



PERMANENT MISSION OF TURKEY
TO THE UNITED NATIONS
GENEVA

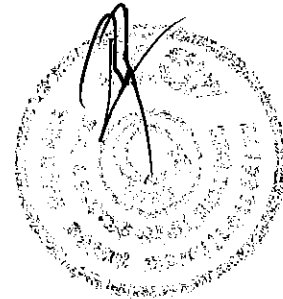
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The Permanent Mission of the Republic of Turkey to the United Nations Office at Geneva and other international organizations in Switzerland presents its compliments to the Office of the High Commissioner for Human Rights and with reference to the letter by Ms. Hilal Elver, Special Rapporteur on the right to food, dated 12 October 2016, has the honour to enclose herewith an information note compiled by relevant Turkish authorities, in reply to the information request stated in the aforementioned letter.

The Permanent Mission of the Republic of Turkey avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.

Geneva, 8 December 2016

Encl: As stated



Office of the High Commissioner for Human Rights
Palais des Nations
1211 Geneva 10

**Answers of the Ministry of Food, Agriculture and Livestock of Turkey for the
Questionnaire of the Special Rapporteur, to prepare annual report on the implications
of the widespread use of pesticides on the right to food**

1. In Turkey, the processes of the production, importation, usage, packaging, labelling, representation, transportation, storage, labelling, sales by prescription or vice versa, approval, control and procurement of plant protection products to be used as pesticides are covered under the Law No. 5996 on “Veterinary Services, Plant Health, Food and Feed” that has entered into force on 01.01.2016 as the main law on food safety, as well as the regulations stipulated based on this Law. One of these regulations is Regulation on “Proposal, Implementation and Registration of Plant Protection Products”. In the context of the Regulation of Turkish Food Codex on “Maximum Residue Limits of Pesticides” (dated 29.12.2011); there are untreated, treated and composite residue limits and list of prohibited pesticides. Another Law No. 5957 regulates the trade of fruits and vegetables, allows exporters to purchase, after notification, directly from producers. Under previous related legislation, it was obligatory to buy in wholesale markets.

Within the frame of the Regulation on keeping records and monitoring plant protection products (PPPs) used in plant protection, that entered into force on 25.11.2011, the competent authorities shall carry out inspections on the use of PPPs, take samples, keep records on the use of PPPs, and shall carry out education, training, and promotion campaigns to promote healthy production with no pesticide residues. Producers shall apply for PPPs in accordance with the recommendations of Ministry of Food, Agriculture and Livestock of the Republic of Turkey (MFAL), retain invoices and keep records for the usage of PPPs. Retailers of PPPs shall keep records for the sales of PPPs and only sell PPPs in compliance with the Regulation on “Rules and Principles of Prescribed Sale of PPPs” which entered into force on 21.4.2011.

Laboratories are authorised in accordance with the Regulation on “the Establishment of Foundation, Duties, Authorizations, Responsibilities, Working Principles and Procedures” published on Official Gazette dated 29 December 2011.

2. In Turkey, plant protection products used in agricultural struggle with pests are licensed and marketed according to the Regulation on “Licensing of Plant Protection Products”. In the phase of licensing of Plant Protection Products, toxicological-ecotoxicological, residue, biological activity, physical and chemical properties that belong to the product as well as the information and documents related with license and suggestion in other countries are considered and as a conclusion of the evaluation, the license procedures are initiated for the license applications of products that are found eligible regarding plant health and environment. Products that are found harmful for human and plant health and environment are not licensed. When used in accordance with the recommendations, it is not seen possible that such products licensed according to these criteria generate any risk for human and plant health and environment or leave residue above tolerated levels.

Sales of licensed PPP's are made in retail dealers by people who are authorized after being successful in the relevant exam. The movement of plant protection products is tracked by barcode reading programme which is compulsory to be used in retail dealers. Usage of 180 plant protection products that include plant protection product active material is stopped within the EU. Similar to the EU, in our country, usage of these products/181 active substances overall have been stopped in the frame of a valid timetable.

In addition, for the PPP's that constitute risk in time, implications like cancellation of the suggestions and restrictions on their usage are conducted. In our country, controls and auditing related with PPP's are regularly carried out.

3. Regulation on "Proposal, Implementation and Registration of Plant Protection Products" entered into force in 1 February 2015, with the aim of MFAL to maintain suggestion of the plant protection products by experts, implementation and providing safe food production and traceability by keeping the necessary records. In our country, there are 417.000 authorized people for PPP implementation. Certified education is provided by our provincial and district directorates for PPP practitioners and authorized people are informed regularly via meetings held every year.
5. MFAL and non-governmental organizations' Project on "Sustainable and Safe Usage of Plant Protection Products" has been conducted and trainings have been organized for the producers and operators.
6. Growing period and markets are controlled for pesticide residues by MFAL in Turkey. The post-harvest inspection programme for the use of PPPs was initiated for the first time in 2005. A pre-harvest inspection programme for the use of PPPs was initiated for the first time in 2012.

Fresh fruit and vegetable samples are taken from fields, market places and market halls. Pesticide residue analyses are conducted. Punishment is imposed for the crops with residue.

A multi-annual control plan for pesticide residues for 2013-2015 time range has been approved by MFAL and includes a risk-based plan for taking samples before the harvest, to be analysed for pesticide residues. The control plan also includes instructions for sampling. It does not contain instructions for controls on further national requirements, e.g. the record keeping of PPP uses or certification of users of PPPs.

7. Transactions and affairs regarding production of plant protection products have been conducted according to Regulation on "Plant Protection Production Sites Procedures and Principles" and are subject to permission and control.
8. MFAL has been supporting the producers who implement biotechnological and biological struggle that are alternative to chemical struggle against pests in plant production, since the year 2010.

Regarding agricultural pest control implementations, before using chemicals; Integrated Control Projects were conducted with the aim of generalizing cultural measures, using alternative methods like biological and biotechnological struggle, environment friendly control methods. In the context of the conducted projects, hands-on trainings are being given to producers at vineyards and orchards, greenhouses and farms.

MFAL gives priority to developing alternative methods to reduce the pesticide usage about integrated pest management (IPM), biotechnological and biological control. The aims of studies carried out in the country are to protect human health and environment and to conduct research on new methods and techniques as alternatives for chemical control. Plant protection applications carried out in Turkey aim to disseminate IPM, biological and biotechnological control. The projects on IPM began in Turkey in the 1970s. From the early 1980s, findings of IPM studies have been shared with farmers and they started to put them to use. Technical guidelines for IPM have been prepared on 16 crops and have been put into practice. Biological control has priorities in plant protection policies and strategies in Turkey. A Biological Control Centre will be opened under Biological Control Research Institution in Adana. The ultimate purposes of this are to increase biological control opportunities, to reduce pesticide use, to protect human health, environment and natural balance. MFAL has also promoted the use of biological and biotechnological control for reducing pesticide usage.

Recently, the projects named "Determination of Pesticide Residues in Extra Virgin Olive Oil Presented to Consumption in and around Bursa by Gel Permeation- Gas Chromatography Method" and "Determination of Effects of Processes in the Production of Apple Juice Concentrate on the Pesticide, Degradation Products and Patulin Content" within the scope of "Food-Forage Security and Quality" Research Programme, concerning pest control and alleviation of pesticide usage in order to prevent and diminish adverse impacts of pesticides on human health, food and environment were concluded. The project named "Research of Pesticide Residues in Some Medical and Aromatic Plants" still continues.

Furthermore the project named "Development of Electrochemical Nanosensor for Rapid Determination of Pesticides in Agricultural Products" and "Measures to be Taken for the

Prevention of Pesticide Residues in Seedless Grapes" within the scope of R&D Support Programme of MFAL were concluded; the outcomes of these projects have provided a benefit to the agricultural practices of our country.

10. MFAL has been conducting "Pesticide Control Before Harvest" since 2012, at vineyards and orchards, greenhouses and farms, in order to maintain safe food supply from farm to table and also to resolve residue problem regarding fruits and vegetables. In case of failure in usage of Plant Protection Products, destruction and harvest delay have been applied to the products and procedures including administrative fine have being applied to product owners.