



**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**

Sayı : 35649853-TİM.KİB.GSK.UYG.2025/316-585

Giresun, 25/02/2025

Konu : Taze Meyve-Sebzede Pestisit Kullanımına İlişkin Misyon Ziyareti

E-POSTA

**KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
2025/122**

Sayın üyemiz,

Tarım ve Orman Bakanlığının bir yazısına atfen, T.C Ticaret Bakanlığı İhracat Genel Müdürlüğünden alınan 21/02/2025 tarih 00106497768 sayılı yazıda;

Birleşik Krallık (BK) Çevre, Gıda ve Tarım Bakanlığı, Birleşik Krallık'a ihraç edilmesi amaçlanan taze meyve-sebzede pestisit kullanımından kaynaklanan gıda güvenliği risklerini kontrol etmek ve azaltmak için uygulanan kontrol sisteminin değerlendirilmesi amacıyla 28 Nisan-9 Mayıs 2025 tarihleri arasında ülkemizde bir Misyon ziyareti gerçekleştirileceğinden bahisle söz konusu ziyaret öncesi Birleşik Krallık tarafından iletilen ankette (4.1) belirtilen, 1793/2019 sayılı Komisyon Uygulama Yönetmeliği (AB) Eklerinde tanımlanan Hayvansal Menşeli Olmayan Gıda (FNAO) ürünlerinin **(denetim turunçgil ve tatlı biber odaklı olacak)** İngiltere'ye ihraç eden paketleme tesisleri isimleri talep edilmektedir.

Bu çerçevede, anılan Bakanlığa iletmek üzere söz konusu ürünleri İngiltere'ye ihraç eden ve paketleme tesisleri bulunan üyelerimizin tesis bilgilerini Genel Sekreterliğimize iletmesi hususunu önemle bilgilerinize sunarız.

e-imzalıdır
Sertaç Ş. TORAMANOĞLU
Genel Sekreter

Ek: Anket (9 sayfa)

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Department
for Environment
Food & Rural Affairs

36-UKO-2425-TUR

Questionnaire to evaluate the systems in place to control and mitigate food safety hazards from the use of pesticides on Foods of Non-Animal Origin intended for export to Great Britain from Türkiye

Date: January 2025

Background

Türkiye exports significant amounts of food to the UK. According to HMRC data, Türkiye was the 6th largest non-EU exporter, by volume, of food to the UK in 2022.

As of 29 October 2024, there are twelve (12) Foods of Non-Animal Origin (FNAO) commodities from Türkiye subject to control under assimilated Commission Implementing Regulation (EU) 1793/2019, with seven (7) under control due to levels of non-compliance for pesticide residues.

Due to the high volume of imports of these commodities from Türkiye and continued levels of non-compliance, a risk-based audit is scheduled to assess the systems in place to control and mitigate food safety hazards from the use of pesticides on FNAO intended for export to Great Britain from Türkiye with a focus on fresh fruit and vegetables (sweet peppers and citrus fruits).

Please submit your returns **in English** to ukassurance@defra.gov.uk by 28 February 2025. Your submission should be supplemented with supporting information such as relevant legislative framework, maps, charts as appropriate. Any confidential information should be specified in the title and the reason for confidentially provided.

If you have any questions about the contents or completion of this questionnaire, please contact ukassurance@defra.gov.uk for the attention of Dr Mohan Pillai MSc PhD.

Objective

To verify the official control systems in place for the control and use of pesticides to ensure pesticide residues in FNAO products intended for export to Great Britain comply with the specified residue limits laid down in Great Britain's legislation.

To assess corrective action undertaken by Turkish authorities to ensure those commodities identified in the Annexes of assimilated Commission Implementing Regulation (EU) 1793/2019 are compliant with Great Britain legislation with a focus on sweet peppers and citrus fruits.

Scope of assessment

The use of pesticides across all FNAO commodities is in scope. However, to manage the scale of this audit, the focus will be on sweet peppers and citrus fruits as these are currently controlled under assimilated Commission Implementing Regulation (EU) 1793/2019.

The following aspects fall within scope of this evaluation:

- Competent Authority structure, organisation and enforcement capability
- National legislation to control the availability and use of pesticides. To include:
 - Controls in place to minimise pesticide residues in food
 - Traceability of the application and use of pesticides on FNAO throughout the growing, harvesting, further processing packaging and dispatch.
- The development, implementation and results of the national pesticide monitoring plan
- Capacity and capability to monitor, control and mitigate food safety hazards from the use of pesticides on FNAO destined for export to Great Britain at growing, harvesting, further processing and packaging
- Training available to growers, harvesters, processors and pack-houses on the safe use of pesticides
- Capability, capacity, accreditation, designation, and regulatory oversight for the testing of pesticides and peer review and interpretation of results
- Export procedures, testing and certification process
- Corrective / preventative action taken to mitigate hazards from pesticide residues in those commodities listed in the Annexes of assimilated Commission Implementing Regulation (EU) 1793/2019.

Part 1: General Information

1. Competent authority for food safety and public health

- 1.1. Please describe the organisation and role of the Central Competent Authority(s) (CCA) and the Competent Authority(ies) (CAs) responsible for controls of FNAO products intended for human consumption. If different competent authorities are involved for different commodities, data on their structure should be provided separately.

Please include an organisation chart.

- 1.2. Please provide the legislative framework allocating the roles and responsibilities for the CCA and each of the CAs.
- 1.3. Please provide a map showing the administrative divisions of your country. Please indicate the location of the relevant CA offices and the geographical area covered, stating the number of full-time equivalent staff in each office.
- 1.4. Please provide the details of the competence of officials responsible for the delivery of controls for pesticide residues for all steps in each production chain.
- 1.5. Please describe the organisational structures of any bodies or agencies authorised or delegated by the CAs to deliver controls on their behalf (including monitoring, compliance, and enforcement). State the different roles for each such agency and their responsibilities.
- 1.6. For any controls delegated to these bodies/agencies, please provide details of how the CA:
- names the delegated body/natural person
 - provides precise instructions (e.g. protocols and procedures) for carrying out controls
 - communicates updates on the results of controls carried out by delegated bodies/natural persons
 - evaluates the performance of organisations and/or individuals delegated to carry out controls
 - manages any conflict of interest that delegated bodies/individuals may have
 - ensures that delegated bodies are accredited according to the ISO 17020 standard.

2. Capability and Capacity of the CAs to deliver FNAO controls

- 2.1. Provide details of the relevant qualifications and registration requirements for officials responsible for delivering pesticide authorisation, marketing and use controls.

- 2.2. Provide details of the induction training, ongoing training and continuing professional development of officials delivering controls. Please include details of training from 2021.
- 2.3. Describe record-keeping requirements for controls related to residues.
- 2.4. Are there any outreach (extension) programs/awareness programme on sustainable use of pesticides undertaken by the CA?

Please include details of how the CA:

- ensures good practices on safe, sustainable, and effective use of pesticides on FNAO are disseminated
- disseminate information on integrated pest management/control programs on FNAO
- carry out inspection of pesticide application equipment in use
- assesses the specific practices (mechanical/areal/ manual spraying methods on different crops) and uses of pesticides on FNAO
- ensure disposal of pesticide packaging and remnants to prevent contamination
- ensure compliance with handling storage and treatment of pesticides on FNAO.

3. Approval of pesticides and oversight of usage

- 3.1. Please provide a list of all pesticides (active ingredient) currently authorised for use on FNAO in Türkiye.
- 3.2. In respect of Governance and Regulatory oversight in Türkiye:
 - what legislative frameworks or international guidelines are followed for the approval and monitoring of pesticides?
 - how often are these regulations reviewed and updated to reflect scientific and policy developments?
 - confirm how the records of all pesticide approvals are retained and published for each product, including any conditions or restrictions for use.
- 3.3. Provide any documented policies and procedures for the approval, usage and withdrawal of pesticides and how users are informed.
- 3.4. Please confirm how frequently any documented policies are reviewed and adjusted based upon any emerging evidence or policy changes.
- 3.5. Detail reporting obligations for manufacturers, distributors and users of pesticides in Türkiye.
- 3.6. Detail what systems are used to collect and store data related to pesticides approval, usage and monitoring, including notification of non-compliance.

- 3.7. Provide details of legislation on pesticides maximum residue levels (MRLs) on food and feed.
- 3.8. Provide details of MRL database maintained by the competent authority for different food and feed commodities
- 3.9. Provide details including a list of the documented procedures including standard operating procedures, work instructions and guidance for carrying out residue controls for FNAO products.
- 3.10. Describe record-keeping requirements for controls related to the application of pesticides.
- 3.11. Provide details on the traceability of the application and use of pesticides on FNAO during growing, harvesting, processing and packaging.
- 3.12. Please confirm how compliance inspections are triggered and conducted. Please also include the frequency of those inspections.

4. Delivery of controls during growing, harvesting, processing and packaging.

- 4.1. Please provide a list and map detailing the location of pack houses, warehouses and distribution centres that currently export FNAO products to Great Britain.
- 4.2. Provide details (e.g. protocols and procedures) on how pesticide controls are delivered during growing, harvesting, processing and packaging.
- 4.3. Provide details of assurance schemes (including the support received and how schemes are audited) used by producers to minimize risk of pesticides residues during growing, harvesting, processing and packaging.
- 4.4. How does the CA ensure compliance to pesticide residue controls and monitoring the MRL levels for FNAO?
- 4.5. What actions does the CA take on non-compliance related to pesticide residue on FNAO?
- 4.6. What enforcement actions are taken when there is non-compliance by Food Business Operator?

5. Pesticide residue monitoring and sampling procedures

- 5.1. Provide details of the pesticide residue monitoring plan in the food chain and the legal basis for implementing and enforcing the regulation. Please provide monitoring plans for last three years (2021, 2022 and 2023), and specifically provide:
 - a list of commodities tested and number of samples for each commodity
 - criteria used for selection of which commodities were tested
 - suites of pesticides sought in each commodity
 - summary of findings.

- 5.2. Provide sampling procedures for FNAO commodities for pesticide residues.
- 5.3. Is all sampling announced (foreseen by the farmer or food business operator) or unannounced? If sampling is announced, please provide an explanation as to why and the type of notification given.
- 5.4. Please confirm if sampling is spread evenly throughout the annual production / growing cycle of each commodity. Where seasonality or substance application affects a sampling period, please provide additional information.
- 5.5. Provide the procedures/instructions to target samples (e.g. sampling criteria, sources of information) when taking a sample.
- 5.6. Provide a description of the criteria used when selecting FNAO commodity to be sampled.
- 5.7. Describe the sampling procedures including details that differ from standard sampling protocols when taking a sample in response to suspected misuse of pesticides.
- 5.8. Provide information on any measures in place for sampling where there is suspicion of pesticide residues from specific active substances. Please include:
 - a list of scenarios where a suspect sample may be taken
 - any national legislation allowing suspect sample is to be legally obtained
 - who is authorised to take such samples
 - the follow up actions undertaken in the event of a positive sample.

6. Internal audit procedures

- 6.1. Provide details of competent authority(s) internal audit processes to ensure the effectiveness of official controls. Please detail:
 - audit planning and programme
 - documented audit procedures.
- 6.2. Please explain how you ensure:
 - independence of the internal audit team
 - transparency of the audit process
 - independent scrutiny of the audit process
 - internal auditor competence.
- 6.3. Provide the audit programme/plan and published outcomes for the last three years, and the forward audit programme/plan for the next year.

7. Pesticide testing laboratories

7.1. Provide the name and addresses of:

- the National Reference Laboratory (NRL) designated to maintain testing standards and provide support on advice for testing of pesticide residues in FNAO commodities
- any other laboratories authorised to perform official testing for pesticide residues. Please state the laboratory category (e.g. government-owned, affiliated or private) and include details on the specialisms, responsibilities and jurisdiction covered by each laboratory

Provide a map showing the location of the above laboratories.

7.2. Provide details of analytical quality control and method validation procedures used by the NRL and official laboratories (e.g. SANTE 11312/2021).

Specifically:

- Provide details of how sample integrity and chain of custody are maintained during sampling, transport, sample preparation and testing

7.3. Provide a description of the legislative framework that enables CCA's to designate, and have appropriate oversight, over laboratories conducting testing on official samples for pesticide residues. Please include specific reference to:

- minimum laboratory requirements to obtain the appropriate designation to perform testing on official samples
- designation / authorisation process enabling laboratories to test official samples.

7.4. Provide the number of technical and non-technical staff working at each laboratory designated to carry out official for pesticide residues on official samples. Please describe how these qualifications are maintained.

7.5. Provide the qualification, training and competence requirements for NRL and official laboratory staff.

7.6. For each laboratory, please describe the procedures the CA have in place to monitor the performance of the laboratories involved with testing official samples for pesticide residues:

- laboratory sample, inventory or information management system
- laboratory quality management system (QMS)
- certificate of accreditation
- copy of last audit conducted by the accreditation body.
- copy of internal auditing procedures
- inventory of equipment to demonstrate sufficient capacity is available
- maintenance of equipment and facilities.

7.7. For each laboratory, please provide details of (national and international) proficiency testing, or other inter-laboratory comparative trials undertaken in the last two years for pesticide residues on FNAO commodities please include:

- the outcome of each analysis (e.g. satisfactory or unsatisfactory)
- the criteria used for judging the outcome of the analysis

- the z-score for quantitative tests
 - a summary of actions or follow-up work undertaken in response to unsatisfactory results.
- 7.8. List the details of the accreditation held by each laboratory involved in testing official samples for pesticide residues. Please include specific reference to:
- whether each laboratory is accredited to ISO/IEC 17025 standard for the specific methods they are performing on the official samples
 - the identity of the accreditation body and the standards they are operating in accordance with
 - the accreditation number, the accreditation certificate and the scope of accreditation.
- 7.9. If the analytical methods used for testing official samples for pesticide residues are not included in the scope of accreditation, please confirm that they have been validated in accordance with internationally accepted scientific protocols such as SANTE 11312/2021 or ISO 16140.
- 7.10. For each laboratory, please list the methods/analytes which are not accredited or validated, including a timeline for when these methods will be validated or accredited and by which standard the methods will be validated against.
- 7.11. Describe the reporting process that exists between the laboratories and the competent authorities. Please refer to any specific criteria that exists for reporting non-compliances to the CA.
- 7.12. Provide the reporting targets that have been agreed with each laboratory in relation to assessing official samples for pesticide residues. If applicable, please state:
- the reporting timeframes
 - how compliance with the timeframes is monitored
 - any actions that may be taken if the target timeframe is not met.

8. Export health certification

- 8.1. Describe the process of completing export health certification and controls for FNAO. Explain how information relevant to the certificate attestations for export to Great Britain are obtained.
- 8.2. Explain the training, qualifications, authorisation, official status, and registration process(es) of officers conducting export health certification.
- 8.3. Explain the application process for requesting and providing an export health certificate for a specific consignment. Please state how this would specifically be applied for exports to Great Britain.
- 8.4. Explain the replacement and cancellation of export health certification procedures including how authorities in Great Britain are notified of such actions where

