



UK Article 68 Report - 2024

Monitoring and control of plant protection products in the United Kingdom

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1. Executive summary

This report describes the official controls carried out by the UK in 2024 under the provisions of Article 68 of Regulation 1107/2009 (as applicable under GB and EU law), by the Chemicals Regulation Division (CRD) of the Health and Safety Executive (HSE), the Department of Agriculture Environment and Rural Affairs (DAERA) for Northern Ireland and by other enforcing authorities.

This report publishes information on the official controls, inspections and reactive investigations undertaken to check compliance with the requirements for placing on the market and use of plant protection products (PPP) and the sustainable use of pesticides as required under Regulation 2017/625 (as applicable under GB and EU law).

In Great Britain, pesticide enforcement officers (PEO) created by HSE conduct official controls on operators within HSE's enforcement remit on the supply and use of PPPs in Great Britain (England, Scotland and Wales). In Northern Ireland (NI) a similar programme will be established in due course and undertaken by pesticide enforcement officers within the DAERA. In the interim, this report documents reactive investigations undertaken in NI.

Operators include authorisation holders, importers, manufacturers, formulators, those who package and label plant protection products, distributors/sellers and users of plant protection products authorised for professional use.

The PEOs carried out 451 Official Controls in GB during 2024 where they visited a range of businesses storing and/or using plant protection products, or carried out analysis on the composition of plant protection products. These controls resulted in a number of different enforcement outcomes including verbal advice, letters and official notices.

The report also explores other enforcement activities undertaken by HSE for the whole of the UK, covering areas like maximum residue levels in food (MRL) and investigations into wildlife (WIIS) and human health incidents (HHEIS).

2. Legal basis

Relevant Legislation

Regulation (EC) No. 1107/2009 concerning the authorisation of plant protection products (PPPs) came into force on 14 June 2011 and currently applies directly to NI and the EU. In Great Britain (GB), this Regulation was assimilated into GB law on 01 January 2024 following the passage of the Revocation and Reform Act of 2023. It is now referred to as Assimilated Regulation No. 1107/2009 and differs from EU/NI Regulation in composition, interpretation, and application. For ease of reference in this document, both Regulations are referred to as Regulation 1107/2009 as they apply directly to their jurisdiction.

- Article 68 of Regulation 1107/2009 requires the Competent Authority (CA) to publish the scope and outcome of the official controls performed in order to verify compliance with this Regulation

Regulation (EU) 2017/625, applies to NI and has also been assimilated into GB law. This Regulation concerns the official controls and other official activities performed ensure the application of food and feed law, rules on animal health and welfare and plant health and plant protection products. Again here, both Regulations can be referred to as Regulation 2017/625 but refer to their respective Regulation as it applies in their jurisdiction.

- Article 10 of Regulation 2017/625 requires CAs to perform official controls to ascertain compliance with requirements for placing on the market and use of plant protection products and the sustainable use of pesticides
- Article 11 of Regulation 2017/625 requires that CAs shall perform official controls with a high level of transparency and shall, at least once a year, make available to the public, including through publication on the internet, relevant information concerning the organisation and the performance of official controls

Enforcement Powers

The powers necessary to enforce Regulation 1107/2009 are contained in the following legislation:

- Plant Protection Products Regulations 2011 (SI 2011/2131) and Plant Protection Products Regulations (Northern Ireland) 2011 (SR 2011/295)
- The Plant Protection Products (Sustainable Use) Regulations 2012 (SI 2012/1657)

- Regulation (EU) 2017/625 is carried out under The Official Controls (Plant Protection Products) Regulations 2020 (SI 2020/552) for Great Britain and The Official Controls (Plant Protection Products) Regulations (Northern Ireland) 2020 (SR 2020/360)

UK national legislation is available on-line at <http://www.legislation.gov.uk>.

Terms of Reference

This Article 68 report focusses on assembling details on the scope and outcome of 2024 UK Competent Authority official controls undertaken to verify compliance with Regulation 1107/2009. Whilst it reflects the full scope of programmes or schemes with enforcement remits and provides links for further information it does not establish conclusions concerning the reported outcomes.

3. Organisation of official controls on plant protection products

The Chemicals Regulation Division (CRD) of the HSE delivers competent authority functions for PPPs as well as for a number of other schemes:

- Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
- Classification, labelling and packaging (CLP)
- Biocides
- Detergents
- Prior Informed Consent (PIC), the import and export of dangerous substances

for which HSE is the appointed authority for the UK.

The EU Official Controls Regulation (OCR) came into force within the European Union on 14 December 2019 and since 01 January 2024 has become “assimilated law” in GB under the Retained EU Law (Revocation and Reform) Act 2023, whilst continuing as the EU OCR applicable in Northern Ireland under the European Union (Withdrawal) Act 2018 and The Windsor Framework agreement (February 2023).

The OCR addresses official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and controls on PPPs. The Official Controls (Plant Protection Products) Regulations 2020 (SI) applicable to GB and The Official Controls (Plant Protection Products) Regulations (Northern Ireland) 2020 (SR) applicable to Northern Ireland, supplement existing regulations that govern the sale and use of PPPs.

Responsibility for PPP enforcement is shared between HSE, local authorities and the agriculture departments of the devolved Governments. HSE is authorised to enforce controls on the storage and use of PPPs as part of enforcement within its remit, such as in industrial settings and by professional contractors in private dwellings. Local authorities enforce controls for those areas not under HSE's jurisdiction.

The Department for Environment, Food and Rural Affairs (Defra), the Scottish, Welsh and Northern Ireland devolved Governments and HSE collectively undertake monitoring and enforcement of legislation governing pesticides and residues for the UK.

Official Controls for plant protection products are delivered by HSE for GB and by the Department of Agriculture, Environment and Rural Affairs (DAERA) for Northern Ireland, whilst HSE is also responsible for:

- monitoring of food pesticide residues and annual reporting for the UK,
- undertaking and reporting an annual Human Health Enquiry and Incident Survey
- monitoring effects of PPPs on wildlife, including pet animals and beneficial invertebrates in the UK
- control on composition of plant protection products

Cross compliance is administered by the Scottish Government Rural Payments and Inspections Directorate in Scotland, and the Rural Payments Team in Wales as the appointed Competent Control Authority (CCA) and DAERA administering cross compliance for Northern Ireland, undertake inspections to check that only authorised PPPs are used and that they are used in compliance with their conditions of use, good agricultural practice and as part of an integrated approach to controlling pests and disease.

Cross compliance in England was administered by the Rural Payments Agency (RPA) as the appointed CCA and although cross-compliance ended on 31 December 2023, existing domestic legislation and regulatory requirements continued to apply from 01 January 2024 with regulatory and enforcement bodies continuing to monitor and enforce compliance.

4. Report on control measures and inspection results

The UK has both an intelligence-led and proactive, risk-based approach to intervention to ensure compliance with PPP Legislation in line with the requirements specified in Article 68 and in a way which is consistent with HSE's and DAERA's policy on enforcement.

Details on HSE's enforcement policy which applies in GB and a link to the HSE's Enforcement Policy Statement (EPS) can be found at:

<http://www.hse.gov.uk/enforce/enforcement.htm>

Details on DAERA's enforcement policy which applies in NI can be found at:

<https://www.daera-ni.gov.uk/publications/daera-enforcement-policy>

Both policies ensure:

- that duty holders take action to deal immediately with serious risks
- sustained compliance with the law
- that those who breach their legal duties are held to account

This approach is informed by the principles of proportionality in applying the law and securing compliance; consistency of approach; targeting of enforcement action; transparency about how a regulator operates and what those being regulated may expect; and accountability for the regulator's actions. These principles apply both to enforcement in particular cases and to the health and safety enforcing authorities' management of enforcement activities as a whole.

The overall aim is always to protect public health and the environment by following up adverse findings or evidence of misuse/abuse of PPPs.

5. Enforcement action taken in 2024

Enforcement action taken by HSE

HSE carries out both reactive and proactive investigations. Reactive investigations focus on investigating complaints received from either outside government (such as the general public or pesticide companies) or received as a result of other initiatives. The Official Control Regulations introduced proactive inspections in 2020. In 2024 HSE carried out 103 reactive investigations detailed here, and 451 proactive investigations detailed at Section 8 'The Official Controls (PPP) Regulations 2020' under 'Official Visits' on page 18.

Summary of enforcement action

Residue cases (2 cases)

There were 2 cases where residues detected in UK produce appeared to indicate use of unauthorised plant protection products. These cases arose from residues monitoring of about 3000+ samples of UK produce.

The cases involved chlormequat found on Conference Pears and Petit Pois containing flonicamid and trifloxystrobin.

Outcomes

- Conference Pears
CRD's investigation found no evidence of an unauthorised use and concluded a possible source of the residue was spray drift from the authorised use of chlormequat on cereal crops in the fields surrounding the pear orchards, some of which are as close as 20 metres away. The source of the chlormequat residue was unable to be determined
- Petit Pois
The investigation found that the petit pois were grown in and imported from France. As this was the case and there were no health concerns, HSE took no further action

MRL Residue cases (38 cases)

There were 38 cases referred to HSE by the Food Standards Agency (FSA) or Soil Association covering a wide range of imported commodities, including rice, spices, vine leaves, dried mushrooms and tea, amongst others. Where contaminated produce was found to be still in store or stock, it was either destroyed or returned to the supplier where appropriate. Some produce had already sold through the market, but risk assessments did not raise any concern for human health.

Outcomes:

- in all cases, advice was given to bring the duty holder back into compliance. This advice was to either destroy or return affected stock back to the supplier

Use, Advertising, Labelling, Sale, Supply and authorisation (63 cases)

Cases related to the sale and offer for sale of unauthorised products including a number of products being offered for sale via the internet. Appropriate enforcement action was taken including removal of online advertising and offers for sale and issuing of enforcement notices. Not all enforcement action had been completed at the end of 2024 and some cases are still being progressed.

Advertising/labelling

21 cases. 15 of these cases involved products making moss control related claims in their advertising or on the label. The remaining concerns involved issues with the advertising and/or sale of products through online platforms.

Outcomes:

- 1 formal letter was issued regarding advertising claims. The duty holder came back into compliance by amending the labels and/or advertising
- in 15 cases, advice was given to help bring duty holders back into compliance by amending the labels and/or advertising
- in the remaining 5 cases it was found there were no compliance issues, or the case was referred on to other authorities. Where no compliance issues were found, this was due to products being out of scope of the regulations

Authorisation/supply issues

42 cases. About half of these cases (19) involved PPPs that did not have an authorisation in place. Some of these products claimed to control or kill moss, others were generic weed killers that contain a range of substances including neem oil or acetic acid. A range of enforcement notices, formal letters and other advice was issued which has resulted in all the companies coming back into compliance.

Outcomes:

- 2 enforcement notices were issued regarding moss control claims. The products were removed from sale
- 1 formal letter was issued in relation to incorrect storage and not having the BASIS certificates available to sell professional PPPs on online platforms
- 33 cases concluded with advice given to the duty holder to help bring them back into compliance
- in 1 case no compliance issues were found during the investigation

- 4 cases were referred out of HSE to other authorities
- 1 remaining case was still ongoing into 2025

Enforcement action taken by DAERA

In 2024 DAERA carried out reactive investigations, focusing on whistleblower complaints received directly from the general public or received as a result of other initiatives.

Summary of enforcement action

Advertising, Sale, Supply and authorisation (3 cases)

In 2024, due to resourcing, only 3 whistleblower cases on retailers advertising and selling to the amateur market via online marketplaces were investigated by DAERA staff.

Non-compliance identified included:

- advertising professional products for sale to amateurs
- advertising products with label claims of moss control which brought products within scope of the regulations

Outcome:

- 3 warning letters issued seeking voluntary compliance
- due to resourcing follow up enforcement visits were not carried out

Use (24 cases)

Agriculture Sector

During Primary Production Hygiene inspections, 18 operators were found to be in breach of one or more requirements related to the correct use of PPPs. The principal areas of non-compliance within the farming sector detected during this year's programmes, included:

- product not approved for the intended method of application - handheld equipment used instead of tractor mounted sprayer
- use of PPPs without a specified training certificate
- PPPs not being stored in areas that are constructed in such a way as to prevent unwanted releases
- out of date PPPs stored on the premises.

Advice was provided and where required, notification of remedial action given.

There were also 2 whistleblower cases which were forwarded to HSENI, to investigate whether the farmers had failed to use a plant protection product in line with the principles

of good plant protection practice as set out in the code of practice for using plant protection products, in that application had not been confined to the target area. HSENI determined that there was insufficient evidence of a breach in both cases to apply any penalty.

Amenity Sector

There were 4 whistleblower cases related to the amenity sector. Concerns raised included:

- permitting an employee, working without supervision, to use a PPP authorised for professional use without undergoing the appropriate training and achieving a specified certificate of competence – health concerns were also raised
- failure to keep the application of PPPs confined to the target area, (over spraying of grass verges) resulting in the impact on species in roadside verges and neighbouring protected habitats

These cases were all forwarded to other regulators (NIEA and HSENI) who deemed that due to resourcing or the lack of information to go on, they would not take forward the complaints.

Outcomes:

- 2 cases related to the controls on marketing PPPs involved the duty holders getting back to compliance
- 1 case related to the controls on marketing PPPs requires future monitoring and follow up action by DEARA Pesticides Enforcement Officers
- 18 cases identified during inspections carried out under the Food Hygiene Regulations (NI) 2006 (as amended) on primary producers, resulted in the duty holders getting back to compliance
- 2 cases – no action taken due to insufficient evidence of a breach
- 4 cases – no action taken due to staff resources or lack of information

We continue to educate and support all PPP operators to achieve and maintain compliance with the legislation through the provision of advice and guidance, either directly to users or via our PPP advice pages on the Departmental website. DAERA Staff within the College of Agriculture, Food and Rural Enterprise (CAFRE) provide technical support and training in the sustainable use of PPPs, and we work with our partners and stakeholders to disseminate advice on the safe use of PPPs and good agricultural practice.

6. Wildlife Incident Investigation Scheme (WIIS)

In the UK, the WIIS investigates deaths of animals and wildlife (including pets, working dogs, some livestock and bees) if there is evidence to suggest that they may have been poisoned or put at risk by pesticides¹.

Where there is sufficient evidence of illegal activity, enforcement court action may be taken. The ensuing fines and adverse publicity of such cases encourage pesticides to be used safely.

Information on WIIS cases investigated is published on-line at:

<https://www.hse.gov.uk/pesticides/reducing-environmental-impact/wildlife/wildlife-incident-investigation-scheme.htm>

Table 1: Cases accepted for investigation from WIIS in 2024

| Case Category | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|-----------------------|-----------|-----------|-----------|-----------|-------|
| Abuse | 1 | 5 | 2 | 6 | 14 |
| Misuse | 0 | 2 | 2 | 0 | 4 |
| No Category | 0 | 1 | 0 | 0 | 1 |
| Not Applicable | 7 | 2 | 8 | 1 | 18 |
| Other Cause | 51 | 53 | 47 | 31 | 182 |
| Unknown | 20 | 21 | 39 | 19 | 99 |
| Unspecified | 8 | 7 | 1 | 4 | 20 |
| Grand Total | 87 | 91 | 99 | 61 | 338 |

¹ Plant protection products and biocides

There were 2 prosecutions in 2024, where in both cases, fines were issued. 1 case in Lincolnshire, England, involved the storage of 100% alpha chloralose. The second case in Devon, England, involved the storage of carbofuran.

Category definitions:

Approved use: a pesticide is used in accordance with its conditions of authorisation.

Misuse: the product has not been used according to the conditions of its authorisation, but often just carelessly or accidentally, without the intention of harming animals.

Abuse: a pesticide has been deliberately used in an illegal manner to poison, or to try to poison animals.

For more details on the category definitions and further information on WIIS, please visit: <https://www.hse.gov.uk/pesticides/reducing-environmental-impact/wiis-quarterly-reports.htm>

7. Human Health Enquiry and Incident Survey 2024

Since 2002 HSE has undertaken an annual Human Health Enquiry and Incident Survey of all companies holding authorisations or permits for PPPs to monitor their safe use. By questionnaire, companies are asked to inform HSE of all possible human health incidents or related enquiries made to the company during the preceding year, running from January to December. The survey includes both professional and home or garden, non-professional products and provides information on all actual and potential exposures to PPPs, no matter how small.

The results of the survey for the past 5 years are presented in Table 2 below where the % number in brackets refers to % of total number of incidents for each year column.

Table 2: Results of Human Health Enquiry and Incident Survey (HHEIS)

| Incidents involving | 2020 | 2021 | 2022 | 2023 | 2024 |
|---------------------------------------|-------------|-------------|-------------|-------------|-------------|
| Professional Use | 15 (31%) | 7 (23%) | 27 (64%) | 8 (25%) | 10 (36%) |
| Professional Use - Involving children | 0 | 0 | 1 (2%) | 1 (3%) | 0 |
| Amateur Use | 27 (55%) | 19 (63%) | 8 (19%) | 19 (59%) | 14 (50%) |
| Amateur Use – Involving children | 7 (14%) | 4 (13%) | 2 (5%) | 4 (13%) | 3 (11%) |
| Unknown Use | 0 | 0 | 4 (10%) | 0 | 1 (4%) |
| Unknown Use – Involving children | 0 | 0 | 0 | 0 | 0 |
| Total Incidents | 49 | 30 | 42 | 32 | 28 |

Data are presented annually for scrutiny to the Government's expert advisory committee, the Expert Committee on Pesticides. Generally, cases reported under HHEIS suggest relatively minor exposures which are not reported to lead to significant health impacts.

The overall number continues to decline with the 2024 return being less than 25% of the peak number of cases reported in 2009. During the 20+ years that the survey has operated the number of authorisation holders contacted has not declined substantively and HSE continue to receive nil returns rather than no response, though there are some non-responders. This suggests either a genuine decrease in the number of incidents or that those involved in exposures are no longer contacting authorisation holders.

8. The Official Controls (Plant Protection Products) Regulations 2020

The Official Controls (Plant Protection Products) Regulations 2020 (SI) and the Northern Ireland equivalent, the Official Controls (Plant Protection Products) Regulations (Northern Ireland) 2020 (SR) are in place to enable regulatory authorities to support compliance and enforce legal requirements that apply to the placing on the market and use of PPPs throughout the supply chain.

Both legislative versions are known as the ‘2020 Regulations’ and hereafter this section 8 of the report will state (GB) or (NI) after ‘2020 Regulation’ when referencing a specific constituent territory.

The 2020 Regulations apply to PPPs and their components, which may include active substances, safeners, synergists or co-formulants that could form a component part of a PPP.

PPPs play a vital role in supporting plant health and crop production. Safe supply and use of PPPs protects our crops and natural landscapes from native and invasive non-native species, supports domestic food production, and helps to maintain our recreational, transport and amenity areas. The 2020 Regulations supplement the Plant Protection Products Regulations 2011 applicable to GB, the Plant Protection Regulations (NI) 2011 and the Plant Protection Products (Sustainable Use) Regulations 2012.

Implementation of the 2020 Regulations enables the four governments of the UK, working with the regulatory authorities, to understand how PPPs are being sold and used and to support businesses and organisations to be compliant with their legal obligations. This ensures PPPs are used sustainably and in accordance with the conditions of use.

Businesses and others subject to the 2020 Regulations will be selected for inspection based on the risk profile of their organisation. This is called taking a risk-based approach. Taking a risk-based approach means that, when planning the approach to inspection visits, factors that contribute to the risks associated with PPPs throughout the supply chain will be considered. This will include looking at the nature and scale of businesses, the amount of PPP used, past records of compliance, the activities under their control and results of previous inspections.

The role of HSE’s PEO is to conduct official controls on operators throughout the PPP supply chain in Great Britain (England, Scotland and Wales). A dedicated pesticide enforcement unit within DAERA will perform similar controls on businesses based in Northern Ireland. However, the PPP Official Controls programme was in development during this reporting year, therefore there is no Northern Ireland data for 2024. Operators include authorisation holders, importers, exporters, manufacturers, formulators, those who package and label plant protection products, distributors/sellers and users of PPPs authorised for professional use.

The PEOs carried out 451 Official Controls during 2024 (this figure includes site visits and the formulations survey). These are split into the following categories:

Official visits

323 official control visits were carried out in 2024. These onsite visits allow the PEO to check how well operators comply with their duties under plant protection product law. Table 3 below provides a breakdown by sector of the visits and outcomes.

Table 3: Official visits and outcomes summary

| Sector | Total Visits | Verbal Advice | Formal Letter | Enforcement Notice |
|----------------------------------|---------------------|----------------------|----------------------|---------------------------|
| Agriculture | 90 | 18 | 61 | 7 |
| Contractors/ Users | 56 | 12 | 38 | 2 |
| Forestry | 4 | 0 | 3 | 0 |
| Horticulture | 40 | 3 | 27 | 3 |
| Local Authority - Amenity | 94 | 13 | 41 | 1 |
| Science / Education | 27 | 7 | 17 | 4 |

| | | | | |
|--|------|----|-----|----|
| Distribution/ Suppliers | 12 | 3 | 5 | 0 |
| Totals | 323* | 56 | 192 | 17 |
| * Includes 75 'compliant' cases where no action was required. Note – Notices are only issued to cases listed as receiving a formal letter | | | | |

There were 323 total cases, actions were taken in 248 cases. These included verbal advice (56 cases, 17%), formal letter (192 cases, 55%), and enforcement notice issued to cases receiving a formal letter (17 cases, 5%). The remaining 75 cases (23%) had no action taken.

Verbal Advice

Verbal advice was given to improve things such as the monitoring of stock (batch numbers, expiry dates), temperatures of stores, COSHH risk assessments, implementing bund maintenance schemes, using inappropriate storage spaces, general housekeeping and appropriate signage.

Formal Letters

192 formal letters were issued with actions for the duty holder to complete. The actions required covered issues for:

- Plant Protection Products (Sustainable Use) Regulations 2012 (SI) (PPP(SU)R) regulation 17(6), unauthorised products whose active substances did not pose a danger to human health and the environment
- Plant Protection Products Regulation 2011 (SI) (PPPR) regulation 12 for compliance with use (dose, frequency, time of application) or formulation of the product had changed; PPP(SU)R regulation 17(5) where store remediable maintenance work was required
- PPPR regulation 19(1) for incomplete or inaccurate spray records

Formal letters were also issued for the following breaches:

- PPP(SU)R regulation 17(1) incomplete or lacking spill kits, first aid equipment and personal protective equipment
- PPP(SU)R regulation 8(1) Competency and training certifications
- PPP(SU)R regulations 11,12 & 14(1) equipment not undergone inspection, and
- Official Control (Plant Protection Products) Regulations 2020 (OCR), regulation 5(1), registration of work involving pesticides

Enforcement Notices

17 enforcement notices were served to cases that received a formal letter. 13 notices were served under the Plant Protection Products (Sustainable Use) Regulations 2012 (PPP(SU)R) regulation 17(6), if the active substance was deemed to pose a danger to human health and the environment. Two notices were served under PPP(SU)R regulation 17(5) where there had been a clear absence of the defined standards for containment /storage of PPPs within a bunded area and two notices were served under the PPPR regulation 19(1), where there had been a clear absence of defined standards for record keeping.

9. Control on the composition of plant protection products

Formulation surveys are comprised of two components: a programme analysing a pre-determined number of active substances; and a programme analysing products brought to the attention of HSE as a result of enforcement activities.

In 2024, the survey consisted of 6 active ingredients across 128 products. The active substances were selected using criteria including the length of time since last selection, number of products containing the active substance and any specific concerns/intelligence received about an active substance. The surveys covered the following active substances and number of samples:

- glyphosate (97 samples)
- cymoxanil (9 samples)
- clethodim (8 samples)
- amisulbrom (5 samples)
- cypermethrin (7 samples)
- captan (2 samples)

Summary of the formulation analysis of pre-determined active substances – 2024

Problems found - 128 products sampled

23 products failed to meet the Food and Agriculture Organisation (FAO) specification with regards to the content of the active substance.

The FAO/WHO specification is regarded as a benchmark representing a global standard of product quality. This is an international objective and so applies to GB authorised substances. It is stated in assimilated Regulation 284/2013 (applicable in GB) that ‘the extent to which plant protection products for which authorisation is sought, comply with the relevant FAO/WHO specification, shall be stated. Divergences from these specifications shall be described in detail and be justified by the applicant’.

Impurities - 97 products sampled

32 products contained an impurity above the specified limit.

Co-formulant - 16 products sampled

0 products were out of specification with regards a co-formulant

Physical/ Chemical properties - 98 products sampled

1 product was out of specification with regards physical/ chemical properties

Labelling concerns - 128 products sampled

2 products either had missing/ illegible batch numbers/ inadequate labelling

Enforcement action in formulations analysis

HSE is taking forward appropriate regulatory follow up action in relation to the results of formulations analysis. This includes working with authorisation holders and the manufacturers of PPPs to correct any issues found with product specifications. Failure to comply may result in the removal of the authorisation.

10. Monitoring of food

The HSE's food monitoring programmes check food and drink in Great Britain and Northern Ireland for traces of pesticide residues on behalf of Defra, the Northern Ireland Executive, the Scottish Government and the Welsh Government.

One of the purposes of the programme is to check whether residues found in food (by food in this report, we mean both food and drink) are above the Maximum Residue Levels (MRLs) set by law.

A MRL is the highest level of a pesticide residue that is legally tolerated in or on food when pesticides are applied correctly in accordance with Good Agricultural Practice. The amounts of residues found in food must be safe for consumers and must be as low as possible.

HSE administers a food monitoring programme that:

- when residues are detected, conducts risk assessments to identify whether the levels found are likely to impact on human health - this is done for all residues, whether or not the MRL is exceeded
- assesses the risk of residues detected on various consumer groups that include particular groups of vulnerable consumers such as babies, toddlers and the elderly
- where more than one pesticide is found with similar modes of action for certain chemical groups of pesticides, identifies if the impact of the sum of the residues is of concern
- when problems are found, takes action including additional testing.
- checks that results align with those set by the regulatory regime when the law on using the pesticides or on pesticide residues in food were set
- communicates with suppliers and food producers. This communication often drives positive impact work for the supply chain

The monitoring programme is risk-based, looking at those foods in which we expect to find residues. Overall results show that the vast majority of food we tested (97.93%) complied with legal limits for pesticides in that food. The compliance rates in this year's report are broadly similar with monitoring results in previous years.

The following results summarise the 2024 programme which analysed 3,482 samples of 29 different foods:

- 1,781 samples (51.15%) had none of the residues HSE looked for
- 1,629 samples (46.78%) had residues found at or below the MRL

- 72 Samples (2.07%) had residues above the MRL

The programme tested 3,482 samples each for an appropriate range of pesticides. In total we tested around 1,153,049 food and pesticide combinations. For Great Britain and Northern Ireland combined, HSE surveyed 29 different commodities, collected 3,482 samples, and carried out 24 detailed risk assessments in 2024.

All the samples in which a residue was detected were checked for risk to consumers by means of a risk assessment screening mechanism. In the Expert Committee on Pesticide Residues in Food (PRiF) quarterly reports of 2024 we published results of 24 detailed short term risk assessments where we wanted to consider in more detail whether there was a concern for human health. Great Britain and Northern Ireland results are assessed together for risk, so these assessments cover samples from both surveys.

Of these a small number, 6, led the FSA to follow up with appropriate action.

HSE refer information about food samples to the FSA where, following risk assessment, we have concerns about the potential risk to health of people eating these foods.

The full UK 2024 results, brand name details and summary tables can be found at: [Pesticide residues in food: quarterly monitoring results for 2024 - GOV.UK](#).

Table 4: Summary of UK commodities sampled and residues detected in 2024

| Survey UK | Highest number of pesticides sought | No. Tested | No. With residues (at / below MRL) | No. With residues above the MRL | No. With more than 1 residue |
|--------------------------------|-------------------------------------|------------|------------------------------------|---------------------------------|------------------------------|
| Aubergine | 402 | 132 | 87 | 2 | 25 |
| Banana | 412 | 109 | 75 | 1 | 49 |
| Beans (dried) (GB only) | 410 | 24 | 9 | 4 | 5 |
| Beans with pods | 409 | 132 | 64 | 12 | 48 |
| Beef | 116 | 144 | 1 | 3 | 0 |

| | | | | | |
|-----------------------------------|-----|-----|-----|----|-----|
| Beetroot | 390 | 132 | 3 | 0 | 0 |
| Bread | 411 | 258 | 251 | 0 | 121 |
| Broccoli | 397 | 156 | 84 | 0 | 38 |
| Chilli peppers | 389 | 120 | 87 | 4 | 44 |
| Eggs | 116 | 144 | 3 | 12 | 0 |
| Fish (white) | 112 | 144 | 27 | 0 | 1 |
| Garlic | 405 | 101 | 16 | 0 | 7 |
| Ginger (GB only) | 405 | 36 | 8 | 3 | 4 |
| Grapefruit | 399 | 157 | 152 | 5 | 153 |
| Grapes | 418 | 144 | 134 | 4 | 131 |
| Honey (GB only) | 406 | 48 | 1 | 0 | 0 |
| Infant food (cereal based) | 417 | 36 | 0 | 1 | 0 |
| Limes | 408 | 58 | 52 | 2 | 46 |
| Melon | 402 | 132 | 99 | 3 | 65 |
| Milk | 112 | 373 | 0 | 0 | 0 |
| Mushrooms | 415 | 145 | 98 | 4 | 51 |
| Olive oil | 410 | 84 | 17 | 0 | 10 |
| Peppers (sweet) | 414 | 132 | 95 | 3 | 63 |
| Potatoes | 411 | 205 | 97 | 3 | 33 |

| | | | | | |
|---|-----|-------------|-------------|-----------|------------|
| Sweet potatoes (NI only) | 414 | 36 | 25 | 0 | 1 |
| Potatoes (processed) (GB only) | 408 | 36 | 29 | 0 | 10 |
| Speciality vegetables (root) (GB only) | 407 | 96 | 27 | 6 | 18 |
| Tomatoes (processed) (GB only) | 407 | 48 | 7 | 0 | 1 |
| Wheat flour | 419 | 130 | 81 | 0 | 36 |
| Total | | 3492 | 1629 | 72 | 960 |

11. Cross Compliance

England

Cross-compliance in England ended on 31 December 2023 as part of a transition away from the EU's Common Agricultural Policy and the Basic Payment Scheme to delinked payments and introduction of the Environmental Land Management Scheme (ELMS).

Scotland

The Scottish Government's Rural Payments and Inspections Division (RPID) is the CCA in Scotland for the purposes of administering cross compliance controls on the proper use of PPPs under SMR 10 and on record keeping under SMR 4.

Further information on cross compliance in Scotland can be found at www.ruralpayments.org/topics/inspections/all-inspections/cross-compliance.

Wales

Rural Payments Wales (RPW) was the appointed CCA in Wales for the purposes of administering cross compliance controls on the proper use of PPPs under SMR 10 and on record keeping under SMR 4.

A guide to cross compliance Verifiable Standards in Wales 2024 is available at www.gov.wales/cross-compliance-2024.

Northern Ireland

The Department of Agriculture, Environment and Rural Affairs (DAERA) is the appointed Competent Control Authority (CCA) in Northern Ireland for the purposes of administering cross compliance controls on the proper use of PPPs under SMR 10 and on record keeping under SMR 4.

A guide to cross compliance Verifiable Standards in Northern Ireland 2024 is available at www.daera-ni.gov.uk/publications/cross-compliance-2024.

Guides to 2024 cross compliance penalty framework are no longer available. However, the current years cross compliance penalty framework that applies in Northern Ireland is available for reference at

<https://www.daera-ni.gov.uk/publications/cross-compliance-penalties>

Number of penalties imposed for Cross Compliance Breaches under SMR10 and SMR4 in 2024

Scotland

The Scottish Government administrate cross compliance controls on the proper use of PPPs in Scotland.

Selected Inspections – 113

Selected inspections failed - 6

Percentage of selected inspections failed – 5.31%

Reductions

Warning Letter - 3

1% reduction - 0

3% reduction - 0

4% reduction - 0

5% reduction - 3

5 - 15% reduction – 0

Over 15% reduction – 0

Wales

The Welsh Government administrate cross compliance controls on the proper use of PPPs in Wales.

Selected Inspections – 189

Selected inspections failed - 0

Percentage of selected inspections failed – 0%

Reductions

Warning Letter - 0

1% reduction - 0

3% reduction - 0

4% reduction - 0

5% reduction - 0

5 - 15% reduction – 0

Over 15% reduction – 0

Northern Ireland

The Department of Agriculture, Environment and Rural Affairs administrate cross compliance controls on the proper use of PPPs in Northern Ireland.

- Selected Inspections – 250
- Selected inspections failed - 1
- Percentage of selected inspections failed – 0.4%

Reductions

- Warning Letter - 0
- 1% reduction - 1
- 3% reduction - 0
- 4% reduction - 0
- 5% reduction - 0
- 5 - 15% reduction – 0
- Over 15% reduction – 0

12. Other monitoring programmes

Pesticide Usage Surveys

Official surveys of PPP usage on a variety of agricultural and horticultural crops are carried out across the UK.

Since 2010, all surveys of pesticide usage in agriculture and horticulture have been fully co-ordinated by the survey teams of England & Wales, Scotland and Northern Ireland. The methodology used for sample selection and the collection of data from sample holdings is identical in each region. This approach enables co-ordinated crop pesticide usage reports to be produced for the United Kingdom alongside specific Scotland and Northern Ireland regional reports.

Data is collected by experienced surveyors, via questionnaires, digital software management systems and telephone discussions, with the option of personal visits (when necessary) to holdings across the UK.

At the time publication of this report the pesticide usage surveys (PUS) for 2024 have not been published. The PUS 2024 reports can be found via the following links once they are ready:

United Kingdom - Fera published reports

<https://pusstats.fera.co.uk/published-reports>

The below calendar gives the expected publication dates for the PUS in England and Wales

| Survey Year | Crops to be surveyed | Expected publication date |
|-------------|----------------------------|---------------------------|
| 2024 | Arable crops in the UK | Nov 2025 - Dec 2025 |
| 2024 | Soft Fruit crops in the UK | Dec 2025 - Jan 2026 |
| 2024 | Orchard Crops in the UK | Jan 2026 - Feb 2026 |
| 2024 | Potato Stores in the UK | Feb 2026 - Mar 2026 |

Scotland - Science & Advice for Scottish Agriculture (SASA) -

<https://www.sasa.gov.uk/pesticides/pesticide-usage/pesticide-usage-survey-reports>

The below calendar gives the publication dates for the PUS in Scotland

| Crops to be surveyed | Expected publication date |
|-----------------------------------|----------------------------------|
| Soft Fruit crops 2024 | Published 29 October 2025 |
| Arable crops & Potato Stores 2024 | Published 29 October 2025 |

Northern Ireland – Agri-Food and Biosciences Institute (AFBI)

<https://www.afbini.gov.uk/articles/pesticide-usage-monitoring-reports>

The below calendar gives the expected publication dates for the PUS in Northern Ireland

| Crops to be surveyed | Expected publication date |
|-----------------------------|----------------------------------|
| Soft Fruit crops 2024 | November 2025 – March 2026 |
| Top Fruit crops 2024 | November 2025 – March 2026 |
| Arable crops 2024 | November 2025 – March 2026 |

13. BASIS

BASIS® Registration Ltd (known as “BASIS”) was established at the suggestion of the UK Government in 1978. BASIS is an independent not-for-profit organisation set up to establish and assess standards in the PPP industry relating to storage, transport and competence of staff.

The functions of BASIS include the Store Inspection scheme that is an independent annual audit for certification required to ensure compliance with legislation and achievement of best practice standards in professional product pesticide stores. Whilst the ‘Yellow Code’ (Code of Practice for suppliers of pesticides to agriculture, horticulture and forestry) recommends BASIS as an appropriate organisation to undertake inspections, use of BASIS for stores inspections is not a statutory requirement and suppliers are free to obtain inspections from other independent experts.

The BASIS Scheme audits to the standards set out in the Defra Code of Practice for Suppliers of Pesticides to Agriculture, Horticulture and Forestry, Plant Protection Products (Sustainable Use) Regulations 2012 (UK SI) and other relevant Codes of Practice. The areas covered as part of the audit include products, segregation and storage, training and qualifications, personal protective equipment, signage and emergency procedures. Annual certification demonstrates compliance to HSE, wider authorities and the public.

BASIS is also a designated award body for statutory Certificates of Competence required by pesticide legislation for all those selling, supplying and storing pesticides.

Inspection of Stores Statistics for January – December 2024

BASIS annually audits every BASIS-registered pesticide store in the UK (Great Britain and Northern Ireland) to ensure that the store, people who operate it and the staff who provide advice on professional pesticides meet their legal obligations and are taking all reasonable precautions to protect people and the environment.

Table 5: Outcome of BASIS store Inspections in 2024

| | 10/2023 | 05/2024² | 10/2024² |
|-------------------------|----------------|----------------------------|----------------------------|
| Pass % | 56.94 | 20 | 55 |
| Qualified pass % | 40.85 | 4 | 14 |
| Fail % | 2.21 | 1 | 6 |

Pass - the company has been audited and there were no actions at all with the audit.

Qualified Pass - the company were audited and there may have been some minor actions required for the company to rectify.

² 05/2024 and 10/2024 columns collectively equal 100%



Further information

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