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COMMISSION STAFF WORKING DOCUMENT

Accompanying the document

REPORT FROM THE COMMISSION

on the overall operation of official controls carried out in Member States (2019-2020) to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products

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Disclaimer

The European Commission has drafted and published this report in accordance with Article 114 of Regulation (EU) 2017/625. This report aims to improve public availability of information on official controls carried out by EU countries, and Commission controls on these, in the areas of food and feed safety, animal and plant health, animal welfare, organic farming and quality schemes for agricultural products and foodstuffs. Only the Court of Justice of the European Union is competent to interpret EU law. Our goal is to keep this information up-to-date and accurate. If errors are brought to our attention, we will try to correct them.

The material used for this report:

- is information of a general nature and is not intended to address the specific circumstances of any particular individual or entity;
- is not necessarily comprehensive, complete, accurate or up-to-date;
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Contents

Introduction	1	
Food	3	
Genetically modified organisms	14	
Feed	15	
Animal health	20	
Animal by-products	24	
Animal welfare	28	
Plant health	34	
Plant protection products	37	
Organic production and labelling of organic products	42	
Protected designation of origin, protected geographical indications and traditional specialities guaranteed	45	
Fraudulent and deceptive practices National official controls programmes	49	49
Coordinated control programmes		50
Operations coordinated by Europol		51
General legend	53	

Introduction

The Commission publishes an annual report on the operation of official controls in EU countries in the areas of food and feed safety, animal and plant health, animal welfare, pesticides, organic farming and quality schemes¹. This report is based on:

- the annual reports submitted by the national authorities on their official control activities; and
- the results of Commission controls carried out in EU countries.

The Commission's report covers the years 2019 and 2020. It provides a compilation of comparable data into EU-wide statistics for 2020. These data will, over time, allow trends in controls and non-compliance issues to be identified.

This staff working document accompanies the Commission's report and provides more details of the controls and audits carried out by national authorities and by the Commission in specific areas of the food chain, as follows:

- Food
- · Genetically modified organisms
- Feed
- Animal health
- Animal by-products
- Animal welfare
- Plant health
- Plant protection products/Sustainable use of pesticides
- Organic production
- Geographical indications
- Fraudulent and deceptive practices

¹ Article 114 of Regulation (EU) 2017/625.

The graphics relating to national official controls are based on the 2020 data from 26 of the 27 EU countries, as Malta did not submit its 2020 annual report in time to be included. These data are presented at EU level. Because the reporting requirements were different for 2019, similar comparable data are not available for that year. The text in this staff working document is based on information submitted for both 2019 and 2020.

As the reporting requirements changed from 2020 onwards, not all EU countries were able to provide all of their data in the detail required. This limits the extent of full comparability in the graphics provided, as data might have been grouped by some EU countries, rather than split into the sub-categories.

For the Commission controls carried out in EU countries, for each topic, a table lists the EU countries audited, the number of audits carried out, the number of recommendations raised and the distribution of these over the different topics. A description of some issues of particular interest is provided after the tables.

Food

Official controls carried out by EU countries

In this part of their annual reports, the EU countries have to report on the official controls carried out in the areas of food and food safety, integrity and wholesomeness at any stage of production, processing and distribution of food. This includes the rules aimed at ensuring fair practices in trade and protecting consumer interests and information, and the manufacture and use of materials and articles intended to come into contact with food. Therefore, data relate to the whole food chain, from farming, fishing and hunting to food production, distribution, wholesale, retail sale and food services.

The EU countries' annual reports do not contain a lot of information on how the level of compliance is followed up. While some reported that, in general, compliance was sufficient and/or in line with previous years, no data on performance indicators were given.

Most EU countries reported that a reduced number of official controls were carried out in 2020 due to the COVID-19 pandemic. This makes it more difficult for them to compare the 2020 results with those from previous years.

Some of the annual reports contained information on the type of non-compliance issues found with food businesses. Problems were identified in the maintenance of premises and equipment, personal hygiene and training, food storage, procedures based on HACCP² principles, food handling and the respect of best before/use by dates. National authorities indicate that reasons for non-compliance include ignorance of legislation on the part of the business operators and, in some cases, intentional misconduct.

Table 1 provides a heat map of the numbers of businesses, official controls carried out, non-compliance issues identified and administrative sanctions applied across the different parts of the food chain, in 2020.

The highest numbers in each column have the darkest shade of colour.

² Hazard analysis and critical control points – Article 5 of Regulation (EC) No 852/2004 of the European Parliament and of the Council

Table 1 - official controls - food sectors - 2020

	Businesses	Controls	Non- compliance issues	Sanctions
Animal production	1 536 971	64 789	14 017	6 032
Aquaculture	14 810	3 912	248	87
Growing of crops	1 795 645	24 610	3 102	2 474
Mixed farming	185 838	13 515	3 067	6 082
Hunting	238 112	4 012		344
Fishing	43 210	4 860		
Meat of domestic ungulates	17 250	152 936	17 002	12 930
Meat from poultry and lagomorphs	4 349	52 747	9 800	6 450
Meat of farmed game	1 094	10 152	1 235	311
Wild game meat	1 441	9 170	1 037	561
Minced meat, meat preparations and mechanically separated meat (MSM)	7 240	41 390	7 007	3 441
Meat products	24 012	76 322	10 309	4 918
Treated stomach, bladders and intestines	817	6 608		408
Rendered animal fats and greaves		7 984	400	
Gelatine	146			
Collagen	81			
Highly refined chondroitin sulphate, hyaluronic acid, other hydrolysed cartilage products, chitosan, glucosamine, rennet, isinglass and amino acids	12			
Colostrum, raw milk, colostrum-based and dairy products	30 380	75 757	9 343	4 097
Egg and egg products	8 006	13 446	1 486	787
Fishery products	12 600	25 856	5 637	2 027
Live bivalve molluscs	4 050		913	665
Frogs' legs and snails	257			
Honey	9 381	3 357		
Sprouts	171			
Processing and preserving of fruit and vegetables	51 160	29 767	6 195	4 324
Manufacture of grain mill products, starches and starch products	5 427	5 223	758	520
Manufacture of bakery and farinaceous products	746 857	90 940	25 979	13 433
Manufacture of vegetable oils and fats	16 768	7 136	1 142	776
Manufacturers of beverages	79 371	31 333	4 007	2 605
Manufacture of other food products	181 601	53 286	8 758	6 197
Establishments producing food contact materials	33 015	4 776	1 168	322
General activity establishments (cold stores, re-wrapping and re-packing establishments, wholesale markets, reefer vessels)	16 712	57 992	7 057	2 215
Transport and storage	190 943	49 770	4 901	2 620
Wholesale	193 600	55 739	8 349	5 312
Retail	3 737 304	763 841	151 777	104 902
Food and beverage service activities	2 444 358	802 830	201 183	103 000
Others	204 027	81 002	23 614	6 346

Official controls in the food chain need to cover a broad range of food categories and a number of specific topics:

- 1. Dairy products
- 2. Dairy alternatives
- 3. Fats and oils, and fat and oil emulsions
- 4. Edible ices
- 5. Fruit and vegetables
- 6. Confectionery
- 7. Cereals and cereal products
- 8. Bakery wares
- 9. Fresh meat
- 10. Minced meat, meat preparations and MSM
- 11. Meat products
- 12. Fish and fisheries products

- 13. Eggs and egg products
- 14. Sugar, syrups, honey and table-top sweeteners
- 15. Salts, spices, soups, sauces, salads and protein products
- 16. Foods intended for particular nutritional uses as defined by Regulation (EU) No 609/2013 of the European Parliament and of the Council
- 17. Beverages
- 18. Ready-to-eat savouries and snacks
- 19. Desserts excluding products covered in categories 1, 3 and 4

- 20. Food supplements as defined in point (a) of Article 2 of Directive 2002/46/EC of the European Parliament and of the Council excluding food supplements for infants and young children
- 21. Processed foods not covered by categories 1 to 17, excluding foods for infants and young children
- 22. Others foods not covered by categories 1 to 21
- 23. Food contact materials

Table 2 provides an overview of the official controls carried out in the EU countries³ during 2020 on the above food categories and specific topics, in relation to EU rules in 10 crosscutting areas.

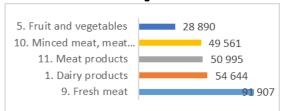
Table 3 gives an overview of the number of non-compliance issues detected and the number of administrative sanctions applied by the national authorities in the different sectors.

Both tables list the top five food categories for the specific topics.

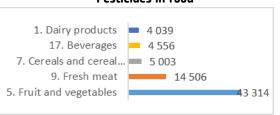
³ Malta did not report in time for this report; Belgium, Ireland, Latvia and Sweden provided incomplete data.

Table 2 - official controls - topics - top 5 - 2020





Pesticides in food



Contaminants in food



Residues of veterinary medicinal products in food



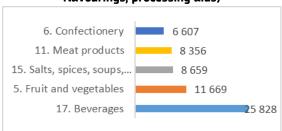
Labelling, nutritional and health claims



Genetically modified organisms (GMOs) in food



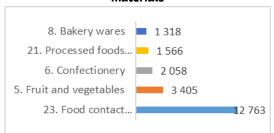
Improvement agents (additives, enzymes, flavourings, processing aids)



Irradiation of food



Contamination by/migration of food contact materials

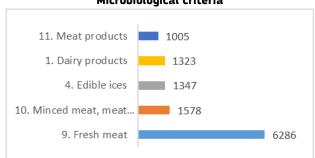


Other

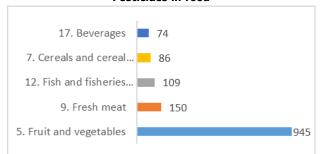


Table 3 - non-compliance issues & sanctions - topics - top 5 - 2020





Pesticides in food



Contaminants in food



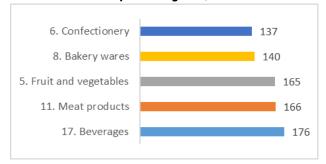
Residues of veterinary medicinal products in food



Labelling, nutritional and health claims



Improvement agents (additives, enzymes, flavourings, processing aids)



Other topics



Administrative sanctions

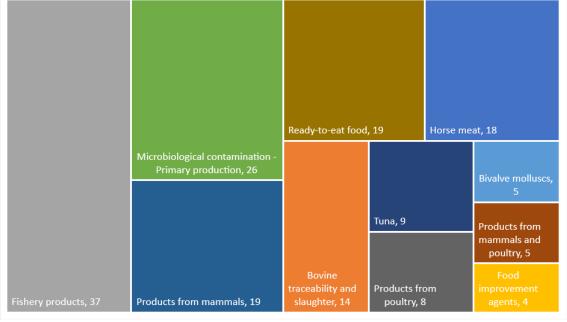


The EU countries need to report in more detail on a number of specific topics:

	Number of non- compliance issues identified	Number of administrative sanctions applied
The labelling of genetically modified organisms (GMO) used in food products	15	11
The use of unauthorised GMO's in food products	1	1
Irradiation of food	9	5
Food contact materials	1740	534
Novel food ⁴	208	146

 $^{^{4}}$ 'Novel food' is food that humans in the EU did not consume to a significant degree before 15 May 1997.

Commission controls of EU countries



The following controls in these areas are highlighted:

Ready-to-eat food

In 2019, we concluded a series of audits and fact-finding missions to assess the arrangements put in place by the competent authorities in the EU countries to verify businesses' compliance with food hygiene requirements that apply to ready-to-eat food.

The audits/missions focused on how national authorities implemented official controls in establishments that produce ready-to-eat food mainly of animal origin, which is considered to potentially pose a higher microbiological risk to consumers.

The series found that the official controls were, in general, effective in identifying hygiene non-compliance issues.

However, on-the-spot visits identified instances where national controls had either not detected certain non-compliance issues or, more often, had detected them, but had not consistently or effectively followed up to verify that businesses had rectified the problems in a timely fashion. These issues related mainly to:

- businesses' procedures to prevent cross-contamination; and
- businesses' procedures based on HACCP principles, including sampling and testing requirements.

In some cases, these non-compliance issues led to food safety alerts and outbreaks of food-borne illnesses.

These ineffective elements in the controls stem from different but sometimes shared challenges, for instance:

- addressing training/support needs for staff carrying out controls in this sector (where a substantial range of requirements need to be checked); or
- implementing more systematic reviews of businesses aimed at identifying the underlying causes of contamination incidents in order to have them address these effectively and to prevent the issues from reoccurring.

The audits also found that EU countries have put in place different measures to address some of the challenges for official controls identified in this area, as well as facilitating business operator compliance and consumer awareness.

Horsemeat

Official controls carried out by EU countries unveiled the 'horsemeat scandal' in 2013, identifying the presence of horsemeat in meat labelled as beef. The discovery led to the recall of beef products in supermarkets across Europe and further investigations, leading to prosecutions in several EU countries.

Against this background, we carried out four audits in 2019 to assess the performance of the official control systems, and to identify improvements (if any) made following the 2013 scandal.

The audits identified that the competent authorities had strengthened their official control systems and the applicable national legislation, with the aim of improving compliance with and enforcement of the relevant EU requirements, and ensuring that only horses with the correct identification and clearance for slaughter enter the food chain.

Nevertheless, the audits identified a number of deficiencies and challenges faced by competent authorities in controlling this sector. The main challenges include:

- verification of the horse passports' reliability and veracity, as these are issued by multiple bodies across the EU;
- swift corroboration of the horses' status in other EU countries' national databases;
- accuracy of the information available in these databases;
- controls on the mandatory recording of non-permitted treatments; and
- issues regarding the return of horse passports which are no longer valid to the respective passport issuing bodies.

Food of non-animal origin

In 2018 we began a second series of audits to evaluate the effectiveness of official controls to verify – and where necessary enforce - the implementation of food hygiene requirements by businesses, in particular those requirements which aim to prevent microbiological contamination of food of non-animal origin.

An initial audit series, carried out between 2013 and 2016, identified a number of shortcomings, most notably that:

- official controls on primary producers of food of non-animal origin intended to be eaten raw were not or not sufficiently focused on the risk of microbiological contaminants;
- official samples to verify microbiological contamination were rarely taken;
- as regards sprout production, controls were not sufficiently effective in verifying and enforcing the requirement that seeds used for sprouting are specifically produced for this purpose, or that they are fit for sprouting.

During the course of the initial series, we observed notable improvements in EU countries' official control systems, with more focus being placed on microbiological risks. EU countries responded positively to the recommendations made in those audit reports.

This second series extended the scope of the audits to include frozen fruits and vegetables. These products are an increasingly important food source in the EU, but are also associated with food-borne outbreaks

The first six of these follow-up audits demonstrated progress on implementing official controls at the stage of primary production, though there is still significant scope for improvement in controls on frozen soft fruits and vegetables.

The audits also established that third-party certification schemes and (associated) inspections implemented by major retailers, discounters and supermarkets play an important role in reducing microbiological risks associated with food of non-animal origin. These efforts are consistent with the General Food Law⁵, which gives food business operators primary responsibility for the production of safe food.

⁵ Regulation (EC) No 178/2002.

Genetically modified organisms

Official controls carried out by EU countries

EU countries must carry out official controls to monitor the deliberate release into the environment of genetically modified organisms (GMOs) for the purpose of food and feed production. In most EU countries, there are no deliberate release activities.

Table 4 provides an overview of the number of official controls carried out, non-compliance issues identified and administrative sanctions applied in 2020, in relation to the commercial cultivation, experimental release and seeds and vegetative propagating materials for use in food and feed⁶.

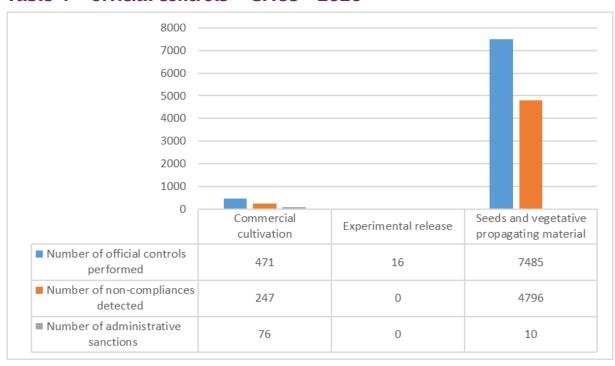


Table 4 - official controls - GMOs - 2020

Commission controls of EU countries

The 2019 and 2020 work programmes did not include any audits relating to the deliberate release of GMOs into the environment.

⁶ The use and labelling of GMO in food and feed is reported in the food and feed sections.

Feed

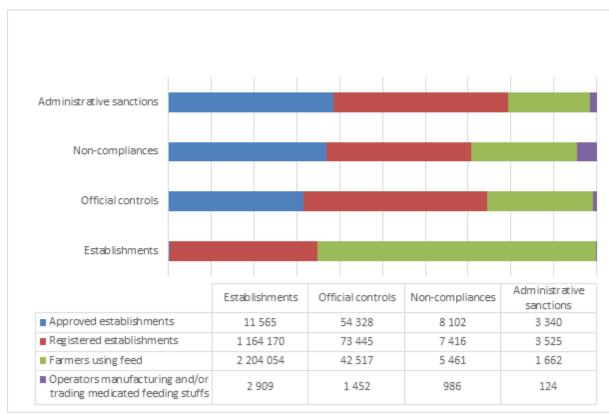
Official controls carried out by EU countries

Businesses active in the feed sector can be classified as follows:

- registered establishments;
- approved establishments⁷;
- businesses manufacturing and/or trading medicated feeding stuffs;
- farmers using feed.

Table 5 gives an overview of the numbers of establishments, official controls carried out, non-compliance issues identified and administrative sanctions applied at EU level⁸, in 2020.

Table 5 - official controls - feed - 2020



⁷ These businesses carry out operations involving more sensitive substances, such as certain feed additives, premixtures and compound feedingstuffs, requiring prior approval (all establishments need to at least be registered with the authorities).

⁸ Data for 25 EU countries: Malta did not submit its report in time to be included in this report; Luxembourg provided incomplete data.

Official controls in the feed sector cover issues such as feed labelling, traceability, additives, undesirable substances, medicated feed, pesticides and GMOs.

Non-compliance issues and sanctions were attributed to businesses' shortcomings in one or more of the following: labelling/traceability, feed safety, additives, undesirable substances, prohibited materials, medicated feed, pesticides, the use of unauthorised GMOs and the labelling of GMOs.

The graphics in Table 6 give an overview and breakdown of the numbers of official controls carried out, non-compliance issues identified and administrative sanctions applied over these different aspects⁹, in 2020.

While pesticide residues in feed is the biggest focus of official controls, most non-compliance issues and administrative sanctions related to feed labelling and traceability.

Specific non-compliance issues mentioned in the EU countries' annual reports included:

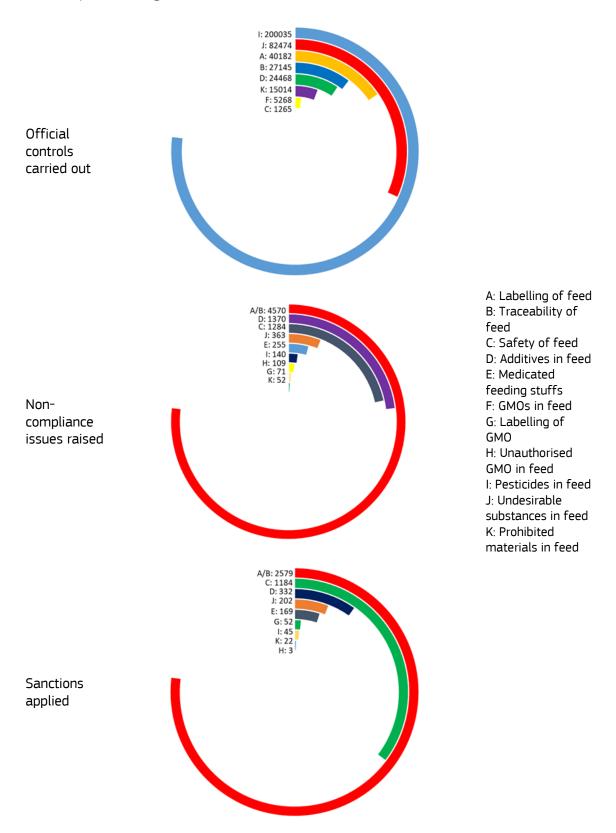
- the maintenance of premises and equipment, hygiene rules and cleanliness;
- self-monitoring plans not addressing all risks, the formalisation and updating of documents (tests, traceability, etc.), maintenance of permanent written procedures based on the HACCP principles (deficient HACCP or HACCP not being adapted or updated), lack of record-keeping or inadequate documentation;
- feed labelling;
- the status of the registration/approval: operating without registration; validity of registration/approval; non-registration of all activities;
- incorrect use of feed additives;
- the presence of undesirable substances in feed.

In its report, Estonia mentioned that it had prepared guidelines for online sales of feed.

⁹ Some EU countries indicated that they are not yet able to provide these data in the format required.

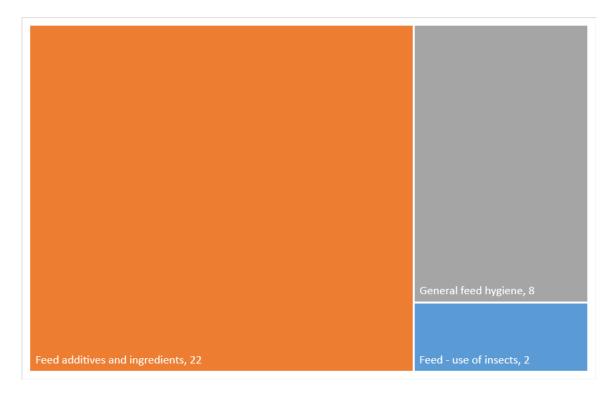
Table 6 - official controls - feed - 2020

Official controls, non-compliance issues and administrative sanctions across 11 different topics, ranked by absolute figures



Commission controls of EU countries

EU countries audited:	
Number of audits carried out:	10
	France: 2
Total number of recommendations raised:	32
Recommendations per audit area:	



In this area the following controls are highlighted:

General feed hygiene

In 2020, a series of audits built on the findings of previous audits on feed additives and processed animal proteins, which had identified some systemic weaknesses in EU countries' official controls, justifying a deeper and broader look at the overall feed sector in the EU.

The audits covered EU countries' official controls on feed hygiene, the approval and registration of feed establishments, feed labelling and EU countries' assessment of the suitability of feed business businesses' HACCP-based procedures.

We carried out three audits in 2020; three are planned in 2021, with a further three to follow in 2022.

Feed additives, their ingredients and traceability

Feed additives and their mixtures (premixtures) are used in producing feed for animals. EU countries must verify that feed manufacturers only place safe feed additives and safe feed on the market

We examined the implementation of official controls on feed additives, their ingredients and traceability in a series of audits carried out in eight EU countries in 2018 and 2019. This series resulted in an overview report in 2020^{10} .

The overall results of the audits were positive, showing that EU countries' inspections of feed additive (and feed) manufacturers and the testing of feed additives was working well. Nevertheless, several areas for improvement were noted, with common problems relating to the competent authorities' assessment of feed labelling, businesses' HACCP-based procedures and the implementation of appropriate sampling protocols. The relevant EU countries implemented corrective actions accordingly.

¹⁰ Overview report on official controls on feed additives, their ingredients and traceability.

Animal health

Official controls carried out by EU countries

Official controls carried out in relation to the identification and registration of cattle, sheep and goats

During 2020, 7% of all cattle (5% of all holdings) were the subject of an official control. 2% of all holdings were non-compliant. For 30 171 animals (0.04%) on 1 752 holdings, the authorities ordered movement restrictions, for 604 holdings (23 168 animals) this affected all animals present. For 49 237 animals (0.06%) on 83 holdings (0.004%), destruction was ordered.

For sheep and goats, 6% of the animals (4% of the holdings) were subject to an official control, with 2% of all holdings found to be non-compliant.

Belgium notes that most sheep and goats in the country are kept as a hobby, with keepers being less aware of the need for identification and registration. Czechia notes that there is a high incidence of the loss of one or both ear tags for grazing animals.

Estonia created guides and instructions for animal keepers and food business operators.

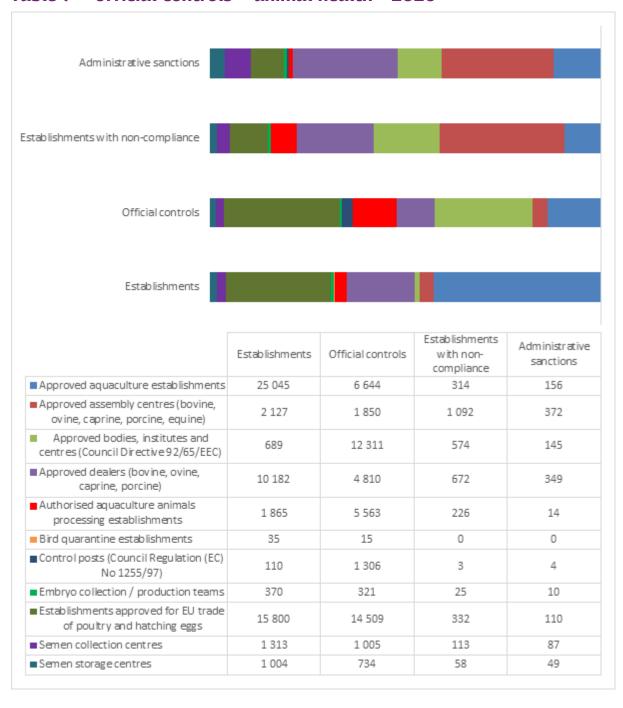
Other official controls

In addition to animal farming, there is a broad range of activities where controls relating to animal health are vital to control outbreaks and the spread of animal diseases.

Table 7 provides an overview of the number of operators involved in these activities and the number of official controls carried out, non-compliance issues identified and administrative sanctions applied¹¹, in 2020.

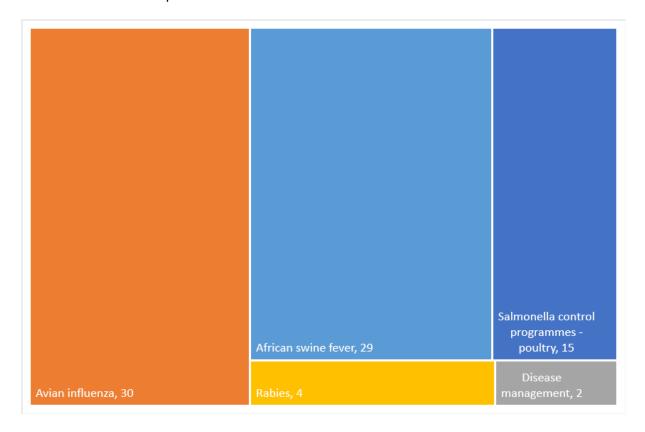
¹¹ Sweden noted that due to outbreaks of animal diseases, it had limited resources to produce the data in the field of animal health.

Table 7 - official controls - animal health - 2020



Commission controls of EU countries

Number of audits carried out: 21	EU countries audited:	
	Number of audits carried out:	21 Bulgaria: 5 – Czechia: 2 – Greece: 2 – Hungary 2
	Total number of recommendations raised:	80
Total number of recommendations raised: 80	Recommendations per audit area:	



In this area, the following controls are highlighted:

African swine fever

During 2019-2020, we carried out controls of affected EU countries and completed a series of fact-finding visits in some disease-free EU countries. These visits focused on their preparedness and response capacity for the disease if this affects wild boar.

The evidence gathered indicated that all EU countries were taking measures to prevent and prepare for a possible Spread of the disease into their territories. They were monitoring border areas properly in order to detect the disease promptly, but passive surveillance was weak in other parts of their territory. This constituted a weak point in case of geographical jump of the disease.

The Commission identified good practices, which supported the update of the EU's strategic paper on African swine fever.

Highly pathogenic avian influenza

We focused the controls on the EU countries most affected by the epidemics in 2016-17 and in 2020, and issued recommendations to improve their preparedness and response capacity.

The main shortcomings noted related to poor risk assessments for the entry of the disease, insufficient application of disease prevention and containment measures, and suboptimal epidemiological analysis to inform the rapid selection of the most suitable control measures.

The detailed knowledge obtained from some of the audited EU countries helped the Commission to manage the application of the regionalisation policy during the 2021 epidemic of the disease.

Zoonoses

The audits on *Salmonella* in poultry populations showed that the majority of EU countries are achieving their targets. The main shortcomings noted related to the low rate of detection of *Salmonella* in samples taken by farmers versus official sampling. This renders the farmers' sampling contribution to the *Salmonella* national control plans practically ineffective.

The evidence indicated that generally, vaccination programmes for eradicating rabies are properly implemented and the number of cases in animals have decreased.

Animal by-products

Official controls carried out by EU countries

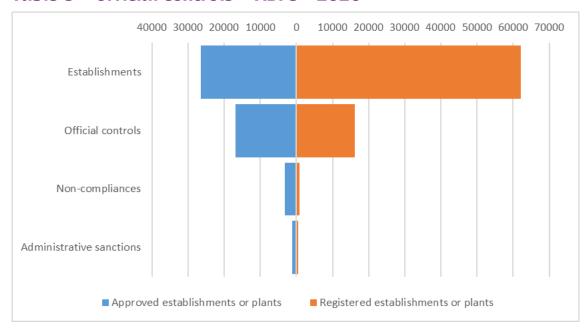
Animal by-products (ABPs) are materials of animal origin that people do not consume. ABPs can spread animal diseases (e.g. Bovine Spongiform Encephalopathy - BSE) or chemical contaminants (e.g. dioxins) and can be dangerous to animal and human health if not properly disposed of. EU rules regulate the movement, processing and disposal of these.

Table 8 provides an overview of the numbers of establishments, official controls carried out, non-compliance issues identified and administrative sanctions applied, in 2020, comparing the numbers between approved¹² and registered establishments.

Table 9 compares the numbers of non-compliance issues and administrative sanctions between two types of product non-compliance issue:

- labelling and traceability of ABPs and derived products;
- safety of ABPs and derived products.

Table 8 - official controls - ABPs - 2020



¹² These establishments process, handle or store ABPs and/or derived products (all establishments need to be at least registered with the authorities).

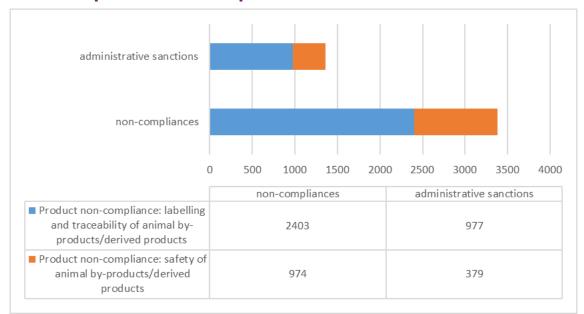


Table 9 - product non-compliance - ABPs - 2020

Non-compliance issues noted in the EU countries' annual reports include:

- the incorrect removal of ABPs, non-removal of ABPs and/or failure to hand over ABP to authorised persons;
- transport of ABPs which were not clearly identified;
- poor hygiene in storage premises, failure to prevent entry of animals and vermin, state of cleanliness of containers, inappropriate storage of ABPs;
- unsubstantiated documents, incomplete completion of documents, missing documents;
- the unauthorised placing on the market of ABPs, carrying out of unauthorised activities.

Estonia plans to organise information days on topics such as procedures based on the HACCP principles, cross-contamination, traceability and labelling requirements, as the competent national authorities consider that Estonian start-ups do not have a good overview of the requirements of the ABP Regulation.

Commission audits of EU countries

EU countries audited:	
Number of audits carried out:	8
Total number of recommendations raised:	33
Recommendations per audit area:	L

Hygiene, traceability and channelling of animal by-products (ABP) and derived products, 12

Processed animal proteins, 14

Feed ban - BSE, 7

In this area the following controls are highlighted:

Hygiene, traceability and trade requirements of processed animal proteins.

Audits on **ABPs and derived products** of mammalian origin cover EU countries' controls on meat-producing establishments dealing with ruminants and pigs and ABP processing plants, where the risk of cross-contamination or misuse of ABPs derived from different species and the risk of fraudulent practices is the highest. In 2020, three audits were carried out; five audits are planned for 2021 and a further six in 2022.

Processed animal proteins are authorised for use in certain types of animal feed, mainly for manufacturing compound feed for pets and farmed fish, and producing organic fertilisers or soil improvers. EU countries need to verify that products placed on the market

are safe and traceable, thus preventing the possible unauthorised use of materials containing processed animal protein in certain types of animal feed ('feed ban').

In 2020, an overview report on how EU countries implemented official controls on processed animal proteins¹³ collated the main findings of audits in eight EU countries, carried out in 2018 and 2019. The audits focused on processed animal proteins produced and traded between EU countries and imported into the EU, and the traceability and trade of organic fertilisers and soil improvers. We also considered the practical implementation of the requirements relating to channelling consignments of ruminant processed animal protein intended for export, following a relaxation of the feed ban rules in July 2017.

The audits found that EU countries' inspections of businesses and testing of processed animal proteins was working well overall, but that controls on cross-border traceability needed to improve. The main deficiencies identified included:

- poor or limited implementation of official controls on channelling of consignments of ruminant processed animal proteins intended for export; and
- the failure of the competent authorities and businesses to systematically record information on the movements of processed animal proteins traded within the EU, thus undermining the EU-wide traceability of these consignments.

Recommendations were made accordingly and the relevant EU countries took corrective action.

Overview report on official controls on hygiene, traceability and trade requirements of processed animal proteins.

Animal welfare

Official controls carried out by EU countries

Animal welfare on farm

Table 10 provides an overview of the numbers of production sites, official controls carried out, sites with non-compliance issues and sanctions applied, in 2020, across the animal species listed.

Sites with non-compliance Controls performed Production sites Sites with non-Production sites Controls performed Sanctions compliance ⇔ Pigs 430191 50660 4658 4370 5520 38403 559 536 88396 8287 902 805 Calves 1020998 22888 5457 6327 ™ Other 1308519 49465 8915 9911

Table 10 - official controls - animal welfare on farms - 2020

The EU countries generally did not provide a thorough analysis of the welfare of animals on farms. While some gave an indication of the main issues identified, there were generally no descriptions of action plans to improve the situation, although these are required by the EU rules¹⁴.

Animal welfare during transport

Table 11 provides an overview of the number of official controls carried out and administrative sanctions applied across the different animal species, in 2020.

¹⁴ Articles 151, 152, 156, 157 and 158 of Regulation (EU) 2017/625 require an analysis of the most serious findings of non-compliance and a national action plan to prevent or decrease their occurrence.

10% 20% 50% 60% Official controls Sanctions Cattle 248459 2728 ⇔ Pigs 394346 3124 ¬ Sheep/goats 19428 ™ Horses/donkeys 21362 123 270256 1231 ™ Other 14162 255

Table 11 - official controls - animal welfare during transport - 2020

These official controls led to a number of administrative sanctions being applied. The graphs in Table 12 show the number of sanctions applied for the different species. The main issues were:

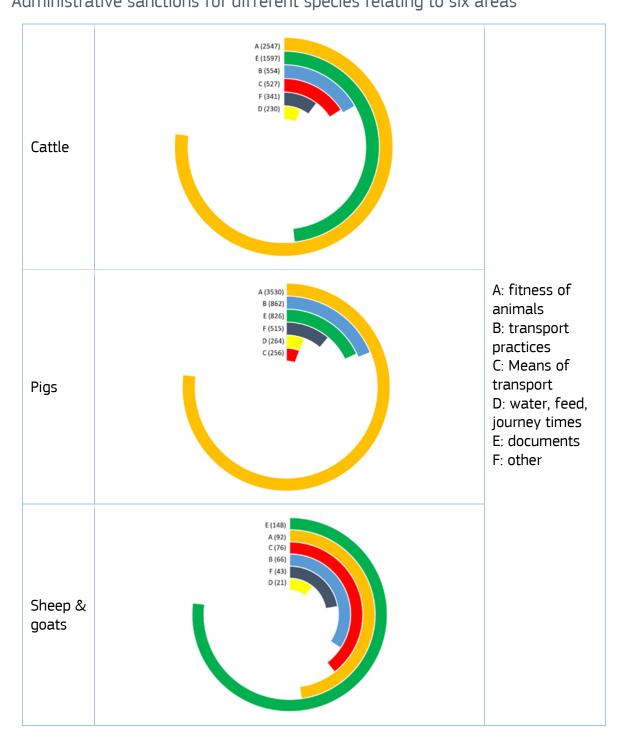
- for cattle and pigs, the fitness of animals;
- for poultry, transport practices;
- for the other species, problems with transport documentation.

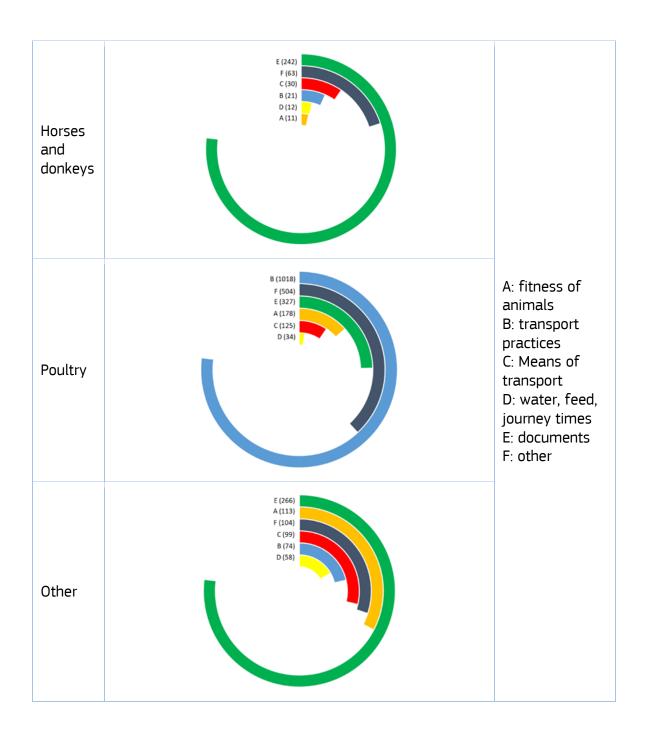
Belgium noted that foreign transporters are responsible for a significant proportion of the infringements identified, posing difficulties for enforcement. These infringements are sent to the national contact point of the relevant EU country.

There are also no clear descriptions of action plans to address major deficiencies, despite the requirement for these¹⁵.

¹⁵ Article 154 of Regulation (EU) 2017/625 requires an analysis of the major deficiencies detected and an action plan to address them.

Table 12 – official controls – animal welfare during transport - 2020 Administrative sanctions for different species relating to six areas





Animal welfare at the time of killing

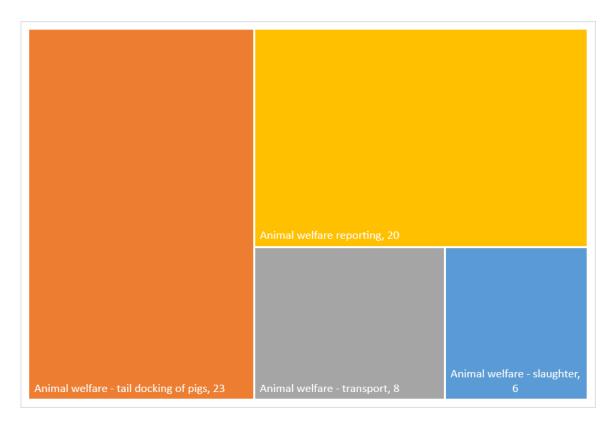
The reports contain some information regarding animal welfare in slaughterhouses and during culling of animals for animal health reasons.

Germany stated that, in its opinion, reporting on official controls on animal welfare at slaughter is optional and therefore unnecessary. Ireland also did not provide any information in this section. Greece noted that, due to resource problems, some regional services are lagging behind on animal welfare controls. Hungary indicated that it would submit the statistical data in another way, in accordance with regulations.

EU countries did not yet make full use of the ability to report these data through the new annual reporting of official controls (AROC) platform.

Commission controls of EU countries

EU countries audited:	
Number of audits carried out:	13
	France: 2
Total number of recommendations raised:	57
Recommendations per audit area:	



In this area the following controls are highlighted:

Animal welfare on farm - pigs

We completed a three-year project aimed at reducing the routine tail docking of piglets. As part of this project, we audited four EU countries and led visits to several EU countries by a team of experts with hands-on experience in rearing pigs with intact tails. The experts met

authorities and farmers and gave advice and recommendations for making progress in this area. We also assessed EU countries' action plans to reduce tail docking.

Animal welfare on farm - indicators

Through our audits and analysis, we looked at the methodologies (including the use of indicators) in EU countries to demonstrate compliance with legal requirements and to assess the state of well-being of farm animals. With a few exceptions, official services do not use animal welfare indicators and the related methodologies are still being developed. Therefore, most EU countries cannot demonstrate the necessary level of compliance in their territories regarding animal welfare, due to the absence of specific objectives and/or the lack of suitable methodologies to monitor these.

Plant health

Official controls carried out by EU countries

The EU countries have to report on the official controls carried out on businesses authorised to issue plant passports¹⁶ and businesses authorised to apply the ISPM 15 mark¹⁷ to wood packaging materials.

Table 13 provides an overview of the number of businesses involved, official controls carried out, non-compliance issues identified and administrative sanctions applied, in 2020.

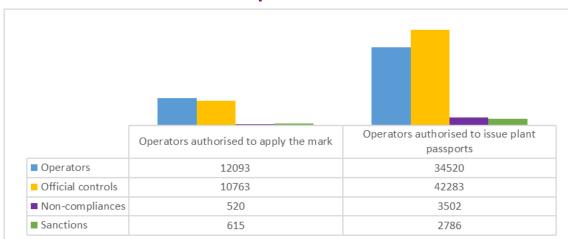


Table 13 - official controls - plant health - 2020

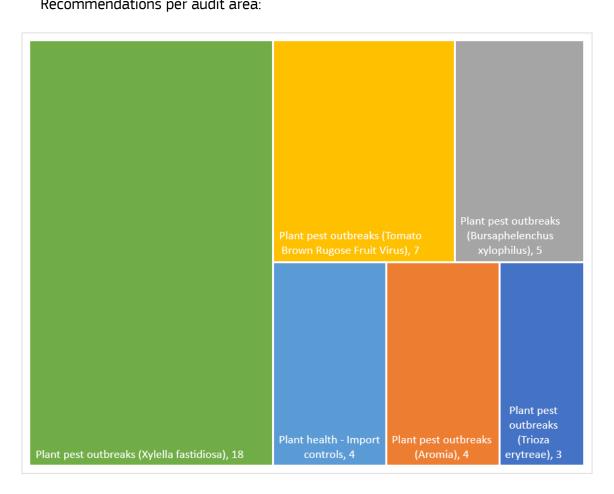
Germany noted that the introduction of the new EU regulations required a significant commitment in terms of human resources to re-register, update and educate establishments. The Netherlands and Poland reported fewer controls or less coverage, because this is a new area of controls. France stated these new regulations were the reason for the high number of non-compliance issues identified during official controls. Slovakia used the time that the COVID-19 pandemic restrictions were in place to develop materials and manuals for professional operators and inspectors.

¹⁶ Plant passports are harmonised labels that must accompany all plants for planting during all business-to-business movements within the EU, to ensure the absence of quarantine pests, compliance with regulated non-quarantine restrictions and traceability.

¹⁷ A mark on wood packaging materials shows they have undergone treatment to remove or kill pests.

Commission controls of EU countries

EU countries audited:	
Number of audits performed:	10
	Spain: 5 – Italy: 2
Total number of recommendations raised:	41
Recommendations per audit area:	



In this area the following controls are highlighted:

Controls on harmful pests and diseases

Plant health is important for sustainable agriculture and horticultural production, food security and protection of the natural environment. We continued to conduct a wide range of audit and analysis activities in the field of plant health, in EU countries (and non-EU countries that export plants to the EU), to verify compliance with EU rules.

EUROPHYT-Outbreaks

Rapid reporting by EU countries on new outbreaks of pests and diseases, and on their spread in the EU, is fundamental for assessing risk factors and better targeting EU countries' control activities. We further developed the web-based module for outbreak notifications under the EUROPHYT system, with the adoption of a common protocol for notifications. This facilitates rapid reporting and supports the harmonisation of practices between EU countries. The introduction of mapping tools in the EUROPHYT-Outbreaks system now allows the extent and localisation of outbreaks to be visualised. This supports rapid decision making, providing increased protection against phytosanitary risks.

Audits on outbreaks of pests in the EU

The EU priority pest *Xylella fastidiosa* is a bacterial pathogen that has done serious damage to olive trees. We have regularly audited control measures in all EU countries that have had outbreaks of these bacteria since its first detection in Italy in 2013. The audit results and follow-up to these have contributed significantly to improving controls in these EU countries. We continued audit and follow-up activity in Italy and other EU countries to address this particular plant health risk.

After the first EU outbreak of the tomato brown rugose fruit virus in Germany in 2018, nine further EU countries reported outbreaks of this virus in subsequent years. Its damaging effects could be of significant concern for plant health in the EU. The virus was mainly detected in tomato crops and greenhouses, but was also found in field crops and peppers. We audited the control measures taken in a number of the affected countries, to support eradication work across the EU.

Plant protection products

Official controls carried out by EU countries

Plant protection products (PPP) are subject to official controls at market level and during use.

Marketing of PPP

A range of businesses are active in the PPP distribution chain. Table 14 provides an overview of the number of operators, official controls carried out, non-compliance issues identified and administrative sanctions applied across the types of operators, in 2020.

Administrative sanctions Non-compliances Official controls Operators Non-Administrative Operators Official controls compliances sanctions ■ Authorisation/parallel trade permit 213 146 35 28 holder ■ Distributors/wholesalers/retailers professional and/or amateur use 335 181 42 22 ■ Entry points 896 1901 48 32 Manufacturers/formulators 2107 1046 28 46 2796 114 Others 2636 173 ■ Packers/re-packers/re-labellers 3337 866 104 65 ■ Storage depots/transport 74567 21475 2898 2013 operators/logistics companies

Table 14 - official controls - marketing of PPP - 2020

A specific non-compliance issue at this stage is the storage of PPP that are no longer authorised to be used.

Use of PPP and sustainable use of pesticides

Table 15 provides an overview of the number of operators, official controls carried out, non-compliance issues identified and administrative sanctions applied, in 2020, across the types of operators in relation to official controls carried out on the use of PPP and the sustainable use of pesticides. Other professional uses include use in forestry, around railways and roads, non-agricultural areas such as golf courses and other public areas, seed treatment operators and spray contractors and/or service providers.

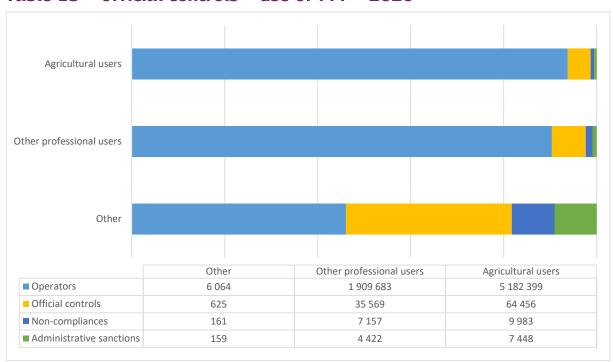


Table 15 - official controls - use of PPP - 2020

Non-compliance issues identified related to use exceeding the authorised dosage of PPPs, the use of PPPs for purposes for which they have not been authorised or the use of unauthorised PPPs, the use of PPPs in breach of the conditions for protecting groundwater and not respecting the requirement for prior notification when using rodenticides.

Commission controls of EU countries

EU countries audited:	
Number of audits performed:	9
Total number of recommendations raised:	49
Pocommondations per audit area	

Recommendations per audit area:



In this area the following controls are highlighted:

The sustainable use of pesticides

The broad range of measures set out in the Directive¹⁸ on the sustainable use of pesticides (SUD) provides the basis for reducing the risks and impacts of pesticide use on human health and the environment, in particular by promoting the use of integrated pest management (IPM) and alternatives to pesticides.

SUD report

We submitted the second report to the European Parliament and the Council on the experience gained by EU countries in implementing national targets set out in their national action plans (NAP) and on progress in implementing the sustainable use of pesticides¹⁹. The

¹⁸ Directive 2009/128/EC.

Report from the Commission to the European parliament and Council on the experience gained by Member States on the implementation of national targets established in their National Action Plans and on progress in the implementation of Directive 2009/128/EC on the sustainable use of pesticides

report concluded that, despite widespread delays in revising NAPs, and the absence of high-level, outcome-based targets in most of the revised NAPs, EU countries have made progress in implementing the SUD. The control of the implementation of IPM by farmers and growers continues to be the most widespread weakness in the application of the SUD in EU countries. This report was published alongside the Farm to Fork and Biodiversity strategies²⁰ to underline the SUD's political importance in achieving the pesticide reduction targets set out in these strategies. To this end, the Commission will propose a revision of the SUD, to reinforce the provisions on IPM, and promote the greater use of alternative ways to protect harvests from pests and diseases.

Evaluation of the SUD

We started an evaluation of the SUD and launched an impact assessment of its possible future revision, to be done in line with the Commission's guidance on Better Regulation²¹.

In May 2020, we published a combined evaluation roadmap and inception impact assessment for this initiative²². This document aims to inform people living in the EU and groups affected by this policy about this initiative and allow them to provide feedback and participate actively in future consultation activities.

We organised a Better Training for Safer Food remote workshop with EU countries' competent authorities on the topic: 'Sustainable Use of Pesticides Directive (SUD) 2009/128/EC - experiences on its current implementation and possible future policy options'. The workshop ran from 17-19 November 2020. Additional details concerning the event are available via the event website²³.

SUD implementation

In 2019, we carried out seven audits to evaluate the implementation of measures to achieve the sustainable use of pesticides. The 2020 work plan contained six audits; we postponed five of these due to the COVID-19 pandemic. We carried out one audit remotely.

We organised two series of Better Training for Safer Food courses. The first series focused on implementing IPM. These 14 courses started in 2018 and we extended the period over which these courses ran, to compensate for delays due to the COVID-19 pandemic. The second series, on pesticide application equipment, started in the third quarter of 2019. These six courses focus on inspection and calibration techniques.

40

²⁰ <u>European Commission – Farm-to-fork Strategy</u> <u>and</u> <u>European Commission – Biodiversity Strategy</u>

²¹ <u>European Commission - Better regulation: guidelines and toolbox</u>

²² Roadmap and results of this public consultation

²³ BTSF Workshop details

Harmonised risk indicators

In August 2020, we published updated EU harmonised risk indicators for pesticides for the 2011-2018 period for the EU countries (which, at that stage, included the United Kingdom). These indicators are important because they show the trends in the risks associated with the use of pesticides.

We also recently set ambitious targets to reduce the use and risk of chemical pesticides (based on Harmonised Risk Indicator 1), and the use of more hazardous pesticides by 50% by 2030, under the Commission's farm to fork strategy.

Harmonised Risk Indicator 1 (HRI 1), which measures the use and risk of pesticides, shows a decrease of 17% since the baseline period in 2011-2013, but no change compared to 2017. Harmonised Risk Indicator 2 (HRI 2), based on the number of emergency authorisations, shows an increase of 56% since the baseline period in 2011-2013, and an 8% increase compared to 2017. These results show that there is no room for complacency if the EU is to reduce the risks associated with pesticides.

Organic production and labelling of organic products

Official controls carried out by EU countries

For the 2019 reporting year, the Commission sent follow-up letters to 21 EU countries and 2 European Free Trade Association (EFTA) countries, because their annual reports for that year lacked quality or accuracy on organic data or official organic control topics²⁴.

This allowed clarification on issues related to:

- a lack of compliance with the legal control requirements (number of annual inspections, additional risk-based and unannounced inspections carried out);
- a lack of information on the number and type of non-conformities detected and information on the relevant measures applied;
- a lack of information on the supervisory activities by the competent authority in relation to the organic control bodies (audits, number of files examined, witness/review audits, major findings and follow-up given to irregularities);
- a lack of information on actions taken by the competent authority to ensure compliance by the organic businesses and/or the effective operation of their official control services.

The Commission's assessment of the annual reports submitted for the 2020 reporting year is ongoing.

EU countries may delegate to control bodies certain official control tasks and other official activities²⁵. In most EU countries, private control bodies are active in certification and official controls of organic businesses. The competent authorities are required to supervise these bodies²⁶.

Under the rules on organic production, EU countries' competent authorities for organic farming supervise the control bodies to whom they delegate official control tasks and report the results of this supervision activity to the Commission. The supervision audits include office assessments of the control procedures, witnessed audits, where the

²⁴ Annex XIIIc and XIIIb of Regulation (EC) 889/2008.

²⁵ Article 28 of Regulation (EU) 2017/625.

²⁶ Article 33(a) of Regulation (EU) 2017/625.

competent authority observes the inspection carried out by inspectors from the control body, review audits, where the competent authority directly inspects organic businesses to verify compliance with the organic rules. The competent authorities impose measures where necessary, including the withdrawal of these bodies' delegations.

Commission controls of EU countries

EU countries audited:	
Number of audits performed:	5
Total number of recommendations raised:	54

Recommendations per audit area:

The recommendations in this area are not split into further topics.

In its Farm to Fork strategy, the Commission set a target for organic farming at 25% of the EU's agricultural area by 2030. In the last 10 years, there has been an increase of 63%, to currently 8.5% of the total utilised agricultural area²⁷.

Imports of organic agri-food products are also significant, reaching 3.2 million tonnes in 2019²⁸.

We continue to carry out an annual programme of audits of the control systems for organic products produced or imported into the EU.

Private control bodies certify imports from most non-EU countries and audits of these bodies are an important part of the Commission audit programme in the organics sector, accounting for 12 of the 17 audits carried out in 2019-2020. The remaining five audits were in EU countries.

A main difference between the two cases is that control bodies in non-EU countries may apply group certification if the group has an internal control system. This approach facilitates exports from small farmers in developing countries that cannot afford individual certification. Many of the non-compliance issues found in non-EU countries relate to issues with the implementation of this system.

²⁷ Organic farming statistics provided by Eurostat.

²⁸ EU Agricultural Markets Briefs No 13, March 2019: "Organic farming in the EU. A fast growing sector".

The most frequent adverse findings identified in the audits in EU countries related to the supervision of control bodies, compliance with minimum control requirements from the control bodies, the notification to the competent authorities of non-compliance issues by businesses from the control bodies and the lack of enforcement of measures in cases of non-compliance issues.

Protected designation of origin, protected geographical indications and traditional specialities guaranteed

Official controls carried out by EU countries

EU geographical indications (GI) legally protect 3 231 registered names of products in order to promote their unique characteristics and protect the traditional expertise of their producers. More than 1 700 non-EU GIs names are protected in international agreements. Each GI has a specific standard on how the product is made, while also serving as a guarantee for the quality and authenticity of the product.

In terms of economic performance, the estimated value of sales in the EU of GI products in 2017 was EUR 74.76 billion, including the United Kingdom (EU28), accounting for 6.8% of the total food and drink sales (EUR 1 101 billion for the EU28). Wines make up 51% of this value, 35% is provided by agricultural products and foodstuffs, and drinks account for 13%²⁹.

The average value premium rate for GI products in the EU28 was estimated in 2017 at 2.07, indicating that the sales value of GI products was on average (weighted) 2.07 times higher than the sales value for comparable standard products without a GI label³⁰.

EU countries carry out official controls on businesses' compliance with product specifications and the labelling of the products, at production and marketing level.

In 2020, 26 EU countries submitted specific information on official controls and enforcement of GIs as part of their annual reports. In comparison to previous years, this is an increase in the number of reports received, while submission via the digital AROC platform considerably improved the transparency of the submitted information and data extraction.

²⁹ Study on economic value of EU quality schemes, geographical indications (GIs) and traditional specialities guaranteed (TSGs)

Study on economic value of EU quality schemes, geographical indications (GIs) and traditional specialities guaranteed (TSGs)

The national authorities identified various objectives for the official controls of GIs. Hungary noted that maintaining trust and protecting the interests of consumers was one of its objectives, and Czechia noted that ensuring the rights of the GI producers were guaranteed and respected was within their remit.

Due to the COVID-19 pandemic, some EU countries reported difficulties in carrying out the planned number of official controls (e.g. France and Belgium). By contrast, the Italian central inspectorate for the protection of quality and fraud prevention of agri-food products (ICQRF) reported that it had carried out 215.9% of its planned control activities due to an intensification of controls in e-commerce, where a particularly high number of operations took place as a direct consequence of the epidemiological situation.

National authorities applying the temporary measures³¹ in order to maintain the smooth functioning of the internal EU market and to ensure the free circulation of goods during the COVID-19 restrictions, had to closely monitor changes in the difficulties in carrying out official controls. Moreover, they were still required to apply a risk-based approach in carrying out their official controls. In this way, while relaxing certain obligations relating to official controls, the EU countries were able to ensure that producers relying on GIs did not need to de-certify their production during the pandemic.

Based on the information submitted, the following observations have been made:

- Official controls on GI included pre-market checks and checks in the marketplace. In some countries (e.g. France) 90% of the checks were pre-market, whereas in , for example, Slovakia there were 67 pre-market checks in comparison to 1 122 checks in the conventional marketplace.
- Official controls in the market place are split into checks in the physical marketplace and checks on the internet. In addition to checks on individual businesses, some national authorities also addressed GI infringements on internet platforms.
- Some countries (e.g. Estonia and Finland) indicated that e-commerce had not been separately audited or separately recorded in the control system. Some (e.g. Estonia) carried out combined checks - both in the physical marketplace and on the internet on the same businesses.
- With the growing size and frequency of e-commerce operations, checks on internet sales play an increasingly important role in establishing GI infringements. The trend to increase the proportion of checks in e-commerce can be considered as positive.

³¹ Regulation (EU) 2020/466 on temporary measures during certain serious disruptions of EU countries' control systems due to coronavirus disease (COVID-19).

- Some countries indicated a particularly high level of compliance (e.g. Greece 97.3 % and Belgium), while in others a higher non-compliance rate was detected (e.g. in France 10 % or Austria 31.4 % of non-compliance, found in 10.6 % of the businesses).
- The types of infringement included: non-compliance with the product specification, presence of substances not allowed or not declared, labelling not in accordance with the rules; and cases where non-GI products were labelled as GI.
- Some countries reported information on infringements per product or product category (e.g. Italy or Austria), while others reported per entire GI sector (e.g. Hungary - on wines).
- Enforcement actions administered included administrative and judicial actions. The
 relatively low rate of judicial actions (in comparison to the number of administrative
 actions) might indicate a relatively less serious level of infringements identified.
 Administrative actions included temporary closure of the businesses (e.g. in Hungary).
- Some EU countries with particularly high awareness of GI issues have reported a very high number of official controls for all types of checks (e.g. France carried out over 43 000checks, and Italy carried out 132 251 checks).
- Very limited or almost no information was provided on the checks of GI that originated from non-EU countries but is protected in the EU either via direct application or on the basis of international agreements.

Table 16 provides an overview of the number of businesses subject to official controls, the number of those with non-compliance issues, the number of official controls carried out, non-compliance issues raised and administrative sanctions applied, in 2020.



Table 16 - official controls - PDO/PGI/TSG/GI - 2020

Commission controls of EU countries

EU countries audited:	
Number of audits carried out:	5
Total number of recommendations raised:	14

Recommendations per audit area:

The recommendations in this area are not split into further topics.

In 2019-2020, we audited five EU countries on their control systems in this area.

The audit teams found overall well-structured systems of official controls with designated competent authorities and well-trained staff in place.

The main negative findings related to weak market controls of products from other EU countries and non-EU countries and the fact that these controls were not always based on an appropriate risk assessment. For their own products, the EU countries often failed to cover all of the elements of the product specifications when carrying out controls on producers.

Fraudulent and deceptive practices

Official controls carried out by EU countries

Fraudulent and deceptive practices are characterised by their intentional nature, aimed at achieving an economic gain, in violation of legal rules and at the expense of the immediate customer or the final consumer.

There are different types of fraud in the agri-food chain: dilution, substitution, concealment, unapproved enhancement, counterfeit products, mislabelling and forgery.

National official controls programmes

Competent authorities are required to carry out official controls to identify possible intentional violations of the rules³², through fraudulent or deceptive practices, and taking into account information regarding such violations shared through the mechanisms of administrative assistance and any other information pointing to the possibility of such violations.

EU countries reported on such official controls. Examples included official controls on:

- honey;
- olive oil;
- illicit wine production (obtained from water and sugar solutions);
- e-commerce of food supplements;
- the sector of self-storage facilities, to ensure these are registered/approved for the activities offered;
- an illegal slaughterhouse;
- the falsification of veterinary certificates regarding animal health status;
- equine identification; and
- the trade of animals.

Coordinated control programmes

EU countries contributed to EU control programmes coordinated by the Commission.

Regulation (EU) 2017/625 introduced new rules on fighting fraud in the entire agri-food chain. Article 9(2) requires EU countries to carry out official controls regularly, with appropriate frequencies determined on a risk basis, to identify possible intentional violations of the rules through fraudulent or deceptive practices.

An initial programme called upon national authorities to increase their vigilance and adapt their control activities on online offers and advertising of food in relation to COVID-19, following the rise in sales of products claiming to prevent and/or cure the disease³³.

The programme asked the EU countries to:

- trace and identify websites, sellers and businesses with illegal practices in marketing food and food supplements linked with COVID-19 sold online in the EU;
- follow-up on non-compliances and suspicions of fraudulent practices that were identified;
- strengthen the cooperation and administrative assistance between Member State authorities on the control of internet sales;
- inform consumers that products bearing COVID-19 infection-related health claims were illegal and might even be injurious to their health.

A second coordinated control programme aimed to estimate the prevalence of some non-compliances including fraudulent practices in the herbs and spices sector³⁴. 21 EU countries, Switzerland and Norway actively participated. The goal was to protect consumers from misleading and potentially unsafe products. Samples of six different herbs and spices were analysed. Oregano was identified as the most vulnerable, with 48% of the samples at risk of adulteration. The Commission called on the businesses to take the necessary actions to enhance prevention against fraudulent practices and on the national authorities to increase their official controls in the sector and sanction those businesses committing fraud.

Operations coordinated by Europol

The EU countries participate in yearly operations coordinated by Europol:

- Operation Silver Axe V³⁵, targeting the counterfeit and illicit trade of pesticides, led
 to the seizure of 1 346 tonnes of illegal pesticides. This quantity could be enough to
 spray 207 000 km², or more than all the farmland in Germany which accounts for
 nearly half the country, almost 75 % of farmland in France or more than 150 % of
 the farmland of Romania³⁶;
- Operation OPSON 2020³⁷, targeting the trafficking of counterfeit and substandard food and beverages, led to the dismantling of 19 organised crime groups involved in food fraud and the arrests of 406 suspects. The operation included more than

More information on this coordinated control plan.

More information on this coordinated control plan, including a question and answer section.

³⁵ Europol press release on Operation Silver Axe V.

³⁶ Estimation of the possible use rate of the found products, Surface of farmlands, Eurostat, 2016.

³⁷ Europol press release on OPSON 2020.

26 000 checks. As a result, about 12 000 tonnes of illegal and potentially harmful products worth about €28 million were seized. With more than 5 000 tonnes seized, animal food was the most seized product, followed by alcoholic beverages (more than 2 000 tonnes), cereals, grains and derived products, coffee and tea and condiments. Large amounts of saffron were seized: 90 kg in Spain and 7 kg in Belgium with an estimated value of more than €306 000.

Commission controls of EU countries

Our work programme did not contain audits on official controls on fraudulent and deceptive practices in 2019 and 2020.

In order to support and monitor the implementation by the EU countries of the new provisions in the Official Controls Regulation on controls on fraudulent and deceptive practices, we launched a project in 2019 including a desk study and two pilot fact-finding studies of two EU countries. In 2020, we carried out fact-finding studies on four additional EU countries, with two more planned for 2022. The information collected in 2019 and 2020 shows that the EU countries already have some arrangements in place to deal with threats of fraud in the agri-food chain, but that official controls targeting fraud are not yet systematically in place across all control areas.

We will produce a guidance document in 2022 based on the information collected in this project on challenges and examples of good practice. This will facilitate the consistent and effective application, by the national authorities, of the new provisions on fighting fraudulent and deceptive practices in the agri-food chain.

General legend

EU countries (EU27)

	Belgium	\$	Greece	Lithuania	(1)	Portugal
	Bulgaria	滅	Spain	Luxembourg		Romania
	Czechia		France	Hungary	•	Slovenia
1	Denmark		Croatia	Malta	#	Slovakia
	Germany		Italy	Netherlands		Finland
	Estonia	Rangerett	Cyprus	Austria		Sweden
	Ireland		Latvia	Poland		