



# **Controls of the marketing and use of PPPs in Germany**

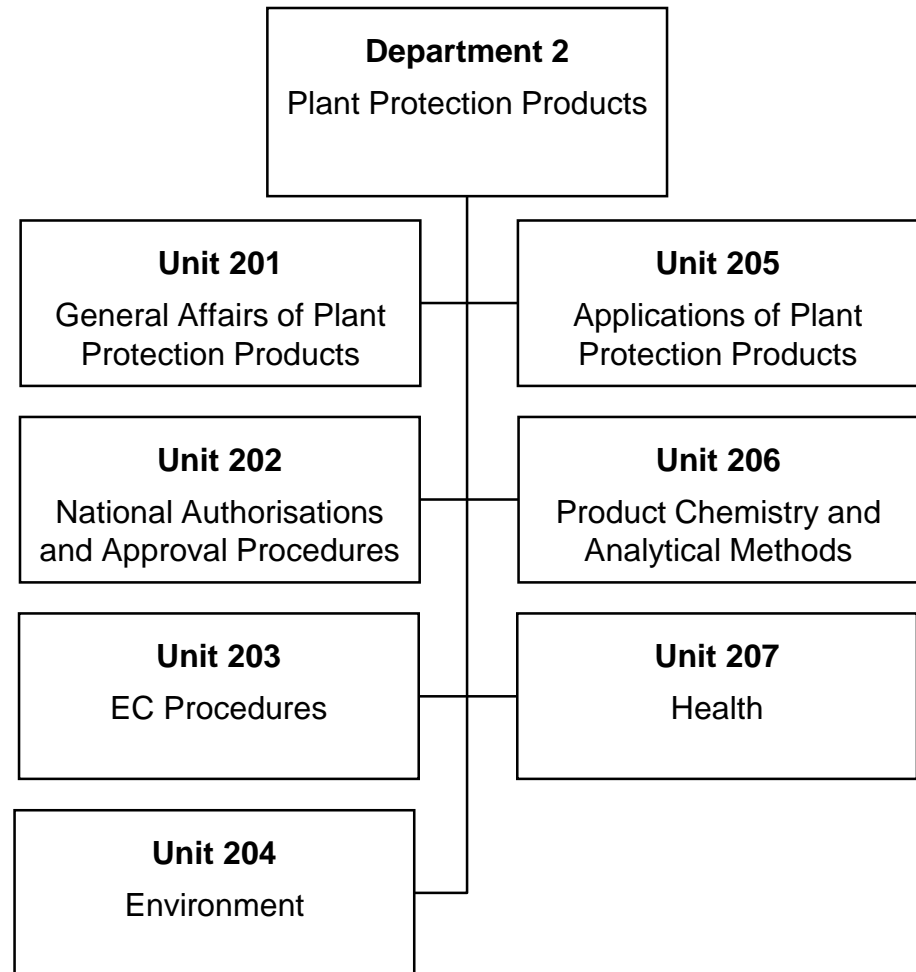
CEUREG Forum XXII. in Vienna  
29.-30. October 2018

# Federal Office of Consumer Protection and Food Safety

## Braunschweig Office Department 2



[www.bvl.bund.de](http://www.bvl.bund.de)  
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# Surveillance of sales and use of Plant Protection Products

## Organisation



### Federal States

- Planning of controls
- Conducting inspections
- Processing infringements
- Reports

### BVL

- Co-ordination
- Contact point for EU authorities
- Lab for product chemistry
- Annual national report

### Joint Working Group

- Development of Standard Operation Procedures (Manual)
- Proposal of annual control schemes
- Exchange of information

# Surveillance of sales and use of Plant Protection Products

## Plant Protection Control Programme

Manual  
(Methods)

Annual Report  
(Results)

Annual Control Plans

Information System  
Plant Protection (FIS-VL)

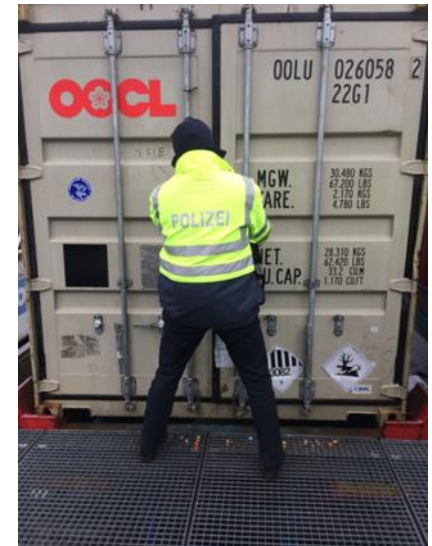
Inspections conducted by Federal States  
with the participation of the BVL

## Cooperation between customs authorities and competent authorities for controls

- a) In case of import of authorized PPPs:  
The customs authority inform the competent authority about the import of a PPP. The competent authority can start an investigation after the arrival of the PPP at the final destination - in case of suspicion.
- b) In case of import of suspicious PPPs:  
The import of a PPP is blocked for 3 days by the customs authority. The competent authority is informed to check the PPP.
- c) In case of suspicious PPPs in transit:  
The PPP is checked by competent authority in cooperation with the customs authority.

## Example: Hamburg harbor

1. Searching for suspicious goods (import or in transit)
  - supervision of dangerous good declarations
  - inspection of shipping documents
2. In case of a suspicion: Visual check of goods in co-operation with waterway police/customs authority.
3. Samples could be taken, e. g. to check the active substances.
4. Stop of suspicious PPPs for further investigations
5. Information of authorities in other MS and Third Countries about suspicious PPPs, which are in transit to their next/final destination.



# Import controls

## Example: Private “import” of PPPs

- **Airports**
  - Customs officers find PPP in the luggage from travelers, e. g. from Turkey.
- **German border**
  - Private person buy PPP on street markets or garden centers near the border.
  - Customs officers control people who re-enter Germany in certain regions.
  - Several PPP have been seized.
  - The competent authorities have published articles to inform about illegal “imports”.



## Focus of inspections

- Registration of traders
- Qualification of sales personnel
- Trade of authorised products
- Identity of the products
- Labelling
- Disposal of outdated PPP
- Record-keeping of stored and sold PPP



In 25 % of the sales shops you will find one P authorisation has been phased out.



## Current situation

- **Types of internet traders**
  - Local shop with online shop
  - Online shop only
  - Trading platforms (eBay, Amazon...)
- **Types of infringements**
  - Insufficient information about the product in the offer (uses, restrictions...)
  - Selling of PPPs for professional users to amateurs (without a certificate)
  - Offer of unauthorised PPPs

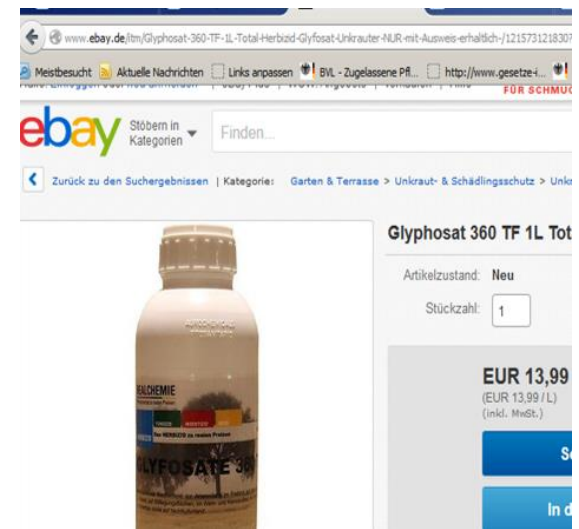


## Actions taken

- **Information of internet traders about legal requirements**
  - Publication about the trade of PPPs via internet
  - Personal communication with shop operators to give advice (visits, e-mails, letters)
  - Meetings with trading platform operators (eBay, Amazon...)
- **Control of suspicious offers**
- **Stop of selling non authorised PPPs**
  - e.g. by deleting offers on trading platforms
- **A control unit for internet sale shall be established**

## Example: German internet shop selling Glyphosate

- **Sale of unauthorised PPPs**
  - some labelled in Spanish, Italian...
- **Sale of professional PPPs to amateurs**
- **Data of 25.000 customers (sales of the last 3 years)**
- **Actions taken**
  - Procedure against the dealer
  - Letter to all buyers without a certificate (amateurs):
    - Information about the legal requirements
    - request to dispose the PPP
  - Control of professional users



## Example: Cooperation between MS

- **Parallel Trade Products (PTPs) not fulfilling the legal requirements**
  - Exchange of information about traders and sources of PTPs between the MS
  - Some court cases and withdrawal of permission for PTPs
- **Polish internet shop selling especially to Germany**
  - Polish control authority send customer data to BVL
- **Polish internet shop selling PPP to Germany**
  - Concerted action in Germany (control storage houses) and in Poland (control of the office of the trader)

## Focus of inspections

- Inspection of storage rooms
- Use of authorised products\*
- Compliance with use restrictions\*  
(e.g. non-spray zones to surface water)
- Qualification of the user
- Check of sprayers
- Disposal of outdated products
- Documentation of uses  
(record keeping)



# Surveillance of sales and use of Plant Protection Products

## Use Surveillance

### Analyses of soil or plant samples to check:

- Is the applied active substances allowed in the crop?
- Compliance with use restrictions?
  - Consideration of buffer zones to surface water
  - No application of PPPs dangerous for bees in flowering plants
  - No application of PPPs on hard surfaces
  - ...



# Surveillance of sales and use of Plant Protection Products

## Composition of Plant Protection Products

- **Is the composition of a PPP according to the authorisation?**
  - Active substance
  - Amount of active substance
  - Amount of relevant impurities (naphthalene...)
  - Amount of co-formulants (solvents etc.)
  - Physical, chemical or technical properties (emulsion stability, flash point, density, pH...)



# Surveillance of sales and use of Plant Protection Products

## Number of annual inspections in Germany

- ~ 2,400 inspections of 11,980 registered retailers and wholesalers (20 %)
- ~ 5,000 inspections of 275,400 farms (2 %)
- ~ 200 samples of Plant Protection Products are sent to the BVL for analysis (systematic samples)
- + X analysis of samples because of a suspicion (phytotoxicity, indication of illegal trade...)



## Further Information

Control methods and annual reports on sales and use surveillance:  
[www.bvl.bund.de/psmkontrollprogramm](http://www.bvl.bund.de/psmkontrollprogramm) (in German)

Annual reports on examination of Plant Protection Product samples:  
[www.bvl.bund.de](http://www.bvl.bund.de) > Plant Protection products > Product Chemistry



# BVL-Symposium Challenges 2019

## 6th and 7th of November 2018 in Braunschweig

Detecting and combating illegal trade in plant protection products



# Thank you for your attention!

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