EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Directorate F - Food and Veterinary Office

DG(SANCO) 2011-8840 - MR FINAL

# FINAL REPORT OF AN AUDIT

# CARRIED OUT IN

# GREECE

# FROM 21 FEBRUARY TO 02 MARCH 2011

# IN ORDER TO EVALUATE THE FOOD SAFETY CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION AND PLACING ON THE MARKET OF POULTRY MEAT AND POULTRY MEAT PRODUCTS

***In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.***

***Executive Summary***

*This report describes the outcome of an audit carried out by the Food and Veterinary Office in Greece, from 21 February to 2 March 2011.*

*The objective of the audit was to verify, that official controls for poultry meat and poultry meat products are carried out in compliance with EU legislation.*

*The report concludes that the system of official controls is implemented by clearly designated CAs and covers the whole poultry production chain. Although conditions at establishment level were generally correct, the effectiveness of official controls is limited by the difficulties in meeting set frequencies of control and by the lack of detection and/or proper follow-up of certain deficiencies.*

*Ante and post-mortem inspections are not carried out and recorded in line with EU requirements.*

*The report addresses to the Greek authorities a series of recommendations to address the shortcomings found.*

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## Abbreviations and definitions used in this report

| Abbreviation | Explanation |
|---|---|
| CA | Competent Authority |
| CCA | Central Competent Authority |
| DGVS | Directorate General of Veterinary Service |
| EFET | Hellenic Food Authority |
| FBO | Food Business Operator |
| FCI | Food Chain Information |
| FVO | Food and Veterinary Office |
| HACCP | Hazard Analysis and Critical Control Points |
| MRDF | Ministry of Rural Development and Food |
| NRL | National Reference Laboratory |
| RASFF | Rapid Alert System for Food and Feed |

## 1 Introduction

The audit took place in Greece from 21 February to 2 March 2011 and was undertaken as part of the Food and Veterinary Office's (FVO) planned audit programme.

The audit team comprised two inspectors from the FVO.

## 2 Objectives

The objective of the audit was to verify, that official controls for poultry meat and poultry meat products are carried out in compliance with EU legislation

In pursuit of this objective, the audit team proceeded as follows:

- an opening meeting was held on 21 February 2011 with the the joint Central Competent Authorities (CCAs), the Ministry of Rural Development and Food (MRDF) and the Hellenic Food Authority (EFET). At this meeting the audit team confirmed the objectives of, and itinerary for the audit, and requested additional information required for the satisfactory completion of the audit;
- the following sites were visited:

| | | |
|---|---|---|
| **Competent authority visits** | | |
| Central Competent Authorities MRDF and EFFT | 1 | Opening and closing meetings were held in MRDF offices |
| Regional level | 3 | Regional offices in Thessaloniki, Ioannina, Evia |
| **Laboratory visits** | | |
| National Reference Laboratory(NRL) | 1 | Athens |
| Designated official laboratory | 1 | Ioannina |
| **Primary production** | | |
| Poultry farms | 2 | In Ioannina and Evia Regions |
| **Food processing facilities in 5 Establishments as follows** | | |
| Slaughterhouses | 4 | |
| Cutting plants | 5 | |
| Meat Products plants | 4 | |

- representatives from the CA accompanied the audit team during the whole audit.

## 3 Legal Basis

The audit was carried out in agreement with the Greek Authorities and under the general provisions of EU legislation and, in particular:

- Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls in Member States performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules;

Full legal references are provided in ANNEX 1. Legal acts quoted in this report refer, where applicable, to the last amended version

## 4 Background

The last mission to Greece concerning poultry meat and poultry meat products was carried out in November 2002. The results of this mission are described in report DG(SANCO)/8729/2002 which

is available on the web at: http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=933.

# 5 Findings And Conclusions

## 5.1 Legislation and implementing measures

### Legal requirements

Article 4.2 (e) and Article 8 of Regulation (EC) No 882/2004. Articles 1 (3) (d), 1 (4) and 10 of Regulation (EC) No 853/2004.

### Findings

- The legal powers to carry out control activities are granted to the Ministry of Rural Development and Food (MRDF) by Law 2538/1997 and Presidential Decree PD No 79/2007, and to the Hellenic Food Authority (EFET) by the Founding Act No 2741/1999 and Joint Ministerial Decision 15523/2006.
- There are national rules for the slaughter of small quantities of poultry and lagomorphs at farm level and their direct supply to the final consumer or retail sale (as defined in Article 4 of Regulation (EC) No 853/2004). However this legislation had not been notified to the European Commission and other Member States in contravention of Article 17(5) of Regulation (EC) No 854/2004 and Directive 98/34/EC.
- There are no national measures as provided for by Article 10 of Regulation (EC) No. 853/2004 concerning low throughput establishments or establishments subject to special geographic constraints. At the moment the CCA is considering drafting national rules for establishments in regions with special constraints, such as islands, but no steps have been taken so far.
- The audit team was informed by EFET that they apply an exception from the sampling frequency to establishments producing minced meat and meat preparations in small quantities (below 4 tonnes per week). This exception is granted on a case-by-case basis.

### Conclusions

Other than the non-notification to the Commission of national rules concerning slaughtering on farm, there is an effective legal basis in place, which complies with EU legislation, for the official control of the production and placing on the market of poultry meat and poultry meat products.

## 5.2 Competent Authority

### Legal requirements

Article 4 of Regulation (EC) No 882/2004. Section III of Annex I to Regulation (EC) No 854/2004, in particular Chapter IV.

### Findings

A detailed description of the CAs designated for official controls in Greece can be found in the Greek country profile at : http://ec.europa.eu/food/fvo/controlsystems_en.cfm?co_id=GR.

MRDF and EFET are the two designated CA responsible for the implementation of Regulations (EC) Nos 178/2002, 852/2004, 853/2004, 854/2004 and 882/2004 as regards poultry and poultry meat products. The officials performing actual checks operate at the regional level of the Ministry of the Interior, Decentralisation and E-Government.

MRDF, as CA, has the overall responsibility for the following activities:

- implementation and monitoring of the official control system, and
- evaluation of the implementation of the control system,

for food of animal origin during primary production and up to the stage of the first processing including first processing and also for imports of food of animal origin.

EFET as CA is responsible for:

- organisation of training;
- implementation and monitoring of the system of official controls; and
- evaluation of the implementation of the control system,

after the first processing of products of animal origin up to final disposal/ sale, with parallel jurisdiction in the sector covered by the audit where they relate to individual enterprises rather than integrated plants. One element of training in 2010 organised by EFET was a course for official veterinarians in carrying out ante and post-mortem inspections.

According to the new structure of the Veterinary Authorities as of 2011, following the implementation of the reform of local government structures known as the "Kallikratis Plan" official controls will be implemented by three CA levels: central, regional and local. Prefectures are being grouped into "L*ocal* V*eterinary* U*nits*" and merged into thirteen regions .

As a way of ensuring cooperation between EFET and MRDF several Memoranda of Understanding had been signed between the two CAs at prefecture level. The audit team was informed that due to the abolition of the Prefectures and their replacement by Regional Districts the existing Memoranda of Understanding were no longer valid. New Memoranda will be signed between EFET at regional level and the Veterinary Services of the Regional Districts. It should be noted that the current Regional Districts are supervised by the Ministry of the Interior, Decentralisation and e-Government as were their predecessors the Prefectures. At the time of the audit it was still unclear as to how the new structures would affect cooperation between the two bodies. Despite this uncertainty officials from both CAs reported good cooperation between them. One regional director indicated reluctance to sign a new agreement EFET-Veterinary Services, as the regional office had not the means to achieve the agreement's objectives. The audit team noted that a *Salmonella* positive result was notified by EFET to officials from MRDF supervising slaughterhouse. Additionally in the document No 17784/11-12-2009 issued by EFET it is concluded that, " *for the better organisation of controls and the rational management of resources and implementation of the required annual inspection frequency, there is a need for cooperation and consultation between the competent authorities so as not to overlap the controls* ".

In practical terms establishments with slaughter activity are supervised by services from MRDF and establishments without slaughter by the officials from EFET but a situation where one establishment could be supervised by both services may happen. CA representatives (both from MRDF and from EFET) acknowledged that in some cases there is a certain overlap between MRDF and EFET in areas such as cutting plants, packaging operations and to a lesser extent meat product establishments.

No internal audit in the poultry sector has been carried out so far, nor are any planned for the sector in 2011. The audit team was informed that priority for internal audit has been given to the red meat and dairy sectors.

The audit team was informed about current serious budgetary difficulties resulting in restrictions of control activities. CA representatives cited as a serious constraint to their duties recent limitations in travel expenses, together with the lack of availability of official cars and the non-replacement of

most retiring staff all of which will make it very difficult to achieve the objectives for inspections. It was also stated that fees paid by FBOs for official controls are not directly channelled to fund the veterinary services concerned.

**Conclusions**

Greece has clearly designated CAs responsible for official controls along the poultry production chain. However the lack of formal procedures to ensure cooperation between the two services cannot guarantee that the duplication of control activities in establishments does not occur.

### 5.3 Official controls of production and placing on the market

#### *5.3.1 Controls at farm level*

**Legal requirements**

Article 3 of Regulation (EC) No 882/2004, Annex I to Regulation (EC) No 852/2004, Article 4(2), Chapter II of Regulation (EC) No 854/2004.

**Findings**

Registration of poultry farms is the sole responsibility of the MRDF and is done in accordance with the criteria of the Sanitary Provisions YIß/2000 for the conditions of poultry and other animal farms.

During the audit the team noted that:

- Poultry farms are appropriately registered.
- The checklist for official controls includes a section covering bio-security requirements which were properly applied in the farms visited.
- The broiler farms visited were found to have adequate production data records including records of feed origin and treatment administered..
- The taking of feed samples at farm level is not done as part of official controls.

The frequency of official controls is set at 10% of all broiler farms per year. According to information provided, this target was achieved in 2010. The selection of farms for sampling is done at regional level. The audit team was informed in one region that the selection of farms is based on production data (e.g. high mortality) however no evidence of formally approved selection criteria could be provided. Additionally in another region visited it was said that no specific criteria are taken into account to select the farms.

One case was analysed by the audit team where an official sample tested positive for *Salmonella* Typhimurium in December 2010. The regional CA informed the team that the next production cycle of this house would be tested again for *Salmonella*. Bio-security measures on the farm concerned were evaluated at the time of sampling and were found satisfactory. Official water and feed samples were taken to find the source of contamination.

According to the system in place, meat from flocks positive to *Salmonella* Enteritidis/Typhimurium should be re-sampled in the slaughterhouse, and if the meat tests positive, it should only be used for heat treated products.

**Conclusions**

Poultry farms are appropriately registered. The farms visited were in compliance with the requirements of Regulation (EC) No 852/2004, Annex I. However there is no system in place to

guarantee that the selection of farms to be subject to official controls is based on specified and risk-based criteria.

### *5.3.2 Approval procedures*

**Legal requirements**

Article 4 of Regulation (EC) No 853/2004. Article 31 of Regulation (EC) No 882/2004.

**Findings**

The rules to be followed for approval of food business establishments are laid down in the Joint Ministerial Decision No 15523/2006 and PD 79/2007. The system is based on two steps, with a first permit called "operating licence" and a subsequent full approval granted at central level, where the full EU approval number is granted. Until 2011 the operating licence had been issued by the local CAs at prefecture level. Under the Kallikratis Plan, the operating license will be issued at regional level. Both CAs will continue to issue the full approval as before. Before issuing a licence a committee comprising of three veterinarians carries out a checklist-based inspection and the report containing the opinion on whether or not an operating licence should be granted, is sent to the region. Where the committee considers that an approval can be granted a positive advice with accompanying documents is sent to the CCA which can be either the Directorate General of Veterinary Service (DGVS) in the MRDF or EFET, depending on the activities performed by the establishment.

The audit team was informed that the MRDF as CCA, may decide to carry out an additional on-the-spot control visit prior to granting final approval. In the cases reviewed by the audit team, MRDF had not carried out a visit prior to granting full approval. Under EFET procedures, this additional on-the-spot visit is systematically performed by EFET staff at regional or central level, depending on staff availability.

Both Joint Ministerial Decision No 15523/2006 and PD 79/2007 allow the conditional approval of establishments, but the audit team only saw evidence that this option had been used by EFET[1].

The audit team noted that:

- On two occasions neither a standardised checklist nor a standard report format was used during pre-approval official controls. The pre-approval report simply stated in one case the compliance with EU legislation and hazard analysis and critical control points (HACCP) and in the second case only made reference to compliance with EU legislation.
- In one establishment visited it was not possible to review the approval documents for certain activities.
- MRDF staff in one region indicated that production between issuing operation licence and giving an approval number would be possible but that the product should be placed only on the local market. However it is not clear how this condition is ensured and supervised and how traceability of the product can be guaranteed without an approval number. The representative from EFET at central level indicated that for establishments under their jurisdiction it would not be possible to place product on the market without first obtaining approval.
- There is a list of approved establishments on the EFET and MRDF websites. At the time of the audit, the EFET website contained information on establishments which were supervised by MRDF. The MRDF elements of the EFET website appeared not to have been

1 The competent authorities in their response to the draft report gave additional information as follows on this issue: "*It should be remembered that of all approvals granted this year, 60% are conditional*"

regularly updated in that the audit team noted certain inaccuracies e.g. Food Business Operators' (FBOs) names outdated despite change requests by the FBOs involved, an establishment whose licence was revoked on 31/12/2010 was still on the list at the time of the audit. Additionally, a number of establishments in operation in the sector were missing from this list. A CCA representative indicated that this was most likely due to technical difficulties.

- Under Decree 79/2007, a re-approvals process was launched after the EU's hygiene package was introduced, with an initial deadline of one year for re-approval of all establishments. However, in practical terms, this could not be achieved and some establishments visited by the audit team were not initially re-approved under the new hygiene package until 2009.
- In one case studied, conditional approval given by EFET for a period of three months, as foreseen in Article 31 of Regulation (EC) No 882/2004, was exceeded. The final check and full approval for this facility was only granted after five months.

**Conclusions**

There are two systems, run independently by MRDF and EFET, for the approval of FBOs and for the registration of approved establishments. However there are cases where the list of approved establishments is not maintained up-to-date. Additionally the current system does not ensure that rules for reports as set out in Article 9 of Regulation (EC) No 882/2004 are respected.

### *5.3.3 Controls in slaughterhouses : Ante-mortem and Post-mortem inspections*

**Legal requirements**

Annex II to Regulation (EC) No 852/2004. Section II of the Annex III to Regulation (EC) 853/2004. Article 4 (2) of Chapter II and Chapter V of Section IV of Annex I to Regulation (EC) No 854/2004.

**Findings**

Ante-mortem inspections

According to information provided in the pre-audit questionnaire ante-mortem inspection can be done either on a farm or in a slaughterhouse. This is decided at regional level.

The audit team noted that in all slaughterhouses visited poultry flocks were accompanied by the Food Chain Information (FCI). The FCI template, which includes among other items the information as regards *Salmonella* test results, was created at central level and is applied throughout the country. A new and more complete template for FCI was being developed at the time of the audit.

In the case, where ante-mortem inspection was done on a holding, poultry flocks were accompanied to the slaughterhouse by a health certificate.

The audit team noted the following deficiencies in the performance of ante-mortem inspections:-

- In one slaughterhouse visited the FCI did not contain all the relevant information for some batches. For instance, on repeated occasions batches where an abnormally high incidence of pathologies had been detected, and with a high number of rejections (e.g. for *septicaemia and caquexia,)* the FCI did not contain any information of production data or an indication of problems at farm level. On another occasion high mortality on a farm (above 10%) was not included in the FCI. This is not in line with point 3g, Section III, Annex II, of Regulation (EC) No 853/2004 which requires the inclusion in the FCI of this production data when this

might indicate the presence of disease.

- In one slaughterhouse the audit team was informed that both ante and post-mortem inspections were done solely by establishment staff for certain batches as the official veterinarian only commenced her duties two hours after the start of the slaughter. The meat from unexamined birds was not declared unfit for human consumption, whereas this should have been the case according to Chapter V,1 (a), Section II, Annex I of Regulation (EC) No 854/2004.
- For one slaughterhouse visited ante-mortem inspection would be carried out either at the holding or in the slaughterhouse depending on the region of origin of the flocks. However, there was no evidence, in any of the cases reviewed by the audit team, that the official veterinarian at the slaughterhouse had undertaken the ante-mortem inspection (when necessary) or that he/she had carried out controls on identification and welfare for batches where ante-mortem inspection had been done at farm level. Therefore, there was no evidence that the poultry examination as required in point 4 and 6 from Chapter V (A), Section IV, Annex I Regulation (EC) No 854/2004 had been performed.

Post-mortem inspection

The audit team was informed that post-mortem inspection is the sole responsibility of official veterinarians and there is no involvement of auxiliary staff.

The audit team noted several deficiencies with regard to post-mortem inspection:-

- In every slaughterhouse visited there was only one official veterinarian present during each shift even in ones with two slaughter lines. Given the responsibility for both ante and post-mortem inspection, with sometimes a throughput of between 6000 – 8000 birds per hour, CA official veterinarians indicated that a proper inspection by a single official veterinarian is impossible. Official veterinarians indicated to the audit team that they were, in certain circumstances, only able to check a part of each consignment of birds.
- In two slaughterhouses visited post-mortem inspections were carried out in practical terms by the establishment staff working on the slaughter line. These operatives, in addition to their normal duties on the slaughter line, condemned birds that in their view were not fit for consumption. Official veterinarians explained that the most experienced staff is chosen and trained for post-mortem inspection. However there was only evidence of training provided in one slaughterhouse and this referred to a six hour training session on hygiene issues and not on post-mortem inspection rules. Additionally there were no procedures as regards official veterinarian supervision over the staff involved as required by Chapter III (a), Section III, Annex I of Regulation (EC) No 854/2004.
- In one case an official veterinarian was carrying out duties which are the responsibility of the FBO such as checks on bleeding, scalding, cleanliness in the factory, measuring the temperature of every batch of product to be despatched and authorising its despatch. However, the official veterinarian indicated that only a proportion of each batch would be subject to post-mortem inspection procedures as described in EU legislation.
- In some cases the designated post-mortem inspection points were not properly equipped, lacking adequate space and/or a mirror.
- Records of post-mortem inspection were available in every slaughterhouse visited. However in two cases these records were related to all birds slaughtered during one day and not to the individual batches. Because existing records related to each day of slaughter (and not to specific batches) in these two cases no link could be made to the FCI and it was not possible

to provide feedback to the holding of provenance of the birds. In several instances no evidence was found that a high number of rejections had been notified to the FBO or to the veterinarian on the farm, although the official veterinarian indicated that this would be done by phone. In the final meeting a CCA representative provided the audit team with a copy of a new template (currently under consultation procedure) requiring official veterinarians to properly document results of ante and post-mortem inspections with more comprehensive data and per flock/batch.

**Conclusions**

FCI which accompanied poultry flocks did not contain all the necessary information as required in Section III, annex II of Regulation (EC) No 853/2004 .

Ante-mortem inspection was in general not carried out in line with the requirements of Chapter V (A), Section IV, Annex I to Regulation (EC) No 854/2004.

In all slaughterhouses visited post-mortem inspection was not carried out in accordance with the general requirements of Chapter II (D), Annex I and the specific requirements of Chapter V (B), Section IV, Annex I to Regulation (EC) No 854/2004. Records of post-mortem inspection are not recorded by flock.

*5.3.4 Controls in other establishments ( cutting plants, cold stores, meat processing establishments)*

**Legal requirements**

Annex II to Regulation (EC) No 852/2004; Chapter III of Section II of Annex III to Regulation (EC) No 853/2004; Section VI of Regulation (EC) No 853/2004; Article 4 (2) of Regulation (EC) No 854/2004.

**Findings**

The procedures for official controls are provided by both CAs in the form of guidance documents, circulars or instructions.

MRDF: There is a risk based approach and with the circular 322851/11-9-2007, DGVS gave guidance on the traceability and the organisation of official controls after risk assessment. According to this circular slaughterhouses belong to the high risk group and should be inspected 2-4 times/year, cutting plants, cold stores and meat processing establishments belong to the medium risk group with an inspection frequency of 1-2 times/year.

EFET: According to the guide issued by EFET the classification of the establishments is based on associated risk and according to it there are high, medium and low risk establishments. This guide was sent to the CAs at regional/ local level with letter No 10772/08-06-2007.

A document No 17784/11-12-2009 was issued by EFET to give the local CA more detailed instructions on the specific criteria to be taken into account when classifying an establishment (e.g. history of the operator, credibility of own checks, etc.

EFET is now drafting Guidelines for small enterprises and on HACCP.

The documented procedures were, in general, followed, e.g. the checklists were used to assess the level of compliance of an establishment. However:-

- The audit team noted during visits in establishment and meetings with MRDF that the set inspection frequency was not respected. Overall it was one visit per slaughterhouse per year instead of 2-4 as provided for in the guidelines on official controls. Additionally in one

region visited there was a misinterpretation of the frequency as described in the guidance document.

- The number of controls performed varied between regions. In one region visited the set target was achieved. In a second region, due to budgetary constraints, only approximately 20% of foreseen checks were performed. As a result some establishments were never controlled in 2010. The audit team was informed that for 2011 this specific region will be in the same situation.
- In one establishment visited the HACCP system was evaluated without using the specific HACCP checklist. The more general checklist used in this case related only to the presence or absence of certain documents and not to a full HACCP audit.
- After approval of a new activity in one establishment visited no checklist was used for the evaluation of the HACCP system and additionally in the report of the approval committee there was no evidence that this system had been evaluated. After starting the new activity a general HACCP evaluation was done covering all activities of the establishment (i.e. for cutting plant, slaughterhouse etc) rather than for the specific newly approved activity.
- Currently, according to the cases reviewed by the audit team, EFET is working on the basis of the general risk assessment set out in Circular 17784/11-12-2009. The system in place requires that this be supplemented by an assessment more specific of each establishment, taking into account several criteria such as population consuming the product, history of compliance etc. However, due mainly to staff shortages and other priorities, this specific categorization is not yet done at least in one region visited. The explanation for this is that priority was given to higher risk areas such as red meat and dairy products. In another region this risk categorization had already been done.
- In one small EFET supervised establishment (20 tonnes/day, one of which is meat preparations), the audit team noted that after initial approval one check per year was carried out. According to the official reports the general hygiene conditions were adequate. However some problems such as inadequate sampling for own-checks and inadequacies in HACCP reoccurred over three years. Despite this repetition this establishment was categorized as low risk and was only subject to one visit per year.

The audit team visited five establishments in four regions. These establishments were in general in acceptable condition with satisfactory own-check sampling including water. Animal welfare conditions at the time of slaughter were also found to be satisfactory.

However some deficiencies were identified by the audit team covering:

- Maintenance – damaged floors, presence of obsolete corroded machinery/objects, overhead structures with corrosion, some doors with gaps.
- Mould and condensation in certain areas of ceilings.
- Wooden deteriorated pallets in production area of establishment with a high risk for physical contamination.
- Washbasins not provided with material for cleaning and hygienic drying of hands. The absence of facilities for disinfecting knives in some areas.
- Incomplete separation between dirty and clean areas.
- Containers for animal by-products in the production area not labelled and there was confusion about the category of product concerned.
- Material unfit for human consumption stored or found in the clean area of an establishment.

- On one occasion the audit team noted that the frequency for taking of neck skin samples was limited to once per month .This decision had been taken by the CA locally and there is no guidance issued by the CCA covering this procedure.
- In all sites visited a HACCP system was in place and implemented. In the majority of establishments HACCP implementation was overall correct, however the audit team found some deficiencies which had not been noted nor documented during official controls.
- There were also inconsistencies found in HACCP plans. For instance, in one establishment the FBO indicated that meat would be cut at a maximum temperature of around 4 degrees, whereas the HACCP indicated as a CCP a maximum temperature of 17 degrees for cutting and deboning.
- In one establishment, no separate HACCP plan had been put in place for a new activity (mechanically separated meat production) and this activity was simply added as an additional Critical Control Point (CCP) to the existing HACCP plan.
- CCPs identified where, in fact , controls points e.g. bleeding.
- For identified CCPs no monitoring procedures had been properly defined or monitoring was not recorded.

Follow-up

The audit team noted that there is an understanding by the official inspectors of the need for proper follow-up. Therefore normally there are clear recommendations and deadlines in control reports. However, these deadlines had been extended in several cases reviewed by the audit team with, according to the CA, only a minor impact on the overall situation. The audit team was informed that these extensions are granted mainly due to the current economic situation in Greece.

In one establishment under EFET supervision deficiencies related to own-check sampling and HACCP system were repeated over three years with no action being taken by the CA to ensure that the FBO remedied the situation. Additionally this establishment was still classified as low risk.

Sanctions

In two cases studied the audit team noted differences in the approach to sanctions. In one case a prosecution was brought against an FBO after a sample of meat tested positive for *Salmonella*, although there was no clear evidence that sanitary rules had been deliberately infringed. In a second case in another region following a positive test result to *Salmonella* in a meat preparation which triggered a RASFF alert, no sanction was taken despite the fact that the establishment was not approved for the type of activity concerned. A representative of the CCA indicated that they are planning to introduce a more harmonised system for applying sanctions.

**Conclusions**

The system of official controls is implemented and covers the whole poultry production chain. However deficiencies identified by the audit team in the establishments visited and not detected during official controls call into question the effectiveness of the system.

There are guidelines setting the frequency of official controls however in many cases these rules are not followed.

The current system does not guarantee that the sanction applied for breaches of food laws are effective and proportionate.

### *5.3.5 Official sampling*

**Legal requirements**

Point 8 (c) of Article 4 of Regulation (EC) No 854/2004; Article 11 of Regulation (EC) No 882/2004.

**Findings**

Sampling procedures are provided for in the following documents:

MRDF:

- Circular 295788/20-5-2007 gives instructions on the sampling and analysis of the water in the framework of FBO's own checks and official controls.

EFET:

- Circular No 15103/22-8-2007 contains guidelines for the official sampling and microbiological analysis of food.
- In addition to these guidelines, Guidance Document No 10772/08-06-2007 was issued with instructions for sampling and analysis of food, including official sampling of water.
- Document 4028/8-03-2010 contains procedures for official controls of microbiological criteria in food of animal origin and controls for *Salmonella* spp. in meat preparations.
- 17783/11-12-2009 – Official controls of water in food producing establishments.

For planning purposes, EFET set up general guidelines, priorities and number of samples to be taken, and allocates to the local inspector, the responsibility to choose the specific premises to be sampled. However there was no evidence on how the specific premises would be chosen and which specific criteria should be considered.

Overall, the number of samples taken met the target set by the CCA.

The audit team found, both in the laboratory and establishments visited, that samples of poultry meat products for testing for *Listeria monocytogenes* and *Salmonella* always comprised five units in accordance with Regulation (EC) No 2073/2005.

Within the priorities defined for 2010, EFET included a programme to study the correct use of additives in meat preparations and meat products. Up to 396 samples were tested, among them poultry meat samples for phosphates, with largely satisfactory results. Additionally the EFET distributed Circular No 5559/22-4-2010 clarifying the correct rules on the use of nitrate additives in meat preparations and meat products.

Both authorities are involved in official sampling and cooperate. The audit team saw evidence, where EFET samples of fresh meat tested positive, that MRDF was informed and initiated an investigation.

One official sample was sent to an unaccredited laboratory. The audit team was also informed that official samples are not taken in one specific establishment as it is too far (in distance terms) from the designated laboratory.

In one region visited the sampling protocol indicated only that samples of poultry meat preparation should be tested in accordance with Regulation (EC) No 2073/2005 and as a result this sample was tested only for *E.coli* and not for *Salmonella.*

**Conclusions**

There is an adequate system of official sampling and the targets as regards number of samples taken are achieved. However no objective criteria appear to be used for the selection of establishments to be sampled.

#### *5.3.6 Rapid Alert System for Food and Feed*

**Legal requirements**

Article 50 of the Regulation (EC) No 178/2002; Chapter I of Title VII of the Regulation (EC) No 882/2004.

**Findings**

There was one notification under the RASSF system in 2009 where *Salmonella* Blockley was detected in a poultry meat preparation. The audit team investigated the case and found out that the batch concerned had not been placed on the market as it was a 30 kg test production exported to Italy. Following receipt of the Italian laboratory result the supplier of the raw meat involved was informed. The affected batch was not placed on the market and according to the FBO the product was distributed among the factory management. The establishment was not approved for this type of production activity.

The official controls in this case were recorded in the establishment's logbook, but no full official report was issued. There were also comments on HACCP but there was no evidence that the HACCP plan had been fully evaluated. No sanctions were applied for undertaking this unapproved activity.

**Conclusions**

The follow up of the RASSF notification studied was only partially satisfactory.

### 5.4 LABORATORIES

**Legal requirements**

Articles 11, 12 and 33 of Regulation (EC) No 882/2004.

**Findings**

Under the current system, in Greece official samples are tested in accredited laboratories. The audit team visited the National Reference Laboratory (NRL) for *Listeria* and one laboratory designated for official samples in Ioannina:

- The NRL visited participated regularly in proficiency tests organised by an external body abroad with satisfactory results.
- The NRL executes its supervisory role over the designated laboratories through regular proficiency tests.
- Evidence was found of a corrective action following an unsatisfactory proficiency test result.
- The designated laboratory is accredited by the Greek accreditation body to ISO 17025 and *Salmonella*, *Listeria monocytogenes*, *E.coli* and *Staphylococcus aureus* tests are in the scope of its accreditation.
- Accreditation is granted for four years but the national accreditation body visits the

laboratories once per year. Reports from these visits with recommendations were available to the audit team in the designated laboratory visited.

- The designated laboratory regularly participates in proficiency tests (minimum twice per year) with satisfactory results however only in one case was the matrix for this test poultry meat.
- The staff is highly qualified and trained via a cascade system which is well documented.
- There are procedures for samples rejection.

**Conclusions**

The laboratory visited and designated for testing of official sampling meets EU requirements.

## 6 Overall Conclusions

The system of official controls is implemented by clearly designated CAs and covers the whole poultry production chain. Although conditions at establishment level were generally correct, the effectiveness of official controls is limited by the difficulties in meeting set frequencies of control, by the lack of detection and/or proper follow-up of certain deficiencies.

Ante and post-mortem inspections are not carried out and recorded in line with EU requirements.

## 7 Closing Meeting

During the closing meeting held in Athens on 2 March 2011, the audit team presented the findings and preliminary conclusions of the audit to the CA.

During this meeting, the CAs acknowledged all the findings and preliminary conclusions presented by the MT and provided a commitment to correct the deficiencies.

At the meeting EFET pointed out that despite financial restrictions the target for the official controls will be achieved by applying a more risk based approach and better use of human resources.

## 8 Recommendations

The CA is invited to provide details of the actions taken and planned, including deadlines for their completion (action plan), aimed at addressing the recommendations set out below, within twenty-five working days of receipt of this report.

| N°. | Recommendation |
|---|---|
| 1. | The CCA should notify the national legislation as regards the activities referred to in paragraph 3(d), Article 1 of Regulation (EC) No 853/2004 to Commission services and Member States as required by Directive 98/34/EC and Article 17(5) of Regulation (EC) No 854/2004. |
| 2. | The CA should ensure that the list of the approved establishments is maintained up-to-date (Article 31, 1(f) of Regulation (EC) No 882/2004). |
| 3. | The CA should ensure that reports on official controls are drawn up in accordance with Article 9 of Regulation (EC) No 882/2004. |

| N°. | Recommendation |
|---|---|
| 4. | The CA should ensure that official controls are carried out using a risk based approach (including those at farm level) and that frequency based on the risk assessment is respected. (Article 3 (1), Chapter I, Title II of Regulation (EC) No 882/2004). |
| 5. | The CA should ensure that all the required information is included in the FCI. (point 3 (g), Section III, Annex II of Regulation (EC) No 853/2004. |
| 6. | The CA should ensure that EU requirements on ante-mortem inspection are respected, in particular those describe in Chapter V (A), Section IV, Annex I Regulation (EC) No 854/2004 and point 1(a), Chapter V, Section II, and Annex I Regulation (EC) No 854/2004), thus correcting the deficiencies mentioned in this report. |
| 7. | The CA should ensure that involvement of slaughterhouse staff in poultry meat inspection meets the conditions of Chapter III (A), Section III, Annex I of Regulation (EC) No 854/2004 and that an official veterinarian carries out the checks specified in Chapter V, B (1), Section IV, Annex I of Regulation (EC) No 854/2004), in order to ensure that post-mortem inspections comply with Union requirements. |
| 8. | The CA should ensure that poultry inspection records will be related to the flock inspected to enable the CA, when necessary, to communicate the inspection results to the concerned parties. (Chapter I,2(b), Section II, Annex I of Regulation (EC) No 854/2004). |
| 9. | The CA should improve the effectiveness of official controls at establishment level in order to ensure that all deficiencies in establishments are identified and addressed (Article 4 (2a) ) Regulation (EC) No 882/2004), in particular to ensure that poultry establishments comply with the requirements of Annex II of Regulation (EC) No 852/2004 and Section II, Annex III of Regulation (EC) No 853/2004. |
| 10. | The CA should ensure that breaches of food law are subject to effective, dissuasive and proportionate sanctions. (Article 55 (1) of Regulation (EC) No 882/2004). |

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/ap/ap_gr_2011-8840.pdf

## Annex 1 - Legal References

| Legal Reference | Official Journal | Title |
|---|---|---|
| Dir. 98/34/EC | OJ L 204, 21.7.1998, p. 37-48 | Directive 98/34/EC of the European Parliament and of the Council of 22 June 1998 laying down a procedure for the provision of information in the field of technical standards and regulations |
| Reg. 178/2002 | OJ L 31, 1.2.2002, p. 1-24 | Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety |
| Reg. 852/2004 | OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3 | Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs |
| Reg. 853/2004 | OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22 | Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin |
| Reg. 854/2004 | OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83 | Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption |
| Reg. 882/2004 | OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1 | Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules |
| Reg. 2073/2005 | OJ L 338, 22.12.2005, p. 1-26 | Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs |