



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ  
Υπουργείο Αγροτικής Ανάπτυξης  
και Τροφίμων

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

**Carried out in Greece during 2017**

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



***Coordinating National Authority:***

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

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## **SUMMARY**

This report describes the outcome of the official controls on plant protection products, made during 2017 in Greece under the provisions of Regulation (EC) No 1107/2009.

The control program was mainly affected by three different facts that happened in 2017:

- 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**

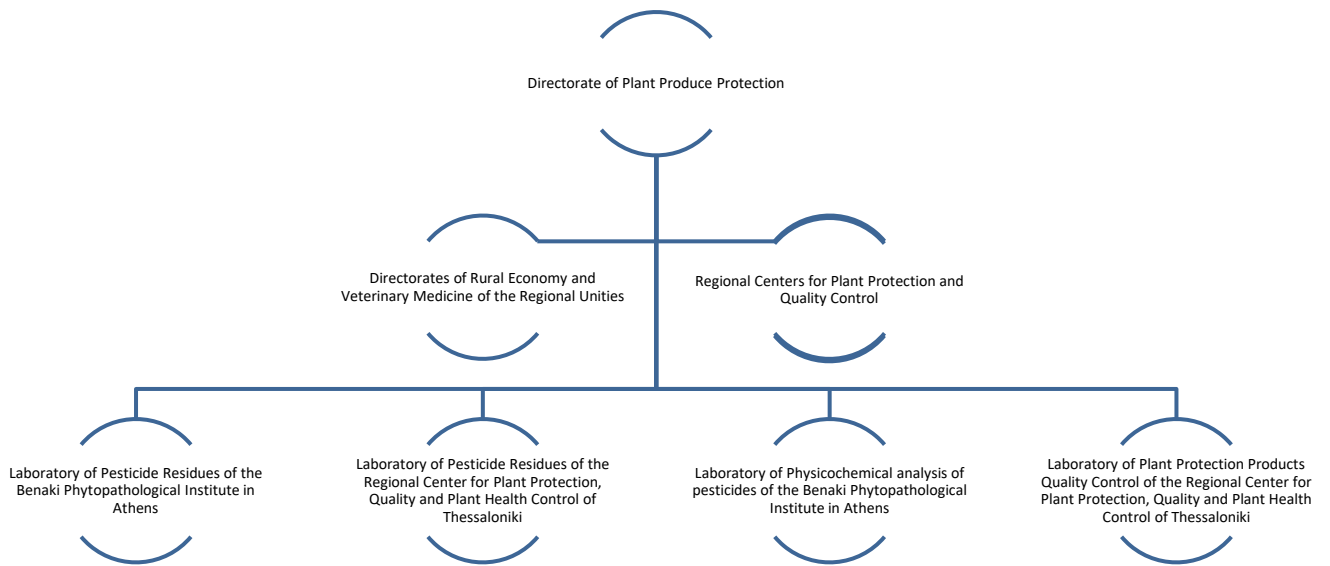
The basic relevant national legislation is law 4036 of 2012 "*Placing of pesticides in the market, sustainable use and relevant provisions*" which was published in the Government Gazette on January 27<sup>th</sup>, 2012. As mentioned in article 1, par. 1a, the scope of the law was among other to establish 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.

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/fytoprostasiamenu/elenxoifitoprostateytikonmenu/523-nomo-elegxon>).

## **ORGANIZATION COMPETENCIES OF THE CONTROL AUTHORITIES**

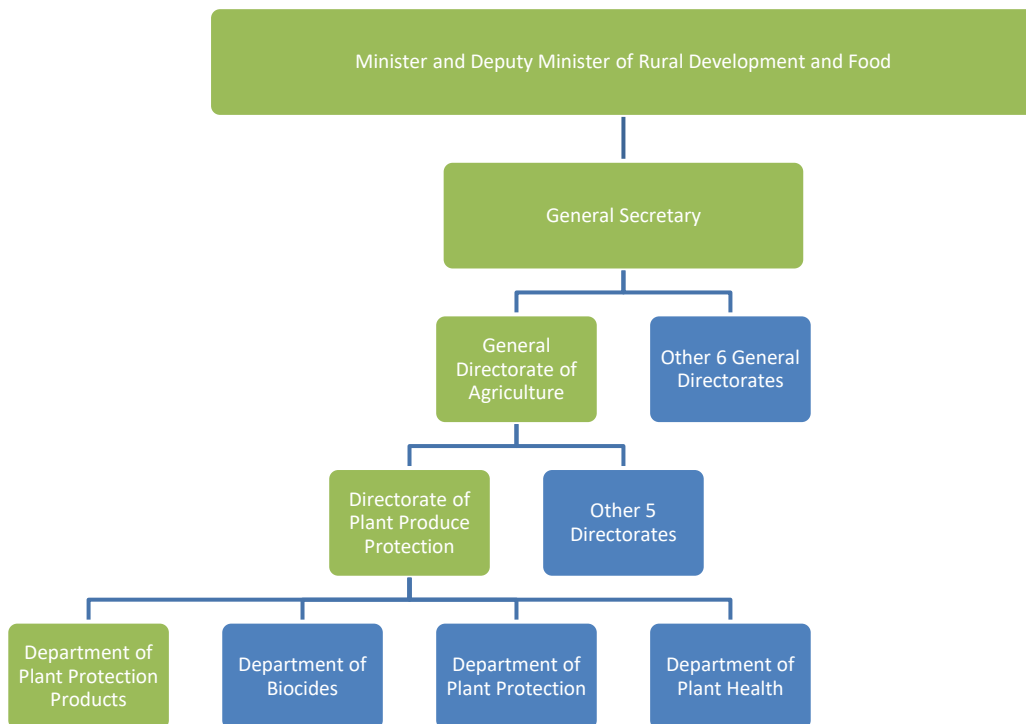
In general, the official controls in Greece are organized as follows:



A. Central authority

The Directorate of Plant Produce Protection (DPPP) of the Hellenic 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.

With the Presidential Decree 97/2017, issued on September 15, 2017, the organization structure of the Hellenic Ministry of Rural Development and Food was reformed as follows:



**Contact person for control measures**

The contact person for control measures is: Mr. Dionysis Ch. Vlachos, Agronomist MSc, Department of Plant Protection Products, Directorate of Plant Produce Protection, Hellenic Ministry of Rural Development and Food (tel.: +302109287238, fax: +302109212090, email: [d.vlachos@minagric.gr](mailto:d.vlachos@minagric.gr)).

**B. Extension authorities**

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 Quality and Plant Health Control (RCPQC) 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 RCPQC	Placing in the market of non authorized products	Non EU authorized products Illegal parallel trade Phase-out products
DREVS of RU and RCPQC	Guaranteed composition	Sampling and analysis of PPPs
DREVS of RU and RCPQC	Labelling	Label inspections
DREVS of RU and RCPQC	PPPs advertisement	Advertisement inspections
DREVS of RU and RCPQC	PPPs sales	Inspections at retailers and wholesalers

**C. Laboratories**

The network of official control laboratories in 2017 consisted of the following laboratories:

**C1. Control of Pesticide formulations**

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 Quality and Plant Health Control of Thessaloniki (for the year 2017, the specific laboratory did not participate the official controls as there was an ongoing procedure for the extension of the scope of its accreditation status).

**C2. Control of Pesticide residues**

1. Laboratory of Pesticide Residues of the Benaki Phytopathological Institute in Athens
2. Laboratory of Pesticide Residues of the Regional Center for Plant Protection Quality and Plant Health Control of Thessaloniki

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 Quality and Plant Health Control (RCPQC) 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.

### **CONTROL PROGRAM OF 2017**

The control program for the year **2017** was issued with the document 1803/17889/16-2-2017 and amended with the document 2932/29802/15-3-2017. According to the program, the following controls were planned:

#### **1. Plant protection products manufacturing plants**

The following controls were 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 were 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 were planned 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 was 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 were to be 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 and the label of the plant protection products were planned to be controlled in retailers and wholesalers, especially plant protection products that are subject to authorization modifications during 2016 in terms of spectrum of action and pre-harvest interval due to any amendment of Annexes II and III of Regulation (EC) No 396/2005 of the European Parliament and of the Council. For example, the following pesticide formulations with active substance are mentioned:

1. Chlorpyrifos EC, WG, CS	6. Thiamethoxam	11. Fluzifop-p-butyl
2. Beta-cyfluthrin	7. Pirimicarb	12. Spiroxamine
3. Folpet	8. Pirimiphos-methyl	13. Methomyl
4. Fludioxynil	9. Deltamethrin	
5. Abamectin	10. Diquat	

Control frequency: Each competent authority should conduct at least 5 controls on packaging and labelling for the year 2017.

#### 1.4. Official controls on the content of the plant protection products

The official controls on the packaging and labelling of the plant protection products were to 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 Quality and Plant Health 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 2017. The distribution is described in the following table:

Distribution of plant protection products samples for 2017 based on the contained active substance			
A. Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute ( <a href="http://en.bpi.gr/section.aspx?id=1&amp;subid=24&amp;subsubid=89">http://en.bpi.gr/section.aspx?id=1&amp;subid=24&amp;subsubid=89</a> ):			
1. fosetyl-aluminium	6. mancozeb	11. mepiquat chloride	16. imazalil
2. chlorpyrifos	7. beta-cyfluthrin	12. fluazinam	17. metalaxyl
3. thiacloprid	8. folpet	13. florasulam	18. imazamox
4. captan	9. ethephon	14. fludioxynil	19. thiophanate methyl
5. lambda-cyhalothrin	10. pendimethalin	15. fenoxaprop-p-ethyl	20. abamectin
21. pendimethalin (including controls on the content of nitroso-pendimethalin)			

#### 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 2017.

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 2017 was programmed to 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 2017.

**3. Official controls on plant protection products use**

The official controls on plant protection products use during 2017 was programmed to 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 were programmed to 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 2017, 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 to 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 was 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 were programmed to be 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 2017 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 2017, the controls authorities, where seed treatment plant exist, were programmed to 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.

#### **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/elnoxifitoprostateytikonmenu/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> .

**TRAINING OF PERSONNEL****A. INEP**

Personnel from the extension authorities, involved to official controls on plant protection products, attended a special training program on “Planning and implementation of official controls on plant protection products”

**B. BTSF SUD-TRAININGS**

Personnel from the extension authorities, involved to official controls on plant protection products, attended BTSF training courses on plant protection products. As part of the Better Training for Safer Food initiative, the Consumers, Health and Food Executive Agency is organizing and implementing a 24 month training programme with the objective to support the sustainable use of plant protection products in the EU. The training is mainly to be held for officials from EU Member States (MS), a limited number of participants from non-EU countries from potential candidate countries (CC), and participants from EFTA/EEA countries under the 'Better Training for Safer Food' Initiative.

**C. BTSF INTERNAL AUDIT**

Personnel from the Regional Centers for Plant Protection Quality and Plant Health Control (RCPQC) attended BTSF training courses on audit systems and internal auditing.

**DEFICIENCIES****A. Economic crisis**

The strong economic crisis affected also the pesticide controls system, by the means of lack of resources.

In the Coordinating National Authority (Directorate of Plant Produce Protection) only one permanent employee is responsible for the coordination of all official controls on plant protection products and pesticide residues, the file compilation and suggestion of administrative sanctions on all infringements and also the legislative proposals.

Due to economic restrictions, the number of trips for inspections had been limited. For the year 2017, a maximum of 220 Km per month was allocated to each inspector. Responsible staff for the visited DREVs highlighted that this would require a significant reorganisation of the works in order to be able to conduct the same number of inspections.

**B. FVO audit**

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 were:

<b>N°</b>	<b>Recommendation</b>	<b>Action Proposed by the Competent Authority</b>
1	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. Conclusions upon which this recommendation is based: 33, 81 Associated findings upon which this recommendation is based: 11, 57, 68	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. The existing training program will be reviewed in a three-month period according to the audit findings including on-job trainings.

		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.
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>	<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> <p>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.</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>	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> <p>Conclusions upon which this recommendation is based: 62</p> <p>Associated findings upon which this recommendation is based: 40</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.
5	Ensure that the programme of official controls on formulation analysis is risk based to provide assurances	The annual control program of the article 68 of Regulation (EC) 1107/2009 on formulation

	<p>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>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 2017 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 (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.</p>
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 2017 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>

**RESULTS OF CONTROL ACTIVITIES ON PLANT PROTECTION PRODUCTS FOR THE YEAR 2017****GENERAL**

The total sanctions (fines) imposed in 2017(\*) in comparison to those of 2016 were:

Infringement of law 4036/2012	2016 num of cases	2016 fines	2017 num of cases	2017 fines
Use of unauthorized ppps	10	15,700 €	26	43,200 €
Use of unauthorized ppps and also use of authorized ppps not according label	0	0	1	2,650 €
Use of unauthorized ppps and MRL excess	1	2,000 €	0	0
Unauthorized ppps (except use)	12	66,000 €	44	158,075 €
Unauthorized ppps (except use) and also other infringements	3	7.450 €	8	19,750 €
Irregularities in ppps content	1	2,000 €	13	111,350 €
Irregularities in ppps packaging or label	2	1,000 €	15	26,840 €
Outdated ppps	13	2,800 €	3	1,000 €
Irregularities in ppps advertisement	1	0	4	6,150 €
Other infringement of Reg. 1107/2009	2	3,500 €	1	1,000 €
MRL excess (Greek origin products)	7	14,650 €	76	219,687 €
MRL excess (imported products)	1	1,000 €	5	9,125 €
Infringements related with sustainable use	12	2,800 €	21	16,130 €
Use of authorized ppps not according label	40	19,816 €	133	56,350 €
Illegal sales of ppps	7	7,500 €	11	13,600 €
Sales of ppps not according specifications	13	14,700 €	30	34,025 €
Sales of ppps without e-registration of sales	13	9,250 €	28	26,300 €
Other	1	0	0	0
<b>TOTAL</b>	<b>140</b>	<b>173,816 €</b>	<b>423</b>	<b>751,482 €</b>

\* The data of the table refer to administrative decisions issued during 2017 and do not cover cases of 2017 that the decision was issued in 2018

**A. Unauthorized products importation**

During 2017 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:

Region	Control date	Origin of illegal product	Illegal products
Imathia	20/07/2016	Italy	"RONSTAR FL"
Imathia	20/07/2016	Turkey	"ETAPIC 72 SL"
Thessaloniki	09/05/2016	Unknown	lambda cyhalothrin, alpha-cypermethrin, thiacloprid, pirimiphos methyl, b-naphthoxy-acetic acid, fenbuconazole, thiacloprid
Thessaloniki	30/09/2016	Turkey, Boulgaria & Italy	Süper Alimek 1.8 EC (abamectin), Lannate 25 WP (methomyl), Ready Germiplus (pendimethalin 1,7%)
Orestiada, Evros	19/01/2017	Boulgaria	Ридомил Голд ("Ridomil Gold"), БОРДО МИКС 20 ВП ("Bordomix 20WP"), Куадрис 25 СК ("Quadris")

<b>Serres</b>	27/03/2017	Turkey	Abamec (abamectin)
<b>Imathia</b>	15/03/2017	Turkey	Hypnose 05SG" (emamectin benzoate) και β) "Antalia 250EC" (difenoconazole)
<b>Ilia</b>	21/03/2017	Albania	Methonate 90SP (methomyl)
<b>Evros</b>	29/03/2016	Turkey	"MASSMECTIN", "MACRO-MIX L" "MERLIN"
<b>Ioannina</b>	08/03/2016	Jordan, Albania	DUSTRIN (malathion) (Jordan) & MERPAN (captan), Albania
<b>Evros</b>	20/08/2015	Turkey	"Coragen 20SC" (Chlorantraniliprole), "Basagran 48SL" (bentazone), "Belair 2,5EC" (deltamethrin)
<b>Evros</b>	20/08/2015	Turkey	"Coragen 20SC" (Chlorantraniliprole), "Basagran 48SL" (bentazone), "Belair 2,5EC" (deltamethrin)
<b>Rodopi</b>	04/08/2016	Boulgaria	"Roundup" (glyphosate), "DIKLAIN 2,5 EK" deltamethrin), Armetil M 72WP" (mancozeb+metalaxyl)
<b>Evros</b>	17/04/2016	Turkey	"DELAYS GOLD" (metolachlor-s), "MASSMECTIN" (abamectin), "BANNER 50 EC" (thiobencarb), PASCAL 20 SP" (acetamiprid), "PANCART 5 SC" (emamectin benzoate)
<b>Evros</b>	17/04/2016	Turkey	"DELAYS GOLD" (metolachlor-s), "MASSMECTIN" (abamectin), "BANNER 50 EC" (thiobencarb), PASCAL 20 SP" (acetamiprid), "PANCART 5 SC" (emamectin benzoate)
<b>Ioannina</b>	25/02/2016	China	METANATE 90 SP (methomyl)
<b>Ioannina</b>	16/03/2016	Albania	DUSTRIN (malathion), GARDENOP PASTA (bromadiolone 0,005%), DETIA GARANTEX (bromadiolone 0,005%)
<b>Ioannina</b>	25/02/2016	China	METANATE 90 SP (methomyl)
<b>Thessaloniki</b>	17/07/2014	Turkey	MASSFIKS 1,1 dimethyl piperidium chloride (mepiquat chloride), CANMEC (abamectin), DALTON 5 SG 5% (emamectin benzoate)
<b>Piraeus</b>	07/04/2016		Phosphonic product
<b>Rodopi</b>	16/04/2015	Boulgaria	"STOMP NEW 330 EC" (pendimethalin), "DYAN 960 EK" (s-metolachlor) & "KOHFNODOP" (imidacloprid)
<b>Dodecanese</b>	24/09/2015	Turkey	methomyl
<b>Piraeus</b>	06/04/2016		Phosphonic product
<b>Serres</b>	07/05/2017	Boulgaria	Karate (lambda Cyhalothrin )
<b>Serres</b>	06/05/2017	Boulgaria	"Agria 1050+" (cypermethrin & chlorpyrifos), "Affirm 095SG" (emamectin) & "Laudis OD" (tembotrione)
<b>Serres</b>	18/04/2017	Boulgaria	Caryx 240SL (metconazole & mepiquat)
<b>Herakleion</b>	14/06/2017		Packages without labels
<b>Evros</b>	04/08/2017	Turkey	DALTON 5SG (emamectin benzoate), EFFORE 20SP (acetamiprid), KORMIX 50SL mepiquat chloride), TUROP ULTRA (Thidiazuron+Diuron), KORTOMIL 200SL (methomyl) & BASAGRAN M SL (bentazone+MCPA)
<b>Ilia</b>	09/06/2017		Phosphonic product
<b>Serres</b>	10/06/2017	Turkey	Lannate 90, δ.o. Methomyl & Kortomil 90, δ.o. methomyl
<b>Rodopi</b>	21/09/2017	Turkey	EPHTAL (ethephon)
<b>Rodopi</b>	15/09/2017	Boulgaria	AΦBPM (emamectin benzoate) & Haca 360CP (glyphosate)
<b>Serres</b>	10/06/2017	Turkey	Lannate 90, δ.o. Methomyl & Kortomil 90, δ.o. methomyl

**B. Use of unauthorized products**

The following cases of use of unauthorized products were detected in 2017, after residue analysis:

Crop	PPP	Residue concentration (mg/kg)
Courgette	Dieldrin	0,020
Courgette	Dieldrin	0,030
Tomato sprouts	Spinetoram	0,019
Tomato sprouts	Spinetoram	0,010
Pears	Spinetoram	0,014
cotton sprouts	Thidiazuron	0,020
Pears	Spinetoram	0,027
cotton sprouts	Thidiazuron	0,100
cotton sprouts	Thidiazuron	0,040
Pears	Diphenylamine	0,010
cotton sprouts	Thidiazuron	0,080
cotton sprouts	Thidiazuron	0,260
cotton sprouts	Thidiazuron	0,140
cotton sprouts	Thidiazuron	0,350
cotton sprouts	Thidiazuron	0,360
cotton sprouts	Thidiazuron	0,520
cotton sprouts	Thidiazuron	0,100
cotton sprouts	Thidiazuron	0,060
apples	Spinetoram	0,025
Courgette	Dieldrin	0,042
tomatoes	Propargite	0,010
Pears	Spinetoram	0,044
potatoes	Carbaryl	0,016
pepper sprouts	Propargite	0,050
pepper sprouts	Propargite	0,010
Pears	Spinetoram	0,01
Pears	Spinetoram	0,014
beans	Carbaryl	0,022

**C. Official chemical controls on plant protection products**

The official controls on composition of plant protection products were conducted by the Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute. A total of five hundred eighty (580) samples of the following categories were analyzed:

- Plant protection products (ppp) authorized or not in the Greek market,
- Parallel trade plant protection products for similarity control,
- Spray solutions,



- Fertilizers,
- Blank plastic packaging after the triple rinsing process,
- Soil samples for pesticide residue determination;
- Samples of coated seed to determine the level of dust and load

Finally, there were also re-examinations of plant protection product preparations that were out of specification at the first examination. Table 1 summarizes the type and number of samples analyzed in the reported year. In addition, it should be noted that the total samples analyzed related to the determination of one hundred and seventy (170) different active substances of plant protection products.

Of the five hundred and eighty (580) samples of plant protection product formulations, three hundred and fifty one (351) samples belong to the market control sample for the year 2017. The aforementioned samples were sent under Ministerial Decisions 2932/29802 / 15-03-2017 and 1803/17889 / 16-02-2017 within the framework of the implementation of Regulation 1107/2009 EC and Law 4036/2012 (Government Gazette A And containing the active substances: fosetylaluminum, chlorpyrifos, thiacloprid, captan, lambda-cyhalothrin, mancozeb, beta-cyfluthrin, folpet, ethephon, pendimethalin, mepiquat chloride, fluazinam, imazalil, metalaxyl, imazamox, thiophanate methyl, abamectin and pendimethalin (including nitrosopendimethalin). It should be noted that the control of the above-mentioned active substances also concerns mixtures with other active substances. Table 2 describes the total aggregated results of the laboratory analysis of the three hundred and fifty one (351) samples for the 2017 official controls.

**Table 1: Categorization of the samples analyzed in 2017**

Control category	Num of analyzed samples	Num of infringements detected
2017 market control	351	21
State program against <i>Dacus oleae</i>	73	0
Government supplies of biocides	8	0
Spray solutions	8	0
Fertilizers for the control of phosphonic acid ions	7	7
Claims	12	0
Illegal ppps without label (identifying active substance)	13	13
Parallel trade products	27	0
Soil samples for the detection of pesticide residues	14	0
Counter analysis (second analysis after infringement)	2	0
Treated seeds for the detection of load (non-official samples)	29	0
Suicides	5	0
Chemical analysis for other European authorities/bodies		
<ul style="list-style-type: none"> <li>• Hungary: National food Safety Office Hungary (nitrosopendimethalin content analysis)</li> </ul>	6	0
<ul style="list-style-type: none"> <li>• Germany: Bundesamt für Verbraucherschutz und Lebensmittelsicherheit (BVL) (nitrosopendimethalin content analysis)</li> </ul>	10	0
<ul style="list-style-type: none"> <li>• ECPA: European Crop Protection Association- empty packages from Bulgaria and Slovakia</li> </ul>	15	0
Total	31	0
<b>TOTAL NUMBER OF SAMPLES</b>	<b>580</b>	<b>41</b>

**Table 2: Cumulative analytical results of the 351 samples in the market control program for the year 2017**

Active substance (a.s.)	Num of analyzed samples for the control of a.s. content and physico-chemical properties	Num of infringements detected
Abamectin	44	0
Beta-cyfluthrin	16	0
Captan	20	0
Chlorpyrifos	49	1
Copper	1	0
Copper / Metalaxyl M	3	0
Cyprodinil / Fludioxanil	1	0
Deltamethrin	3	0
Deltamethrin / Thiacloprid	3	0
Ethephon	5	0
Fenoxaprop –p-ethyl	1	0
Florasulam / Penoxsulam	1	0
Florasulam / Mesotrione	1	0
Florasulam / 2,4 D	1	0
Fluazinam	2	0
Fluazinam / azoxystrobin	1	0
Folpet	11	0
Folpet / Fosetyl Al	3	0
Folpet / Metalaxyl M	1	0
Fosetyl Al	23	3
Fosetyl Al / Propamocarb	2	0
Imazanox	3	0
L-Cyhalothrin	30	0
Mancozeb	31	0
Mancozeb / Bentiavalicarb	1	0
Mancozeb / Metalaxyl M	8	0
Mancozeb / Fosetyl Al	2	0
Mepiquat Chloride	6	0
Pendimethalin (Relevant impurity -nitrosopendimethalin)	45	17
Tebuconazole (treated seeds)	2	0
Thiacloprid	11	0
Thiophanate methyl	20	0
<b>TOTAL</b>	<b>351</b>	<b>21</b>

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

In year 2017, 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
269	4 cases investigated

Infringements on labelling and packaging	
Category	Cases of infringements
Instructions of use	2
Batch num/manufacturing date/expiry date	0
Safety phrases/classification	1
Wrong packaging plant	0
Wrong packaging size (parallel import product)	0
Safe disposal of empty containers (parallel import product)	0
Description of content in active substance	0
Storage conditions	0
Not clear and indelible label (Reg.547/2011)	0
False additional indication	1
Categories of users allowed to use the plant protection product	0

**E. Official controls on sales of plant protection products**

In year 2017, the official controls on sales of plant protection products are presented below:

Official controls on sales	Total numbers
Inspections	558
Cases investigated	43
Infringements	

Infringement	Number per infringement type
Unauthorized sales	6

Unauthorized products (recalled or without authorization)	1
Inappropriate storage conditions	18
E-register of PPPs retailer sales	17

#### F. Official controls on plant protection products advertisement

In year 2017, the official controls on plant protection products advertisement are presented below:

Total number of controls on advertisement	Infringements
<b>141</b>	2 cases investigated 2 sanction cases: <ul style="list-style-type: none"> <li>▪ 1 advertisement containing indications not relevant with the respective authorization</li> <li>▪ 1 advertisement of unauthorized product</li> </ul>

#### G. Official controls at user level

In year 2017, 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	966 (674 on-site inspections + 292 samples of leaves and sprouts)
Sampling and residue analysis	~2,000
<b>TOTAL</b>	<b>~3,000</b>

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)
Use of authorized plant protection product not according label	150
Use of unauthorized plant protection products	4
<b>TOTAL</b>	<b>154</b>

## H. Official controls on sustainable use of plant protection products

In 2017, during the official controls on sustainable use of plant protection products and especially for the provisions of article 12 of Directive 2009/128/EC, eighteen (18) cases of infringements were investigated and sanctions were imposed.

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).

### **CONTROL PROGRAM OF YEAR 2018.**

The control program for the year **2018** was issued with the document num. 2958/41888/16-3-2018. 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 official controls on the packaging and labelling of the plant protection products will be conducted through sampling from pesticide sales shops (wholesales and retailers). The controls are applied to plant protection product packages and labels that are subject to authorization modifications during 2017 in terms of uses for which the plant protection products have been authorized and pre-harvest interval, due to an amendment to Annexes II and III of Regulation (EC)

No 396/2005 of the European Parliament and of the Council. For example, the following pesticide formulations with active substance are mentioned:

Sampling plant protection products for the year 2017		
Plant protection products with active substances:		
1. chlorpyrifos	6. mepiquat chloride	11. metalaxyl
2. abamectin	7. tebufenpyrad	12. acrinathrin
3. fluazifop-p-butyl	8. dimethoate	13. fenamidone
4. pirimiphos-methyl	9. triadimenol	
5. deltamethrin	10. fenpropimorph	

The controls of the labels of plant protection products should be registered with the special digital service "Plant protection products", in accordance with Article 5 of the num. 1/32/2-1-2015 (Government Gazette B26) of the Joint Ministerial Decision on the "Definition of supplementary measures for the application of Regulation (EC) No 1107/2009 of the European Parliament and of the Council (OJ L 309, 24.11.2009, p. 1) ".

Control frequency: Each competent authority should take at least five (5) labels and packages of plant protection products for the year 2018.

#### 1.4. Official controls on plant protection products content.

The official controls on plant protection products content 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 Quality and Plant Health Control of the Ministry of Rural Development and Food of Thessaloniki. Samples can be taken from pesticide industries, retailers, wholesalers or storage places of pesticide plants. Special attention should be paid by the control authorities when sampling the preparations to ensure that both the sample and the counter-sample are of the same batch.

Control frequency: Each competent authority should take at least ten (10) samples of plant protection products for the year 2018. The distribution is described in the following table:

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

1	Cypermethrin	12	Myclobutanil
2	Aminopyralid	13	Nicosulfuron
3	Metrafenone	14	Triadimenol
4	Hexythiazox	15	Mesotrione
5	2,4 D	16	Phosmet
6	Chlorpyrifos	17	Pyrimethanil
7	Fosetyl aluminium	18	Methomyl
8	Maleic hydrazide	19	Dicamba
9	Glyphosate	20	Pyroxsulam
10	Quizalofop-p-ethyl	21	Clodinafop propargyl
11	Pyrethrins		

The Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute for the year 2018 will check the chromatographic profile of all market control formulations in order to identify their guaranteed composition in terms of their authorization.

**B. Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection Quality and Plant Health Control of the Ministry of Rural Development and Food of Thessaloniki**

<b>1</b>	Kresoxim-methyl	<b>5</b>	Dimethomorph
<b>2</b>	Triadimenol	<b>6</b>	Pyraclostrobin
<b>3</b>	Nicosulfuron	<b>7</b>	Alpha-cypermethrin
<b>4</b>	Rimsulfuron	<b>8</b>	Azoxystrobin

The controls of plant protection products content should be registered with the special digital service "Plant protection products", in accordance with Article 5 of num. 1/32/2-1-2015 (Government Gazette B26) of the Joint Ministerial Decision on the "Definition of supplementary measures for the application of Regulation (EC) No 1107/2009 of the European Parliament and of the Council (OJ L 309, 24.11.2009, p. 1) ".

**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 2018.

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

The official controls focus on:

- ✓ Records of supply and use of plant protection products.
- ✓ 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).
- ✓ Sampling of seed packages to check the labelling of treated seed in comparison to the relevant plant protection product authorization.
- ✓ 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 2018 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 2018.

### 3. Official controls on plant protection products use

The official controls on plant protection products use during 2018 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 2018, 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 2018 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 2018, 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 plants 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.