

**ANNEX**

**Response of the Competent Authorities of Greece to the recommendations of Mission Report ref. DG(SANCO)/2009-8162-MR carried out from 07 to 15 September 2009 in order to assess the official control systems in place for pesticide residues in and on food of plant origin**

<b>N°.</b>	<b>Recommendation</b>	<b>Action Proposed by the Competent Authority</b>
1	Ensure that a multi-annual national control programme for pesticide residues is established as required by Article 30 (1) of Regulation (EC) No 396/2005.	A national multi-annual national control programme for pesticide residues for the years 2010-2012 has been established as required by Article 30 (1) of Regulation (EC) No 396/2005. The programme has been notified to the national competent authorities and also to the European Commission (DG SANCO) and EFSA with Documents 180941/11.02.2010 and 180861/29.01.2010 of the Directorate of Plant Produce Protection of the Ministry of Rural Development and Food and uploaded to Extranet. Furthermore, it can be accessed in the official web site of the Ministry of Rural Development and Food ( <a href="http://www.minagric.gr/greek/2.2.5.8.1b1.html">www.minagric.gr/greek/2.2.5.8.1b1.html</a> ). Updates of the multiannual national control programme for pesticide residues will be submitted annually.
2	Ensure that the national control programme for pesticide residues in place contains at least the information listed in Article 30 (1) (a), (b), (c) and (d).	The national control programme for pesticide residues in place contains all the information listed in Article 30 (1) (a), (b), (c) and (d) specifying the products to be sampled, the number of samples to be taken the pesticides to be analysed and the criteria applied in drawing up. The programme is risk-based, taking into account the specificities of each region of the country. The Community Control Programme according to Commission Regulation (EC) No 901/2009, of 28 September 2009, has been incorporated in the multiannual national control programme 2010-2012. Sampling methods will be those provided for in JMD 91972/2003 (Directive 2002/63/EC). The official laboratories, analysing samples for pesticide residues are accredited and participate in the Community Proficiency Tests. The methods of analysis used by the laboratories fully comply with the criteria set out in relevant EU law provisions and other adopted technical guidelines. Effective, proportionate and dissuasive sanctions, predicted in national legislation, will be imposed in any case

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		of infringement of the provisions of Regulation (EC) No 396/2005. The control programmes for pesticide residues and the report of results of the national residue monitoring are published on the official web site of the Hellenic Ministry of Rural Development and Food ( <a href="http://www.minagric.gr/greek/2.2.5.8.1b1.html">http://www.minagric.gr/greek/2.2.5.8.1b1.html</a> ) on an annual basis.
3	Ensure that official controls are carried out at all appropriate stages of production, processing and distribution, as required by Article 3 (3) of Regulation (EC) 882/2004 and consider that samples within the national control programme for pesticide residues are taken as close to the point of supply as is reasonable to allow for any subsequent enforcement action to be taken, as set out in Article 27(1) of Regulation (EC) No 396/2005.	Official controls on pesticide residues are carried out at the appropriate stages of production, processing and distribution. Sampling strategy will be based on “from the farm to the fork” rationale, taking into account the specificities of each region of the country. The sampling methods, necessary for carrying out such controls of pesticide residues, are those provided for in JMD 91972/2003 (Directive 2002/63/EC). Samples are taken by domestic production and imports, proportionally; covering points of collection, storage, packing and trade of products of plant origin. Effective, proportionate and dissuasive sanctions, predicted in national legislation, will be imposed in any case of infringement of the provisions of Regulation (EC) No 396/2005.
4	Ensure that a documented procedure is in place in the case of sampling for pesticide residues as laid down in Article 8 (1) of Regulation (EC) No 882/2004.	The sampling methods, necessary for carrying out controls of pesticide residues, are those provided for in JMD 91972/2003 (Directive 2002/63/EC) and details and explanations for sampling procedures have been incorporated in several relevant documents sent to the regional and local competent authorities. A detailed documented procedure in the case of sampling for pesticide residues is being processed and it is waited to be finalized by the end of May, 2010. All competent authorities will apply this procedure for sampling for pesticide residues. The main aspect of the procedure is to obtain a representative sample of the product and relies on the elimination of deterioration and contamination of the product.
5	Take account of the reliability of food business operators' own checks, especially when carrying out official controls on non – processed food of plant origin, as stipulated in Article 3 (1) (c) of Regulation (EC) No 882/2004.	In order to ensure that reliability of food business operators’ own checks, in the case of non – processed food of plant origin auto-control systems, is taken into account in a uniform way, a documented procedure in place along with the necessary check lists for reliability is being processed and

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		it is waited to be finalized by the end of May, 2010.
6	Ensure that official controls on imported food of plant origin, including controls at points of entry, are risk – based and frequency of controls is considered in accordance with the requirements laid down in Article 15 and Article 16 (2) of Regulation (EC) No 882/2004.	Official controls on imported food of plant origin, including controls at points of entry, are risk – based. The frequency of controls is considered in accordance with the requirements laid down in Article 15 and Article 16 (2) of Regulation (EC) No 882/2004. Guidance, clarifications and technical assist are communicated orally and in writing between the CA and the regional and local authorities performing the controls.
7	Substantially increase the number of analytes including metabolites covered by their analytical methods for pesticide residues in food of plant origin; guarantee the effectiveness and appropriateness of official controls as required by Article 4 (2) (c) and 4 (2) (d) of Regulation (EC) No 882/2004, ensure implementation of Regulation (EC) No 396/2005 and take account of the provisions laid down in Commission Regulation (EC) No 1213/2008.	Comparing the results of the pesticide residue controls of the last years, there is a significant annual increase of the range of analytes and this will continue intensively by all official labs so as to guarantee the effectiveness and appropriateness of official controls.