

ANNEX

Response of the Competent Authorities of Turkey to the recommendations of Report ref. DG(SANCO)/2013-6684-MR of an audit carried out from 11 to 19 April 2013 in order to evaluate controls of pesticides in food of plant origin intended for export to the European Union

No	Recommendation	Action Proposed by the Competent Authority
1	<p>Ensure that the levels of pesticide residues in peppers intended for export to the EU comply with EU standards as laid down in Regulation (EC) No 396/2005. This could be achieved by implementing inspection procedures, apart from sampling, for official controls on the use of plant protection products. Integrated Pest Management measures, including biological control, should be supported to ensure their implementation by growers.</p>	<ul style="list-style-type: none"> - There are 553 pests which harm more than one hundred and sixty culture plants that are economically cultivated in Turkey. The agricultural pest controls are implemented on 329 of those causing economic damages in accordance with the principles of Integrated Pest Management (IPM). - Within this scope, it is targeted to implement controls on 6 and 8 million hectares in Turkey in accordance with the principles of IPM until the years of 2018 and 2023, respectively. - With regard to the IPM projects launched, technical staff enables growers to implement biological control and biotechnical control methods as well as other alternative control methods through weekly visits, and the practitioners are supported by the Ministry. - The growers who implement biological or biotechnical controls are provided with support aids with the aim of reducing the use of chemical pesticides in plant production and of protecting human health and natural balance. - In Turkey, pepper is commonly produced in the districts of Demre and Kumluca in the province of Antalya. The Development Agency of the region has adopted the training,

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		<p>practice and introduction project "Biological Control in Demre, Pepper is in Safe Hands", which has been designed for the purpose of extending biological control in those districts and of creating model regions where biological control is successfully applied.</p> <ul style="list-style-type: none"> - Continuous inspections are carried out in greenhouse production areas by the technical staff of the companies providing biological control agents within the project. The Ministry also conducts studies for keeping records and ensuring traceability. - In Turkey, Good Agricultural Practices (GAP) are supported and extended through studies with the purpose of protecting environment and natural resources and of ensuring traceability and food safety. The growers provided with training courses are oriented to Good Agricultural Practices (GAP) by means of organising activities regarding record-keeping, control and training within the scope of Integrated and Controlled Product Management (EKUY) project which is implemented for extending the principles of IPM. Hence, it is aimed at developing and extending systematic agricultural methods. - With regard to the use of Plant Protection Products (PPP), the growers are inspected by the Ministry, and therefore, the inspection forms related to the use of PPPs are established and

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		<p>ensured to be utilized during the inspections so as to achieve association in those inspections across Turkey.</p> <ul style="list-style-type: none"> - Specific training, practice and inspection activities are carried out for the growers in terms of the greenhouse production of pepper and other vegetables. During the visits paid to the growers under this Project, they are given trainings on the principles of IPM; moreover, the PPPs applied by the growers are inspected. - Besides, the Contingency Plan was established with the purpose of conducting Pre- and Post Harvest inspection for the administration of pesticides on pepper only in the years of 2012 and 2013, and the inspection activities intended for pepper only are continuously carried out.
2	<p>Ensure that food business operators, carrying out any stage of production or distribution of peppers for export to the EU, adopt measures for sampling and analysis, as appropriate, as required by Article 4.3(e) of Regulation (EC) No 852/2004 in conjunction with Article 10 of the same Regulation.</p>	<ul style="list-style-type: none"> - The exporting companies of fresh fruits and vegetables verify the compliance of the products they receive from producers with the Turkish Food Legislation by means of collecting samples from those products for the purpose of <u>self-inspection</u> during <u>good acceptance and storage process</u> and delegating the

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		<p>performance of their analysis by public and private laboratories authorized by the Ministry. The relevant numerical information may be obtained from the records of the private samples which are analyzed for the control of pesticide residues by public and private laboratories. Food business operators are already obliged to establish their own self-control mechanisms and traceability systems in pursuance of the Law No. 5996. Hence, the Ministry conducts internal controls and inspections on the basis of risk, and criminal actions required by the Law are taken in case of the detection of infringements. In this regard, it was seen that some exporting companies carrying out packaging activities specified and recorded written rules in their quality systems during the mission visit. Moreover, the Ministry informed the Unions with which the exporting companies are registered of the initialization of corrective and remedial actions regarding the situation recommended by the mission team. Hence, the Ministry may share with the mission team the results of the studies which are conducted across Turkey and particularly in the provinces visited.</p> <ul style="list-style-type: none"> - Likewise, the study “<i>The Guideline on the Sectoral Good Hygiene Practices for Fresh Fruit and Vegetables</i>” is going to be completed, printed and distributed to companies and introduced through seminars with the participation of the relevant Non-Governmental Organisations and sectoral

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		representatives under the coordination of the Ministry.
3	Ensure that samples of peppers for export to the EU are analysed in laboratories with the relevant scope and reporting limits to achieve effective controls of MRLs laid down in Regulation (EC) No 396/2005.	<ul style="list-style-type: none"> - The Public and Private Food Laboratories under the Ministry conduct Pesticide Analysis in pursuance of the Turkish Food Codex Regulation on Maximum Residue Limits of Pesticides. These analyses are conducted in consideration of the procedures specified in the Pesticide Manual No. 12495 which was published by DG SANCO and entered into force following 01/01/2012. The devices which laboratories use for pesticide analysis are calibrated in consideration of the limits laid down in the Turkish Food Codex Regulation on Maximum Residue Limits of Pesticides. - Pursuance of the Regulation on the Establishment, Duties, Powers, Responsibilities and Working Principles and Procedures of Food Control Laboratories, Public and Private Laboratories prepare and submit dossier for the analyses they start conducting recently to the General Directorate. The General Directorate has qualified staff review the dossier, and laboratories are authorized for analyses at issue on the condition that inspections are conducted where necessary. - In terms of the analysis of pesticide active substances which are used in the plant products for export to the EU from Turkey and required by the EU to be controlled, the capability to analyse all of 262 active substances is going to be ensured.

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No	Recommendation	Action Proposed by the Competent Authority
		<ul style="list-style-type: none"> - Laboratories are going to be instructed to initiate studies necessary for the accreditation of them for all 11 active substance required to be analysed in pepper (Carbendazim, Clofentezine, Diafenthiuron, Dimethoate, Fometanate, Malathion, Methomly, Oxamyl, Procymidone, Tetradifon, Thiophanate-Methyl). - The Ministry follows up the analysis process of the samples collected during export and import and the capacity enhancement process of laboratories for pesticide analysis through the Food Safety Information System (GGBS).
4	<p>Ensure that laboratories for pesticide residue analysis are evaluated and/or accredited under officially recognized quality management and assurance programmes so as to guarantee reliability of analytical results provided as set out in Point 41 of CODEX CAC/GL 26-1997 on the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems.</p>	<ul style="list-style-type: none"> - The laboratories under the Ministry are accredited by TURKAK, which is the sole authority in Turkey in this regard. Inspections are thoroughly carried out by the inspectors assigned by the General Directorate of Food and Control. - Pursuance of the Regulation, quality management unit is regarded to be the main unit of a laboratory. The quality management unit is obliged to ensure the coordination and traceability of the studies related to quality and to determine the policies and objectives of management system in accordance with TS EN ISO/IEC 17025 or guide standards. Laboratories are going to be notified of the deficiencies determined by the mission team and ensured that their quality management units

Competent Authority response to the report recommendations, received 4/7/2013

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		make arrangements necessary for the fulfilment of those deficiencies.