

Enforcement of Plant Protection Products in Sweden

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Content



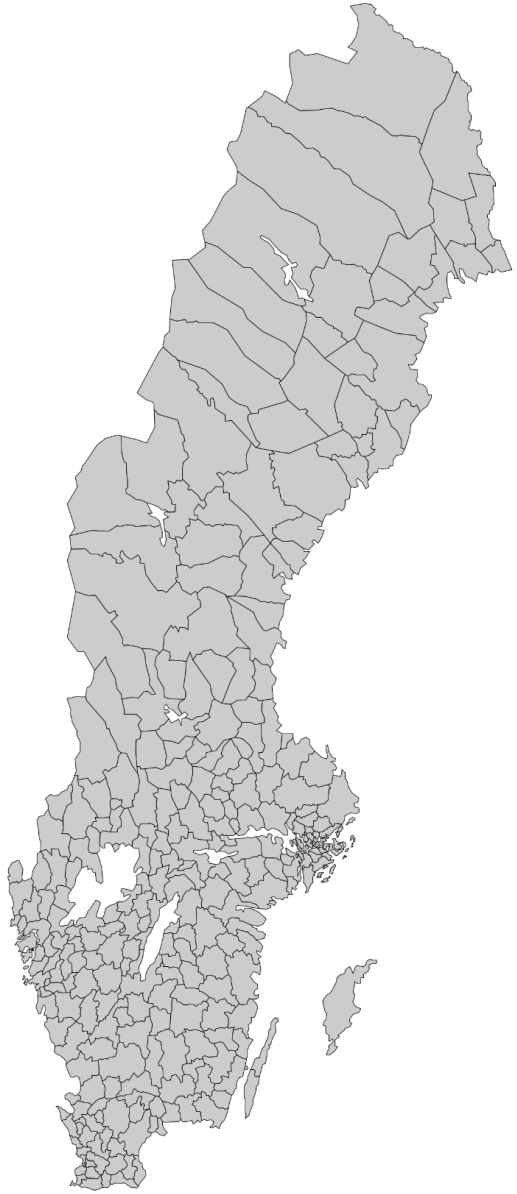
- Introduction to Swedish Enforcement System for Plant Protection Products (PPPs)
- Planning and Coordination of Official Controls under Regulation (EU) 2017/625
- Risk-Based Frequency and Register of Operators
- Enforcement Projects by the Swedish Chemicals Agency (KEMI)
- Summary and Questions

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Swedish Enforcement System for Plant Protection Products (PPPs)

Competent authority *	Responsible for the control of…
Swedish Chemicals Agency (KEMI)	Manufacturers, packers / re-packers and distributors introducing PPPs to the Swedish market (first-tier suppliers)
County Administrative Boards (21)	Certain professional users within agriculture
Municipalities (290)	Local users and retailers of PPPs

**** Designated Competent Authorities for Official Controls under Article 4 of Regulation (EU) 2017/625.***



Coordination, Planning, Guidance…

- Swedish Chemicals Agency (KEMI)
- Swedish Board of Agriculture
- Swedish Environmental Protection Agency
- Swedish Forest Agency
- County Administrative Boards

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Jordbruks verket

NATUR VÅRDS VERKET

SKOGSSTYRELSEN

Länsstyrelserna

www.kemikalieinspektionen.se

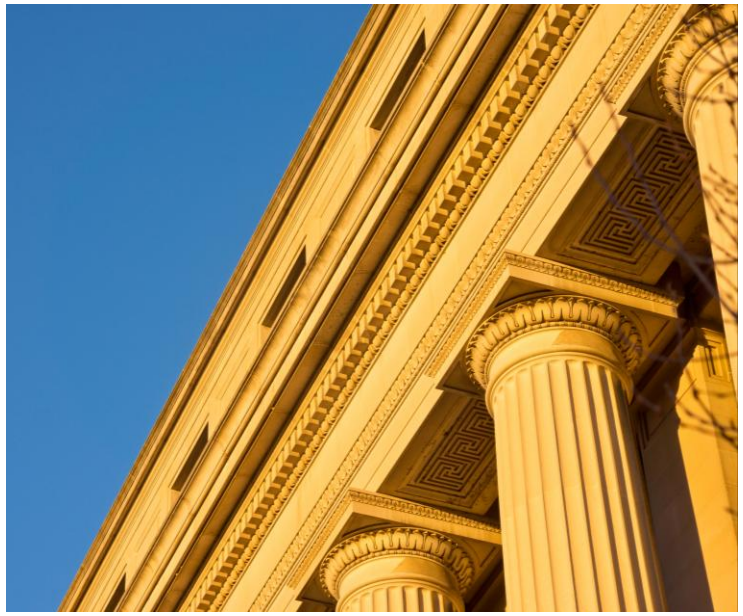
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Official Controls Regulation (EU) 2017/625

Examples of Requirements

Competent authorities

- Regular and risk-based official controls – Art. 9
- Inspections without prior notice – Art. 9
- Up-to-date registers of operators – Art. 10
- Written records of official controls – Art. 13

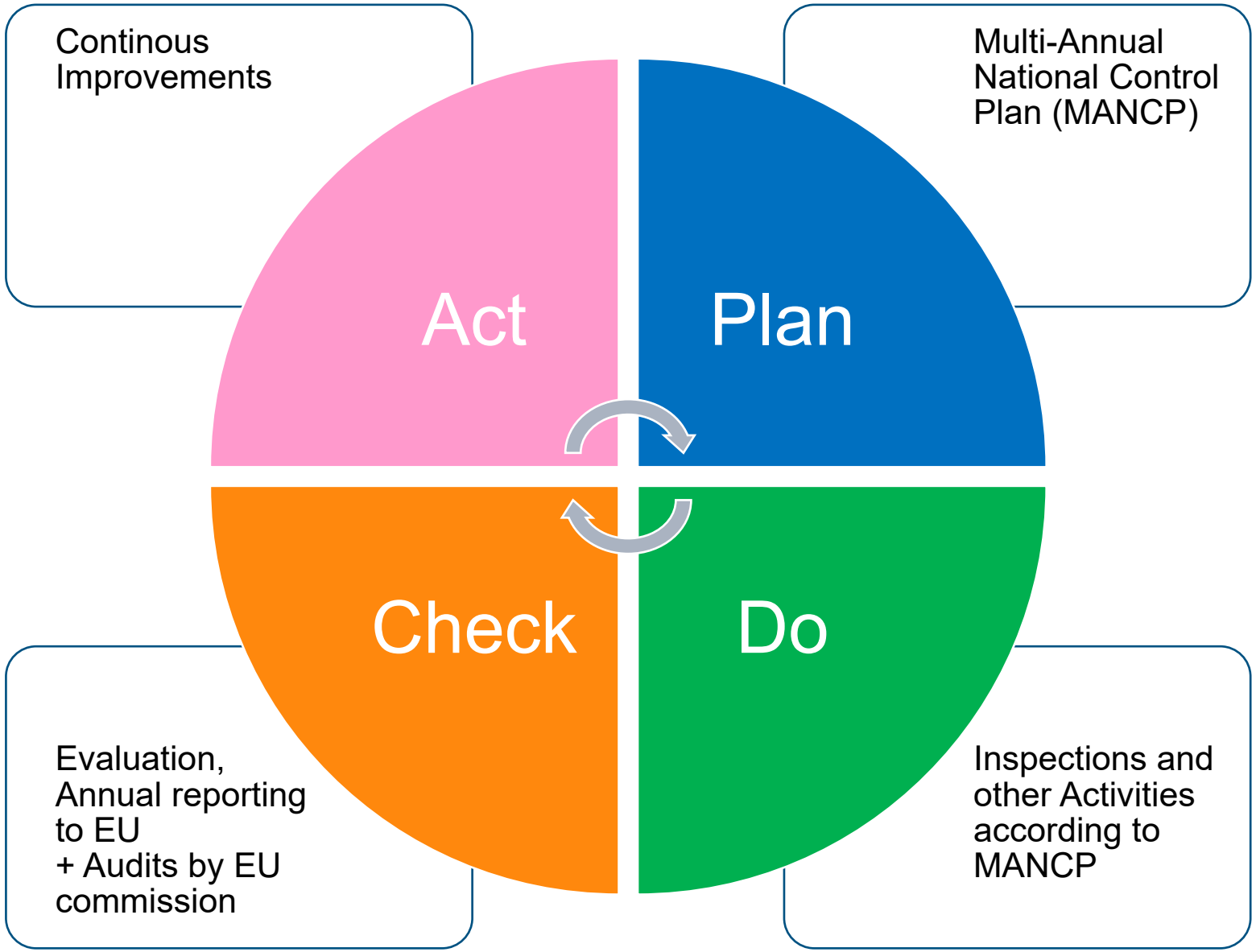


Member state level

- Multi-Annual National Control Plan (MANCP) – Art. 109
- Annual reporting on official controls – Art. 113
- Audits performed by the EU commission – Art. 116

Planning and Coordination

Cooperation between authorities in the agri-food chain



Multi-Annual National Control Plan (MANCP)
”Nationella kontrollplanen (NKP)”

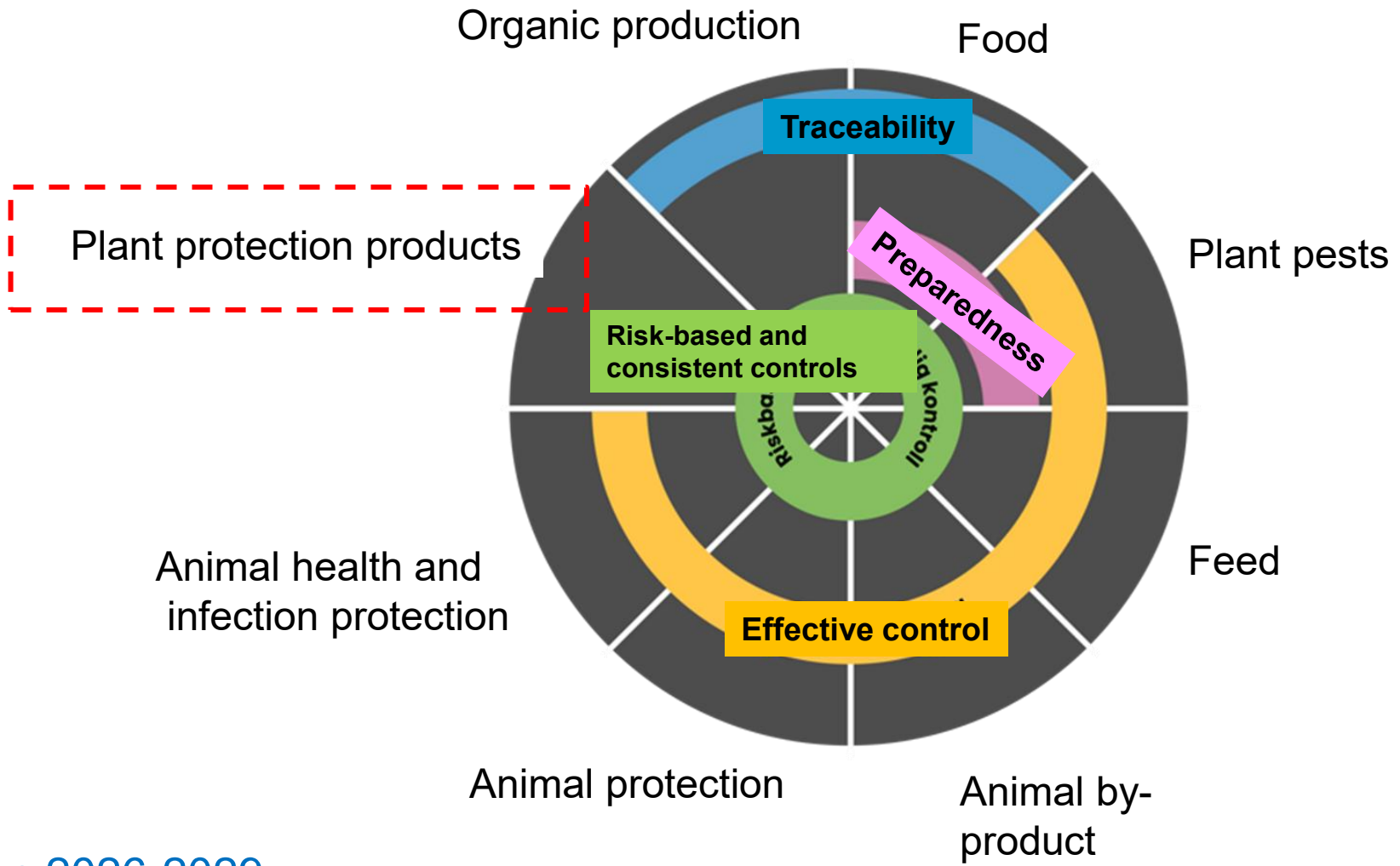
Overall Objectives for the Entire Agri-Food Chain	*e.g. ‘Consumers have access to safe food’*
Control Areas	*e.g. ‘Plant Protection Products, PPPs’*
Focus Areas	*National priorities within each control area* *e.g. ‘Risk-based and consistent controls’*
Control Objectives (+ Indicators)	*What is to be achieved within each focus area during the planning period*
Activities	*What will be done* • *Guidance for authorities* • *Inspection activities*

Livsmedelsverket

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MANCP for the Agri-Food Chain
Focus Areas 2026–2029



Links in Swedish
(MANCP = NKP)

- NKP-webben
- Mål för kontrollen 2026-2029

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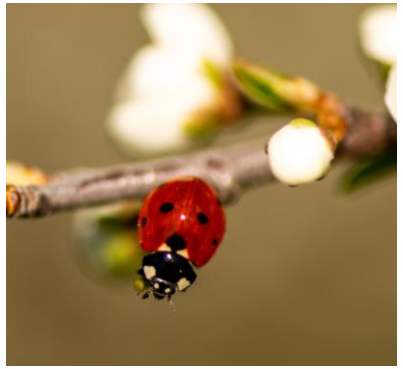
Objectives for Official Controls of PPPs in Sweden 2026–2029

1. The competent authorities to develop more fit-for-purpose **registers of operators** marketing or using PPPs.
2. The competent authorities to improve their **risk-based approach** to official controls.
3. The competent authorities to carry out more extensive and consistent **controls of distributors** of PPPs.
4. The competent authorities to carry out more extensive and consistent controls of **nationally selected operators and control areas related to the use of PPPs**.
5. The competent authorities to undertake activities to **strengthen competence and expertise**.









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Risk-Based Frequency of Official Controls – Article 9.1

Guidance is provided to all competent authorities by the Swedish Chemicals Agency (KEMI) in cooperation with the Swedish Board of Agriculture and the Swedish Environmental Protection Agency.

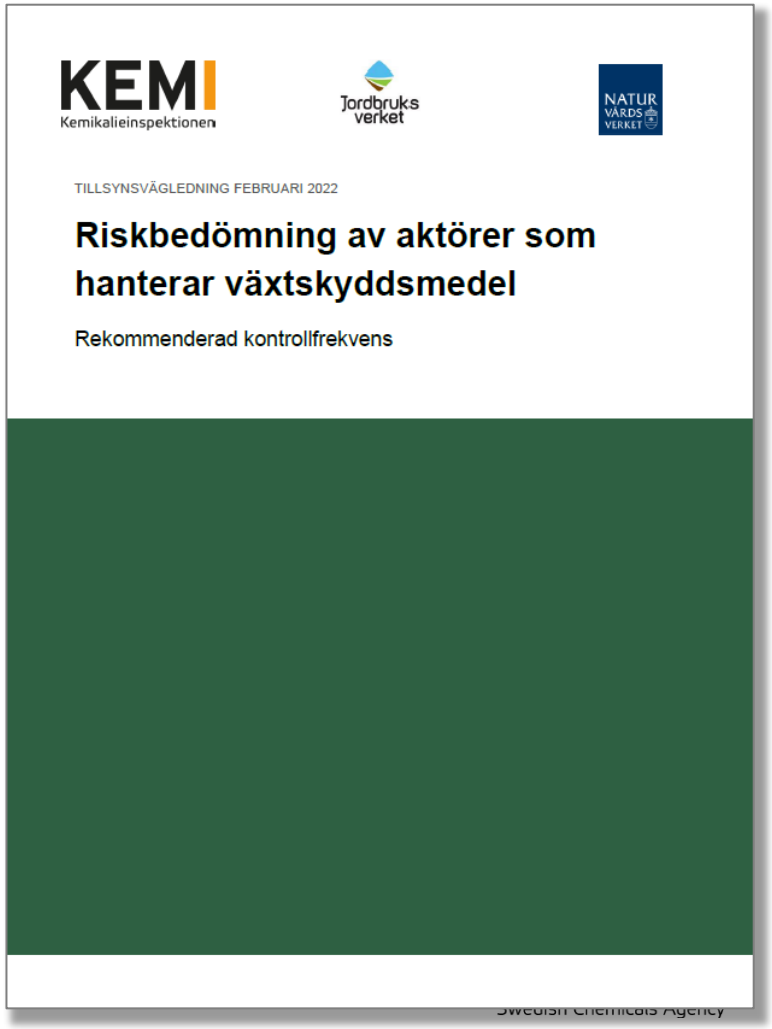
Recommended Procedure

Step 1

Each category of operator has a recommended base-line control frequency, inspection intervals between 1 and 5 years. (See next slide for examples.)

Step 2

The competent authority may adjust the control frequency of a specific operator considering individual risk factors, such as sales volumes or history of non-compliences.



Examples of Base-Line Control Frequencies

Please note that the recommendations below are currently under revision.

Category of Operator	Estimated Risk	Recommended Control Frequency (Years)
Distributors of PPP for professional use	Medium	3
Distributors of PPP for private use	Low	4
Farmers cultivating < 50 ha	Low	4
Farmers cultivating > 50 ha	Medium	3
PPP spray contractors	High	2
Organic farming	Low	5
Greenhouses	High	2
Plant nurseries	Medium	3
Orchard growers	Medium	3
Seed treatment operators	High	1-2
Forestry	Low	5

Jordbruks verket
Swedish Board of Agriculture

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Examples of Risk Factors Influencing Control Frequency

Higher risk

- Large volumes of PPPs handled
- Authorised Category 1 products
- Inadequate internal controls
- Operators located within a water protection area
- Operators located near sensitive areas, such as residential areas, schools, healthcare facilities, sensitive ecosystems
- Poor compliance history

Lower risk

- Small volumes of plant protection products handled
- Authorised Category 3 products
- Effective internal controls
- Third-party certification, including a quality assurance system
- Good compliance history

Registration of Operators – Article 10.2

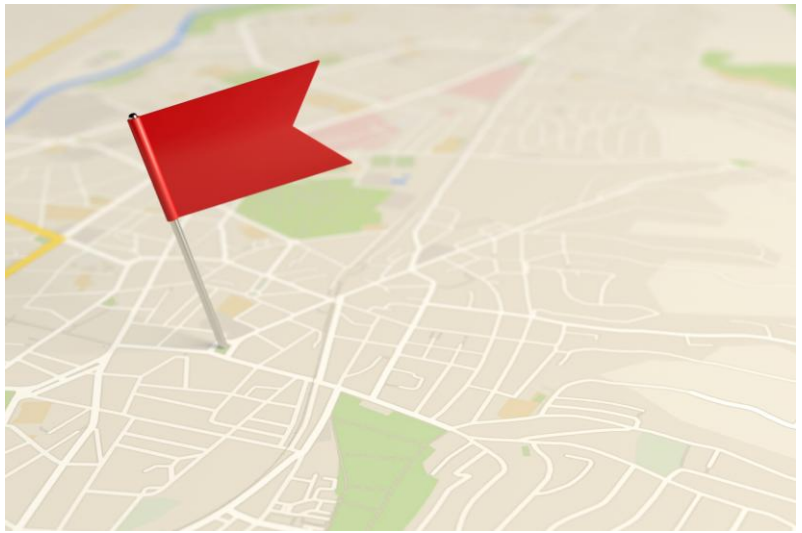
- Each competent authority shall keep an up-to-date register of all operators under its control.
- Ideally, the register should comply with the categories of operators according to the standard model form for annual reporting (Commission Implementing Regulation (EU) 2019/723).
- Risk factors that may influence the frequency of official controls should also be noted.
- Registration is a challenge, as there are no comprehensive provisions requiring the registration of all operators marketing or using PPPs in Sweden.

8.2 Official controls	
On marketing of plant protection products (PPPs)	
Entry points	
Manufacturers/formulators	
Packers/re-packers/re-labellers	
Distributors/wholesalers/retailers — professional and/or amateur use PPPs	
Storage depots/transport operators/logistics companies	
Authorisation/parallel trade permit holder	
Others	
On use of PPPs and sustainable use of pesticides	
Agricultural users	
*Applicants under the EU Basic Payment Scheme or Rural Development schemes, subject to Cross Compliance (CC) controls**	
*Agriculture users outside the scope of CC controls**	
Other professional users	
*Industrial use e.g. railways, roads**	
*Seed treatment operators**	
*Spray contractors/service providers**	
*Forestry**	
*Non-agricultural areas (golf courses/other public areas)**	
Others	

Municipalities: Registration of Retailers and Professional Users of PPP

Examples of sources

- Invent companies already registered by other reasons, e.g. food production
- Search online using relevant key words
- Use business directories and company databases
- Carry out field surveys in the local area
- Follow up on tips and local information
- The Swedish Board of Agriculture keeps a list of all persons having a PPP user certificate.



KEMI: Registration of First-tier PPP Suppliers

The Products Register

- Maintained by the Swedish Chemicals Agency (KEMI)
- Covers chemical products and biotechnical organisms (including chemical and microbial PPPs)
- Based on self-reporting by operators (first-tier suppliers)
  - ✓ Manufacturers of PPPs in Sweden
  - ✓ Companies bringing PPPs into Sweden
  - ✓ Repackers and relabellers marketing PPPs under their own name
- Useful, but not a complete list of operators under KEMI's control



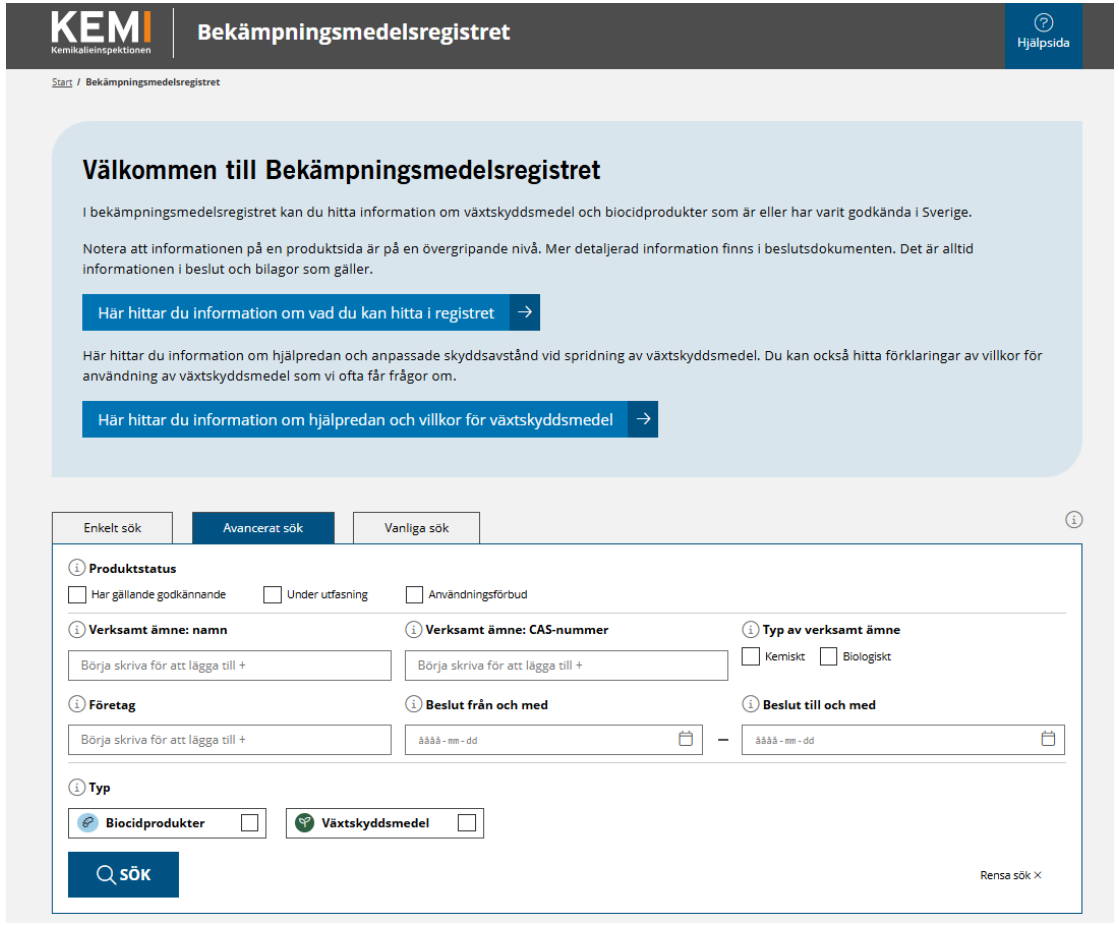
The Swedish Products Register

- Name and location of companies
- Product name
- Classification
- Product groups / function
- Number of products
- Manufactured/Imported volumes
- Substances in mixtures
- Professional and/or consumer available
- ……..
- https://www.kemi.se/en/products-register

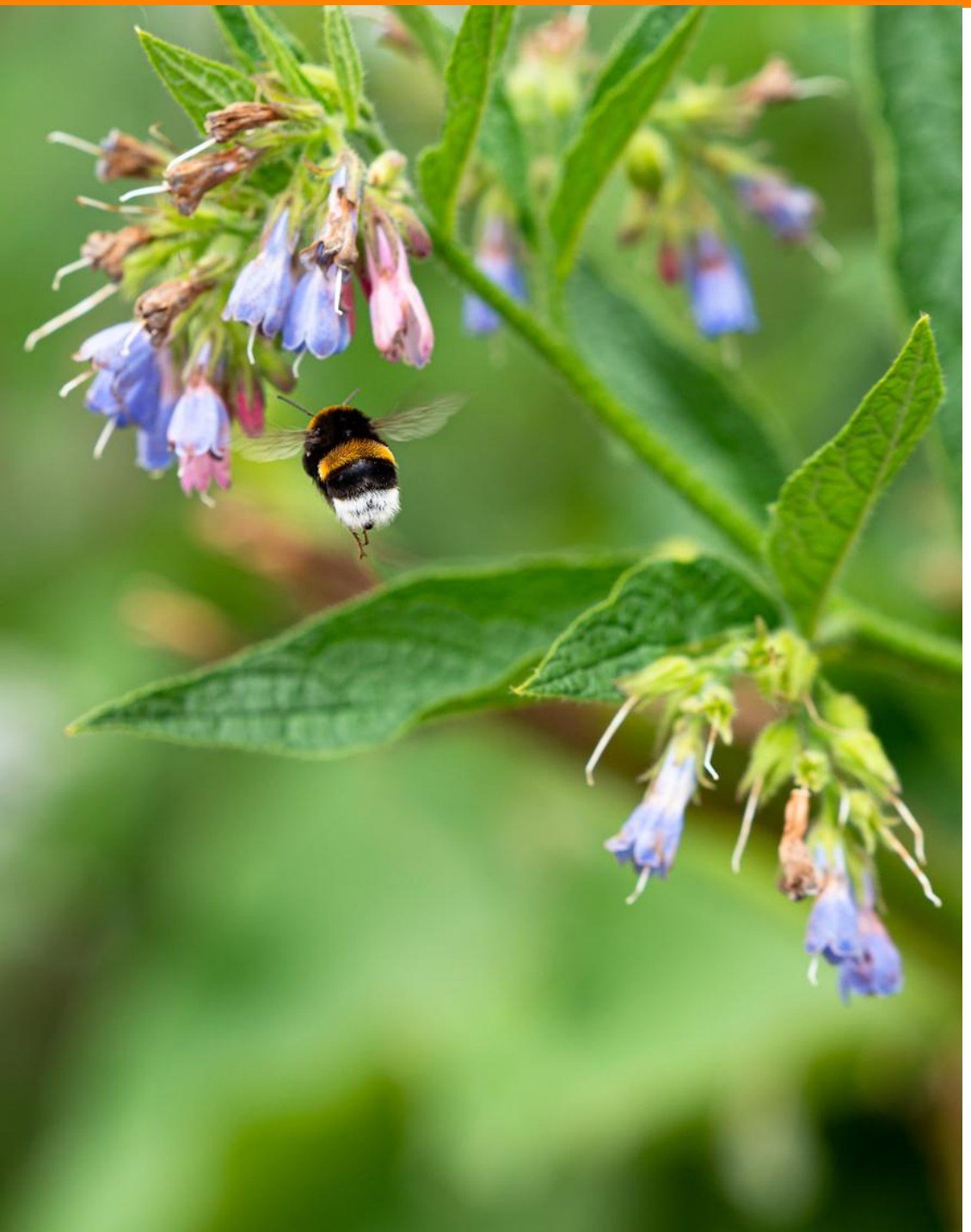


National Pesticides Register

- Authorised and previously authorised pesticides (BP and PPP) in Sweden
- Search (in Swedish) by:
  - Product names
  - Authorisation numbers
  - Companies
  - Active substances
- https://www.kemi.se/en/pesticides-and-biocides/pesticides-register



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KEMI – Enforcement Projects in 2026

- Formulation Analysis of PPPs
- National Enforcement Campaign on PPP Distributors
- Control of Non-Authorised PPPs in E-Commerce
- Inspection Cases Triggered by Reports of Suspected Non-Compliance
- Cooperation with Customs Authorities

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Formulation analysis – Article 24.1

We have analysed PPPs almost annually since 2018. (Framework agreement with the Danish Technological Institute.)

Sampling strategy:

- 50% products with high sales volumes
- 25% products with a high-risk profile or a history of non-compliance
- 25% randomly selected products

Challenges:

- Samples should preferably be collected directly by KEMI from first-tier suppliers. However, only a few first-tier suppliers have storage facilities in Sweden. In many cases, we therefore need to order the products from the first-tier suppliers.
- Primary focus on concentrations of active substances; expanding the analytical scope to also include prohibited co-formulants and regulated impurities.



EU Guidance Documents

- **EU Commission (2017):** *Draft Guidance document on 2018 EU sampling programme for plant protection product formulation analysis, Version 1.*
- **EU Working Group on Formulation Analysis (2019):** *Reference document illustrating best practices on analytical strategies and interpretation of results for the formulation analysis of plant protection products obtained during official market control, v 1.0.*

Formulation Analysis of PPPs 2018 – 2026

Year	Number of Products	Results
2018	19	18 products compliant; 1 product non-compliant
2019	50	50 products compliant
2020	20	19 products compliant; 1 product non-compliant
2021	19	19 products compliant
2022	24	23 products compliant; 1 product non-compliant
2023	29	29 products compliant
2024	0	-
2025	0	-
2026	20	20 products compliant

National Enforcement Campaign on PPP Distributors



Spring 2026

- Municipalities carried out inspections of PPP retailers.
- The Swedish Chemicals Agency provided webinars and written guidance.
- Municipalities submitted questions, reports and inspection results to the Swedish Chemicals Agency.

Autumn 2026

- The Swedish Chemicals Agency will inspect first-tier suppliers based on reports and findings from the municipalities.
- The Swedish Chemicals Agency will prepare a report and update the guidance.
- Final webinar (Winter 2026–2027)

Focus of the National Enforcement Campaign 2026

Official controls in retail stores

- Product authorisation
  Art 28 of Reg (EG) 1107/2009
- Traceability
  - Record-keeping
    Art 67 of Reg (EG) 1107/2009
    - Basic labelling requirements
      Reg (EU) 547/2011 on labelling of PPP
- Certification and Permits
  Art 6 of Directive 2009/128/EC (transposed through Swedish Pesticides Ordinance 2014:425)



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Enforcement in E-commerce

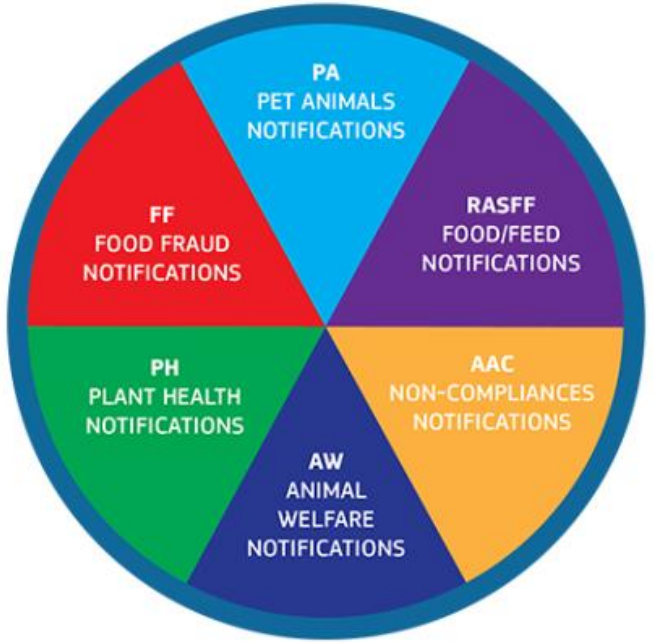
- We have had annual projects focusing on online trade since 2019.
- Many illegal pesticides sold online
  - Products not authorised in Sweden but authorised in other EU Member States.
  - Products not authorised in any EU Member State.
  - Many e-commerce operators are not aware of the legislation, they believe the product is OK to sell if authorised in their own EU Member State. Some actors don´t even understand they sell pesticides, especially when drop shipping is involved.



Exchange of Information between EU Member States

- Rapid Alert System for Food and Feed (RASFF): RASFF - Food Safety - European Commission
- To ensure the exchange of information between member states to support swift reaction by competent authorities in case of risks to public health resulting from the food chain.
- Report non-compliant PPPs
  - Example: Non-compliant plant protection products sold online to Swedish customer by company based in other EU Member State.

Alert and Cooperation Network (ACN)



ACN - Food Safety - European Commission

Looking Ahead

- Strengthened cooperation between central authorities to combat fraud in the agri-food chain.
- A coordinated digital platform for guidance and reporting.
- Improved operator registers and a more risk-based approach to official controls.
- Enhanced sampling strategies and fit-for-purpose formulation analysis methods.



Summary

- ✅ Risk-based official controls require reliable registers and effective planning.
- ✅ Cooperation between authorities is essential for consistent enforcement throughout the supply chain.
- ✅ Enforcement increasingly includes e-commerce, cross-border cases and information exchange between Member States.
- ✅ Analytical controls provide an important tool for verifying compliance of PPPs on the market.
- ✅ Continued development is needed to improve registers, risk-based controls and analytical methods.



Thank you for your attention!

Any comments or questions?

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