



The role of the Food and Veterinary Office (FVO) in the implementation of pesticide legislation

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Food and Veterinary Office

FVO - General

- ✓ *The Food and Veterinary Office is a European Commission Directorate responsible for verifying compliance with EU standards concerning food safety, animal health, animal welfare, and plant health;*
- ✓ *It is active in Member States, Candidate Countries, and in Third Countries exporting, or wishing to export, foodstuffs/feedstuffs/live animals to the EU.*

FVO – General (2)

- ✓ *The FVO is based 50 km from Dublin*
- ✓ *It comprises some 160 staff*
- ✓ *It carries out some 250 inspection missions per year, of which more than 1/3 in third countries.*
- ✓ *Reports are published and available at:*
http://ec.europa.eu/food/fvo/index_en.htm



FVO – What does it do?

- ✓ Makes **recommendations** to competent authorities (CA) to address shortcomings
- ✓ **Follows up** on the recommendations and corrective actions announced/undertaken by CA.
- ✓ Contributes to **policy development** and **management** within the Commission in respect of food safety, animal and plant health, and animal welfare.

What does the FVO look at?

FVO assessment of control systems:

- ✓ Aimed at answering 4 questions:
 - = > *IS* there a system?
 - = > *CAN* it work?
 - = > *DOES* it work, in practice?
 - = > if not, *WHY* not?
- ✓ Basis for *FVO recommendations* in reports
- ✓ Based on *general*, and *specific* requirements and standards.

What are we not?

a police service:

- *We have no police powers*

a fire-brigade:

- *We don't (and can't) run after every incident*

a research institute/laboratory:

- *We don't take samples etc.*

the competent authority:

- *We don't do their job, and don't decide on/tell them how to implement corrective action, we indicate its result.*

FVO audits on Pesticide controls

*Three series of missions to **Member States** (1998 to 2011): Two Overview reports published on SANCO website; third series focussed on pesticide residue controls – overview report currently drafted*

*New series of audits in **Member States** from 2012 covering controls on marketing and use*

*Visits to all major **Third countries** exporting fruit and vegetables to the EU (Overview report published on SANCO website)*



Member States

- **Verify implementation and enforcement of EU legislation**
- **Assess performance of Competent Authority control systems**

FVO pesticide audits on marketing and use of PPP



Applicable legislation

Regulation 1107/2009: provisions for marketing (and use) of PPPs;

Directive 2009/128: sustainable use of pesticides

Regulation 882/2004: includes controls of pesticide use in food production;

Regulation 852/2004: includes pesticide use in food production;



Issues currently covered in Member States

- ✓ *Transposition of new legislation;*
- ✓ *Designation of competent authorities;*
- ✓ *Resources for performance of controls;*
- ✓ *Authorisation of PPP;*
- ✓ *Controls of wholesalers/retailers/growers/formulations/counterfeit pesticides;*
- ✓ *Pesticide residue controls (follow up);*
- ✓ *Prioritisation, procedures, co-ordination, enforcement, audit.*

Results Member States

- *Four draft reports from 2012 audits available;*
- *No overview yet;*
- *formulation analysis: profiling methods for suspected counterfeit pesticides being developed in some Member States;*



Third Countries

- **Compliance/Equivalence with EU Import requirements**
- **Assess performance of Competent Authority control systems**
- **Third Country guidelines**
- **Equivalence agreements**

Pesticide Audit Priorities – RASFF

Notifications for pesticide residues in
EU Rapid Alert System for Food and Feed

Country	RASFF 2005-2009
Turkey	115
Thailand	80
India	40
Egypt	35
Morocco	27
Argentina	19

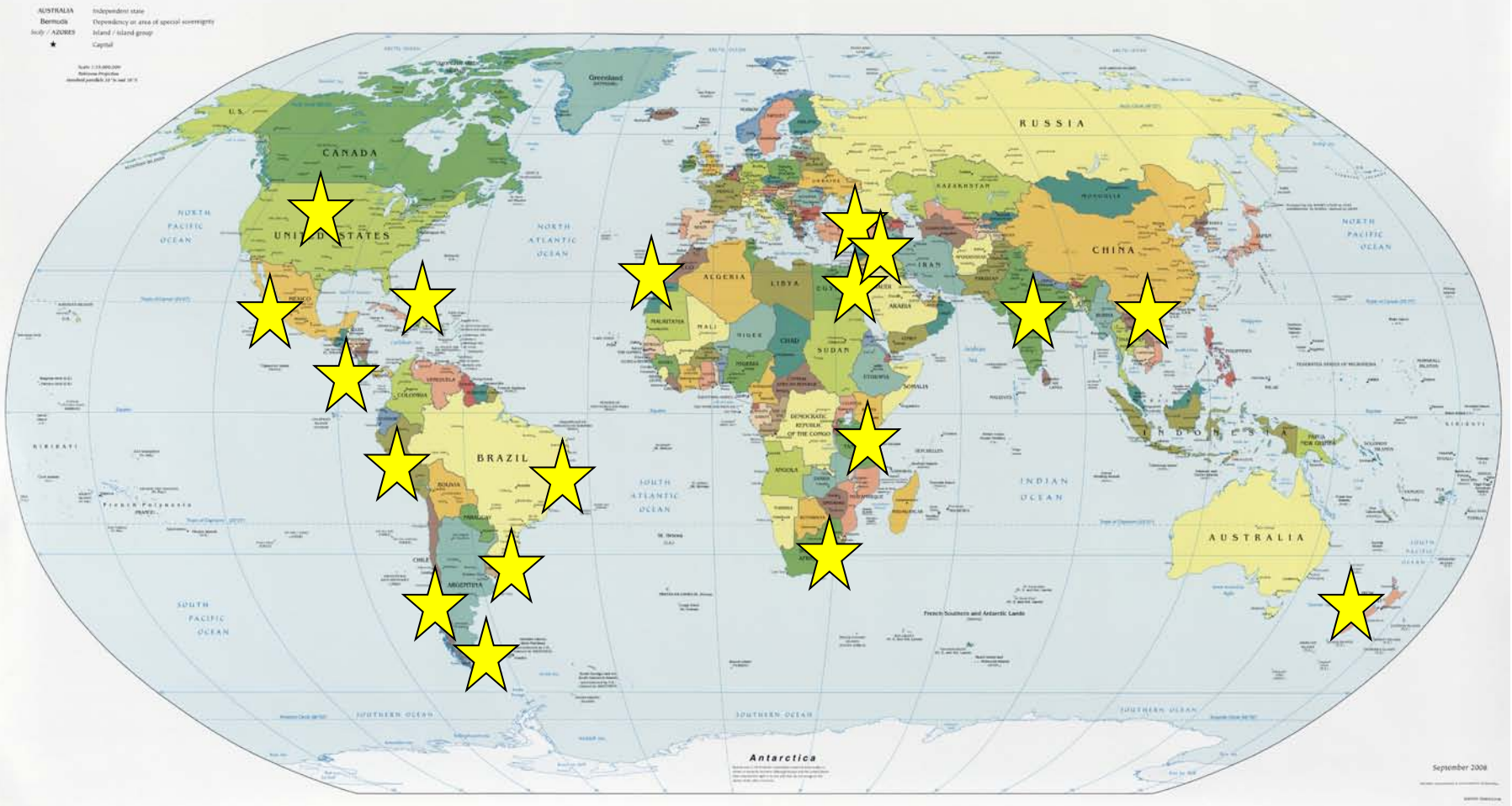
Pesticide audit Priorities – Trade

Import volume in tonnes, Eurostat 2008

Country	fresh fruit (excl banana)	fresh vegetables (excl. tubers)	total
South Africa	1,221,690	23,377	1,245,067
Morocco	393,944	623,109	1,017,053
Turkey	580,188	348,974	929,162
Chile	710,576	53,575	764,151
Costa Rica	757,765	3,584	761,349
Argentina	673,125	62,320	735,445
Brazil	583,593	1,791	585,384
Israel	178,419	361,788	540,207
Egypt	178,541	323,430	501,971

Pesticide audits in Third Countries

Political Map of the World, September 2008





Audits on pesticide controls to Third Countries

- evaluate the control systems for pesticide residues in foodstuffs of plant origin intended for export to the EU.
- evaluate the control systems for marketing and use of plant protection products (PPPs)



Audits on pesticide controls in Third Countries

- EU legislation does not contain specific requirements regarding pesticide controls in fruit and vegetables;
- The competent authorities are, however, the natural contact points of the EU;
- The reports contain recommendations to the competent authorities.

Results – authorisation of plant protection products

- **Systems exist for authorisation of plant protection products (PPPs);**
- **Many of the authorised PPPs can not be marketed and used in the EU;**
- **Their authorised use can cause residues in excess of EU MRLs and EU RASFF notifications.**

Results – controls of marketing of plant protection product (PPP)

- **Systems in place for official controls of retailers of PPPs in accordance with national legal provisions;**
- **Formulation analyses regularly performed (huge variation between countries: 0 to 1,700 analyses per year);**

How can I apply
pesticides and be in
line with EU
MRLs???



Results – controls of growers

- **Official controls of growers only in some Third Countries;**
- **Private controls, especially by large producers:**
 - Certification to private GAP standards
 - Advice on pesticide usage for EU market and private sampling through Exporters and EU retail chains
- **Growers keep records of pesticide uses.**



Results – Pack-houses and RASFF follow-up

- Pack-houses of fruit and vegetables generally registered;
- Traceability is generally in place, often back to the plot/orchard;
- Generally good follow-up of EU RASFF notifications by authorities.

Results– sampling for pesticide residues

- **Sampling programmes not in all Third Countries, and often focus on domestic market;**
- **Sampling generally in line with Dir 2002/63/EC = CAC/GL 33/1999;**
- **Export control performed by some Third Countries;**





Results – Official Pesticide Residue Laboratories

- Often accredited to ISO 17025, but accredited scope small;
- Rarely use of LC-MS/MS for pesticide residues;
- Analytical screen generally small (often < 50 substances), and does not include important pesticides used by growers and notified in RASFF system.
- Control by official laboratories mostly not effective

Conclusions of pesticide audits in Third Countries

1. Official pesticide controls focus mostly on compliance with national rules, which differ from EU legislation, and official laboratory control for pesticide residues is ineffective.
2. Authorisations of PPPs in TCs are not aligned with EU MRLs, and growers producing for export to the EU must be informed on Good Agricultural Practices in line with EU MRLs.
3. Such information is generally provided by pack-houses and exporters, and their self-control systems largely ensure compliance with EU MRLs.
4. Main Problems in areas without strong private sector.
5. Co-operation between authorities and private sector important.



Thank you.....

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Any questions?

