

**SYSTEM OF POST-
REGISTRATION
CONTROLS OF PLANT
PROTECTION PRODUCTS
IN THE SLOVAK REPUBLIC**

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Legislation

- **The act of the NR SR No. 193/2005 Coll. of Plant health care as amended by the act No. 295/2007 Coll. and the act No. 45/2009 Coll. (next as „the act“).**
- **§ 4 section 1 letter d) – phytoinspectors of the CCTIA perform a control of introduction into the market an using of plant protection products and other products.**
- **§ 25 letter o) – the controlling institute performs a control of attributes and using of plant protection products and other products, including their untoward effects.**
- **§ 25 letter p) – the controlling institute performs an analyses of plant protection products and other products.**

Places of performing of controls

- **retail stores – once per year,**
- **big warehouses – once per year,**
- **end users divided according to the acreage into intervals:**
 - **up to 5 ha,**
 - **5-50 ha,**
 - **50-300 ha,**
 - **over 300 ha.**
- **companies deal with services,**
- **There is controlled – warehouse, plant protection products, mechanisation equipment, liquidation of wrappings of pesticides and keeping records.**

Focus of controls

- control of end users:
 - stock-keeping – control of warehouse and warehousing pesticides,
 - control of administrative data – consumption's evidence of plant protection products, delivery notes, invoices,
 - control of certificate of work with poisons (if company uses pesticides marked as T a T+),
 - wrappings' disposal,
 - using of non-registered plant protection products – including obsolete pesticides – disallowed, unidentified,
 - disallowed using of registered plant protection products (into the other vesture or against other harmful organism than is registered),
 - infringed safety orders (e.g. restriction of using in water hygienic protection zones, un-announcement for „beekeepers“, „hunters “, authority of nature protection, period of protection etc.),
 - mechanisation equipment (whether sprayers are registered and tested, or not).

Focus of controls

- **control of shops:**
 - **control of administrative data,**
 - **control of labelling – not-registered plant protection products,**
 - **not-registered sale (without certificate of specialized skills),**
 - **unsuitable storing conditions,**
 - **control of sale's form (self-service sale is prohibited).**

Focus of controls

- control of big warehouses of plant protection products:
- **control of suitability of warehouse – must be operated in accordance with the Ordinance of the MoA SR No. 624/2007 Coll. of taken samples and storage of plant protection products and other products,**
- **control of administrative data – e.g. invoices, certificates of work with poisons,**
- **control of labelling and wrappings of pesticides,**
- **control of locating of pesticides in warehouse (in shelves).**

Focus of controls

- control of labelling (packed-in leaflet):
 - size of package,
 - trade name,
 - name of the active substance and its amount,
 - producer,
 - registration's holder,
 - the one, who packs and distributes the plant protection product into the market,
 - registration number,
 - allowed range and application method,
 - number of production's batch,
 - manufacture date,
 - date of over packing,
 - date of consumption.

Taking samples of plant protection products

- On demand of external claimant.
- The state control – execution of control in terms of § 5 letter b) of the act of NR SR No. 193/2005 Coll. of plant health care as amended by later prescriptions.

Taking samples of retail packages of plant protection products within the state control:

- subjects are not informed in advance of planned taking samples,
- minimal size of sample is 50 g or 50 ml package,
- places of taking samples – producers, registration holders, the ones who over-pack plant protection products to the retail packages.

Taking samples of wholesale packages of plant protection products within the state control:

- **the size of packages from 1 litre, or 1 kilogram up to maximum 5 litres, or 5 kilograms packages of PPPs,**
- **newly registered plant protection products at registered subjects,**
- **suspicious PPPs on control in distributing chain and at the end user, that do not meet the essentials of labelling (incorrect or unreadable labelling),**
- **plant protection products imported from third countries – there must be a producer originated in third country listed on labelling,**
- **parallel import of parallel plant protection products,**
- **PPPs, that have been registered in the last year,**
- **PPPs, that have been the most used in the last year,**
- **places of taking samples – subjects, that are being holders of pesticides' registration, or all the big warehouses and warehouses of pesticides in the Slovak republic.**

The number of controls of plant protection products

Year	In distributing chain	At end users
2003	180	927
2004	175	676
2005	174	728
2006	373	794
2007	359	538
2008	261	820

Measures issued by the controlling institute

After finding of shortness at controlled subject within the post-registration control:

- **attention to elimination of shortness with specifying of time to perform of retrieval**
- **decisions with collation to perform the corrective measures – e.g. withdrawal of plant protection product from the market, disposal of obsolete pesticides**
- **after non-performance of corrective measure – imposition of fines.**

A problematic area – parallel imports

- **the greatest probability of falsification is just at parallel plant protection products (parallel import)**
- **within the state control, there is possible to realize taking of their samples usually just on the basis of impulse from the praxis**
- **in distributive big warehouses of pesticides in the Slovak republic, there is a problem to find a parallel plant protection products**
- **the controlling institute wants to address the professional praxis by this way, so be able to inform within the frame of possibilities the controlling institute about cases and places, where the parallel products (and other suspicious products) could be found as well as where they are distributed into the market**
- **the controlling institute will improve the phytoinspectors' activity in relation to growers, in order to control the parallel products' import.**

Parallel imports – controls in the future

- **in frame of the control activity – improvement of the traceableness of parallel plant protection products arrives after trainings' finalization for all the (or majority) business companies that deal with distribution of pesticides into the market**
- **arrangement into persons' evidence, that introduce plant protection products and other products into the market, will contribute for better overview and option to control the parallel imports**
- **intensification of controls directly at growers during the treatment's season.**

Illegal imports – control's reinforce

- it is necessary to improve the control activity in frame of the legislation possibilities, on the border's outside of the EU, as well as at declare in the area of the Slovak republic**
- the necessity of existence of operative information's exchange between Customs directorate of the Slovak republic, Police forces of the Slovak republic and CCTIA of pesticides' imports into the Slovak republic => to stop the „suspicious“ pesticide short of its introduction into the market in the Slovak republic**

- **it is necessary to improve the control activity, focused also on the holders of registration of parallel plant protection products in the Slovak republic themselves**
- **it is necessary to improve the control activity, focused especially on the business sphere, that work among pesticides' producers or their registration holders, and end users of plant protection products.**

Methodical guideline to check the parallel plant protection products

CCTIA – Plant protection department has issued in this year the following guideline for phytoinspectors, to check the parallel plant protection products:

- 1. The check is focused on parallel plant protection products at holders of license for their import (there is always a sign „PI“ as a part of the registration number in the middle), as well as in a big warehouses and in shops.**
- 2. The check focused on parallel plant protection products in time of their application at growers, and especially at holders of license for import of parallel products intended for own use (there is always a sign „PI“ as a part of the registration number in the middle and at the end sign „VP“).**

Thank you for your attention