An original concept of Pesticides Surveillance and Enforcement in France
Organization and Results

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Scope of the presentation

- Authorities dealing with pesticides
- The main administration in charge of pesticides
  - Inspectorates: position and function
  - Laboratories
- Surveillance and enforcement procedures
- Results for the year 2003
- Conclusion
Authorities dealing with Pesticides

Ministry of Health
Ministry of Agriculture
Ministry of Environment
Ministry of Economy

Rising down the pesticides pressure

Competences of official authorities

- **Ministry of Agriculture**
  - Management of Pesticides Study and Putting up for sale
  - Pesticides Control before / while using, and Control in crude meat

- **Ministry of Environment**
  - Management of the spreading off of the pesticides
  - and contamination of surface water

- **Health Ministry**
  - Management of pesticide residues in Healthy products and pesticides in quell Water, swimming pool

- **Ministry of Economy**
  - Pesticides specialties and residues
**DGCCRF in the Ministry of Economy**

Ministry of Treasury and Economy

- Delegation of Budget
- Delegation of Industry
- Ministry of Consumption
- Delegation of Outside Trade

- DGTEP
- INSEE

DGCCRF

Money

Medals

**Historical Points of the DGCCRF**

- 1905 Creation of the 1st laboratory in Paris related to the Ministry of Agriculture under the Direction of Quality as SRFCQ
- Control of wine
- Control of addition of water in milk

- In the sixties
  - Beginning with Pesticides Control

- 1993 Consumption Code enlarged competences to services
Competences of the DGCCRF

- Regulation of the competition in any fields
- Economic protection of the consumers
- Security of the consumers in any fields
  - Sanitary and Risk Protection
  - Control of the nutrition
  - Advising in any fields
  - Enforcement and penalty
Scope of DGCCRF in Pesticides

- Competences in Pesticides Specialties Control
- Competences in Pesticide Residues
  - Surveillance
  - Enforcement
  - National for all the country despite of location

Food on sale

Tasks of the DGCCRF and Pesticides

- Share the MRL statement, the putting up for sale, the risk assessment and the Enforcement Rules with other administrations
- Coordination of the EU Commission’s tasks
- Elaboration of National Tasks
- Management of sampling and collect of results
- Feed back to the Commission
- Publication of the results
- Resolution of bilateral discrepancy in MRLs
- Alert in case of risks

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Police Competences of Inspectorates

- **Inspection of plants, factories at sale points**
  - Control of documents
  - Input and output of pesticides use
  - Supervision of self controls
  - Follow up of enquiry about quality and quality control
  - Respect of the trade agreements

- **Statement of enforcement**
  - Introduction of administrative Penalties
  - Transmission to the examining magistrate

  **State on visual facts**

- **Confirmation by sampling**

Competences of the Laboratories

- **TASKS**
  - Ensure the supervision of the attached sub country with national competences
  - Apply normalized or validated methods
  - Deal with all matrix with specialization
  - Accreditation

- **SCOPE**
  - Analytical control of food and feed
  - Juridical competences concerning non conformity
  - State on the food’s conformity
  - Assist technically the inspectorate in the check of QA QC in factories
  - Report to the inspectorates and to the General Directory

  **State according analytical results**
7 on 9 laboratories deal with Pesticides

Actions

- **National Tasks**
  - Surveillance related to the EU Monitoring Study
    - Fruit and Vegetables
    - Organic products
    - Cereals
    - Processed Products (Baby food)
  - Enforcement on focused products
    - Related to non conformity or advertising in surveillance

- **Local Tasks**
  - Surveillance or check of particular products in local productions
    - Respect of treatment time tables before sale.
    - Respect of use
Enforcement’s Tools

EU Regulation

Respect of MRLs

Authorization of use

EU Directives

French Laws

Details of Enforcement’s Tools

- **EU Directives (must be translated in French Laws)**
  - D 91-414 Putting up for sale
  - D 76-895 MRL in Fruit and Vegetables
  - D 86-362 MRL in Cereals
  - D 86-363 MRL in meat
  - D 90-642 MRL in Products from vegetable Origin

- **French Laws**
  - Law n°525 (1943)
  - Putting up for sale
  - Law n°93-539
  - Consumption Code
  - Arrêté 10/02/1992
  - MRL Cereals
  - Arrêté 05/08/1992
  - MRL on Fruit and Vegetables and Products from vegetable origin
Actual Enforcement’s Tools

- Regulation 2092/91
  - Organic Products
- Regulation 2005/396
  - MRL in Fruit, Vegetables, Meat and Products from vegetable Origin (Replace EU Directives D 76-895, D 86-362, D 90-642)
- Directive 91-414
  - Putting up for sale

Analytical Tools

- Rugged methods
- Adapted laboratories
- Educated people
Analytical Tools

- **EU Directives**
  - D 89-397
  - R 882-2004
  - D 65-2002
  - DG SANCO
  - Enforcement’s competence
  - Official Controls
  - Sampling
  - Guidelines

- **ISO Norms**
  - ISO 17025
  - ISO 5725
  - Accreditation
  - Method validation

- **EN NF Norms**
  - EN NF 12193
  - EN NF 13296
  - EN NF 1528
  - EN NF 14333
  - EN NF 14185
  - MRM Pesticides in Non Fatty Food
  - Maneb Group
  - MRM Pesticides in Fatty Food
  - Benomyl Group
  - N Methyl carbamates

- **NF Norms**
  - V 03 110
  - "In House Validation"

- **Publications**
  - Maleic Hydrazid
  - Daminozid

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Surveillance - Enforcement

- **Surveillance**
  - 1 sample per batch
  - Enquiry about treatments
  - Enquiry about cross contaminations
  - Advertising at the point of sampling
  - Rapid Alert to the other Labs, inspectorates, EU

- **Enforcement**
  - 3 samples per batch
  - Possibility of retaining the batch till the end of the analysis
  - Obligation of just in time analysis
  - Destruction of the batch if the MRLs are exceeded
  - Advising the examining magistrate
  - Rapid Alert to the other Labs, inspectorates, EU
Surveillance follow up

Inspectorate

1 Samples of the batch

Irregular Pesticide?

> National MRL

> EU MRL

No EU MRL

No National MRL

Advertising at point of sampling

Enforcement follow up with retention

Inspectorate

3 Samples

Retention of the batch?

Yes

Irregular Pesticide From Lab?

No

Document in dispute

Examining Magistrate

Destruction of the batch

Release

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2005-07-17 42h FLORIDA PESTICIDE RESIDUE WORKSHOP
Enforcement follow up without retention

Inspectorate

3 Samples

Irregular Pesticide From Lab?

No

Advising OK

Yes

Document in dispute

Examining Magistrate

EU Sample follow up

Inspectorate

Surveillance EU Sample

Pesticide

No EU MRL
No National MRL
MRL in Country of Origin

First Import Seller

Request of Import MRL In 3 months delay

Yes

OK

No

Document in dispute

Examining Magistrate
Surveillance: Fruit & Vegetables
Results of year 2003

2877 Fruit and Vegetables Samples

- 49.9% Without Residues
- 43.6% With Residues ≤ MRL
- 6.5% With Residues > MRL

Surveillance Fruit and Vegetables: The ten more frequent pesticides

- Maleic hydrazide
- Methomyl
- Bromides
- Thiabendazole
- Benomyl Group
- Imazalil
- Iprodione
- Maneb Group
- Chlorpyrifos
- Imidaclopride
Surveillance: Fruit Results

402 Citrus within 1102 Fruits Samples

- 59.0% Without Residues
- 35.5% With Residues < or = MRL
- 5.5% With Residues > MRL

Surveillance: Fruit Results

Commodity Commodity Samples > MRL Total Total %
Lemon 9 79 11.4
Pineapple 1 9 11.1
Oranges 11 116 9.5
Grapefruit 2 22 9.1
Mandarins 7 86 8.1
Peaches 10 101 9.9
Strawberries 8 93 8.6
Grape 4 93 4.3
Apricots 1 27 3.7
Plum 1 44 2.1
Pears 2 90 2.2
Apple 3 217 1.4
Cherry 1 25 4.0
## Surveillance: Vegetables Results

**1775 Vegetables Samples**

- **58.9%** Without Residues
- **34.0%** With Residues < or = MRL
- **7.0%** With Residues > MRL

### Surveillance: Vegetables 7% > MRL

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Samples &gt; MRL</th>
<th>Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dandelion</td>
<td>1</td>
<td>1</td>
<td>23.1</td>
</tr>
<tr>
<td>Avocado</td>
<td>3</td>
<td>13</td>
<td>23.1</td>
</tr>
<tr>
<td>Spinach</td>
<td>3</td>
<td>13</td>
<td>23.1</td>
</tr>
<tr>
<td>Celeriac</td>
<td>3</td>
<td>16</td>
<td>18.8</td>
</tr>
<tr>
<td>Courgettes</td>
<td>3</td>
<td>20</td>
<td>15.0</td>
</tr>
<tr>
<td>Wild mushrooms</td>
<td>1</td>
<td>7</td>
<td>14.3</td>
</tr>
<tr>
<td>Cress</td>
<td>1</td>
<td>7</td>
<td>14.3</td>
</tr>
<tr>
<td><strong>Cucumber</strong></td>
<td><strong>11</strong></td>
<td><strong>85</strong></td>
<td><strong>12.9</strong></td>
</tr>
<tr>
<td><strong>Pepper</strong></td>
<td><strong>9</strong></td>
<td><strong>92</strong></td>
<td><strong>11.9</strong></td>
</tr>
<tr>
<td>Turnips</td>
<td>5</td>
<td>42</td>
<td>11.9</td>
</tr>
<tr>
<td><strong>Lettuce</strong></td>
<td><strong>36</strong></td>
<td><strong>307</strong></td>
<td><strong>11.7</strong></td>
</tr>
<tr>
<td><strong>Witloof</strong></td>
<td><strong>9</strong></td>
<td><strong>79</strong></td>
<td><strong>11.4</strong></td>
</tr>
</tbody>
</table>

2005-07-17 42th FLORIDA PESTICIDE RESIDUE WORKSHOP
Surveillance: Vegetables 7% > MRL

<table>
<thead>
<tr>
<th>Commodity</th>
<th>Samples &gt; MRL</th>
<th>Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Garlic</td>
<td>1</td>
<td>15</td>
<td>6,7</td>
</tr>
<tr>
<td>Kiwi</td>
<td>1</td>
<td>15</td>
<td>6,7</td>
</tr>
<tr>
<td>Carrots</td>
<td>12</td>
<td>183</td>
<td>6,6</td>
</tr>
<tr>
<td>Tomatoes</td>
<td>11</td>
<td>212</td>
<td>5,2</td>
</tr>
<tr>
<td>Beans</td>
<td>2</td>
<td>44</td>
<td>4,5</td>
</tr>
<tr>
<td>Peas</td>
<td>2</td>
<td>44</td>
<td>4,5</td>
</tr>
<tr>
<td>Eggplants</td>
<td>3</td>
<td>72</td>
<td>4,2</td>
</tr>
<tr>
<td>Potatoes</td>
<td>7</td>
<td>217</td>
<td>3,2</td>
</tr>
<tr>
<td>Cauliflower</td>
<td>2</td>
<td>69</td>
<td>2,9</td>
</tr>
</tbody>
</table>

Surveillance: Cereals Results

248 Cereals Samples

- 49.6% Without Residues
- 50.4% With Residues < or = MRL
Surveillance Cereals: The more frequent pesticides

- Pyrimiphos methyl
- Malathion
- Deltamethrin
- Dichlorvos
- Chlorpyriphos Methyl
- Chlorpyriphos
- Gamma HCH

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Surveillance: Processed Product Results

3 Processed Products

- 33.3% Without Residues
- 66.7% With Residues ≤ or = MRL
Sampling of EU Coordinated Exercise

- Wheat
- Grapes
- Pepper
- Cucumber
- Eggplant
- Cauliflower
- Peas
- Rice

With a turn over all 3 years

EU Coordinated Exercise

508 Samples

- 59.3% Without Residues
- 38.6% With Residues < or = MRL
- 2.2% With Residues > MRL
Repartition of Multi-residue Samples

<table>
<thead>
<tr>
<th>Food Item</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>12</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lettuces</td>
<td>112</td>
<td>69</td>
<td>48</td>
<td>37</td>
<td>25</td>
<td>16</td>
<td>11</td>
<td>5</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td>330</td>
</tr>
<tr>
<td>Oranges</td>
<td>42</td>
<td>60</td>
<td>40</td>
<td>25</td>
<td>8</td>
<td>2</td>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>179</td>
</tr>
<tr>
<td>Peaches</td>
<td>34</td>
<td>9</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>52</td>
</tr>
<tr>
<td>Apples</td>
<td>69</td>
<td>59</td>
<td>20</td>
<td>6</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>157</td>
</tr>
</tbody>
</table>

Detail of EU Coordinated Exercise

Number of Samples > MRL in %

- Grapes: 4.3%
- Pepper: 3.2%
- Cucumber: 2.2%
- Eggplants: 2.9%
- Cauliflower: 2.8%
- Peas: 5.9%
Enforcement Results

Number of Samples analysed in %

- Without Residues: 44.5%
- With Residues ≤ MRL: 37.2%
- With Residues > MRL: 18.2%

Details of Enforcement Results

Number of Samples > LMR

- Lemon: 11.4%
- Ananas: 11.1%
- Peaches: 9.9%
- Oranges: 9.5%
- Grapefruit: 9.1%
- Strawberries: 8.6%
- Mandarines: 8.1%
- Kiwi: 6.7%
Enforcement Actions

- 37 Documents in Dispute
- 32 Advising at sale point

Conclusion

- Coordination between Inspectorates improve the efficiency of control.
- Coordination between Inspectorates and laboratories improve and increase the pertinence of the essays.
- Coordination between Inspectorates and laboratories improve the accuracy of enforcement.
- Reduced amount of samples for at least a good check of quality
- Many commodities contain more than 1 pesticides despite of origin (23.7 % for France against 20 % mean of EU).
- 5 origins for non conformities:
  - More and more pesticides MRLs are harmonized at LOD.
  - Lack of treatment labeling (citrus or potatoes).
  - MRL exceeding.
  - Using of forbidden Pesticides according to D 91-414.
  - Always not enough harmonization within EU.
Thank you for your attention.