State Plant Health and Seed Inspection Service

Legal and organisational conditions of applying
Good Experimental Practice in the area of efficacy evaluation of plant protection products in Poland

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Legal basis

- Act of 18 December 2003 on plant protection (Journal of Laws of 2008 No. 133, item 849, as amended)
- Ordinance of the Minister of Agriculture and Rural Development of 4 August 2004 on efficacy evaluation of plant protection products
 (Journal of Laws No. 183 item 1890, as amended)
- Ordinance of the Minister of Agriculture and Rural Development of 24 June 2002 concerning occupational safety and health while applying and storing plant protection products as well as mineral and organic-mineral fertilisers

(Journal of Laws No. 99 item 896, as amended)

Directive 93/71/EEC, amending Council Directive 91/414/EEC concerning the placing of plant protection products on the market

Tests and analyses (...) shall be conducted by <u>official or</u> <u>officially recognized testing facilities or organisations</u>

• Guidelines of the European and Mediterranean Plant Protection Organisation (EPPO) concerning efficacy tests of plant protection products in terms of efficacy evaluation of plant protection products – (harmonisation of the process of efficacy evaluation within registration procedure)



Authorisation procedure

In Poland – tests on efficacy evaluation of products can be conducted solely **by authorised organisational units**. (Act on plant protection - Article 40 paragraph 1).

Authorisation to conduct tests is issued by the **Main Inspector of Plant Health and Seed Inspection** (since 1 May 2004).

Supervision over units authorised to conduct tests is carried out by **State Plant Health and Seed Inspection.**

Tests on efficacy evaluation of plant protection products must be conducted in accordance with **Good Experimental Practice** (GEP)



Authorisation procedure

Organisational unit

[institute/ university/ agency of a foreign company in Poland/ branch of a foreign company in Poland / limited liability company]



Application for authorisation to conduct efficacy evaluation tests of plant protection products

- name of the unit; address; tel./fax number; e-mail;
- groups of plant protection products tested
- place of conducting tests [arable farming, covers, nurseries, orchard cultivation, forest stand, storehouses, etc.]
- kind of cultivation [e.g. grains, bulb and root plants, vegetables].



Appendices to the application

- 1. List of employees
- 2. Description of management and control structure in the organisational unit, taking into account the scope of obligations of particular individuals.
- 3. List of places where tests are conducted with specification of their surface area and address.
- 4. List of equipment for carrying out plant protection treatments as well as cultivation, soil nurturing, sowing or planting, harvesting equipment, devices for performing plant protection treatments and measuring devices.
- 5. Method of preparing Standard Operating Procedures.
- 6. List of Standard Operating Procedures.
- 7. Declaration that tests will be conducted and documented in compliance with the EPPO guidelines.
- 8. Declaration that the organisational unit ensures storing source data and specified materials for the period corresponding to the period of validity of the authorisation for placing a plant protection product on the market in Member States of the European Union.
- 9. Declaration concerning consequences of making false declarations.

Duties of the Main Inspector of Plant Health and Seed Inspection

- giving explanations concerning authorisation principles,
- making information on GEP available,
- verifying conclusions in terms of compliance with effective requirements,
- calling for completing missing documents or communicating additional information where formal requirements are not met,
- deciding together with the organisational unit manager on the date of performing audits,
- developing audit schedules and specifying number of test controls,
- carrying out an audit paying special attention to meeting organisational and technical requirements by a unit,



Duties of the Main Inspector of Plant Health and Seed Inspection

- preparing documentation on issuance or rejection of issuance of the authorisation,
- keeping register of applications and authorisations granted,
- preparing speeches calling for eliminating incompliances when a unit no longer meets organisational and technical requirements or conducts tests in a way that does not guarantee appropriate quality,
- preparing test reports and submitting them to the Ministry of Agriculture and Rural Development,
- keeping separate documentation for each authorised entity and storing it for the period of the authorisation validity.



Schedule of submitting information on efficacy evaluation tests of plant protection products

An organisational unit applying for the authorisation to conduct tests or filing for modification of the scope of authorisation, should submit an application within specified period of time.

Terminarz przekazywania informacji z zakresu badań skuteczności działania środków ochrony roślin

Termin	Zakres informacji	Wykonawca	Odbiorca	
1 marca	Składanie rocznego wykazu z przeprowadzonych doświadczeń przez upoważnione jednostki	Glówny Inspektorat OR i N	Ministerstwo Rolnictwa i Rozwoju Wsi	
30 kwietnia	Zglaszanie doświadczeń planowanych od wiosny	Upoważniona jednostka	Główny Inspektorat OR i N	
do I maja	Składanie wniosku o upoważnienie do prowadzenia badań od jesieni	Jednostka organizacyjna	Główny Inspektorat OR i N	
15 maja	Przekazywanie wykazu doświadczeń planowanych od wiosny i planu kontroli	Główny Inspektorat OR i N	Wojewódzki Inspektorat OR i N	
15 czerwca	Uaktualnianie danych o jednostce upoważnionej do prowadzenia budni w zakresie: organizacji, personelu, obiektów, sprzętu, miejse prowadzenia doświadczeń, Standardowych Procedur Roboczych	Upoważniona jednostka	Główny Inspektorat OR i N	
do 1 pażdziernika	Składanie wniosku o upoważnienie do prowadzenia badań od wiesny	Jednostka organizacyjna	Główny Inspektorat OR i N	
15 października	Zgłaszanie doświadczeń planowanych od jesieni	Upoważniona jednostka	Glöwny Inspektorat OR i N	
30 października	Przekazywanie wykazu doświadczeń planowanych od jesieni i planu kontroli	Główny Inspektorat OR i N	Wojewódzki Inspektorat OR i N	
31 grudnia	Składanie rocznego wykazu z prowadzonych i zakończonych doświadczeń	Upoważniona jednostka	Główny Inspektorat OR i N	
Przed rozpoczęciem doświadczeń	Zgłaszanie badań krótkoterminowych, np. szklarniowych, które prowadzone są przez cały rok	Upoważniona jednostka	Główny Inspektorat OR i N	

Submission of the required documents constitutes a legal basis for performing an audit in the organisational unit.

The audit shall include:

- > checking the structure of the organisational unit, employment structure and division of duties of the employees;
- checking qualifications of employees in terms of activities performed;
- > evaluation of technical base apparatus, equipment, storehouses, etc. with reference to the declared scope of tests;
- > evaluation of places of tests with reference to the needs resulting from the proposed scope of tests;
- ➤ elaboration and accessibility of Standard Operating Procedures and their compliance with the list presented in the application;

- organisation of supervision over selected testing processes described in Standard Operating Procedures;
- > way of storing test documentation;
- > specifying the way of protecting the information and data obtained during tests;
- general fulfilment of GEP (Good Experimental Practice).





Audit is performed by persons authorised by the Main Inspector of Plant Health and Seed Inspection, on the basis of so called "Control List of Good Experimental Practice with reference to organisational and technical conditions".



40.	Czy w jedanitoś ospaczwyjany zaprzeżone jest rejestrowanie danych źródkowych i gameratów przekacywanych i wydawanych?	00	
**	Czy w jednostce jest poswadzony i aktoalizowane plan- działana jednostki ospraznecyjnej w zakowar budań środków ochony rodka oraz czy ją spozządzane, co roku sprawoczbana z żych budać?	00	
45.	Czy zwządzający jednoską przekazuje do wiadomości Okiwargo lialpriktowa informacje zgodnie z sineckowym terminenzom?	20	
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Identified deviations are written down in "Non-compliance report with reference to organisational and technical conditions"



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"Control List" and "Non-compliance Report" constitute the appendix to the audit "Protocol".

Results of verification of meeting organisational and technical requirements within the scope declared in the application, <u>shall</u> constitute the basis for issuance or rejection of issuance of the <u>authorisation to conduct efficacy evaluation tests of plant</u> <u>protection product by the organisational unit</u>.

The authorisation is <u>valid</u> for the period of **5 years**.

Activities related to the issuance of decision shall fall under <u>registration fee</u>. Its amount shall be specified by an ordinance of the Minister of Agriculture and Rural Development.



Obligations of the authorised unit

Organisational unit is obliged to:

- update the data in terms of: organisation, personnel, facilities, equipment, places of conducting tests, Standard Operating Procedures;
- > send the list of planned tests that will commence in spring and in autumn;
- inform about short-term tests (e.g. greenhouse tests), which can be conducted all year round;
- submit annual report on conducted tests and completed tests

in specified dates.



Supervision over efficacy evaluation tests of plant protection products

Supervision over efficacy evaluation tests of plant protection products consists in verifying fulfilment of requirements by an organisational unit authorised to conduct tests in compliance with GEP, guaranteeing appropriate quality of tests, in particular of conditions in which these tests are planned, performed and supervised, and in which their results are registered, stored and provided in the test report.

Supervision over units authorised to conduct tests is performed by **State Plant Health and Seed Inspection**





Obligations of organisational unit in terms of being supervised

In order to enable performing supervision over efficacy evaluation tests of plant protection products, an organisational unit is obliged to:

- accept in the agreed time the control of State Plant Health and Seed Inspection,
- provide the Main Inspector with any information confirming acting in accordance with GEP.





Controls under performing supervision

As part of supervision the following controls are carried out:

- controls of meeting organisational and technical conditions to conduct tests [before issuing an authorisation to conduct tests and verification within the period of authorisation validity];
- controls of tests when they are in progress [verifying whether an authorised organisational unit conducts a test in accordance with the test schedule and Standard Operating Procedures;
- controls of final test reports [the report is drawn up in compliance with effective principles and includes all necessary information and results of efficacy evaluation tests of a plant protection product].





Frequency of random controls depends on the number of tests conducted annually by a given organisational unit:

- ➤ fewer than 10 tests: *1 control* of randomly chosen *test* is carried out, during which compliance with randomly chosen *1 Standard Operating Procedure* is verified;
- ➤ 10–100 tests: 2 controls /2 tests/ 2 procedures;
- > more than 100 tests: 3 controls / 3 tests/ 3 procedures.

Controls are carried out by individuals trained and authorised by a voivodeship Inspector of Plant Health and Seed Inspection competent for the place of conducting the tests.



Controls are carried out on the basis of:

- > "Control List of Good Experimental Practice with reference to experiences during the trials",
- Non-compliance Report with reference to test schedule",
- Non-compliance Report with reference to Standard Operating Procedure".

After performing controls the following documents are drawn up:

- Control protocols
- > Follow-up control protocols



Actions to be taken where recommendations are not fulfilled

If any incompliance is identified, e.g. when an authorised organisational unit no longer meets organisational or technical conditions, or conducts tests in a way that does not guarantee their appropriate quality, the Main Inspector of Plant Health and Seed Inspection shall issue an order to eliminate identified incompliances or, by way of decision, shall withdraw the authorisation to conduct efficacy evaluation tests of plant protection products.





Scope of tests

- ▶ **efficacy** evaluation of plant protection product in terms of eradicating or preventing occurrence of pests or of influencing plant life processes in other way than nutrition component;
- > phytotoxicity of the product, taking into account different kinds of plants;
- influence of the product on the quality or the size of plant crops, where the efficacy evaluation was performed;
- possibility of occurring of resistance of pests to the product;
- **possibility of occurring** of adverse or unexpected **side effect** of the product **on beneficial organisms** or other organisms which are not eliminated, **on successive plants** and influence on seed-producing plants.



In Poland efficacy evaluation tests of plant protection products are conducted by **33** organisational units.

The Main Inspector holds a register of organisational units authorised to conduct tests including:

- > name, seat and address of the unit,
- scope of the authorisation granted.

The register is published on the Inspection website:

http://www.piorin.gov.pl/cms/upload/josor.pdf





Thank you

