



ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ
Υπουργείο Αγροτικής Ανάπτυξης
και Τροφίμων

HELLENIC REPUBLIC
MINISTRY OF RURAL DEVELOPMENT AND FOOD

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

Carried out in Greece during 2021

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



Coordinating National Authority:

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

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This report describes the outcome of the official controls on plant protection products, made during 2021 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

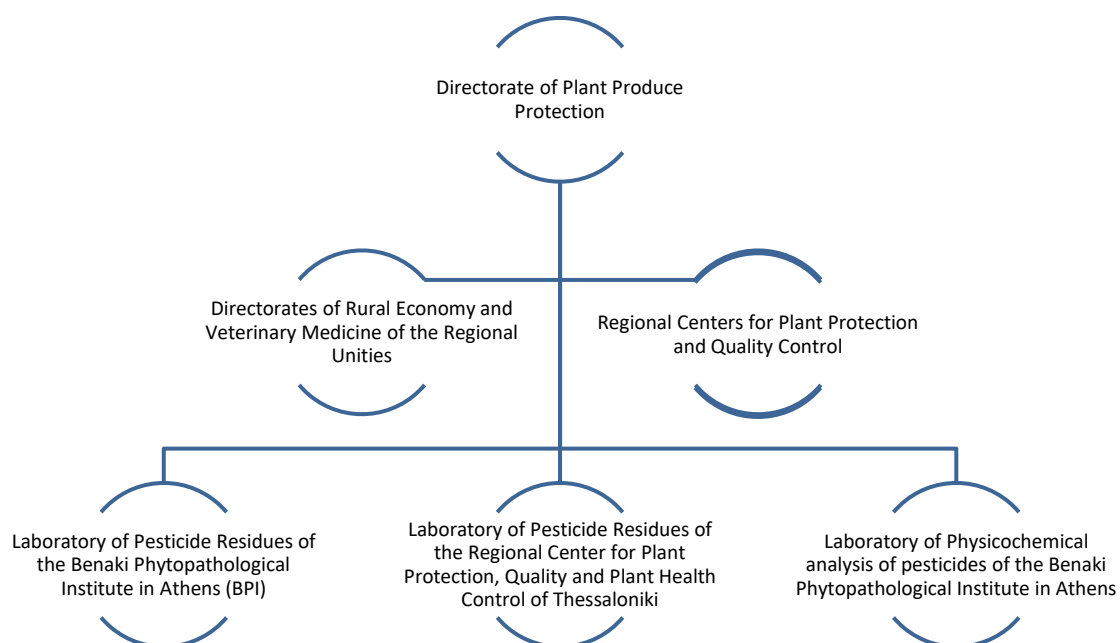
The basic relevant national legislation is the law 4036/2012 (Government Gazette A' 8) concerning the "Placing of pesticides in the market, sustainable use and relevant provisions". As mentioned in article 1, par. 1a, one of the main objectives of this law is to establish the necessary measures for the implementation of the Regulation (EC) No 1107/2009.

According to article 7 of the law 4036/2012 (Government Gazette A' 8), the Coordinating National Authority is responsible for drafting the annual or the 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/elenxoifitoprostatevtikonmenu/745-apotelesmata-elegxon>).

ORGANIZATION COMPETENCIES OF THE CONTROL AUTHORITIES

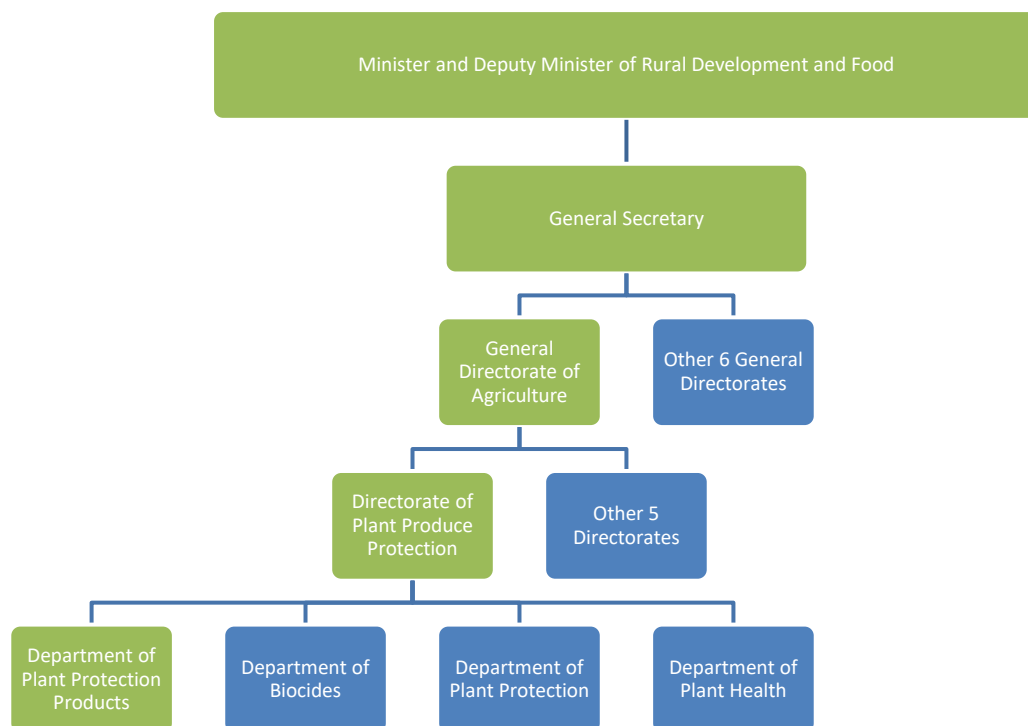
The official controls in Greece are organized as follows:



A. Central authority

The Directorate of Plant Production 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.

The organization structure of the Hellenic Ministry of Rural Development and Food is formed as follows:



Contact persons

The contact persons for control measures are: 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 Tsitsiopoulos Panagiota, Department of Plant Protection Products, (tel.: +302109287215, fax: +302109212090, email: tsitsiopoulos@minagric.gr), 4) Mrs Efstathiou Violeta, Department of Plant Protection Products, (tel.: +302109287164, fax: +302109212090, email: veustathiou@minagric.gr) and 5) Mr TRIANTAFYLLOU Theodor, Department of Plant Protection Products, (tel.: +302109287214, fax: +302109212090, email: thtriantafillou@minagric.gr).

B. Regional authorities

The control authorities [the Directorates of Rural Economy and Veterinary of the Regional Unities (DREV of RU) the Regional Centers for Plant Protection Quality and Plant Health 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
DREV of RU and RCPPQC	Placing in the market of non	Non EU authorized products

	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

Laboratories

The official control laboratories in 2021 are:

Control of Pesticide formulations

Laboratory of Physicochemical analysis of pesticides of the Benaki Phytopathological Institute in Athens.

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.

REVIEW OF THE CONTROL PROGRAM OF 2021

The control program for the year **2021** was issued on 20th of December 2020. 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 Plant 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 in 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 the parallel trade product in relation to 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 2021 in terms of registered uses and pre-harvest interval due to any amendment of registrations of the plant protection products. The pesticide formulations listed below (Tablet 1), concerns the controls of the content of plant protection products.

Control frequency: Each competent authority should conduct at least 5 controls on packaging and labelling for the year 2021.

- 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. Samples can be taken from retailers, wholesalers or storage places of pesticide plants. Special attention will be drawn so that sample and counter-sample are from the same batch.

Control frequency: Each competent authority should take at least ten (10) samples of plant protection products for the year 2021. The distribution is described in the following table:

Table 1: Distribution of plant protection products samples for 2021 based on the contained active substance (Laboratory of Chemical Control of Pesticides of the Benaki Phytopathological Institute)			
1	abamectin	19	tefluthrin
2	epoxiconazole	20	penconazole
3	pyraclostrobin	21	methomyl
4	boscalid	22	pyrimethanil
5	azimsulfuron	23	tembotrione
6	pyrethrins	24	phosmet

7	deltamethrin	25	quizalofop-p-ethyl
8	thifensulfuron-methyl	26	mesotrione
9	beta-cyfluthrin	27	florpyrauxifen benzyl
10	bispyribac sodium	28	oxamyl
11	captan	29	ethephon
12	cypermethrin	30	diflufenican
13	difenoconazole	31	bromoxynil
14	mandipropamid	32	cycloxydim
15	lambda-cyhalothrin	33	etofenprox
16	imidacloprid	34	kresoxim-methyl
17	metribuzin	35	azoxystrobin
18	glyphosate		

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 2021.

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) 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 2021 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).
- 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 2020.

3. Official controls on plant protection products use

The official controls on plant protection products use during 2020 was programmed to focus on:

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

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

3.1.2. Controls 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. Controls on the existence of the valid certificate of Good Agricultural Practice.

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.

Control frequency: Each competent authority should take five (5) maximum samples for the year 2020, 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.

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.

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) 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.

Control frequency: Maximum five (5) samples per competent authority for the year 2021 after consultation with the Chemical Control Laboratory of the Benaki Phytopathological Institute, where samples are to be dispatched. Any exceedance should be documented.

Combined controls

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

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/elenvoifitoprostateytikonmenu/527-odigies-ele-arxes> in Greek language. The relevant 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-useplantprod-menu>

RESULTS OF CONTROL ACTIVITIES ON PLANT PROTECTION PRODUCTS FOR THE YEAR 2020-2021**GENERAL INFORMATION**

The total sanctions (fines) imposed in 2021 in comparison to those of 2020 were:

Cases of Infringement of Law 4036/2012	2020 No of cases	2020 Fines (€)	2021 No of cases	2021 Fines (€)
Use of unauthorized ppps	5	2.475	6	6.425
Use of unauthorized ppps and also use of authorized ppps not according label	3	6.630	0	0
Use of unauthorized ppps and MRL exceedance	0	0	3	7.845
Unauthorized ppps	6	157.200	12	36.775
Unauthorized ppps and also other infringements	1	5.812	0	0
Irregularities in ppps content	6	94.000	2	17.950
Irregularities in ppps packaging or label	2	3.450	1	6.400
Outdated ppps	4	2.073	7	3.015
Outdated ppps and other infringements	0	0	3	5.552
Irregularities in ppps advertisement	6	5.290	1	3.270
Outdated ppps and sales not according to the National Legislation	0	0	0	0
No cooperation during controls	0	0	1	1.000
Other infringement of Reg. 1107/2009	3	1.000	4	5.000
MRL exceedance (Greek origin products)	71	103.275	41	83.550
MRL exceedance (imported products)	19	36.880	37	139.660
MRL exceedance (Greek origin products) and Use of authorized ppps not according label	7	10.150	9	16.835
Loss of traceability	1	1.000	3	5.160
Infringements related to sustainable use	14	7.380	4	1.200
Use of authorized ppps not according to the label	87	48.270	32	12.040
Illegal sales of ppps	8	17.700	1	1.933
Sales of ppps not according to the specifications	12	9.075	8	13.490
Sales of ppps without e-entry and without recipes of sales	10	5.635	7	3.670
Sales of ppps not according to the specifications and without e-entry	4	3.850	0	0
Sales of ppps not according to the national legislation about marketing of pesticides	0	0	2	915
Sales of ppps without e-entry	0	0	3	1.980
Sales of ppps without recipes of sales	0	0	4	1.560
TOTAL	269	521.145	191	375.225

A. Unauthorized products importation

During 2021 the following cases were established mostly after 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
Evros	13/1/2021	Turkish	(DIVAX 300 EC, CLOPAR 240 EC)
Thessaloniki	12/2/2021	-	Without Buch No & date of production/expiration: Cyproconazole, 2,4 D, difenoconazole, myclobutanil, azoxystrobin, deltamethrin, lambda-cyhalothrin, acetamiprid, thiophanate-methyl, dicamba-nicosulfuron-rimsulfuron
Evros	8/8/2021	Turkish	(TUROP ULTRA)
Serres	14/6/2021	Turkish-Bulgaria	PORTICO (imazamox), ZAPATA (emamectin-benzoate), DEVAPLAN 20 SP (acetamiprid), TORNADO 5 EK (quizalofop-p-ethyl), STAPLE SL (pyrithiobac sodium)

B. Use of unauthorized products

C. The following cases of use of unauthorized products were detected in 2021, after residue analysis:

Crop	PPP	Residue concentration (mg/kg)
Olive oil	chlorpyrifos	0,021
Beetroot leaves	chlorpyrifos	0,014
tomatoes	Thiamethoxam	0,064
	Clothianidin	0,032
potatoes	chlorpyrifos	0,012
tomatoes	thiacloprid	0,017
Fresh onions	dimethoate	0,016
tomatoes	chlorpyrifos	0,014
Tomatoes tissue	Clothianidin	0,017
	Profenofos	0,080
pears	ethoxyquin	0,029
cucumbers	chlorpyrifos	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 eighty-eight (488) samples of the following categories were analyzed:

- Plant protection products (ppp) authorized or not in the Greek market,
- Illegal unlabeled ppp for identification of active substance
- Parallel trade plant protection products for similarity control,
- Spray solutions,
- 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 2 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 fifty-seven (157) different active substances of plant protection products.

For 2021, 157 formulations were tested.

The aforementioned samples were sent under Ministerial Decisions 2490/62189/25-2-2020 within the framework of the implementation of Regulation 1107/2009 EC and National Law 4036/2012. The aforementioned samples containing the active substances: abamectin, azoxystrobin, azoxystrobin & difenoconazole, beta cyfluthrin, boscalid & pyraclostrobin, captan & CCl₄, cypermethrin, deltamethrin, difenoconazole, difenoconazole & cyflufenamid, difenoconazole & mandipropamid, dimethomorph & pyraclostrobin, emamectin benzoate, ethephon, etofenprox, fludioxonil, fluxapyroxad, glyphosate, glyphosate & 2,4-D, glyphosate & MCPA, imidacloprid, kresoxim methyl, kresoxim methyl & boscalid, lambda cyhalothrin, mandipropamid, mandipropamid & cymoxanil, metalaxyl-M, methomyl, metribuzin, penconazole, phosmet, pyraclostrobin, pyrethrins, pyrimethanil, quizalofop-p-ethyl, tebuconazole & abamectin & deltamethrin και tefluthrin. It should be noted that the control of the above-mentioned active substances also concerns mixtures with other active substances.

Table 2: Categorization of the samples analyzed in 2021

Control category	No of analyzed samples	No of infringements detected
2020 market control	6	
2021 market control	232	4
State program against <i>Dacus oleae</i>	90	-
Government supplies of biocides	6	-
Complaints	10	-
Government procurement of health importance products (including spraying solutions from mosquito repellent)	2	-
Illegal ppps without label (identifying active substance)	29	-
Parallel trade ppp	18	-
Soil samples for the detection of pesticide residues (official samples)	13	-
Soil samples for the detection of pesticide residues (non-official samples)	7	-
Counter analysis (second analysis after infringement)	4	4
Treated seeds for the detection of a.s. (official samples)	3	-
Non-official other samples	53	-
Chemical analysis for other European authorities/bodies: <ul style="list-style-type: none"> • Slovakia and Lithuania 	9	-
Chemical analysis ppps from Slovenia	6	-
TOTAL NUMBER OF SAMPLES	488	8

Table 3 describes the total aggregated results of the laboratory analysis of the one hundred and sixty-six (232) samples for the 2021 official controls.

**Table 3: Cumulative analytical results of the 232 samples
in the market control program for the year 2021**

Active substance (a.s.)	Num of analyzed samples for the control of a.s. content and physico-chemical properties	Num of infringements detected
Abamectin	31	-
Azoxystrobin	5	-
Azoxystrobin & difenoconazole	3	-
beta cyfluthrin	1	-
boscalid & pyraclostrobin	5	-
captan & CCl4	9	1
cypermethrin	17	-
deltamethrin	30	1
Difenoconazole	4	-
difenoconazole & cyflufenamid	2	-
difenoconazole & mandipropamid	1	-
dimethomorph & pyraclostrobin	6	-
emamectin benzoate	1	-
ethephon	2	-
etofenprox	3	-
fludioxonil	1	-
fluxapyroxad	1	-
glyphosate	22	-
glyphosate & 2,4-D	1	-
glyphosate & MCPA	1	-
imidacloprid	15	-
kresoxim methyl	1	-
kresoxim methyl & boscalid	3	-
lambda cyhalothrin	25	-
mandipropamid	2	-
mandipropamid & cymoxanil	1	-
metalaxyl-M	1	-
methomyl	1	-
metribuzin	4	-
Penconazole	9	-
Phosmet	7	-
Pyraclostrobin	5	-
pyrethrins	5	2
pyrimethanil	1	-
quizalofop-p-ethyl	3	-
tebuconazole & abamectin & deltamethrin	1	-
tefluthrin	2	-
TOTAL	232	4

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

In year 2021, the official controls on labeling and packaging of plant protection products in the market were conducted by comparison of the labels of the products with the relevant authorizations. The results are presented below:

Total number of controls on labelling and packaging	Infringements
206	7

E. Official controls on sales of plant protection products

In year 2021, the official controls on sales of plant protection products are presented below:

Official controls on sales	Total numbers
Inspections	355
Cases investigated	29
Infringements	19

F. Official controls on plant protection products advertisement

In year 2021, the official controls on plant protection products advertisement are presented below:

Total number of controls on advertisement	Infringements
94	2 cases investigated

G. Official controls at user level

In year 2021, 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
Sampling and residue analysis	~833

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 non compliant to the label	32
Use of unauthorized plant protection products	6
TOTAL	38

H. Official controls on sustainable use of plant protection products

In 2021, during the official controls on sustainable use of plant protection products and especially for the provisions of article 12 of Directive 2009/128/EC, **four (4) cases** of infringements **were investigated** and **1 sanction were imposed**.

The controls mainly refer to complaints regarding the use of plant protection products near residential areas.