETENCIES OF THE CONTROL AUTHORITIES

A. Central authority

The Directorate of Plant Produce Protection (DPPP) of the Ministry of Rural Development and Food 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 (tel.: +302109287238, fax: +302109212090, email: d.vlachos@minagric.gr).

B. Onsite inspections

The control authorities which are locally the Directorates of Rural Economy and Veterinary Medicine of the Regional Unities (DREVM of RU) and regionally 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 in 2015 consisted 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 Piraeus**

** Following the recommendations of the FVO Audit Report 2015-7475 (Ref. Ares(2016)248934 - 18/01/2016), the Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Piraeus was excluded from the official controls on the quality of plant protection products.*

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 Laboratory for Pesticides Chemical Control conducts also comparative analysis of parallel import products.

The Central Competent Authority (CCA) is responsible for drafting the control program and assisting the control authorities for the implementation of the program. The control authorities which are (locally) the Directorates of Rural Economy and Veterinary Service of the Regional Units (DREVS of RU) and (regionally) 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 Minister of Rural Development and Food), who imposes the administrative sanctions.

RESULTS FROM THE CONTROL PROGRAM OF 2015

The control program for the year **2015** was issued with the Ministerial Decree num. 528/21-1-2015. According to the program, the following were planned:

- Market controls in order to verify provisions of article 28 of Regulation (EC) num 1107/2009 and especially:
 - a. Placing in the market of unauthorized products and especially those with foreign labels in cooperation with custom authorities.
 - b. Placing in the market of unauthorized products and especially those that the authorization had been revoked in 2013 and 2014.
 - c. Placing in the market of unauthorized products and especially those that had granted emergency authorization for 120 days and the period of use had passed.
- Market controls of plant protection products granted parallel import permit. Sampling of products holding a parallel import permit in force and comparative analysis of them with two batches of the relevant reference product to examine their similarity.
- Market controls of plant protection products sales and especially on unauthorized pesticide sales and controls of wholesalers and retailers for sale specifications. The choice and the number of wholesalers and retailers controlled should be defined according to risk based analysis (article 14, Presidential Decree 159/2013 (Government Gazette A 251).
- Controls on the label and content of the plant protection products conducted with sampling from official authorities and laboratory analysis according to the following table:

Plant protection products containing the following active substances:	Chemical Control Laboratory
Propamocarb, Metamitron, Diquat, Cymoxanil, Chlorantraniliprole, Propyzamide, Esfenvalerate, Propiconazole, Ethofenprox, Chlorothalonil, Paraffin oil (CAS 64742-46-7, 8042-47-5, 97862-82-3) & Triadimenol	Laboratory of Physicochemical analysis of pesticides of the Benaki Phytopathological Institute
Tebuconazole (WG, SC & EW formulations), Pendimethalin (EC formulations), Boscalid & Pyraclostrobin. 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 Piraeus

- Controls on PPPs advertisement and especially on the advertising material distributed in pesticide wholesalers and retailers.
- Controls on PPPs proper use conducted mainly by on-site controls of professional users and b) sampling of leaves and sprouts and laboratory analysis for PPPs residues revealing their use.

- Controls on PPPs electronic register of retailer sales on the specific official e-service.
- Controls on expired PPPs in retailers and professional users.
- Controls on the implementation of the general principles of integrated pest management defined in Annex D of law 4036/2012 and NAP.

PROCEDURES FOR PERFORMANCE AND REPORTING OF 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 or modified in 2015:

Internal audit system and verification of the effectiveness of official controls

Official doc	Number	Subject
Ministerial Decision	1280/19057/ 16-2-2015	Modification of num. 402/147651/21-11-2014 Ministerial Decision regarding the designation of the members of the Internal Audit Committee of article 5 of the num. 11935/134642/24-10-2014 Common Ministerial Decision.
Ministerial Decision	6480/76829/ 9-7-2015	Internal audit program for the Official Controls on Pesticides

National Action Plan on sustainable use of plant protection products

Official doc	Number	Subject
Circular	7325/85357/ 31-7-2015	Granting the certificate of knowledge on sustainable use of pesticides (question database for the exams)
Common Ministerial Decision	2/34/2-1-2015, 3501/41173/ 20-4-2015 & 7716/89356/ 13-8-2015	Modification of num. 13631/159106/20-12-2013 Common Ministerial Decision regarding the 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.
Document	521/7086/ 21-1-2015	Proposed training program for training courses of sustainable use of plant protection products aimed to professional users and proposed training material.
Circular	3625/42655/ 17-4-2015	Examinations for granting the certificate of knowledge of SUD (Annex I)
Circular	5725/68135/ 18-6-2015	Procedure for controls in the examinations for granting the certificate of knowledge of SUD (Annex I)
Common Ministerial Decision	6669/79087/ 15-7-2015	Modification of num. 8197/90920/22-7-2013 Common Ministerial Decision regarding: "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"

Official controls on plant protection products labeling

Official doc	Number	Subject
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Common Ministerial Decision	1/32/2-1-2015	Establishment of necessary supplementary measures for the implementation of the Regulation (EC) num 1107/2009, regarding official controls on plant protection products
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Official controls on plant protection products composition

Official doc	Number	Subject
Common Ministerial Decision	1/32/2-1-2015	Establishment of necessary supplementary measures for the implementation of the Regulation (EC) num 1107/2009, regarding official controls on plant protection products
Ministerial Decision	5878/69892/23-6-2015	Technical procedures for the plant protection products chemical control and for the evaluation of the results of the plant protection products chemical control

RESULTS OF CONTROL ACTIVITIES ON PLANT PROTECTION PRODUCTS FOR THE YEAR 2015

A. Unauthorized products importation

During 2015 the following cases were established mostly after close cooperation with the customs and other authorities, followed by sanctions, issued by the Ministry of Rural Development and Food:

Authority	Active substance	Description	Origin	Quantity (kgs or lts)	Total quantity (kgs or lts)
Ormenio custom, Evros	Pinoxaden	AXIAL 45 EC	Turkey	15 x 5 lt	75
	Oxyfluorfen	EASY STAR 24 EC	Turkey	10 x 1 lt	10
	Tribenuron methyl	GUSTAR	Turkey	20 x 50 gr	1
Ormenio custom, Evros	2,4-D		Turkey	3 x 5 lt	15
Kipoi custom, Evros	s-metolachlor	DUALCOM	Turkey	10 x 1 lt	10
Nimfaia border control point (GR-BG)	metalaxyl-m	RIDOMIL GOLD	Bulgaria	2 x 250 cc	0,5
	deltamethrin	DECIS 2,5EC	Bulgaria	1 x 500 cc	0,5
	glyphosate	ROUNDUP	Bulgaria	1 x 1 lt	1
	pendimethalin	STOMP NEW 330 EC	Bulgaria	1 x 1 lt	1
	glyphosate	HACA 360	Bulgaria	1 x 1 lt	1
Nimfaia border control point (GR-BG)	deltamethrin	AGROCHEMICALS	Bulgaria	1 x 1 lt	1
Nimfaia border control point (GR-BG)	trifloxysulfuron-sodium	ENVOKE 75 WG	Turkey	5 x 100 gr	0,5
Nimfaia border control point (GR-BG)	glyphosate	HACA 360	Bulgaria	2 x 1 lt	2
	deltamethrin	DECIS 2,5EC	Bulgaria	2 x 500 cc	1
-	Pyriproxyfen	MARJINAL 100 EC	Turkey	19 x 1 lt	19
	Lamda-cyhalothrin	KUNG-FU 5 EC	Turkey	1 x 1 lt	1
Police	mepiquat chloride	MASSFIKS	Turkey	300 x 1 lt	300
	spinetoram	DELEGATE	Turkey	24 x 500 gr	12
Drama custom	cymoxanil 8%, mancozeb 64%	CUPROCENT	Bulgaria	2 x 1 kg	2
	thiophanate methyl	TOPSIN	Bulgaria	2 x 0,5 kg	1
	triadimenol	BAYFIDAN	Bulgaria	6 x 50 ml	0,3

Komotini custom	mepiquat chloride 5%	Kormix	Turkey	126 x 1 lt	126
	Abamectin 1,8%	Arvilmel	Turkey	16 x 1 lt	16
Nimfaia border control point (GR- BG)	Pendimethalin	Stomp New 330 EC	Bulgaria	5 x 2 lt	10
	S-metolachlor	Dyan 960 EK	Bulgaria	2 x 1 lt	2
	imidacloprid	KOHΦNDOP	Bulgaria	2 x 1 lt	2
Total quantity					610,8

B. Use of unauthorized products

The following cases of use of unauthorized products were detected in 2015, after residue analysis:

Crop	PPP	Residue concentration (mg/kg)
Carrot	aldicarb	0,019
Cucumber	carbendazim & benomyl	0,03
Cotton (leaves)	cyflanilide	0,016
Cotton (leaves)	cyflanilide	0,083
Grapes	diphenylamine	0,1
Cotton (leaves)	dithiazuron	0,08
Cotton (leaves)	dithiazuron	0,04
Cotton (leaves)	dithiazuron	0,005
Cotton (leaves)	dithiazuron	0,1
Cotton (leaves)	dithiazuron	0,06
Olive oil	fenthion	0,32
Apples	propargite	0,09
Apples	propargite	0,13
Apples	propargite	0,15
Apples	propargite	0,05
Apples	propargite	0,03
Apples	propargite	0,14
Apples	propargite	0,11
Apples	propargite	0,04
Apples	propargite	0,08
Apples	propargite	0,2
Apples	propargite	0,22
Apples	propargite	0,03
Apples	propargite	0,49
Apples	propargite	0,03
Apples	propargite	0,15
Apples	propargite	1,5
Eggplant	prothiophos	0,01
Rice	tricyclazole	0,15
Rice	tricyclazole	0,1

C. Official chemical controls on plant protection products

The official controls on composition of plant protection products were planned to be conducted by:

- The Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute
- The Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control (PPPQC-RCPP & QC) of Thessaloniki of the Ministry of Rural Development and Food and
- The Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control (PPPQC-RCPP & QC) of Pireaus of the Ministry of Rural Development and Food

In 2015, the total number of samples analyzed for the chemical control of pesticides were:

Laboratory	Samples analyzed according to the annual program of 2015	Infringements
Laboratory of Chemical Control of Pesticides of B.P.I.	172	3
Laboratory of PPPQC-RCPP & QC of Thessaloniki	42	0
Laboratory of PPPQC-RCPP & QC of Pireaus	22	0
TOTAL	236	3

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, soil sample and also plant samples for the determination of heavy metals.

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

A. Laboratory of Chemical Control of Pesticides of the **Benaki Phytopathological Institute**

In 2015 a total number of three hundred and twelve (312) samples of plant protection products and non-authorized formulations in the Greek market, soil samples for determination of pesticide residues and for determination of heavy metals and reviews of plant protection products were analyzed in the Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute.

In the attached Table I, the type and number of samples analyzed during the year 2015 is summarized. Furthermore, it should be noted that the total samples analyzed were analyzed for sixty-nine (69) different active substances of plant protection products and for 11 (eleven) metals (Cd, Zn, Cr, Pb, Hg, As, Ca, Cu, Fe, Mn, Mg).

From three hundred twelve (312) samples of plant protection product formulations, the one hundred seventy-two (172) samples were market samples for the annual program of the year 2015. The above mentioned samples were sent under the Ministerial Decision 528/7139/21.01.2015 in implementation of Regulation EC 1107/2009 and law 4036/2012 (Government Gazette A '8) and containing active substances: Propamocarb, metamitron, diquat, Cymoxanil, Chlorantraniliprole, Propyzamide, Esfenvalerate, Propiconazole, Ethofenprox, Chlorothalonil, Paraffin oil (CAS No. 64742-46-7, 8042-47-5, 97862-82-3), Triadimenol.

It is noted that the laboratory control of the above active substances was also conducted in mixtures with other active substances.

TABLE I Samples per control scope

Control Scope	Number of samples
2015 Annual program for market control	172
PPPs used for the 2014 National program for olive protection against <i>Bactrocera oleae</i>	20
Claims	16
State procurements for biocides	10
Non authorized PPPs	1
PPPs for which a parallel trade permit has been granted	39
Soil samples tested for pesticide residues	14
Plant samples for the determination of heavy metals	34
Second analysis (appealing first analysis results)	3
Building materials	3
TOTAL	312

TABLE II: Analysis of the samples of 2015 annual program for market control

Active substance (s)	Number of samples	Infringements
Propamocarb	23	0
metamitron	5	0
diquat	25	1 (different color than authorized)
Cymoxanil/mancozeb	9	0
Cymoxanil/famoxadone	1	0
Chlorantraniliprole	15	0
Chlorantraniliprole/abamectin	1	0
Propyzamide	4	0
Esfenvalerate	5	0
Propiconazole	8	0
Ethofenprox	6	0
Chlorothalonil/metalaxyl-M	3	0
Chlorothalonil/cymoxanil	2	0
Paraffin oil (CAS No 64742-46-7, 8042-47-5, 97862-82-3)	37	0
Triadimenol	8	0
Triadimenol/propineb	16	0

Dimethoate*/omethoate-isodimethoate	3	0
pendimethalin*	1	0
TOTAL	172	1

- Samples of dimethoate and pendimethalin were analyzed due to technical problem to other laboratories.

Products of parallel trade

- Analysis BPI 95/2015: Abamectin 1,8EW formulation granted parallel trade permission found to be different for the relevant reference product in terms of chromatographic analysis.
- Analysis BPI 133/2015: Abamectin 1,8EW formulation granted parallel trade permission found to be different for the relevant reference product in terms of chromatographic analysis

Pesticides chemical control after claim

- Analysis BPI 133/2015: A fosetyl-al 80% WG formulation found after laboratory analysis:
 1. Concentration of the active substance not homogeneous (75,95%-90,2%).
 2. Wet sieve test: 25,6% of the formulation retained on a 75 µm test sieve.

- B. Laboratories of Plant Protection Products Quality Control of the Regional Centers for Plant Protection and Quality Control (PPPQC-RCPP & QC lab) of the Ministry of Rural Development and Food:

Laboratory	Active substance (s)	Number of samples	Infringements
Laboratory of PPPQC-RCPP & QC of Thessaloniki	Tebuconazole	20	0
	Pyraclostrobin	2	0
	Pendimethalin	12	0
	Boscalid + Pyraclostrobin	7	0
	Boscalid	1	0
	Total	42	0
Laboratory of PPPQC-RCPP & QC of Piraeus	Dimethoate	22	0
	Total	22	0

D. Official controls on labeling and packaging of plant protection products

In year 2015, 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 on labelling and packaging	Infringements
324	22 cases investigated 2 sanction cases: 1 not clear and indelible label and 1 with wrong phytotoxicity indications

E. Official controls on sales of plant protection products

In year 2015, the official controls on sales of plant protection products are presented below:

Official controls on sales	Total numbers
Inspections	588
Cases investigated	147
Infringements	117

Infringement	Number per infringement type
Unauthorized products (recalled or without authorization)	9
Unauthorized selling	7
Inappropriate storage conditions	29
Absence of trained personnel	2
Sales of PPPs after expiry date	25
E-register of PPPs retailer sales	45

F. Official controls on plant protection products advertisement

In year 2015, the official controls on plant protection products advertisement are presented below:

Total number of controls on advertisement	Infringements
108	13 cases investigated 5 sanction cases: <ul style="list-style-type: none"> ▪ 3 advertisement of unauthorized products ▪ 1 advertisement not containing indications of article 66 or the Regulation (EC) num 1107/2009 ▪ 1 advertisement containing indications not relevant with the respective authorisation

G. Official controls at user level

In year 2015, 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	552
Sampling and residue analysis	1885
TOTAL	2437

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

Infringement type	Total number (pairs of active substance-crop)
Improper use of authorized plant protection product	163
Use of unauthorized plant protection product	33
TOTAL	196

The active substances that were found to be illegally used are:

Use of unauthorized plant protection product		Improper use of authorized plant protection product	
Active substance	Num of cases	Active substance	Num of cases
propargite	18	chlorpyrifos	25
dithiazuron	5	imidacloprid	12
cyclanilide, tricyclazole	2	cypermethrin	11
aldicarb, carbendazim & benomyl, diphenylamine, fenthion, prothiophos, daminozide	1	boscalid, metanipyrin	7
		acetamiprid	6
		pyraclostrobin	5
		metalaxyl, thiocloprid	4
		dimethoate, fenamiphos, glyphosate, penconazole, thiophanate-methyl	3
		azoxystrobin, cyfluthrin, etofenprox, flonicamid, fluopyram, folpet, fosthiazate, indoxacarb, kresoxym-methyl, lambda-cyhalothrin, linuron, myclobutanil, Pendimethaline, pirimiphos	2

		methyl, prochloraz, propamocarb, tau-fluvalinate, tetraconazole, trifloxystrobin, zoxamide	
		2,4-D, acrinathrin, chlorpyrifos methyl, clothianidin, cyproconazole, cyprodinil, cyromazine, deltamethrin, diflubenzuron, dimethomorph, ethephon, famoxadone, fenbuconazole, fenpropidin, fludioxynil, fluometuron, formetanate, imazalil, lufenuron, metrafenone, phosmet, proquinazid, pyrimethanil, quinoxifen, spirodiclofen, tebuconazole, thiamethoxam	1

The crops where the active substances that were found to be illegally used are:

Use of unauthorized plant protection product		Improper use of authorized plant protection product	
Crop	Num of cases	Crop	Num of cases
apples	16	vine-leaves	25
cotton leaves	7	parsley	14
rice	2	roman rocket	13
aubergines, carrots, cucumbers, grapes, olive oil	1	spinach	12
		olive (olives, olive leaves and olive oil)	9
		plums	7
		peppers	6
		beans, celery, grapes, rice, strawberry	5
		aubergine, carrot, oreganum, pomegranate	4
		cucumbers, kiwi, oranges	3
		apples, apricots, chestnuts leaves, lettuce, mandarin, melons, peaches, pears, potato, quince	2
		asparagus, broccoli, cabbage, cauliflower, courgettes, green amaranth, rosemary, thyme	1

H. Official controls on sustainable use of plant protection products

In 2015, during the official controls on sustainable use of plant protection products and especially for the provisions of article 12 of Directive 2009/128/EC, ten (10) cases of infringements were investigated and sanction were imposed in eight (8) of them.

The controls mainly refer to claims for using plant protection products nearby areas used by the general public (article 12a of the directive 2009/128/EC).

A report about incidents of poisoning from plant protection products recorded by the Poisoning Center of Greece during 2012, 2013 and 2014 is published on the official website of the Ministry of Rural Development and Food:

http://www.minagric.gr/images/stories/docs/agrotis/Georgika_Farmaka/elenxoi/ENHMERWSH_KOINOY_OX_EIA_DHLHTRIASH220416.pdf.

The list of holders of certificate of knowledge for the topics of Annex I of Directive 2009/128/EC is published on the official website of the Ministry of Rural Development and Food:

<http://www.minagric.gr/index.php/el/for-farmer-2/crop-production/fytoprostasiamenu/elenxoifitoprostateytikonmenu/525-ethniko-sxe-drashs/1590-sxedio-drashs-gevgikon-farmakon>.

CONTROL PROGRAM OF YEAR 2016.

The control program for the year **2016** was issued with the Ministerial Decree num. 2627/30727/10-3-2016. According to the program, the following are planned:

1. Plant protection products manufacturing plants

The following controls are to be conducted in plant protection products manufacturing plants:

1.1. Regarding the formulation and packaging of the plant protection products, the plan consists of controls on:

- The registration of the company in Pesticide Plants Registry for the specific types of formulation that are manufactured or repacked.
- Whether the conditions of the authorization certificate regarding the origin of active substances, solvents, plant protection products in bulk or already packed plant protection products (with or without label on the packaging) are met, by sample control of invoices issued by the supplier.
- The size and packaging material of produced packages in relation to the one on the relevant authorization certificate (sample control).
- The distribution of the plant protection products to official recognized distributors (sample control).

Control frequency: Since plant protection products industries exist in the area of responsibility of the competent control authority, controls are made to at least 5 industries per authority. The selection of the industries is based on their past records and any guidance issued by the Directorate of Plant Produce Protection of the Ministry of Rural Development and Food (C.N.A.).

1.2. Parallel trade plant protection products. Regarding the marketing of parallel trade plant protection products, sampling from the market and laboratory analysis in the Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute. The analysis is planned to be a comparative analysis of them with two batches of the relevant reference product to examine their similarity.

Control frequency: In consultation with the control Laboratory, samples are taken from all parallel traded plant protection products, so that each chemical control refers to different formulation batch and package size.

1.3. Official controls on the packaging and labelling of the plant protection products

The packaging or the label of the plant protection products is controlled in retailers and wholesalers. The plant protection products planned to be controlled for their composition are also controlled for packaging and labelling. In addition, the packaging and labelling is controlled to those products that their authorization is modified during the past two years regarding their indications for use, the approved crops and dosage and the pre-harvest interval.

Control frequency: Each competent authority should conduct at least 10 controls on packaging and labelling for the year 2016.

1.4. Official controls on the packaging and labelling of the plant protection products

The official controls on the packaging and labelling of the plant protection products will be conducted through sampling and laboratory analysis to the Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute and the Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of the Ministry of Rural Development and Food of Thessaloniki. Samples can be taken from retailers, wholesalers or storage places of pesticide plants. Special attention will be taken so that sample and counter-sample to be from the same batch.

Control frequency: Each competent authority should take at least ten (10) samples of plant protection products for the year 2016. The distribution is described in the following table:

Distribution of plant protection products samples for 2016 based on the contained active substance			
A. Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute (http://en.bpi.gr/section.aspx?id=1&subid=24&subsubid=89):			
1. Difenconazole	6. Dicamba	11. Myclobutanil	16. Tebuconazole
2. Cyproconazole	7. Fosthiazate	12. Pyriproxyfen	17. Cypermethrin
3. Imidacloprid	8. Metribuzin	13. Fluometuron	18. Chlorpyrifos
4. Deltamethrin	9. Metalaxyl-M	14. Quazilofop-p-ethyl	
5. Hexythiazox	10. Oxyfluorfen	15. Phosmet	
B. Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Thessaloniki (http://www.esyd.gr/portal/p/esyd/el/showOrgInfo.jsp?id=40295):			
1. Tebuconazole (WG, EW & SC formulations)	3. Pendimethalin (EC formulations)	5. Alpha-cypermethrin	In plant protection products containing only these active substances and not mixtures with other active substances
2. Pyraclostrobin	4. Dimethomorph	6. Azoxystrobin	

1.5. Official controls on plant protection products advertisement

The official controls focus on the advertising material distributed in pesticide wholesalers and retailers.

Control frequency: Each competent authority should conduct at least 10 controls on plant protection products advertisement material for the year 2016.

1.6. Official controls on seeds treating with plant protection products facilities.

The official controls focus on:

- A. Records of supply and use of plant protection products.
- B. Sampling of seed packages to check if plant protection products are authorized for the specific purpose. The competent control authorities for plant protection products in cooperation with the competent control authorities for seeds should conduct controls on imported treated seeds to check if seeds treated with plant protection products are authorized for that use in at least one Member State (article 49.1 of Regulation (EC) num. 1107/2009).
- C. Sampling of seed packages to check the labelling of treated seed in comparison to the relevant plant protection product authorization.
- D. Controls if best available practices are implemented to reduce dust during seed handling, storage and transfer.

2. Official controls on plant protection products sales

The official controls on plant protection products sales during 2016 will focus on:

- a. Unauthorized pesticide sales.
- b. Controls of wholesalers and retailers for sale specifications. The choice and the number of wholesalers and retailers controlled should be defined according to risk based analysis (article 14, Presidential Decree 159/2013 (Government Gazette A 251)).
- c. Controls on PPPs electronic register of retailer sales on the specific official e-service.
- d. Controls on the recipe system for plant protection production according to the specific official instructions issued by the Ministry of Rural Development and Food.

Control frequency: Each competent authority should conduct controls on plant protection products sales at least to 20% of retailers or wholesalers in their region for the year 2016.

3. Official controls on plant protection products use

The official controls on plant protection products use during 2016 will focus on:

3.1. On site checks of professional plant protection products users and especially:

- 3.1.1. Checks on storage facilities including checks for products that had an emergency authorization which has expired.

- 3.1.2. Checks on record keeping including invoices of plant protection products. In cases of more than one crop, all crops are checked. During the checks on record keeping, it is checked whether the use was according to the relevant authorization.
- 3.1.3. Checks for the certificate of knowledge for the topics of Annex I of Directive 2009/128/EC.
- 3.2. Sampling of leaves and sprouts. The samples should be dispatched to the Residue laboratory of the Benaki Phytopathological Institute after consultation with the laboratory. Taking account the results of previous years checks, the samples of leaves and sprouts will focus on:
- 3.2.1. Samplings on cotton crops for the use of unauthorized plant protection products.
- 3.2.3. Samplings on vine fields for the use of the unauthorized plant grow regulator PCPA.
- Control frequency: Each competent authority should take five (5) maximum samples for the year 2016, after consultation with the control laboratory.
- 3.3 Fruits sampling. These controls refer to the residue control program.
- Control frequency: The samples are taken according to the residue control program and in case of infringement an on-site control of the farmer is conducted.
- 3.4. Random controls of at least 5% of holders of the certificate of knowledge for the topics of Annex I of Directive 2009/128/EC in the relevant region of the competent authority on the implementation of the general principles of integrated pest management defined in Annex D of law 4036/2012 and the National Action Plan for the sustainable use of pesticides and the implementation of the crop specific instructions for the integrated pest management.
- Especially for the case of official established crop specific instructions for the integrated pest management, the checks refer to the implementation of obligatory principles, according to the provision in the column of "Obligatory Implementation-General Principle of Integrated Pest Management" of each crop specific instruction.
- 3.5. Samplings from plant protection product spray liquid.
- Samplings from plant protection product spray liquid are applied only if it is necessary for the investigation of the correct use of plant protection products, after consultation with the Chemical Control Laboratory of the Benaki Phytopathological Institute, where samples are to be dispatched.
- Control frequency: The controls are conducted on at least 5% of holders of the certificate of knowledge for the topics of Annex I of Directive 2009/128/EC in the relevant region of the competent authority

4. Illegal plant protection products

Official controls will be conducted in marketing of plant protection products in terms of the provisions of article 28 of the Regulation (EC) num. 1107/2009 and especially:

- 4.1. Placing in the market of unauthorized products and especially those with foreign labels in cooperation with custom authorities.
- 4.2. Placing in the market of unauthorized products and especially those that had granted emergency authorization for 120 days and the period of use had expired.

4.3. When necessary, sampling of products may be conducted after consultation with the Pesticides Chemical Control Laboratory of the Benaki Phytopathological Institute, where samples are to be dispatched.

Control frequency: The frequency of the controls is based on the past control records for infringements in the region of the competent authority. The controls are combined to those on manufacturers, retailers, wholesalers or professional users of plant protection products.

5. Expired plant protection products

The controls are conducted in retailers and wholesalers. The controlled products should be placed for sale (not specifically labeled as obsolete), which are suspected to alter their composition. Such are when:

5.1. The expiry period has passed at least twice of the referred on the label period.

5.2. There is deformation of the package, leaks or precipitate which does not dissolve after stirring

Control frequency: Maximum five (5) samples per competent authority for the year 2016 after consultation with the Chemical Control Laboratory of the Benaki Phytopathological Institute, where samples are to be dispatched. Any excess should be documented and result after consultation with the Coordinating National Authority and the Control Laboratory.

Combined controls

It is recommended to conduct combine controls if feasible to preserve resources. As an example, during the official controls on retailers, it is recommended to conduct controls on guaranteed composition and labeling.

Pilot control program for the chemical control of seeds treated with plant protection products

During 2016, the controls authorities, where seed treatment plant exist, should conduct sampling of treated seeds according to the instructions of the Coordinating National Authority and Pesticides Chemical Control Laboratory of the Benaki Phytopathological Institute. The samples will be analyzed for the seed loading. The samples are taken only from the storage of the seed treatment plant and should be accompanied by the relative sample of the relative batch of the plant protection product used for seed treatment. Each seed sample should be at least 500 grams.

The laboratory results are used for the calculation of uncertainty as expressed by repeatability and reproducibility and the improvement of the sampling method.

FVO Audit

Between 14 and 22 September 2015, the Food and Veterinary Office carried out an audit in Greece, under the provisions of Regulation (EC) No 882/2004 on official food and feed controls and Regulation (EC) No 1107/2009.

The objective of the audit was to evaluate the system for official controls on the marketing and use of plant protection products.

The final report of the audit “DG(SANTE) 2015-7475 – MR” is published on the official website of the Ministry of Rural Development and Food:

http://www.minagric.gr/images/stories/docs/agrotis/Georgika_Farmaka/elenxoi/2015-7475_Report.pdf.

The recommendations, that were resulted from the audit were:

N°	Recommendation
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>
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, 17, 18, 23, 64</p>
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>
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> <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>
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>

	Conclusions upon which this recommendation is based: 63 Associated findings upon which this recommendation is based: 47, 48
7	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 Conclusions upon which this recommendation is based: 95 Associated findings upon which this recommendation is based: 92
8	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 Conclusions upon which this recommendation is based: 96 Associated findings upon which this recommendation is based: 90