

National Brigade for Veterinary and Phytosanitary Investigations B.N.E.V.P. Ministry for Agriculture and Fisheries FRANCE

CEUREG FORUM XIII

15-16 OCTOBER 2009

Venue: Congress Center Hotel IOR,
ul. Władysława Węgorka 20, 60-318 Poznań, Poland

Organizer: Institute of Plant Protection - National Research Institute
The Forum is organized under the auspices of the Polish Ministry of
Agriculture and Rural Development.

The meeting is a technical conference for pesticide registration experts from Central and East Europe. Over the past twelve years the Forum has been organised by Hungarian Ministry of Agriculture and Rural Development in Budapest in a close cooperation with the colleagues from the Plant Protection Section of the State Phytosanitary Administration of the Czech Republic from Brno and the Polish Institute of Plant Protection - National Research Institute from Poznań.

MORE INFO

Invitation

**OUTCOMES
OF THE
CONTROLLING
ACTIVITY
ABOUT PARALLEL IMPORT
PRODUCTS**

M. Boureau – H. Gillet

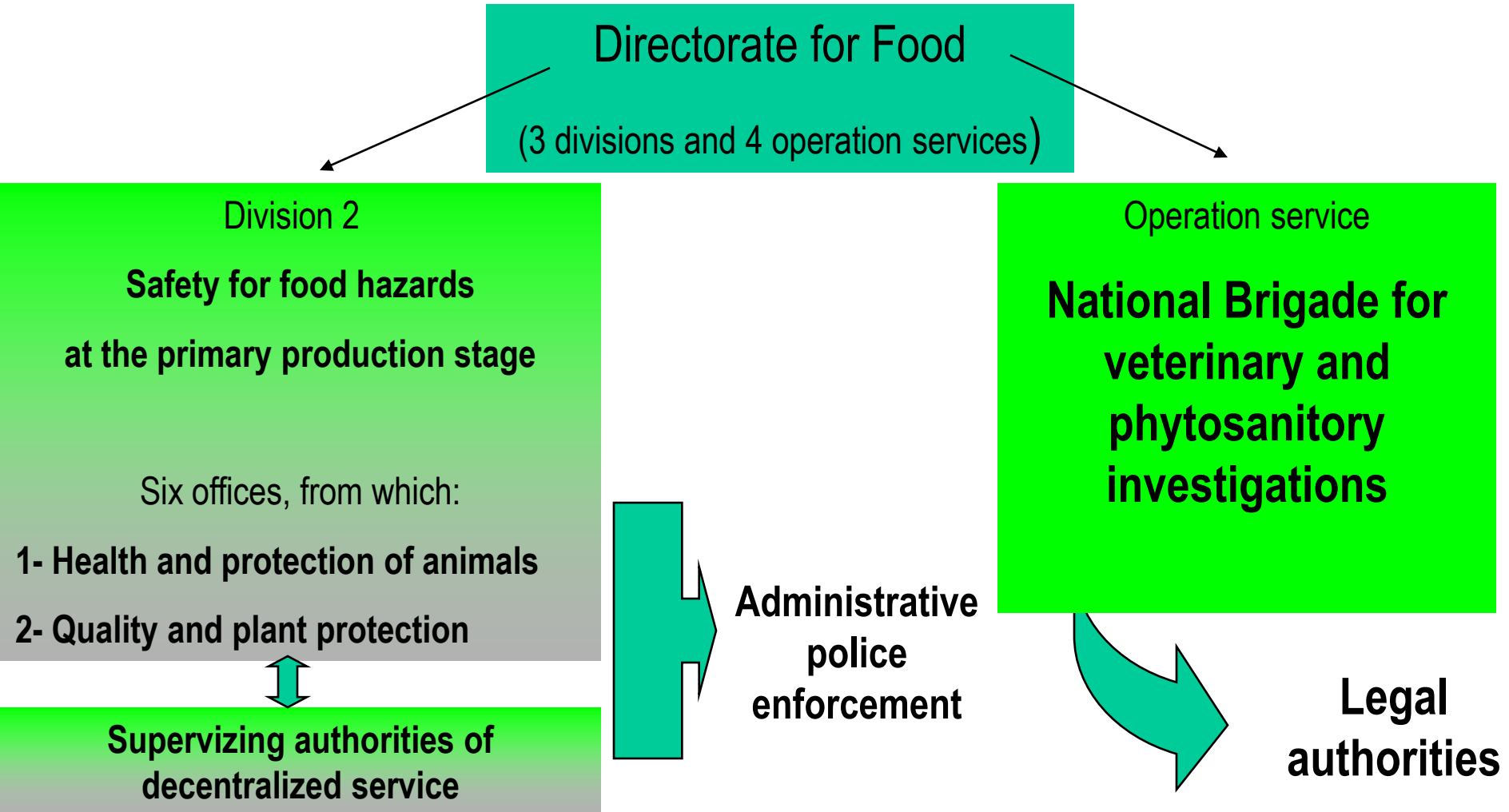
Terminé

National Brigade for Veterinary and Phytosanitary Investigations
(BNEVP – Manager: C. COLLINET)
Ministry for Agriculture and Fisheries

« Its task is to conduct investigations with the aim of fighting against organized crime in veterinary and phytosanitary health field . It also provides technical support to the Directorate for food, the regional sanitary control services or the legal authorities »

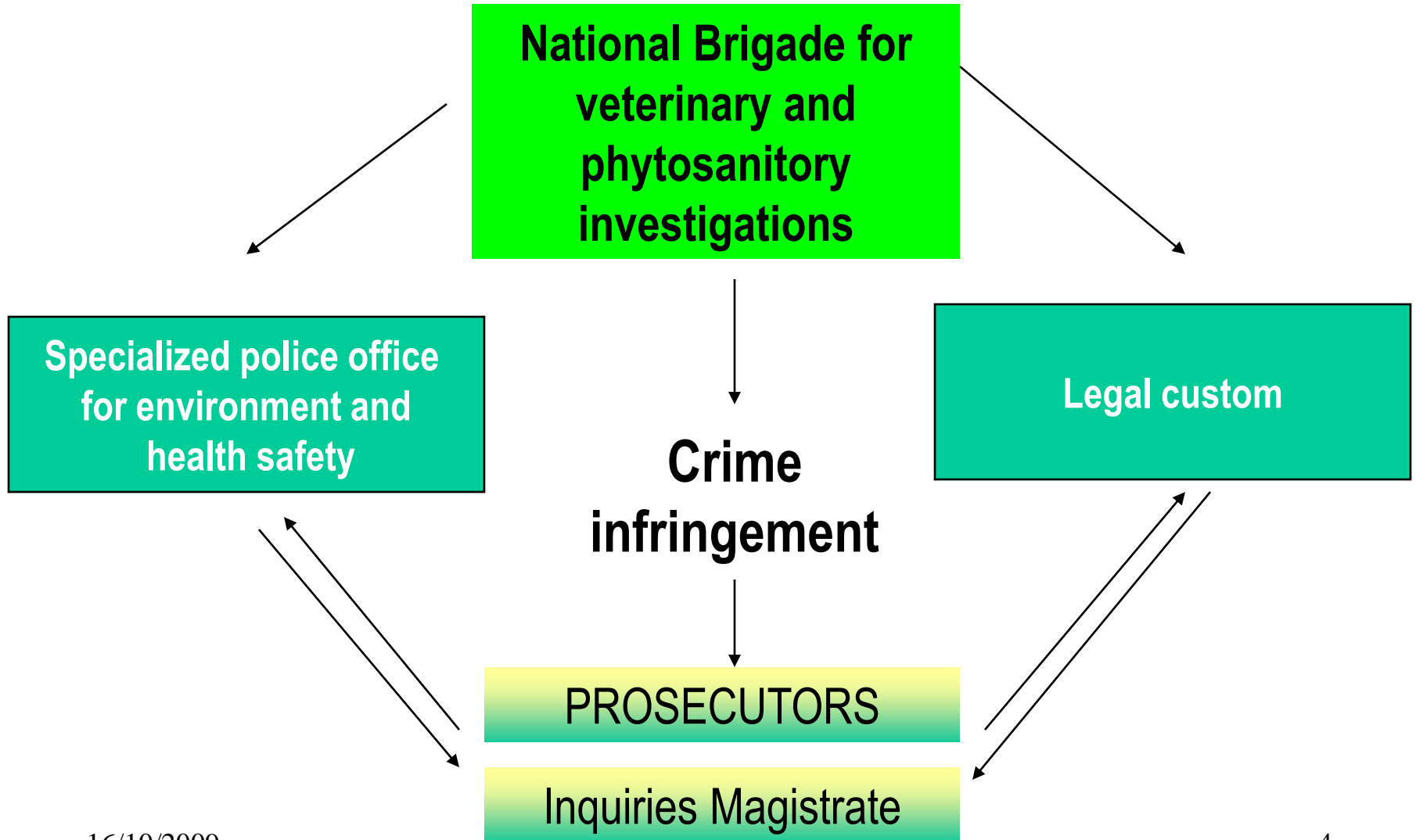
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Ministry for Agriculture and Fisheries



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A database of parallel import products

Imported in France

- name of imported product
- N° and date of registration
- Approval holder
- Date of withdrawal

From the origin country

- name of product
- N° and date of registration
- Approval holder
- Manufacturing company
- Date of withdrawal

Reference product in France

- Name, date and N° of registration
- Approval holder
- Manufacturing company
- Date of withdrawal

IMPORT PARALLEL TRADE

Who are the approved holders of authorized imported product in FRANCE?

- Companies who market only imported products in several EU countries. They are registered in Germany, Belgium, Austria, Luxembourg and have organized networks out of the EU
- Some French distributors who sell only on the french market

Who are the buyers?

- Wholesalers who sell to exclusive networks of distributors
- Some individual distributors in direct business

Who sales to final users?

- All distributors who want to increase profit margin

**Investigations carried out by BNEVP in the domain of trade
of plant protection products (ppp) for three years**

120 CONTROLS AGAINST DISTRIBUTORS

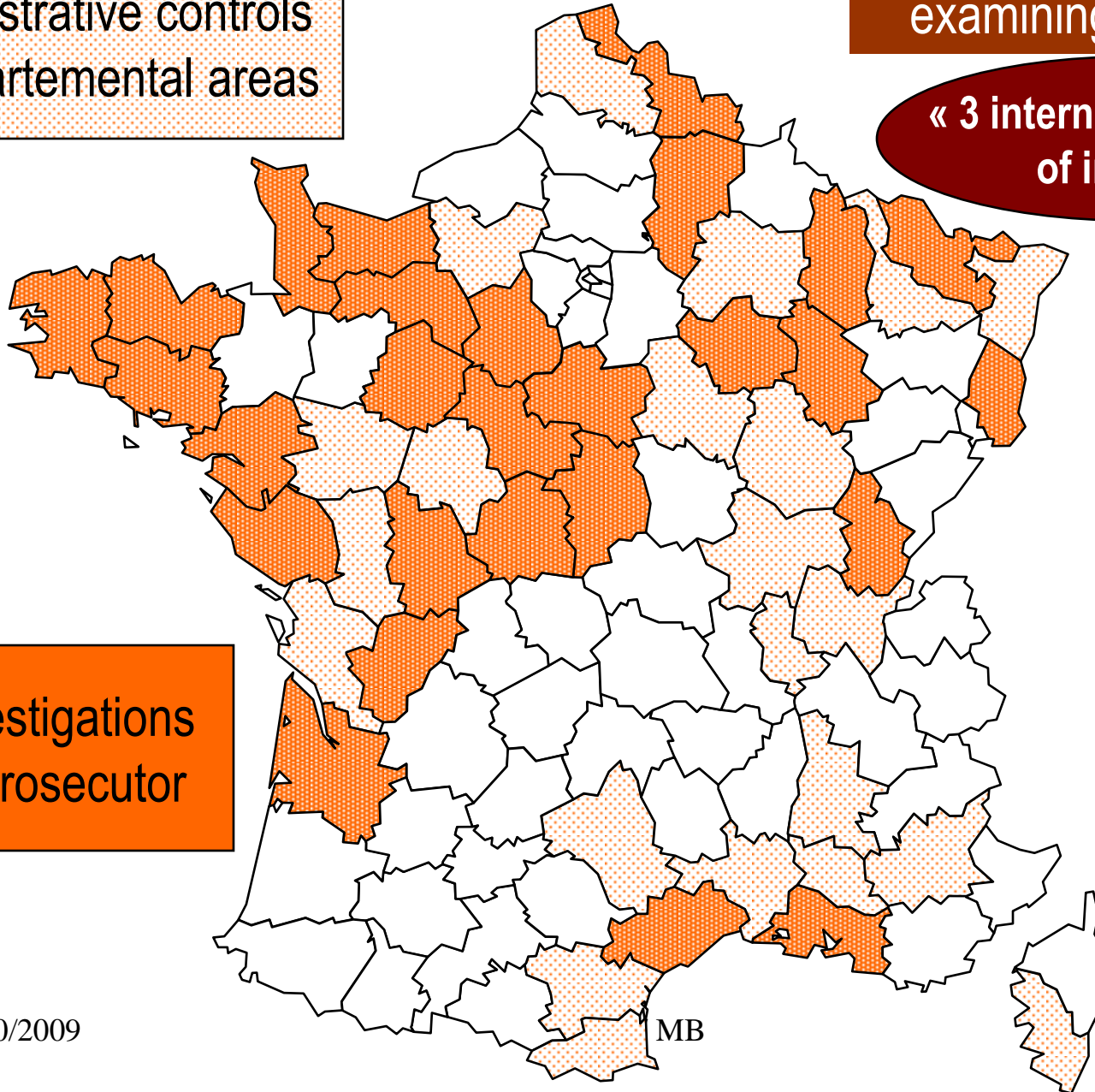
**200 TONS
OF ILLEGAL PRODUCTS
WITHDRAWN FROM THE MARKET**

administrative controls
in departemental areas

2 inquiries with
examining Magistrate

« 3 international letters
of inquiries

32 investigations
with prosecutor



16/10/2009

MB

8

One investigation out of all → 95 tons



16/10/2009

BNEVP / MB

9

Three judicial samples for each product are taken out for analyze



16/10/2009

BNEVP / MB

10

Detected illegal parallel import products → the results of investigations

Packaging and chemicals contained by counterfeited ipp

- Re-packaging of pesticides which did not go through health safety administrative control**
- Insecticide instead of fungicide**
- Unidentified substances or lack of active substance**
- Impurities and by-products or solvent above standard**
- Composition similar to original product (minor difference in impurity levels) = high quality counterfeits**

INSECTICIDE INSTEAD FUNGICIDE

Reference product

=ROVRAL

A.S. = 53% iprodione

Identify impurities = 0.005

unidentify impurities =
retention time 9,27min

Illegal product:

(fungicide)

A.S. iprodione = 0 %

(insecticide)

A.S.pyrimicarbe = 45%

SOLVENT ABOVE STANDARD

Référence Product:

A.S. = 104 g/l

Naphtalène : 0,154%

Polyéthylène glycol
d'alkylphenol : 2,98%

Stickiness : +++

Moisture content: ++

Illegal Herbicide:

S.A. = 104 g/l

Naphtalène : 4,77%

Polyéthylène glycol
d'alkylphenol : 0,78%

Stickiness :+

Moisture content: +

CONSEQUENCES

Health hazards

Référence Product :

Xn R36 R48/22

Illegal Product :

Xn *cat 3 R40*

Safety precautions for the user are under-evaluated and do not appear on the label

Environmental hazards

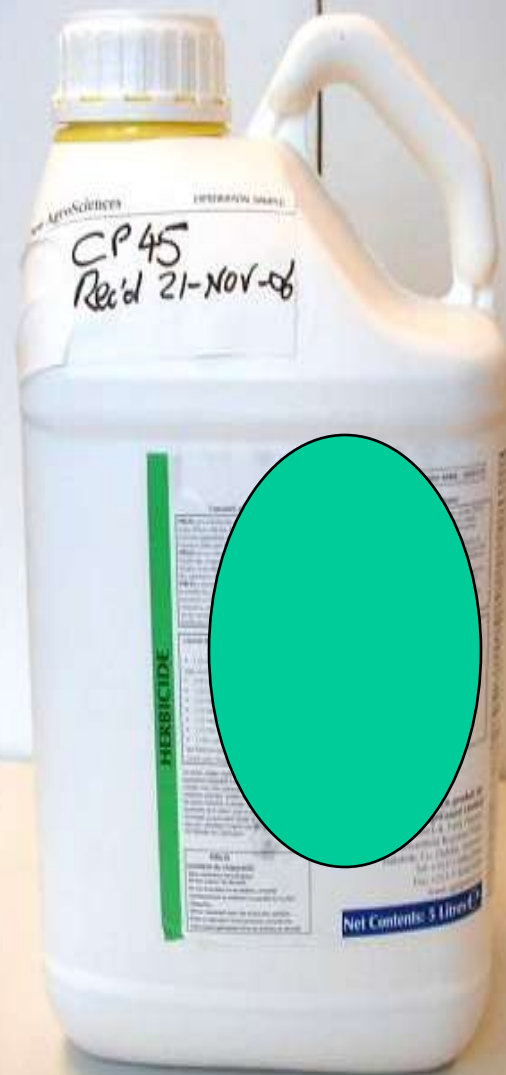
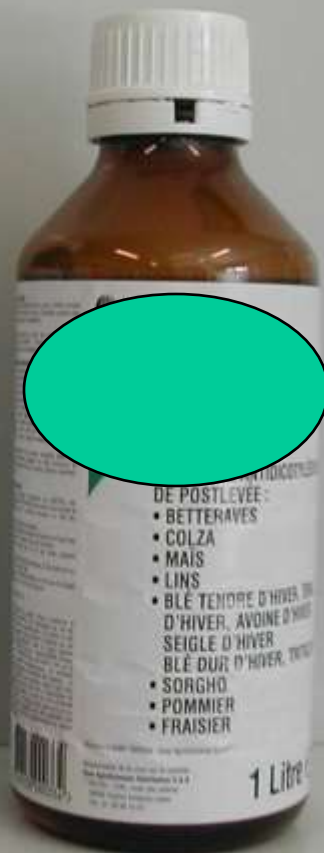
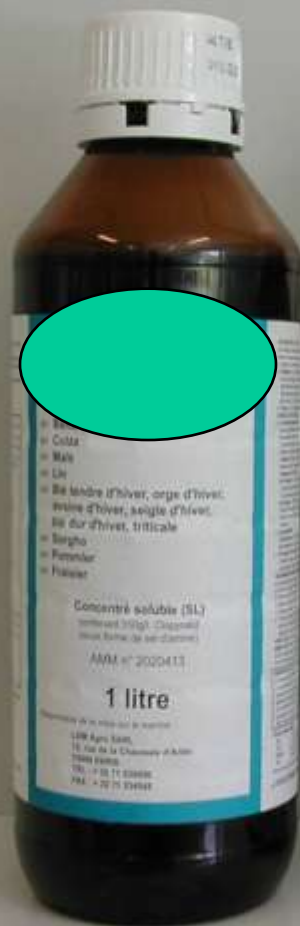
Naphtalène >1%

Classement N

For treatments implementation

Variation in terms of viscosity and humidity can affect the product's quality and performance

Example of repackaging of IP products with a counterfeit pesticides



Suspected network of illegal plant protection products sold like parallel import product

GERMANY

***Principality of
MONACO***

AUSTRIA

Parallel importing companies buy active ingredients or formulated pesticides out of EU.

Chemical companies of service provision mix up and package the final pesticides in some countries into EU

Products are labelled on request in domestic area

IRELAND

ITALY

LUXEMBOURG

***BELGIUM and
NETHERLAND***

FRANCE

EVOLUTION IN WAYS OF COUNTERFEITING

China
India

A.S.

**Pesticides Formulation without
final label before transport**

The product is labelled in the destination country by a wholesaler or a contracting company

Imported parallel
product

Own labelled
manufactured
product

Future undertakings

- **No repackaging awaiting the improvement of traceability in trade**
- **Further development of the administrative inspections:**
 - **Increased level of information to the distributor**
 - **Leads to discovery of further infringements**
- **Controls towards final users, focusing mainly on buying groups or associations of buyers**
- **More effective exchange of information with competent authorities about anti-counterfeit protections of products.**
- **Regular meetings with representatives of competent authorities to establish cooperation**
- **Introduce a more effective anti-counterfeit protection by industry**

THANK YOU FOR YOUR ATTENTION

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maurice.boureau@agriculture.gouv.fr
Phone: +33 673670935
herve.gillet@agriculture.gouv.fr
Phone: +33 673670937

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