



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 2022

[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 (PPPs), made during 2022 in Greece under the provisions of Reg. (EC) No 1107/2009.

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.

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

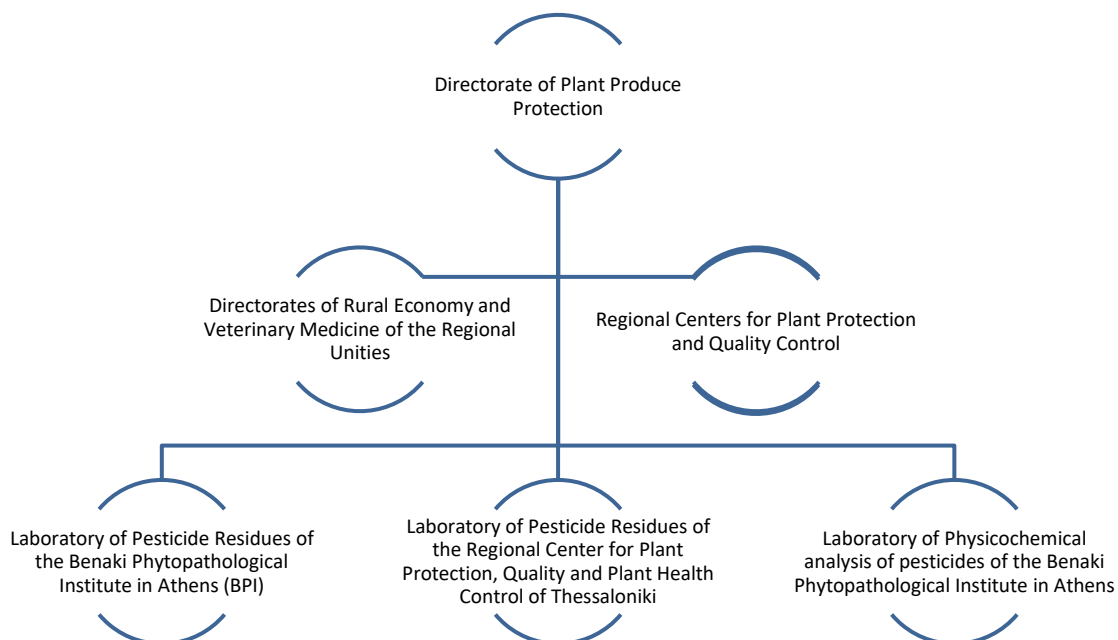
The basic relevant national legislation is the law 4036/2012 (A' 8) concerning the “*Placing of pesticides in the market, sustainable use and relevant provisions*”. As mentioned, one of the main objectives of this law is to establish the necessary measures for the implementation of the Regulation (EC)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

According to article 7 of the law 4036/2012 (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 ('Ministry') website (Ministerial website) (<http://www.minagric.gr/index.php/el/for-farmer-2/crop-production/fytoprostasiamenu/elenxoifitoprostateytikonmenu/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 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 Points

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, email: amavridou@minagric.gr), 2) Mrs Pitarokili Danae - Head of Department of Plant Protection Products (tel.: +302109287254, email: dpitarokili@minagric.gr), 3) Mrs Tsiotsiopoulos Panagiota, Department of Plant Protection Products, (tel.: +302109287215, email: tsiotsiopoulos@minagric.gr), 4) Mrs Efstathiou Violeta, Department of Plant Protection Products, (tel.: +302109287164, email: veustathiou@minagric.gr) and 5) Mr TRIANTAFYLLOU Theodor, Department of Plant Protection Products, (tel.: +302109287214, email: thtriantafyllou@minagric.gr).

B. Regional authorities

The control authorities [(CA) Regional Unities & Regional Centers] are designated for the implementation of controls on the marketing and use of PPPs in Greece.

The structure of controls on marketing of PPPs is described below:

Responsible authority	Control scope	Control item
Regional Unities & Regional Centers	-Placing in the market of non authorized products	-Non EU authorized products -Illegal parallel trade -Phase-out products
Regional Unities & Regional Centers	-Guaranteed composition	-Sampling and analysis of PPPs
Regional Unities & Regional Centers	-Labelling	-Label inspections
Regional Unities & Regional Centers	-PPPs advertisement	-Advertisement inspections
Regional Unities & Regional Centers	-PPPs sales	-Inspections at retailers and wholesalers

Laboratories

The official control laboratories in 2022 are:

Control of Pesticide formulations

Laboratory of Physicochemical analysis of pesticides of the Benaki Phytopathological Institute in Athens (**BPI**).

Control of Pesticide residues

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

The Laboratory of the Benaki Phytopathological Institute is designated as the **National Lab** for the controls on PPPs and conducts also, comparative analysis of parallel import products.

REVIEW OF THE CONTROL PROGRAM OF 2022

The control program for the year 2022 was issued on 28th of February 2022. According to the program, the following controls were planned:

1. PPP manufacturing plants

The following controls were to be conducted in PPP manufacturing plants:

1.1. Regarding the formulation and packaging of the PPP, 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 PPPs (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 PPPs to official recognized distributors (sample control).

Control frequency: Since PPPs industries exist in the area of responsibility of the competent control authority, controls were planned in **8** specific industries scattered in 4 responsibility areas. The selection of the industries is based on their past records and any guidance issued by the Directorate of Plant Production Protection of the Ministry of Rural Development and Food (C.N.A.).

1.2. Parallel trade PPPs. Regarding the marketing of parallel trade PPPs, sampling from the market and laboratory analysis in the Laboratory of Chemical Control of Pesticides of the BPI. 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 PPPs, so that each chemical control refers to different formulation batch and package size. Samples from PPPs containing 5 of the a.i. listed below (Table 1).

1.3. Official controls on the packaging and labelling of the PPPs

The packaging and the label of the PPPs were planned to be controlled in retailers and wholesalers, especially PPPs that are subject to authorization modifications during 2022 in terms of registered uses and pre-harvest interval due to any amendment of registrations of the PPPs. The pesticide formulations listed below (Table 1), concerns the controls of the packaging and labelling of PPPs.

Control frequency: Each competent authority should conduct at least 5 controls on packaging and labelling for the year 2022.

1.4. Official controls on the content of the PPPs

The official controls on the packaging and labelling of the PPPs were to be conducted through sampling and laboratory analysis to the Laboratory of BPI. 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 10 samples of PPPs for the year 2022. The distribution is described in the following table:

1	2,4 D	17	Nicosulfuron
2	Prothioconazole	18	Oxyfluorfen
3	Azadirachtin	19	Pendimethalin
4	Cloquintocet mexyl	20	Rimsulfuron
5	Dithianon	21	S-metolachlor
6	Florasulam	22	Spinosad
7	Flupyradifurone	23	Tebuconazole

8	Folpet	24	Propamocarb hydrochloride
9	Fosetyl-Al	25	Tebuconazole
10	Imazalil	26	Prochloraz
11	Imazamox	27	Trifloxystrobin
12	Terbutylazine	28	Spinosad
13	Mepiquat-chloride	29	Pyriproxyfen
14	Metalaxyl	30	Kresoxim-methyl
15	Metalaxyl-M	31	Pyridate
16	Tribenuron methyl	32	Fenhexamid

1.5. Official controls on PPPs advertisement

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

Control frequency: Each competent authority should conduct at least 10 controls on PPPs advertisement material for the year 2022.

1.6. Official controls on seeds treating with PPPs facilities.

The official controls focus on:

- A. Records of supply and use of PPPs.
- B. Sampling of seed packages to check if PPPs are authorized for the specific purpose. The competent control authorities for PPPs in cooperation with the competent control authorities for seeds should conduct controls on imported treated seeds to check if seeds treated with PPPs 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 PPP authorization.
- D. Controls if best available practices are implemented to reduce dust during seed handling, storage and transfer.

2. Official controls on PPPs sales (wholesalers/retailers)

The official controls on PPPs sales (wholesalers/retailers/stores) during 2022 was programmed to focus on:

- a. Unauthorized pesticide sales.
- b. Controls of wholesalers/retailers for sale conditions (safety measures). The choice and the number of wholesalers/retailers controlled should be defined according to risk based analysis (National legislation).
- c. Controls on PPPs electronic registration of retailer sales using the specific official e-service, issued by the Ministry.
- d. Controls on the recipe system for PPPs according to the specific official instructions, issued by the Ministry of Rural Development and Food (e-services).

Control frequency: Each competent authority should conduct controls on PPPs sales at least to 30% of retailers or wholesalers per region for the year 2022.

3. Official controls on PPPs use

The official controls on PPPs use during 2022 was programmed to focus on:

3.1. On site controls of professional PPPs 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 PPPs. In cases of more than one crop, all crops are checked.

3.1.3. Existence of the valid certificate of Good Agricultural Practice.

3.2. Sampling of leaves and sprouts. The samples should be dispatched to the BPI after consultation with the laboratory.

Control frequency: Each competent authority should take five (5) samples for the year 2022.

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. In addition, led by the needs of imported fruits from third party countries (Bulgaria, Turkey, etc.), 4 additional 'emergency' 3-months, residue control programs, have been carried out, enhanced the aforementioned national residue control program.

3.4. Random controls of at least 5% of holders of the certificate of knowledge for Good Agricultural Practice.

3.5. Samplings from PPPs spray liquid.

Samplings from PPPs 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.

3.6. Samplings from specific users of PPPs for seeds treating, databased on the e-service of electronic records of PPPs sales, developed by the Ministry.

4. Illegal (unauthorised) PPPs

Official controls will be conducted in marketing of PPPs 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 or no label in cooperation with custom authorities (imports of illegal PPPs from 3rd country).

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 in coordination with Laboratory of BPI, where samples are to be dispatched.

Control frequency: The frequency of the controls was based on the past year control records for infringements (feedback) in the region of the competent authority. The controls are combined to those on manufacturers, retailers, wholesalers or professional users of PPPs.

5. Expired PPPs

The controls were programmed to be conducted in retailers/wholesalers.

Control frequency: Maximum five (5) samples per competent authority for the year 2022 in coordination with BPI, 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/fytoprostatiamenu/elenzoifitoprostateytikonmenu/527-odigies-ele-arxes> in Greek language. The relevant national legislation regarding official controls on marketing and use of PPPs in English language is also published in Ministerial 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 2022**GENERAL INFORMATION**

Cases of Infringement (National legislation)	2021 No of cases	2022 No of cases	2022 No of infringments
Use of unauthorized PPPs	6	17	
Use of unauthorized PPPs and also use of authorized ppps not according label	0	2	
Use of unauthorized PPPs and MRL exceedance	3	2	
Unauthorized PPPs	12	10	
Unauthorized PPPs and also other infringements	0	0	
Irregularities in PPPs content	2	1	
Irregularities in PPPs packaging or label	1	8	3
Outdated PPPs	7	12	
Outdated PPPs and other infringements	3	0	0
Irregularities in PPPs advertisement	1	3	2
Outdated PPPs and sales not according to the National Legislation	0	3	3
No cooperation during controls	1	1	1
Other infringement of Reg. 1107/2009	4	8	8
MRL exceedance (Greek origin products)	41	64	53
MRL exceedance (imported products)	37	35	35
MRL exceedance (Greek origin products) and Use of authorized PPPs not according label	9	8	8
Loss of traceability	3	2	2
Infringements related to sustainable use	4		
Use of authorized PPPs not according to the label	32	83	33
Illegal sales of PPPs	1	3	3
Sales of PPPs not according to the specifications	8	17	12
Sales of PPPs without e-entry and/or without recipes of sales	7	35	30
TOTAL	191		

A. Unauthorized (illegal) PPPs importation/marketing

During 2022 the following cases were established mostly after cooperation with the customs and other competent authorities, followed by sanctions, issued by the Ministry of Rural Development and Food:

Region been seized	Total quantity	Country of Origin	Unauthorized (illegal) PPPs
EVROS (borders)	5 L	TURKEY	"RAMTO 240 EC"
EVROS (borders)	11,8 L + 8,87 k	BULGARY	"ENVOKE", "CORAGEN", "GRANLAND WG"
GIANNITSA	508,65 L + 13,5 K.	-	methidathion, chlorfenapyr, imidacloprid, metalaxyl, methomyl, 2-naphthoxy acetic acid, thiocyclam
EVROS (borders)	100 L	TURKEY	"PASSAT 5 EC"
EVROS (borders)	20 L + 220,4 k	TURKEY	"POTEGON 20 SP", "TRIVELA (ioxynil 240g/L)", "CONSERO 75 WG"
THESSALONIKI	213 L	TURKEY	"CROP ULTRA thidiazuron 119,75 gr/diuron 59,88gr SC"
KAKAVIA (borders)	213 L	ALBANIA	"Aragol L 40"
CHIOS (borders)	2 K.	TURKEY	"NUTRA MIWTOX", "ROK CYPER EC", "IMPERATOR 25 EC"
HERAKLION	28,55 K + 6 L.	UNAUTHORIZED	Thiamethoxam, hymexazol, cyromazine
PATRA	184,6 L.	UNAUTHORIZED	mancozeb, methiocarb, thiacloprid, chlorpyrifos, dimethoate

B. Use of unauthorized products (withdrawn, no longer authorized, etc.)

The following cases of use of unauthorized products were detected in 2022, after residue analysis:

Crop	PPP
lime	clothianidin
herbs	chlorpyrifos, oxadiazon
cherries	thiacloprid, carbendazim
apricot	thiophanate-methyl/carbendazim
peach	thiophanate-methyl/carbendazim
grapes	thiophanate-methyl/carbendazim
olives	dimethoate/omethoate, thiacloprid
Orange	chlorpyrifos
tomatoes	famoxadone, thiophanate-methyl
lettuce	atrazin
pears	thiophanate-methyl/carbendazim
Beat-root	chlorpyrifos
apple	beta-cyfluthrin

C. Official controls on content of PPPs

The official controls on composition/content of PPPs were conducted by the Lab of BPI. A total of 383 samples of the following categories were analyzed:

- PPPs authorized or not in the Greek market,
- Illegal unlabeled PPPs for identification of active substance
- Parallel trade PPPs 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
- re-examinations of PPPs 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 174 different active substances of PPPs.

For 2022, 174 formulations were tested.

The aforementioned samples were sent under Ministerial Decisions within the framework of the implementation of Regulation 1107/2009 EC and National legislation. The aforementioned samples containing the active substances (simple or mixture a.s.):

2,4-D, [2,4-D & MCPA], [2,4-D & dicamba & mecoprop-p & MCPA], [2,4-D & glyphosate], [2,4-D & florasulam], azadirachtin, dithianon, [florasulam & clopyralid], [florasulam & aminopyralid], [florasulam & halauxifen methyl & cloquintocet acid], flupyradifurone, folpet, [folpet & metalaxyl], [folpet & valifenalate], [folpet & fosetyl AI], fosetyl AI, [fosetyl-AI & propamocarb], imazalil, imazamox, mepiquat chloride, metalaxyl, [metalaxyl & Cu], tribenuron methyl, nicosulfuron, oxyfluorfen, pendimethalin, rimsulfuron, S-metolachlor, [S metolachlor & mesotrione], Spinosad, tebuconazole, [tebuconazole & trifloxystrobin], [tebuconazole & fluopyram], [tebuconazole & bupirimate], [tebuconazole & deltamethrin & abamectin], pyriproxyfen, [propamocarb hydrochloride & fluopicolide].

Table 2: Categorization of the samples analyzed in 2022

Control category	No of analyzed PPPs samples	No of infringements detected
2021 content official controls	232	
2022 content official controls*	174*	-
State program against <i>Dacus oleae</i>	69	-
Complaints	9	-
Illegal PPPs without label (identifying active substance)	15	-
Parallel trade content control of PPPs	6	-
Soil samples for the detection of pesticide residues (official samples)	11	-
Soil samples for the detection of pesticide residues (non-official samples)	18	-
Counter analysis (second analysis after infringement)	4	-
Treated seeds for the detection of a.s. (official samples)	2	-
Chemical analysis for other European authorities/bodies (ECPA-European Crop Protection Association):	12	-
-Slovakia, Lithuania, Bulgaria		
Illegal PPPs without label (identifying active substance) from Lithuania	6	
content analysis PPPs from Slovenia	26	-
TOTAL NUMBER OF SAMPLES	383	-

Table 3 describes the total aggregated results of the laboratory analysis of the 174 samples for the 2022 official controls.

[Table 3: Cumulative analytical results of the 174 samples in the market control program for the year 2022]

Active substance (a.s.)	No of analyzed samples	No of infringements
rimsulfuron	4	-
pendimethalin	16	-
tribenuron methyl	2	-
dithianon	6	-
tebuconazole	5	-
trifloxystrobin & tebuconazole	5	-
folpet	3	-
imazamox	6	-
fosetyl AI	15	-
florasulam & clopyralid	1	-
flupyradifurone	9	-
S-metolachlor	8	-
oxyfluorfen	9	-
nicosulfuron	4	-
mepiquat chloride	9	-
azadirachtin	8	-
pyriproxyfen	5	-
imazalil	2	-
MCPA & 2,4-D	1	-
2,4-D	11	-
dicamba & mecoprop-p & 2,4-D & MCPA	4	-
spinosad	12	-
metalaxyl & Cu	4	-
fosetyl AI & folpet	6	-
fluopyram & tebuconazole	3	-
metalaxyl	1	-
fosetyl AI & propamocarb	4	-
2,4-D & glyphosate	2	-
folpet & valifenalate	1	-
tebuconazole & deltamethrin & abamectin	1	1
florasulam & halauxifen methyl & cloquintocet acid	1	-
tebuconazole & bupirimate	1	-
florasulam & aminopyralid	1	-
folpet & metalaxyl	1	-
Propamocarb HCl & fluopicolide	1	-
florasulam & 2,4-D	1	-
S-metolachlor & mesotrione	1	-
TOTAL	174*	1

D. Official controls on labeling and packaging of PPPs

In year 2022, the official controls on labeling and packaging of PPPs 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
263	8
2021 : 206	2021 : 7

E. Official controls on sales of PPPs

In year 2022, the official controls on sales of PPPs are presented below:

Official controls on sales (retailers/wholesalers, marketing national legislation, premises, Register etc.)	Total numbers
Inspections	685
Inspections 2021	355
Infringements	64
Infringements 2021	29

Official controls on sales (use of Ministerial e-services/ sales e-entry & sales recipe)	Total numbers
Inspections	542
Infringements	40

F. Official controls on PPPs advertisement

In year 2022, the official controls on PPPs advertisement are presented below:

Total number of controls on advertisement	Infringements
Inspections	130
Inspections 2021	94
Infringements	5
Infringements 2021	2

G. Official controls - users

In year 2022, the official controls regarding the proper use of plant PPPs 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 PPPs	Total number
Sampling and residue analysis	~573

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

Infringement type	Total number (pairs of active substance-crop)
Use of authorized PPP non compliant to the label	32

Use of unauthorized PPP	17
TOTAL	49

H. Official controls on sustainable use of PPPs

In 2022, the official controls on sustainable use of PPPs are presented below. The controls mainly refer to complaints regarding the use of PPPs and no proper use of PPPs according to label.

Total number of controls on sustainable use of PPPs	Infringements
Inspections	77
Infringements	8