



HELLENIC REPUBLIC
MINISTRY OF RURAL DEVELOPMENT AND FOOD

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

Carried out in Greece during 2018

[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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This report describes the outcome of the official controls on plant protection products, made during 2018 in Greece under the provisions of Regulation (EC) No 1107/2009.

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.

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/elenzoifitoprostateytikonmenu/523-nomo-elegxon>).

ORGANIZATION COMPETENCIES OF THE CONTROL AUTHORITIES

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.

Contact person for control measures

The contact persons for control measures is: 1) Mrs Mavridou Annoula - Head of Plant Protection Directorate, Hellenic Ministry of Rural Development and Food (tel.: +302109287221, fax: +302109212090, email: amavridou@minagric.gr), 2) Mrs Pitarokili Danae - Head of Department of Plant Protection Products (tel.: +302109287254, fax: +302109212090, email: dpitarokili@minagric.gr), 3) Mrs Tsiotsiopoulou Panagiota - Agronomist MSc, Department of Plant Protection Products, (tel.: +302109287215, fax: +302109212090, email: tsiotsiopoulou@minagric.gr), 4) Mrs Efstathiou Violeta - Agronomist MSc, Department of Plant Protection Products, (tel.: +302109287164, fax: +302109212090, email: veustathiou@minagric.gr).

Laboratories

The official control laboratories in 2018 are:

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.

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.

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>

RESULTS OF CONTROL ACTIVITIES ON PLANT PROTECTION PRODUCTS FOR THE YEAR 2017-2018

GENERAL INFORMATION

The total sanctions (fines) imposed in 2018(*) in comparison to those of 2017 were:

Cases of Infringement of Law 4036/2012	2017 No of cases	2017 Fines (€)	2018 No of cases	2018 Fines (€)
Use of unauthorized ppps	26	43,200 €	11	12,600 €
Use of unauthorized ppps and also use of authorized ppps not according label	1	2,650 €	0	0
Use of unauthorized ppps and MRL excess	0	0	1	1500 €
Unauthorized ppps (except use)	44	158,075 €	23	68,075 €
Unauthorized ppps (except use) and also other infringements	8	19,750 €	2	1,500 €
Irregularities in ppps content	13	111,350 €	4	23,650 €
Irregularities in ppps packaging or label	15	26,840 €	5	0
Outdated ppps	3	1,000 €	3	2,800 €
Irregularities in ppps advertisement	4	6,150 €	6	9,225 €
Other infringement of Reg. 1107/2009	1	1,000 €	3	2,150 €
MRL excess (Greek origin products)	76	219,687 €	65	140,710 €
MRL excess (imported products)	5	9,125 €	17	19,000 €
MRL excess (Greek origin products) and Use of authorized ppps not according label	0	0	7	23,400 €
Loss of traceability	0	0	5	14,000 €
Infringements related with sustainable use	21	16,130 €	32	9,300 €
Use of authorized ppps not according label	133	56,350 €	108	48,200 €
Illegal sales of ppps	11	13,600 €	9	20,860 €
Sales of ppps not according specifications	30	34,025 €	11	13,350 €
Sales of ppps without e-registration of sales	28	26,300 €	9	7,250 €
Sales of ppps without recipes	0	0	7	7,500 €
Other	0	0	4	1,000 €
TOTAL	423	751,482 €	332	426,070 €

* The data of the table refer to administrative decisions issued during 2018 and do not cover cases of 2018 that the decision was issued in 2019

A. Unauthorized products importation

During 2018 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	Country of Origin of illegal product	Illegal products
Serres	24/10/2017	Turkey	Kortomil 90 (methomyl)
Thessaloniki	17/1/2018	Hellas	Ethygene II (ethygen)
Aitolokarnania	24/1/2018	Great Britain	Alsa
Evros	22/2/2018	Turkey	Observe 300EC (Propiconazole, Difenconazole)
Evros	22/2/2018	Turkey	Select Super (clethodim)
Evros	22/2/2018	Turkey	Sumosa EC (lambda-cyhalothrin)
Evros	22/2/2018	Turkey	Lontrel Extra (clopyralid, picloram, aminopyralid)
Evros	22/2/2018	Turkey	Grandstar (tribenuron methyl)
Evros	22/2/2018	Turkey	Lanten SP 90 (methomyl)
Evros - Orestiada	4/3/2018	Turkey	Axial 050 EC (pinoxaden)
Evros - Orestiada	4/3/2018	Turkey	Admin 10 EC(pyriproxifen)
Hraklio - Crete	27/9/2017		<i>β-naphthoxyacetic acid</i> (2-NOA) (white packaging)
Evros	27/4/2018	Turkey	Pancart 5 SG
Evros	27/4/2018	Turkey	Caniplan 20 SP
Pieria	26/4/2018	Bulgaria	ДЕЛТАГРИ (deltamethrin)
Rodopi	26/4/2018	Bulgaria	Валсаглиф (glyphosate)
Rodopi	18/4/2018	Bulgaria	Валсаглиф (glyphosate)
Rodopi	18/4/2018	Bulgaria	ШАМПИОН ВП (copper hydroxide)
Rodopi	12/4/2019	Bulgaria	Децис (deltamethrin)
Rodopi	12/4/2019	Bulgaria	Фунгуран ОН 50 ВП(copper hydroxide)
Rodopi	26/4/2018	Bulgaria	Фунгуран ОН 50 ВП(copper hydroxide)
Rodopi	26/4/2018	Bulgaria	НАСА 360 СЛ (glyphosate),
Rodopi	26/4/2018	Bulgaria	КОНФИДОР ЕНЕРЖИ ОД (imidacloprid, deltamethrin)
Rodopi	26/4/2018	Bulgaria	СКОР 250 ЕК (difenoconazole)
Ioannina	7/6/2018	Albania	Metanate 90 SP (methomyl)
Arkadia	6/6/2018	Unknown	A lot of ppps
Rodopi	10/5/2018	Bulgaria	ДЕЛТАГРИ (deltamethrin)
Rodopi	10/5/2018	Bulgaria	Фунгуран ОН 50 ВП (copper hydroxide)
Rodopi	10/5/2018	Bulgaria	Фунгуран ОН 50 ВП (copper hydroxide)
Xanthi	11/5/2018	Bulgaria	ROUNDUP (glyphosate)
Xanthi	11/5/2018	Bulgaria	DECIS 2,5 EC (deltamethrin)
Xanthi	11/5/2018	Bulgaria	mancozeb
Thessaloniki	14/2/2018	Turkey	a lot of ppps
Evros-Orestiada	16/9/2018	Turkey	TUROP ULTRA SC (thiadiazuron, diuron)
Evros-Orestiada	16/9/2018	Turkey	PIYAMBO EC (pendimethalin)

B. Use of unauthorized products

C. The following cases of use of unauthorized products were detected in 2018, after residue analysis:

Crop	PPP	Residue concentration (mg/kg)
Cabbage seedlings	Pencycuron	0,010
Apple	Propargite	0,013
Tomato	chlorfenapyr	0,015
Tomato	chlorfenapyr	0,016
Tomato	chlorfenapyr	< 0,010
Tomato	chlorfenapyr	0,015
Tomato	chlorfenapyr	0,010
Tomato	chlorfenapyr	0,011
Tomato	chlorfenapyr	0,011
Tomato	chlorfenapyr	0,017
Tomato	chlorfenapyr	0,016
cotton leaves	endosulfan	0,187
tomato	chlorfenapyr	0,017

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 four hundred sixty-seven (467) 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 eighty-four (84) different active substances of plant protection products.

Out of the four hundred and sixty-seven (467) samples of plant protection product formulations, two hundred and fifty-one (251) samples belong to the market control sample for the year 2018.

The aforementioned samples were sent under Ministerial Decisions 2958/41888/16-3-2018 within the framework of the implementation of Regulation 1107/2009 EC and Law 4036/2012 (Government Gazette A

And containing the active substances: Cypermethrin, Alpha-cypermethrin, pyraclostrobin, Aminopyralid, Metrafenone, Hexythiazox, 2,4 D, Myclobutanil, Nicosulfuron, Triadimenol, Mesotrione, Phosmet, Chlorpyrifos, Fosetyl-aluminium, Maleic hydrazide, Glyphosate, Quinalofop-p-ethyl, Pyrethrins, Pyrimethanil, Methomyl, Dicamba, Pyroxsulam, Pendimethalin (including N-nitrosopendimethalin) και Dimethoate (including omethoate and isodimethoate). 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 two hundred and fifty-one (251) samples for the 2018 official controls.

Table 1: Categorization of the samples analyzed in 2018

Control category	No of analyzed samples	No of infringements detected
2018 market control	251	6
State program against <i>Dacus oleae</i>	73	0
Government supplies of biocides	2	0
Spray solutions	7	0
Fertilizers for the control of phosphonic acid ions	12	12
Fertilizers for the control of 2 phenyl-phenol	2	2
Unknown samples for verification	5	5
Determination of toxicological relevant impurity (n-nitrosopendimethalin) in formulations with active substance pendimethalin- <i>Complaint</i>	1	-
Formulations with active substance dimethoate for its determination active substance and toxicologically of relevant impurities omethoate and isodimethoate- <i>Complaint</i>	29	-
Illegal ppps without label (identifying active substance)	6	6
Parallel trade products	18	0
Soil samples for the detection of pesticide residues	18	0
Counter analysis (second analysis after infringement)	1	0
Treated seeds for the detection of load (non-official samples)	31	0
Non official samples	2	
Chemical analysis for other European authorities/bodies		
<ul style="list-style-type: none"> • ECPA: European Crop Protection Association- empty packages from Bulgaria and Slovakia 	11	0
Total	31	0
TOTAL NUMBER OF SAMPLES	467	31

**Table 2: Cumulative analytical results of the 251 samples
in the market control program for the year 2018**

Active substance (a.s.)	Num of analyzed samples for the control of a.s. content and physico-chemical properties	Num of infringements detected
2.4 D	10	-
2.4 D		
Dicamba	1	-
MCPA		
Mecoprop-P		
2.4 D	4	-
Glyphosate		
Alpha-cypermethrin	2	-
Ametoctradin	1	-
dimethomorph		
Aminopyralid	5	1
Triclopyr		
Azoxystrobin	1	-
Difenoconazole		
Chlorpyrifos	39	-
Cypermethrin	25	-
Dicamba	5	-
Fluopyram	1	-
Triadimenol		
Flyxapyroxad	1	-
Fosetyl Al	15	-
Fosetyl Al	1	-
Mancozeb		
Glyphosate	30	-
Hexythiazox	4	-
Kresoxim Methyl	1	-
Kresoxim Methyl	1	-
Boscalid		
Lambda-cyhalothrin	1	-
Maleic Hydrazide	1	-
Pelargonic Acid		
Mesotrione	2	-
Mesotrione	2	-
Nicosulfuron		
Methomyl	4	-
Metrafenone	9	-
Myclobutanil	28	-
Nicosulfuron	6	3
Phosmet	13	-
Propineb	5	-
Triadimenol		
Pyraclostrobin	3	-
Boscalid		

Pyraclostrobin	1	-
Dimethomorph		
Pyrethrins	6	2
Pyrimethanil	3	-
Pyrimethanil	1	-
Dithianon		
Pyroxsulam	1	-
Quizalofop-P-ethyl	14	-
Triadimenol	4	-
TOTAL	251	6

The official controls on composition of plant protection products were conducted by the Laboratory of Chemical Control of Pesticides of the Laboratory of Plant Protection Products Quality Control of the Regional Center for Plant Protection and Quality Control of Thessaloniki of the Ministry of Rural Development and Food. A total of thirty nine (39) samples of the following categories were analyzed: kresoxim-methyl, dimethomorph, azoxystrobin, alpha-cypermethrin, nicosulfuron, pyraclostrobin, pyraclostrobin/dimethomorph, triadimenol.

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

In year 2018, 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
214	0

E. Official controls on sales of plant protection products

In year 2018, the official controls on sales of plant protection products are presented below:

Official controls on sales	Total numbers
Inspections	564
Cases investigated	44
Infringements	40

F. Official controls on plant protection products advertisement

In year 2018, the official controls on plant protection products advertisement are presented below:

Total number of controls on advertisement	Infringements
174	7 cases investigated

4 sanction cases:

- 3 advertisement containing indications not relevant with the respective authorization
- 1 advertisement of unauthorized product

G. Official controls at user level

In year 2018, the official controls regarding the proper use of plant protection products 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	1,280 (636 on-site inspections + 544 samples of leaves and sprouts)
Sampling and residue analysis	~2,200
TOTAL	~3,500

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	115
Use of unauthorized plant protection products	12
TOTAL	127

H. Official controls on sustainable use of plant protection products

In 2018, during the official controls on sustainable use of plant protection products and especially for the provisions of article 12 of Directive 2009/128/EC, **thirty-two (32) cases** of infringements **were investigated** and **23 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).