

COMMENTS TO THE DRAFT REPORT OF AN AUDIT CARRIED OUT IN PORTUGAL FROM 20 TO 27 NOVEMBER 2012 IN ORDER TO EVALUATE CONTROLS OF PESTICIDES

Page 5, ninth paragraph:

Where it is written:	It should be:
“The General Directorate for Agriculture and Rural Development is the CA involved in the recognition of entities (institutions and / or private companies) providing training for sellers, end users and applicators of PPPs, in particular the approval of individual training sessions.”	“The General Directorate for Employment and Work Relationships (DGERT) is the CA responsible for the recognition of entities (institutions and / or private companies) providing training. In what concerns training for sellers, end users and applicators of PPPs, the General Directorate for Agriculture and Rural Development (DGADR) is the CA involved in the verification of requirements and the approval of individual training sessions.”

Page 5, last paragraph:

Where it is written:	It should be:
“ASAE is the CA en charge of official controls on the marketing of PPPs and pesticide residues”	“ASAE is the CA en charge of official controls on the marketing of PPPs and sampling for the control plan of pesticide residues”

Page 6, first paragraph of Findings:

Where it is written:	It should be:
“The General Inspectorate for Agriculture, Sea, Environment and Spatial Planning (IGAMAOT) is the authority responsible for planning and performance of systematic external audits in the area of food safety”	““The General Inspectorate for Agriculture, Sea, Environment and Spatial Planning (IGAMAOT) is the authority responsible for planning and performance of systematic external audits in the area of food safety, in Ministry of Agriculture, Sea, Environment and Spatial Planning (MAMAOT).” Moreover this abbreviation should be included in the list of abbreviations, page III.

Page 6, fourth paragraph MR 2012-6298 DRAFT PT

Where it is written:	It should be:
“Em geral, as AC dentro do âmbito da auditoria foram designadas e as suas responsabilidades foram	“Conclusões: Em geral, as AC no âmbito da presente auditoria foram designadas e as suas responsabilidades foram definidas.”

definidas.”	
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Page 8, last paragraph of Findings:

Where it is written:	It should be:
“These PPPS should not be marketed by retailers and wholesalers”	“These PPPS should only be marketed by retailers and wholesalers within the 120 days of the authorization”

Page 9, third paragraph:

Where it is written:	It should be:
“...for high risk PPPs to be sold to professional users and operators...”	“...for high risk PPPs to be sold to professional users...” in view of the definition of professional user adopted by Directive 2009/128/EC

Page 9, fourth paragraph:

Where it is written:	It should be:
“However, low risk PPPs can only be sold...”	“However, all the other PPPs for professional use can only be sold...”

Page 9, eighth paragraph:

Where it is written:	It should be:
“They have to pass an exam”	“They are evaluated by a proof of assessment of knowledge acquired”

Page 11, first paragraph: it is incorrectly stated that the audit team has visited the formulations laboratory at INIAV in Oeiras, instead of saying that it was at DGAV in Oeiras;

Where it is written:	It should be:
“... at the Institute for Agricultural and Veterinary Research (INIAV) in Oeiras.”	“... at the Institute for Agricultural and Veterinary Research (DGAV) in Oeiras.”

Page 11, second paragraph:

Where it is written:	It should be:
“...for the collection and the safe disposal of remnants of PPS”	“...for the collection and the safe disposal of empty packages of PPS and a management system for this type of residues is licensed by the Portuguese Environment Agency (APA)”

Page 13, last paragraph:

Where it is written:	It should be:
"...and IPM is covered by agricultural subsidy programs"	"...and integrated production (IP) is covered by agricultural subsidy programs"

Page 14, seventh paragraph:

Where it is written:	It should be:
"...has been established by an Order of the Director General of DGAV..."	"...has been established by Order 13879/2012, on 25 October, of the Minister for Agriculture, Sea, Environment and Spatial Planning..."

Page 16, first paragraph:

It is referred that the audit team has identified some weaknesses in the LRP regarding the quality control procedures in force. As we do not fully understand what they specifically refer to, we would like to have additional clarification about this matter.

Page 18, first paragraph:

Where it is written:	It should be:
the information regarding the object of application of a pre-defined uncertainty by default of 50% is not entirely correct and, according to what was said to the auditors, that uncertainty of 50% is not applied to the notified results, but only to the close LMR results, in order to assess the compliance of the samples, in accordance with the Document SANCO/12495/2011.	"It is estimated, for validation purposes, an uncertainty of internal measurement, being nevertheless applied by default a pre-defined value of 50% to the close LMR results in order to assess the compliance of samples, in accordance with the Document SANCO/12495/2011"

Page 18, third paragraph:

It is referred that "(...) for MRM some results were however considered questionable $2 < |z| < 3$."

The information regarding the questionable results is correct; our intention was to clarify that these questionable results are beyond the scope of accreditation, were obtained with alternative equipment, because it was impossible to use the usual ones, these being under the scope of accreditation, but were inoperative.

Page 23, fifth paragraph:

Where it is written:	It should be:
<p>Although systems have been established for external and internal audits, official controls on food of non-animal origin have not been a subject to either external or internal audits so far, which is not in compliance with the requirements of Article 4 of Regulation (EC) No 882/2004.”</p>	<p>“Although systems have been established for external and internal audits, official controls on pesticides have not been a subject to either external or internal audits so far, which is not in compliance with the requirements of Article 4 of Regulation (EC) No 882/2004. An external audit, to be conducted by IGAMAOT, was scheduled for the 1st half of 2013.” (We want to clarify the EU that at November 2012 had been subject to external audit, by the former IGAP and by IGAMAOT, several areas of official control of food of non-animal origin.)</p>