

Annex 6 - Problem analysis per each activity and identification of needs

Georgia has a long and rich tradition of agricultural production, thanks to its rich soil and temperate climate. Despite many changes, further development in the area of plant health sector remains necessary in Georgia. The Georgian national legislation still contains some inconsistencies and gaps, which may present difficulties to the EU legislation in following years. According to FAO, there is a need for further improvement of institutional capacities of the Phytosanitary and Quarantine services, the food control laboratories for pesticide registration and quality control, residue monitoring, certification of institutions, capacity development of phytosanitary inspection services and the gaps in managing the hazardous chemicals. Integrated Pest Management systems shall be introduced.¹ The so-called pesticides clean up done in 2016 eliminated the last stock of pesticides from Soviet Union and banned pesticides, which posed significant threat to peoples' health and the environment.² However, despite this success, the subsequent pesticides control and registration, certification, the implementation of efficient policies, regulations and phytosanitary procedures are needed. These measures will lead to agricultural productivity improvement, pests' damages mitigation and increase in the trustworthiness.³ However, many of the above problems persist, which indicates the need for further professional intervention within this project.

ACTIVITY 1 - Area of EU Directive 128/2009 on sustainable use of pesticides (certification of professional users of pesticides, certification of application machinery, National Action Plan for Sustainable Use of Pesticides)

Requirements upon EU member states within the area of safe use of pesticides expect risk analysis within PPP sector in the country (incl. contaminants in agricultural production) and forming National Action Plan for Safe/sustainable Use of Pesticides. This area includes identification of different types of professional users of pesticides, spayers attestation, and establishment of certification system (education/knowledge verification system).

¹ FAO. 2013. *FAO COUNTRY PROGRAMME FRAMEWORK IN GEORGIA 2013-2015*.

See: <http://www.fao.org/3/a-bc353e.pdf>

² FAO. 2016. *Georgia benefits from obsolete pesticide clean-up*.

See: <http://www.fao.org/europe/news/detail-news/en/c/414276/>

³ FAO. 2016. *Phytosanitary Capacity Evaluation (PCE) in Georgia*. The report on the deadline for drafting this document has not been approved, its results will be taken into account during project implementation.

See: <http://www.fao.org/georgia/news/detail-events/en/c/421905/>

Risk analysis within PPP sector- actual situation in the country within the area of sustainable use of pesticides

Risk analysis within PPP sector should be basic tool for introduction of regulation mechanisms in the country. However, there are missing hard data within the sector in many cases, some main problems have been already identified/estimated and some actions have been taken in 2022 (according to preliminary activities linked to *Resolution of the Government of Georgia on Laying down Measures for Achievement of Sustainable Use of Pesticides* (under preparation).

Certification of professional users of pesticides

However, there are some activities already taken upon Specialized Store Consultants for Pesticides and Agrochemicals and national system for approval of pesticide-stores has been introduced, other parts (farmers, services providing crop protection) are in fact not regulated at all.

There is missing definition of professional user of pesticides in Georgia - definition is key point for appropriate regulation of the sector. Although registration of importers, distributors and pesticide shops have been introduced, there are not implemented any requirements on records on further pesticides movements nor use (import is monitored from 1998 by Custom Service), so in fact there is very difficult or practically impossible traceability.

There are several organisations under MEPA within the area of inspection, analysis, education/certification and registration.

Some trainings of farmers on IPM within ENPARD project (use of pesticides in practise) has been realized on voluntary base, but complex regulatory system is still missing.

Situation on the market with PPP in Georgia

There are about 50 registered distributors and/or importers of PPP in Georgia (some of them have a more shops, so the total number can be about 120). Apart from this, there is about 600 pesticide shops, what sell PPP (and fertilizers) to final users. However these entities are registered at NFA, there is not obligation to keep records on pesticides. Simple pesticide shops are registered at NFA and also at tax office. Registration at NFA has to be renewed annually upon fee about 30-40 GEL. Some basic requirements on shops are applied, but there is not obligatory system for verification of their professional responsibility (nor for importers, distributors and advisors).

Personnel of these shops and distributors in fact play role of advisory service too, as there is general lack of agronomically educated people in Georgia (there are practically not agricultural schools/universities or these are at very low level of knowledge). Only big companies and distributors have usually professional agronomists employed (vast majority of smaller and medium-size farmers are in fact self-made-men).

From total number of pesticide shops (about 600), more than 100 did not received re-approval (there is several official measures applied from NFA (light problems – recommendations are implied /medium problems - measures are implied and re-registration is only conditionally granted / serious problems - suspension of approval).

Use of pesticides on farms – organisation of crop protection

There is about 800.000 of small farms with acreage between 0,5 – 1,5 ha in Georgia. Apart from this, about 500.000 farms have less than 0,5 ha. There are also medium-size farms usually 5-20 ha – usually fruit-growers and several tents of big farms (300-500 ha) – especially vine growers (wineproducers). Part of fruit production (e.g. peaches and nectarines) in the western part of the country is generated mainly onto small scale farms (in fact gardens with mixed crops) and completed for export and/or domestic supply by individual packhouses. Main crop in eastern part of the country are grapes dedicated for wine production. Grapes from smallest vinyards are usually used for own use, but vast majority of growers about 1 ha sell grapes to bigger wine producers.

There are no legal requirements upon growers linked to IPM. There is not obligatory to keep records on pesticide application, storage, ect.

Small and medium size farmers do not have often agricultural/horticultural education and follow the best practise inherited from previous generations and/or consult the crop protection with bigger farmers and/or with personel of pesticide shops, who serves in fact as advisors.

Big farms (hundereds of ha) has usually professional agronomist responsible for organisation of crop protection (whole agro-technology), but due to very limited study programs in agriculture (chemistry as well) on university level there is significant lack of agronomists in the whole sector.

There is not any system of safe liquidation of empty PPP packagings. Empty packagings are often let directly in orchard/vinyard.

Professional education in Georgia within the area of PPP

Education system in Georgia is non comparable to CZ or DE system of professionally orientated high-schools – more general studding programmes are applied within 12 years education system). During Soviet union, most of Phd. Grades was generated out of territory of Georgia.

In fact, there is missing wider and complex agronomy education (including growing technologies, planting materials and seeds, fytopathology and crop protection, IP/IPM). This deficiency is partly replaced by special advisory services (Agrosphere (Noblis), Cartlis, Agrosistemebi, Barakka,...) These advisory companies are usually in role of pesticides importer/distributor (based on experiences of specialized agronomist of big company, advises by these distributors might be sometimes limited only to products within their bussines portfolio). However, existing advisory services might not be fully independent, but at least in some cases (Agrosphere) are able to provide to customers informations necessary for better targeted crop treatments (meteorological data, some forecasting models outputs ?)

– this system allow practical realisation of IPM (at least in some areas). Notifications are send via e-mail (SMS) to growers in the advsystemsystem.

There is possible in Georgia also to attend (pre-seasonal) educational lessons organized by pesticide distributors and/or advisory services and/or discuss the actual problems directly in local pesticide shops (expectable limited knowledge in comparison to bigger distributors).

Because proper IP/IPM realisation requires quite high knowledge of agronomist, sometimes big companies pay for foreign advisors.

During Soviet union, Georgia was center of vinegrapes and fruit production and research/advisory centers/demo-farms were established at the best production farms (kolchozes). These centers actually do not exists any more, but there is intention to restart professional education in several ways:

Rural Development Agency (**RDA**) has 54 plants in municipalities. Subordinated **ICC's** provide trainings and educations throughout country (extension service). RDA/ICC introduced several projects by UNDP (They will run 30 meteorostations on different territories from 2025, IPM tools are step by step introduced on farm level). Under FAO – electronic on-line public information platform **E-Library** has been created. RDA/ICC developed with assistance of FAO net of **demoplots** (about 100 farms, especially hasel-nut, apple, peach orchards and vineyards).

EIEC – is independent organisation under MEPA. Main role is education in different areas. This organisation is only one empowered to issue certificates, what are accepted by other official bodies within Georgia. Apart from general education, they realized also training program for farmers, but main role of EIEC is training of trainees (education for people, who will consequently provide trainings).

FAO with other donors realized recently, some activities within ENPARD III. within the area of IPM – throughout the winter months (2023), farmers received predominantly theoretical training on topics related to Food Safety, including safe composting, effective pesticide management, and nitrates. Subsequently, in the spring, they engaged in practical exercises and demonstrations at the Model Farms.

During Jan-June 2023 730 primary producers, state agencies' staff and input suppliers' staff were trained on safe and effective use of pesticides, safe composting and nitrates in vegetables (in total 59 trainings up to now).

In February 2023, training session on Food Safety in apple production was held for a total of 70 farmers and technical staff members from Cartlis Ltd. The training passed various subjects, including the safe and efficient application of pesticides, proper composting practices, and the management of nitrates.

55 persons engaged in wineries and vineyard ownership and 13 persons as input suppliers took part in a two-day trainings to acquire knowledge on producing winegrapes using sustainable practices that emphasize the efficient utilization of pesticides, crop nutrition strategies aimed at diminishing nitrates in both soil and water sources, and the incorporation of organic matter to enhances oil quality, which includes managing cover crops.

Other practical training has been focussed onto proper use of backpack motor sprayers.

These activities are focused especially on farmers and do not interfere with the targets of the project, what is institutional support and establishment or modification of the system.

Generally was reported, that extension services in Georgia offer actually only limited knowledge level.

Certification of sprayers (application technique)

There are not any legal requirements on PPP application technique. Small farmers use standardly backpack sprayers. Bigger farms use different sprayers, often quite old, but lot of small farms are treated by other farmers (as service). No records are kept on obligatory base.

Actually there are not accredited/empowered entities for testing of sprayers.

ACTIVITY 2 -National database of pesticides statistics

EU acquis within the area of pesticide reporting were not added onto list of implementation (by mistake). REGULATION (EC) No 1185/2009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 November 2009 concerning statistics on pesticides establishes a common framework for the systematic production of Community statistics on the placing on the market and use of those pesticides which are plant protection products (the annual amounts of pesticides placed on the market and the annual amounts of pesticides used). Apart from old Regulation 1185/2009, new amendments has been already intruduced by Regulation (EU) No. 2022/2379 of the European Parliament and of the Council of 23 November 2022 on statistics on agricultural input and output, amending Commission Regulation (EC) No 617/2008 and repealing Regulations (EC) No 1165/2008, (EC) No 543/2009 and (EC) No 1185/2009 of the European Parliament and of the Council and Council Directive 96/16/EC (text with EEA relevance). The statistics shall, in particular, together with other relevant data serve the purposes of Articles 4 and 15 of Directive 2009/128/EC.

Actually only imports are monitored on borders by Custom Service. Methodology in Georgia should be harmonized with EU rules according to legislation on PPP stasticics. (point will be added into GE implementation plan later).

Introduction of CZ system of data collection and keeping records on trade with PPP and use of PPP will be introduced. Recommendations in this area are needed.

ACTIVITY 3 - Improvement the control of PPPs – laboratory area and control of feed contaminants

Activity 3 - Improvement the control of PPPs is closely linked to activity 4 - Post-authorization control and in in fact also to activity 5 - System of PPP registration and traceability in accordance with Regulation (EC) No 1107/2009

Whole pesticide regulation package shall be accompanied by appropriate control mechanisms. Record keeping on the use of PPPs (Regulation (EC) No 1107/2009), records of trade with pesticides should be accompanied by suitable inspection system.

Technically, Activity 3 should be orientated more onto laboratory activities, incl. proper sampling, preparation of the samples, while activity 4 will cover in fact all inspection activities carried out in

terrain (farms, shops, distributors, ect.). To obtain complex overview about situation in the area, problem area for activities 3 and 4 is explained together, as technically all work out of the office and/or out of the laboratory will be covered most probably by the same people (subdivision of PPP registration department).

Official checks within PPP (Activity 3, activity 4)

There is new sub-division nat NFA under PPP and fertilizers registration department responsible for controls within the sector. Actually there are also annual plans to take samples as post-registration checks (about 500 samples was analysed in 2023 in private accredited laboratory Multitest upon contract with NFA, as NFA do not have own laboratory and capacity of SLA is already exceeded and analysis of PPP have not been analyzed here yet (only some residues of pesticides).

Although, there is not National Action Plan for Sustainable Use of Pesticides established yet, there is already Annual State Control Programme established.

Official checks are oriented especially onto approval of pesticide shops (incl. distributors).

However, there are some control activities within PPP area, there is significant lack of records within all pesticide chain (importeur-distributor-pesticide shops (for professional use)-use on farms (professional users).

Apart from inspection subdivision within NFA, there are about 50 NFA employees at municipalities (this staff is responsible for all NFA activities in the territory, so their capacities are very limited).

Sampling within post- registration control is one of the priorities of NFA (already identified) due to huge presence of PPP generics in the register. Samples were taken by municipality inspectors as well as checks linked to approval of pesticide shops (approval is issued once and than about 200-300 random checks are carried out a year (from total number of about 600 shops).

PPP post-registration control include mainly correspondence between data of official approval (registration) and data printed on label (labels are printed in Georgian language out of official structures), expiry dates, portfolio of products and storage. Laboratory analysis are done only in respect of content of active ingredient.

However, registration of pesticides in Georgia is based on list of approved active ingredients, some already not-approved active substances has been discovered in shops (e.g. metiram, dimethoat).

Big obstacle during registration and post-registration control is not existing access to EU database of chemical equivalent sources of active substances.

Other contaminants in feed

NFA, as well as other agencies and laboratories are focused onto pesticide residues analysis and other contaminants (e.g. mycotoxins, ect.) in food and feedings. Actually, some controls are realized especially on exported commodities, but activities are focused only onto some segments. Risk analysis and forming of sampling plans, used methods and protocols and laboratory equipment should be studied and consulted with Czech experts.

ACTIVITY 4 - Post-authorization control of PPPs

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ACTIVITY 5 - System of PPP registration and traceability in accordance with Regulation (EC) No 1107/2009

PPP approval system in Georgia

Implementation of EU acquis is realized by copying of whole documents or their parts into national legislation (new legislation within the registration area will be effective from 1.1.2024). Apart from this new legislation (list of adopted acquis is specified and actualised in the document *Pesticide management in Georgia 2022*), there is in force also national law on Pesticides and Agrochemicals from 1998.

During approval procedure list of EU approved active ingredients is followed. Concerning ecotoxicological evaluation related to Georgia is used still existing capacity of external experts (about 10-15 experts linked to universities and/or another institutes (NEA – water, Waste and Chemical dept. of MEPA, Institute for Labour Medicine and Ecology (MLR /protection of operators))

However, there are some personal capacities still available, due to very limited possibilities to do relevant tests, this evaluation is carried out of own capacities of NFA (in limited extend some field tests are carried out on farms) the procedure shall be called more-less – estimation of the risks instead of evaluation of the risks (based on chemical and physical characteristics of the evaluated substance). Personal capacities of NFA – PPP dept. is very limited (6 persons covering also fertilisers).

Big problem is very big number of generics imported mainly from Turkey and China (due to genecisc - register of PPP includes actually 825 pages). NFA is in position, they are not able to fully analyse these

products/confirm equivalency to referent products and take appropriate official decisions. In 2022 500 samples of PPP was taken from PPP market (pesticide shops/distributors) and analysed in accredited private laboratory, but there is not possible to find out any co-formulants, additives, fillers and only about 100 active ingredients. Despite the fact, only 5 samples did not show appropriate content of active ingredient, real state of play can not be verified within existing capacities in Georgia (actually there are not possibilities to carry out appropriate post-registration checks in Georgia). Georgia does not have actually access to EU databases of approved sources (chemical properties and chemical equivalence of sources of active substances).

Generally, evaluations from OECD countries are taken over.

Apart from active ingredients approved within the territory of EU, in emergency cases, also products approved in USA are used (elimination of invasive pests during massive outbreaks).

There are actually not specific requirements on packaging (material used for packaging (origin, certificate)).

There is not registration for professional/non-professional growers in force.

ACTIVITY 6 - Other supporting activities focusing on improvement of Georgian SPS Official Risk-Based Inspection Controls in Phyto area

Training of monitoring and surveillance control program of selected harmful organisms. (Phyto area of SPS Official risk-based Inspection Controls)

Official control activities include next to inspection also monitoring and surveillance. These two are one of the most important risk-management tools. Risk-based approach is more or less new in Georgia. Georgia recently started with risk analysis in the field of plant protection – however, so far risk analysis has been conducted only for several harmful organisms.

There is a very strong and recognized need to establish a risk-based control system with strong monitoring and surveillance tools. Sharing EU and Czech practices in risk-based control (risk assessment and risk management) in the case of selected harmful organisms is essential.

GENERAL INFORMATION

Most of the activities is structured generally into following pattern:

1. Evaluation mission of CZ experts in GE (expert-expert guided technical visits)
2. Workshop (s) on specific problems (problem description/analysis, EU requirements , examples of application in CZ)
3. Study visit (s) in CZ (sharing of experiences, model work, demonstration of application in CZ)
4. CZ experts work in GE –expert to expert approach- sharing of experiences

5. Formulation of recommendations/methodologies/technical protocols respecting EU requirements as well as GE national conditions and possibilities