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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

GREECE

FROM 23 APRIL TO 04 MAY 2012

IN ORDER TO EVALUATE THE OFFICIAL CONTROLS RELATED TO SLAUGHTER AND
PROCESSING OF FRESH MEAT, IN PARTICULAR FRESH OVINE MEAT

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

The report describes the outcome of an audit carried out by the Food and Veterinary Office (FVO) in Greece from 23 April to 4 May 2012. The main objective of the audit was to evaluate the official controls related to production and storage of fresh meat, in particular of fresh ovine meat and the follow-up action taken by the competent authorities (CAs) in response to the recommendations made in report DG(SANCO)/2009-8237- MR Final.

The structure of the CAs did not change since the last General Review mission carried out in 2010 (mission DG(SANCO)/2010-8368) and is described in the Country Profile of Greece. The representatives of the Directorate General of Veterinary Services (DGVS) confirmed to the FVO audit team the different actions carried out or planned to be carried out to address the recommendations of the audit report DG(SANCO)/2009-8237-MR Final. In particular, there has been significant progress in relation to the non-approved slaughterhouses. The DGVS informed the FVO audit team that at present those establishments which were not upgraded or rebuilt were closed apart from four slaughterhouses, all located on islands which are covered by a national derogation.

The Hellenic Food Authority (EFET) informed the FVO audit team of initiatives taken in addition to the actions already notified to the Commission services. It concerned in particular the overlap of activities, supervision, competence, auditing and lack of staff.

Procedures are in place for the approval of the establishments. The General Directorate for Internal Audit is in charge of auditing the CCA as well as the Regional and Local Authorities. In 2011 the meat sector was one of the targets of these internal audits.

A system is in place countrywide providing for the supervision and auditing of the establishments on a risk-based frequency. The supervision/audit reports were available at the established frequency in all establishments visited. However, most of these reports contained only a factual listing of the facilities and the existing documentation. As a consequence few deficiencies were identified and particularly those regarding maintenance, cleaning and operational hygiene which had been identified by the FVO audit team were not listed.

The general layout of the slaughterhouses, the structures and the equipment were mainly satisfactory. Numerous deficiencies were identified in the slaughterhouses by the FVO audit team in relation to maintenance, working operational hygiene and cleaning and disinfection. The situation was particularly poor in two establishments visited.

The operational hygiene varied, depending on the slaughterhouses visited. The respect of general and specific hygiene rules by the food business operators (FBOs) varied in the cutting plants visited.

The layout, structure, equipment, maintenance, cleaning and disinfection as well as operational hygiene of all meat processing establishments visited but two were generally satisfactory.

All establishments visited had own check procedures in place. Weaknesses were identified in relation to testing of potable water, microbiological sampling and testing of carcasses and surfaces after cleaning and disinfection. All establishments visited had procedures in place based on Hazard Analysis Critical Control Points (HACCP) principles, but deficiencies were identified in nearly all establishments where the HACCP had been evaluated by the FVO audit team.

The labelling of bovine meat checked by the FVO audit team with the exception of one cutting plant was compliant with the relevant EU regulations. Labelling and health marking were in general satisfactory as well as traceability systems in the establishments visited. Nevertheless in two meat processing plants significant deficiencies were identified in the reconciliation of the meat.

In all cases evaluated by the FVO audit team ante-mortem inspection was properly carried out and the results were documented. The Food Chain Information (FCI) was provided in accordance with the official template. Post mortem inspection was carried out by official veterinarians (OVs) in all seven slaughterhouses where it was evaluated. A number of non-compliances were identified regarding post mortem inspection. The stunning was not properly carried out in four slaughterhouses visited. In two slaughterhouses visited, the FBOs took immediate corrective action.

A number of recommendations have been made to the CA with a view to addressing the deficiencies identified during this audit.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
CA(s)	Competent Authority(ies)
CCA(s)	Central Competent Authority(ies)
CCP(s)	Critical Control Point(s)
COM	European Commission
DGVS	Directorate General of Veterinary Services (Γενική Διεύθυνση Κτηνιατρικών Υπηρεσιών)
EC	European Community
EFET	Hellenic Food Authority (Ε.Φ. Ε.Τ: Ενιαίος Φορέας Ελέγχου Τροφίμων)
EU	European Union
FBO(s)	Food Business Operator(s)
FCI	Food Chain Information
FVO	Food and Veterinary Office
HACCP	Hazard Analysis of Critical Control Points
Hygiene Package	Regulations (EC) No 852/2004, No 853/2004 and No 854/2004
MANCP	Multi-Annual National Control Plan
MRDF	Ministry of Rural Development and Food (Υπουργείο Αγροτικής Ανάπτυξης και Τροφίμων)
OV	Official Veterinarian

1 INTRODUCTION

The audit took place in Greece from 23 April to 4 May 2012 as part of the planned audit programme of the FVO. The FVO audit team comprised four auditors from the FVO.

The FVO audit team was accompanied throughout the audit by representatives from the CCA, the DGVS. The EFET accompanied the FVO audit team in meat products establishments.

The opening meeting was held on 23 April 2012 with the CCA in Athens. At this meeting the FVO audit team confirmed the objectives of, and itinerary for the audit, and additional information required for the satisfactory completion of the audit was requested.

2 OBJECTIVES

The main objective of the audit was to evaluate the official controls related to production and storage of meat, in particular of ovine meat and the follow-up action taken by the competent authorities (CAs) in response to the recommendations made in report DG(SANCO)/ 2009-8237-MR Final with regard to:

- competent authority organisation and operation;
- official controls over FBO's compliance with general and specific rules on the hygiene of food of animal origin.

In particular, controls over meat of domestic ungulates in the framework of Regulations (EC) No 178/2002, (EC) No 852/2004, (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 were subject to this evaluation, with particular emphasis on the production of fresh ovine meat.

In pursuit of these objectives, the audit itinerary included the following meetings and visits:

COMPETENT AUTHORITIES			Comments
Competent authorities	Central	2	
	Regional	9	Attica, Central Greece, Central Macedonia, Crete, East Macedonia, Epirus, Ionian Islands, Peloponnese, Thessaly
	Local	14	
FOOD PRODUCTION / PROCESSING / DISTRIBUTION – ACTIVITIES			
Slaughterhouses		10	
Cutting premises		6	Combined with a meat product plant or a slaughterhouse.
Minced meat / meat preparation establishments		6	One independent, the others combined with a cutting plant.
Meat products establishments		6	One independent, the others combined with a cutting plant.

3 LEGAL BASIS

The audit was carried out 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 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

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

4 BACKGROUND

The previous audit concerning the safety of food of animal origin in Greece was carried out from 22 June to 03 July 2009, the results of which are described in report DG (SANCO)/2009-8237 - MR Final (hereafter referred to as the previous audit report). This report is accessible at:

http://ec.europa.eu/food/fvo/index_en.cfm

The action plan received from the Greek authorities in response to the report's recommendations provided satisfactory guarantees in relation to five of the twelve recommendations and unsatisfactory responses to the remaining seven recommendations. Within the scope of this audit, the recommendations with an unsatisfactory response were related to the non-approved establishments and Rentis market, the official controls and follow-up of non-compliances identified at establishment level, the ante- and post-mortem inspection and FBOs' responsibilities related to procedures based on HACCP principles. The guarantees to two recommendations regarding the non-approved establishments and Rentis Market were closely monitored in co-operation with other services from DG SANCO.

5 FINDINGS AND CONCLUSIONS

5.1 COMPETENT AUTHORITIES

5.1.1 Designation of Competent Authorities

Legal requirements

Article 4 of Regulation (EC) No 882/2004 requires Member States to designate the CAs responsible for the purposes and official controls set out in the Regulation. It also lays down operational criteria for the CAs.

Audit findings

The structure of the CAs did not change since the last General Review mission carried out in 2010 (mission DG(SANCO)/2010-8368) and is described in the Country Profile of Greece. The Country Profile is accessible at:

http://ec.europa.eu/food/fvo/last5_en.cfm?co_id=GR

The representatives of the DGVS confirmed to the FVO audit team the different actions carried out or planned to be carried out to address the recommendations of the previous audit report. In particular, there has been significant progress in relation to the non-approved establishments. In 2009, 48 establishments were non-approved establishments. The DGVS informed the FVO audit team that at present those establishments which were not upgraded or rebuilt were closed apart from four slaughterhouses, all located on islands. These four establishments are covered by a national derogation waiting for a specific Greek legislation defining the flexibility measures applicable to low capacity slaughterhouses located in regions that are subject of special geographic constraints. The draft legislation has been prepared, notified to the Commission services and the Member States and was already discussed in the Standing Committee of the Food Chain and Animal Health. This draft is expected to be finalised after the elections planned on the 6 May 2012.

The EFET informed the FVO audit team of initiatives taken in addition to the actions already notified to the Commission services in response to the follow-up of the General Audit and General Review. It concerned in particular five horizontal issues (overlap of activities, supervision, competence, auditing and lack of staff). There has been an increase in staff from 219 in 2009 to 269 at present. An operational audit unit has been set-up and at present the EFET is designing the system for internal controls and audits. The EFET also informed the FVO audit team that new national legislation in relation to sanctions is being drafted and expected to be finalised and published soon after the elections.

5.1.2 Registration/approval of Food Business establishments

Legal requirements

Article 31 of Regulation (EC) No 882/2004 requires Member States to establish procedures for the registration/approval of food and feed business establishments, for reviewing compliance with conditions of approval and for the withdrawal of approvals.

Audit findings

The FBO has to apply to the Veterinary Unit of the Regional Department for an authorisation to establish its facilities. This application has to be supported by appropriate documentation, e.g. its "food business plan" describing the intended activities as well as a blue print of the layout of establishment. Documents requested by building and environmental legislation have also to be provided. This application is evaluated by a three member committee (two veterinarians and one engineer) and in the case of a positive evaluation the authorisation to build the facilities is granted by the Governor of the Region.

Once the facilities are established and equipped, the FBO has to apply to the same service for an operational licence. A three member committee visits the facilities and the Governor of the Region

is delivering the requested operational licence if the results of the on-the-spot visit are satisfactory.

For the establishments requiring approval by the DGVS or the EFET, the Veterinary Unit of the Regional Department has to submit a request to the central level of the DGVS or the EFET accompanied by a copy of the operational licence as well as all supporting documents and relevant information submitted by the FBO. A conditional or a full approval is granted by the DGVS or the EFET if there is a positive evaluation of the file or, if need be, after a DGVS or an EFET on-the-spot visit.

The FVO audit team noted that the report of the three member committee is not available for the FBO. In addition it was noted that in all establishments where the approval process was evaluated but one, the file to the central level contained only the request of the Regional Veterinary Unit with a copy of the operational licence. The documents foreseen in Article 6.3.2 of the Presidential Decree 79/2007 were not sent to the CCA. In the case of the DGVS, the approval is delivered automatically except in the cases where the CCA would decide to go on-the-spot. In case of the EFET, a systematic visit on-the-spot is carried out.

In different establishments visited the OV in charge of approval could not provide the FVO audit team with the documented evidence that the procedures had been followed. In one particular establishment visited, the file on the approvals was quite empty and the OV had to rely on the FBO file to try to demonstrate the activities he would have carried out in relation to the different approvals given to the establishment.

In another establishment a full approval had been issued although the establishment had not yet started to produce and that the documentation in relation to potable water sampling and HACCP was not yet satisfactory. In the same establishment, the FVO audit team noted that the lay out for the meat products production was not respecting the principle of the EU Regulation to favour the forward progress of the products. The FVO audit team also noted that this establishment had received an approval for production which was not taking place in the establishment.

5.1.3 Prioritisation of official controls

Legal requirements

Article 3 of Regulation (EC) No 882/2004 requires that official controls are carried out regularly, on a risk basis and with appropriate frequency. Controls shall be carried out at any of the stages of the production and processing chain and, in general, are to be carried out without prior warning. Controls shall be applied with the same care to exports from the EU, imports into the EU and to product placed on the EU market.

Audit findings

A system is in place countrywide which provides for the supervision and auditing of the establishments on a risk-based frequency. The criteria taken for this first stage of risk evaluation are the type of establishment, the type of production and the vulnerability of the consumers resulting in a classification of high, medium and low risk establishments. At regional level a second stage of risk evaluation is carried out taken into account criteria such as the infrastructural design of the establishment, operational hours, history of compliance during the previous audits, and HACCP bases procedures, which result in ranking the establishment. This ranking may increase or decrease the minimum level for supervision. The number of supervision visits can vary in normal

circumstances from 2 to 4 in a year.

5.1.4 *Official sampling and laboratory analysis*

Legal requirements

Article 4 of Regulation (EC) No 882/2004 requires CAs to have, or to have access to, adequate laboratory capacity. Article 11 of the Regulation establishes requirements for sampling and analysis and Article 12 requires the CA to designate laboratories that may carry out analysis of samples taken during official controls. It also lays down accreditation criteria for the laboratories so designated.

Audit findings

The FVO audit team was informed by the EFET that the official laboratories in Athens and Thessaloniki have been accredited. This accreditation covers the analysis methods for *Salmonella* and *Listeria* in ready to eat products of animal origin, and different chemical tests.

The DGVS stated that DG SANCO has been informed of their difficulties to have all *Trichinella* laboratories accredited. The national reference laboratory in Athens had instead performed and had planned further ring tests to identify the *Trichinella larvae*. In one slaughterhouse visited the OV confirmed to the FVO audit team participation in the ring test.

5.1.5 *Procedures for performance of control activities*

Legal requirements

Article 8 of Regulation (EC) No 882/2004 requires that CAs carry out their official controls in accordance with documented procedures, containing information and instructions for staff performing official controls.

Audit findings

The DGVS has issued the following instructions:

- New instructions to the OVs in charge of the slaughterhouses;
- A hand book in relation to official tasks for ungulates inspection;
- A leaflet with the obligations for the FBO;
- A SRM registration form;
- An updated check-list for the supervision/audit of the slaughterhouses;
- A template for recording the ante and post mortem inspection findings;
- A template for the FCI to be completed and signed by the holder of animals sent for

slaughter;

- A circular on carcass sampling for microbiological testing;
- A circular in relation to the *Trichinella* testing.

EFET has issued the following circulars:

- 5128/14-4-2010. Issues relating to official checks on the frequency of sampling of minced meat and meat preparations, control of nitrites and nitrates.
- Circular 6345/7-5-2010. Information about legislative developments in the field of food additives.
- Circular 3666/8-3-2011. Guidelines for issuing operating licences for businesses handling food of animal origin.

5.1.6 Training

Legal requirements

Article 6 of Regulation (EC) No 882/2004 requires CAs to ensure that staff receives appropriate training, and are kept up-to-date in their competencies.

Audit findings

The DGVS had organised training for OVs on the artificial digestion method for the detection of *Trichinella larvae* as well as on TRACES. At one slaughterhouse visited, the OV demonstrated participation in the training mentioned above, and to have provided further training to other OVs involved in *Trichinella* testing.

The EFET had organised annual training for official staff. The training provided in 2011 included the following subjects: HACCP, official controls at meat processing establishments, implementation of microbiological criteria for food establishments, research on epidemics caused by food; official controls related to contact materials, legal requirements of official controls and preliminary investigation procedures, Rapid Alert System for Food and Feed and managing food crisis/emergency situations. A training plan with similar subjects is established for 2012.

5.1.7 Enforcement measures

Legal requirements

Article 54 of Regulation (EC) No 882/2004 requires a CA which identifies a non-compliance to take appropriate action to ensure that the operator remedies the situation. Article 55 of the Regulation states that Member States shall lay down the rules on sanctions applicable to infringements of feed and food law and other EU provisions relating to the protection of animal health and welfare and shall take all measures necessary to ensure that they are implemented. The sanctions provided for must be effective, proportionate and dissuasive.

Audit findings

The follow-up of the CA findings on non-compliances identified in the establishments visited was not always adequately carried out, specially in relation to slaughterhouses. A number of issues remained during subsequent visits without appropriate actions taken by the FBO and the CAs in order to remedy the situation.

5.1.8 Verification and review of official controls and procedures

Legal requirements

Article 4 of Regulation (EC) No 882/2004 requires the CAs to ensure the impartiality, consistency and quality of official controls at all levels and to guarantee the effectiveness and appropriateness of official controls. Article 8 states that they must have procedures in place to verify the effectiveness of official controls, to ensure effectiveness of corrective action and to update documentation where needed. Under Article 4 of the Regulation CAs are required to carry out internal audits, or have external audits carried out. These must be subject to independent scrutiny and carried out in a transparent manner.

Audit findings

The General Directorate for Internal Audit is in charge of auditing the CCA as well as the Regional and Local Authorities. In 2011, the meat sector was one of the targets of these internal audits. The audit report has not yet been finalised.

As mentioned in point 5.1.4, a system is in place countrywide providing for the supervision and auditing of the establishments on a risk-based frequency.

Conclusions on Competent Authorities

The CA had undertaken a series of actions in order to address the recommendations of the previous report.

The CCA has taken the necessary corrective actions regarding the slaughterhouses, which were previously working without approval.

A documented official control system was found to have been put in place in all regions audited in relation to registration and approval of establishments, prioritisation of official controls, official sampling, performance of control activities and verification and review of official control and procedures.

The system for approving establishments was not well implemented in different regions and establishments visited.

Although the CAs have the necessary legal powers, the enforcement of EU requirements was found to be acceptable in most of the establishments visited, but to be weak in some establishments, especially in slaughterhouses.

5.2 OFFICIAL CONTROLS OVER FOOD BUSINESS OPERATORS' COMPLIANCE WITH HYGIENE RULES AT ESTABLISHMENT LEVEL

5.2.1 Animal identification and movement controls

Legal requirements

Article 4(1) of Regulation (EC) No 852/2004 requires that FBOs carrying out primary production shall also comply with some specific requirements provided for in Regulation (EC) No 853/2004 including sending only properly identified animals to the slaughterhouse and to provide slaughterhouse operators with the FCI. FBOs operating slaughterhouses must ensure that the procedures that they have put in place in accordance with the general requirements of Article 5 of Regulation (EC) No 852/2004 guarantee that each animal or, where appropriate, each lot of animals accepted onto the slaughterhouse premises is properly identified (Annex II, Section II of Regulation (EC) No 853/2004). Regulation (EC) No 21/2004 sets out the requirements for identification of ovine animals.

Audit findings

The CA in one slaughterhouse visited explained that the vast majority of ovine and caprine animals sent for slaughter in Greece are less than six months old. These animals intended for slaughter must be identified with one ear tag in the right ear with the registration number of the holding of birth. All other ovine and caprine animals must be identified with two means of identification. Depending on the age and its intended use, one means may be with a bolus or ear tag with an electronic device, the other means is an ear tag with the holding of origin.

All ovine and caprine animals seen in slaughterhouses visited were identified with an ear tag in accordance with Regulation (EC) No 21/2004.

According to Greek legislation, the animals sent for slaughter must be accompanied by an animal health certificate. In one slaughterhouse visited however, the OV received animal health certificates which were not signed. In one other slaughterhouse visited located in another region not all consignments of animals are accompanied by a health certificate. The CA in this region allowed the slaughtering of animals from the region without a health certificate if the holdings are not subject to animal health restrictions. A special computerised programme has been set up for this purpose. At the final meeting, the CCA informed the FVO audit team that the CA had been requested in this region to carry out corrective action.

Conclusion

The animal identification and movement controls were satisfactory.

5.2.2 General and specific hygiene requirements

Legal requirements

Article 4(2) of Regulation (EC) No 852/2004 establish that the FBO carrying out any stage of production, processing and distribution of food after the stage of primary production/associated operations shall comply with general hygiene requirements as set out in Annex II to Regulation (EC) No 852/2004. These provisions relate to cleaning and maintenance, layout, design,

construction, sitting and size of food premises.

Article 3 of Regulation (EC) No 853/2004 sets out that the FBO shall comply with the specific requirements of Annexes II and III to this Regulation. Article 4(3) of Regulation (EC) No 852/2004 states that FBOs shall adopt specific hygiene measures regarding compliance with microbiological criteria for foodstuffs, compliance with temperature control requirements and sampling and analyses.

Article 4(2) of Regulation (EC) No 854/2004 specifies that the CA shall carry out official controls in respect of products of animal origin to verify the FBO's compliance with these requirements.

Audit findings

Slaughterhouses

The respect of general and specific hygiene rules by the FBOs was weak in most of the slaughterhouses visited.

The general layout of the slaughterhouses visited, the structures and the equipment were in general satisfactory. Nevertheless a number of deficiencies were identified:

- In two slaughterhouses visited there were direct connections with the exterior allowing the birds to create their nests.
- In four slaughterhouses visited, hand wash basins were missing or were not placed at the appropriate location. In one establishment the ceilings were made of projected polyurethane making the surface not easy to clean.
- In one slaughterhouse, the lairage waste (urine, faeces and waste water) was not properly conducted and contaminated the environment.

Numerous deficiencies were identified in relation to maintenance, operational hygiene and cleaning and disinfection:

- *Maintenance:*

The maintenance of most areas in eight slaughterhouses visited was poor. Although the FBOs claimed to have maintenance programmes in place the physical situation found by the FVO audit team was a clear demonstration that these maintenance programmes were inadequate: floors, walls, ceilings were lacking maintenance with flaking paint in a lot of places. Rust was largely present and in all slaughterhouses corrosion of equipment and structure was noted. This situation was particularly significant in one slaughterhouse visited and very significant in another.

- *Cleaning:*

All slaughterhouses visited but two, were poorly cleaned and disinfected. In one slaughterhouse, the lairages and reception area for live animals were not appropriately cleaned and contained old dirt. The FVO audit team identified dirt on walls, floors, ceilings, other infrastructures and equipment within the slaughterhouses. Moulds and algae were present in different slaughterhouses. The FVO audit team identified different working tools, in particular saws that had not been cleaned for a long

time with crusted dirt dried in.

The situation was particularly poor in two establishments visited. In both establishments, the level of dirt caused a potential risk of contamination of the meat, which should have prevented the OV from authorising the slaughter. In one of these establishments, the FBO took immediate action to improve the situation. In the other one, a significant quantity of dirt was spread all over the establishment. The walls and ceilings were green with algae in a lot of places and, in particular, at the start of the pig line. Cigarettes butts lay on the ground. The blood from the three slaughter lines was collected in an unprotected silo, located between these slaughter lines. In addition, waste water was also collected in this silo. The cleaning of this silo was non-existent and a strong odour was emanating from it. Due to the very significant findings in relation to maintenance and cleaning identified in this establishment, the FVO audit team requested the CAs to take immediate corrective action. The FVO audit team was informed by the DGVS that due to other reasons different actions were already undertaken against this establishment including a request for the suspension of the approval. Nevertheless these actions had not been completed so far. At the end of the visit in the establishment the FVO audit team was informed of the immediate suspension of all activity in this establishment until compliance with EU standards is achieved.

- *Operational hygiene:*

The operational hygiene varied depending on the slaughterhouses visited. In most slaughterhouses visited, temperature in the sterilizers at the slaughter line did not reach the appropriate temperature at the start of the slaughter or was not maintained thereafter. Nevertheless the FBOs were able to carry out an immediate corrective action in nearly all cases.

In most slaughterhouses visited, the de-hiding of carcasses was in general acceptable although certain deficiencies were identified by the FVO audit team, such as contact of wool with the meat, de-hiding of the head prior to the de-hiding of the body, insufficient cleaning and disinfecting of hands and knives during the slaughter process, using a one knife system for bleeding, and in all slaughterhouses but one the FBOs cut through the trachea and the oesophagus. In one slaughterhouse this resulted in reflux of the stomach content on the meat. In one slaughterhouse visited, the de-hiding of the carcasses and removal of the rectum was not done in a hygienic way. Consequently, a significant number of carcasses contained faecal contamination. In addition, the FBO staff involved had not received particular training on the operational hygiene in a long time. In one slaughterhouse visited, the intestines were touching the floor when they were emptied. In one cutting plant visited, carcasses present in one slaughterhouse were significantly contaminated with faeces.

In five slaughterhouses, the changing rooms visited were not appropriate. Civil and work clothes were mixed and the unclean clothes had not been removed. Some toilets were not equipped with soap and hand drying equipment. Wash hand basins were hand operated and there was no soap or equipment to dry hands available in some toilets. Sometimes only cold water was available.

In one slaughterhouse visited, the equipment for cleaning was not stored in the dedicated rooms and, moreover, some wooden and worn out cleaning equipment was present in the production areas.

Cutting plants

The respect of general and specific hygiene rules by the FBOs varied in the cutting plants visited.

The general lay out of the cutting plants, the structures and the equipment was mainly satisfactory. Nevertheless a number of deficiencies were identified:

In two slaughterhouses visited with an adjacent cutting plant, the cutting room/de-boning hall was not in use. Instead, the reception/dispatch area of the slaughterhouses was used as cutting room/de-boning hall. This area was not equipped with sterilizers and no alternative system was in place for cleaning and disinfection of the knives and tools in use. The FBO claimed to use the room only for a limited period. In one of these establishments the room and dispatch area of the cutting plant were in use for the storage of equipment no longer in use or for storage of the forklift, packaging and similar items.

In one of these two establishments, several rooms were not in use any more. Nevertheless the FBO had not taken appropriate action to remove the obsolete equipment, to clean up these rooms and to seal them appropriately. The cutting room was oversized taking into account the limited activities and its state of cleaning and maintenance was poor. In addition staff were using an adjacent room which was not in use as a social room with very poor hygienic conditions. The CAs requested the FBO to take immediate action and the activities in the cutting room were stopped immediately as well as the “social” activities nearby.

In a third one, approved as a cutting plant and meat processing plant, the crate wash facilities were not appropriately constructed and cats had free access to the area. From this area reflux of cleaning water entered the storage area for packaging materials. The staff had to enter the facilities through the storage area for packaging materials. No hand wash facilities were present in the processing area. The only hand wash facilities available were in the toilets and, in addition, were hand-operated. There were big gap underneath two doors at the reception area. The plastic folio was not removed from the doors and consequently dirt had accumulated. There was no equipment in the cutting room for animal by-products and the dedicated storage area was used for the storage of fresh meat. The area for storage of spices and additives was not mentioned on the floor plan.

Two cutting plants visited were poorly maintained and in addition both plants were poorly cleaned and disinfected.

- *Operational hygiene*

There were no activities in the cutting plants attached to the slaughterhouses during the audit. Due to the deficiencies identified related to equipment, maintenance and cleaning, three out of the four cutting plants visited were not fit to operate.

In one of the cutting plant visited which was in operation significant contaminated carcasses were accepted and the hooks used in the cutting room were dirty despite procedures in place. Bovine carcasses had been quartered through the rope which resulted in the contamination of plastic and saw dust on the carcasses. Knives were not stored appropriately when not in use and the electric wire of the de-hiding equipment was in touch with each piece of pork meat. The cutting board contained nearly loose chips of plastic. Jumbo cartons which were dirty were re-used with own products produced without removing the original identification mark and label of another Member State. The FVO audit team requested the EFET to initiate corrective action in the cutting plant and the DGSV to initiate corrective action in the slaughterhouse of origin.

Meat processing establishments

The layout, structure and equipment of all meat processing establishments visited but two were generally satisfactory.

The maintenance, cleaning and operational hygiene of the meat establishments visited was largely satisfactory. However, in one establishment visited, the maintenance, cleaning and operational hygiene was not satisfactory. In one other meat processing establishment significant condensation had accumulated in the freezers. In a third establishment the operational hygiene was not satisfactory.

Derogated slaughterhouses

The FVO audit team visited a slaughterhouse located on an island for which a derogation of the requirement to be approved had been granted. Although built 45 years ago, the main building was well maintained and the equipment was well maintained and cleaned. Different projects had been prepared to upgrade the facilities in order to grant approval. All projects were aimed at rebuilding an oversized slaughterhouse at high costs. The FVO audit team reviewed the on-the-spot situation in detail with the CAs and it became evident that the main building could easily be transformed and upgraded to EU standards (even without a derogation) at a reasonable cost. Deficiencies regarding the operational hygiene and the implementation of own checks system and procedures based on HACCP principles were identified.

Official controls

The instructions referred to in point 5.1.5 were present, when requested, in all establishments visited.

The CAs carried out official controls at the established frequency and the reports were available in all establishments visited.

Most of the officials met during the audit were highly motivated and well aware of their duties and of the relevant EU legislation. Nevertheless, in some establishments visited, the commitment of the OV in charge of official controls was rather weak. This lack of commitment in conjunction with the poor performance of certain FBOs led to situations found by the FVO audit team where the CCA had to take immediate action.

Conclusions

The layout of the establishments visited, the structures and the equipment were in general satisfactory.

Progress was made in relation to operational hygiene although deficiencies were still identified in this area by the FVO audit team, in particular concerning de-hiding.

Nevertheless in most of the establishments audited the maintenance as well as cleaning and disinfection of facilities and equipment was inadequate. Immediate action was taken in three of the establishments by the CAs. This was primarily the result of the OV's lack of commitment, linked to the poor performance of the FBOs involved.

5.2.3 HACCP-based systems

Legal requirements

On the basis of Article 5 of Regulation (EC) No 852/2004 the FBO shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles. Section II of Annex II to Regulation (EC) No 853/2004 lays down the specific requirements for HACCP-based procedures in slaughterhouses. Official controls in respect of all products of animal origin in the scope of Regulation (EC) No 854/2004 shall include audits of HACCP-based procedures (Article 4

(3)(a) and (5) of Regulation (EC) No 854/2004).

Audit findings

Own checks

The EFET informed the FVO audit team that in case municipality water is used, the FBO should have results available from the supplier to prove that the water is potable. It is foreseen in Greek law that the supplier should carry out a full test at least once per year. In addition, the FBOs' responsibilities as set out in the EFET instruction should be a yearly test on microbiological criteria (*E. coli*, colibacteriae, total plate count at 22 and 37 degrees Celsius). This frequency may be reduced if no problems arise. The same instruction foresees that FBOs using their own wells must carry out a yearly test on all physico-chemical parameters and that each season (four times per year) microbiological criteria must be tested. The EFET instructions are also applied in the food producing establishments for which the DGVS is responsible.

Concerning own checks, the FVO audit team noted that the water analysis was sometimes not carried out at the frequency recommended by the DGVS or the EFET. In one establishment using both potable water from the public supply and water from its own well, the FBO claimed that the water from the well was dedicated to the watering of the animals of his fattening farm located nearby and would only be used in the case of a breakdown of the public network and after proper sampling. Nevertheless the physical visit on the spot demonstrated that on the contrary the water from the well was used and that the public supply was the backup.

In one establishment, the FBO stated that water was used from its own well but had not carried out tests on chemical parameters. The frequency of testing for other parameters, including microbiological parameters, was not in line with the CA's instructions.

In all establishments visited but one where the FVO audit team checked the water testing, the FBO did not test for all physico-chemical parameters.

Official controls include checks on water controls, nevertheless the CA have not commented on the shortcomings in water testing by the FBO.

HACCP

In relation to HACCP, all establishments visited had procedures in place based on HACCP principles. Nevertheless, in nearly all establishments where the HACCP have been evaluated by the FVO audit team, Critical Control Points (CCPs) were identified which were only control points. In one meat product establishment the fast cooling down of a ready to eat product was not considered as a CCP. In one establishment, the flow chart did not mention one of the steps of the production process. In one establishment a CCP (metal detection) was established for a small size meat product, but not for a similar meat product of a larger size.

The HACCP based procedures were not regularly reviewed in some of the establishments visited and consequently the HACCP based procedures contained control procedures and monitoring of the CCPs that were not carried out or records were not kept as indicated.

In one establishment visited, the responsible person for HACCP was not familiar with the HACCP based procedures.

In two meat product establishments the FBO could not prove through documentation the established expiry dates of the meat products.

Conclusions

All establishments visited had own checks and procedures based on HACCP principles in place.

Progress was made in relation to the implementation of procedures based on HACCP principles although deficiencies were still identified in these areas.

In addition, the FBOs' obligation and CA controls for potable water testing were not in line with the relevant EU requirements in relation to physico-chemical parameters.

5.2.4 Microbiological criteria for foodstuffs

Legal requirements

Details on the microbiological criteria foodstuffs shall comply with are set out in Regulation (EC) No 2073/2005. Article 1 of Regulation (EC) No 2073/2005 specifies that the CA shall verify compliance with the rules and criteria laid down in that Regulation. These cover a range of items with regard to requirements for slaughterhouses, cutting plants, emergency slaughter, game handling, raw milk and dairy products and other products of animal origin.

Audit findings

In relation to the microbiological sampling of carcasses, most of the establishments visited had sampling plans in place but did not fully implement Regulation (EC) No 2073/2005. The CCA did not allow so far any flexibility in this area for small capacity establishments.

The laboratory testing samples of carcasses for microbiological criteria taken at one slaughterhouse visited was accredited, but not yet for the relevant test methods indicated in Regulation (EC) No 2073/2005. Moreover the test results referred to a repealed Commission Decision 2001/471/EC and no reference was made to the methods used. The staff of the laboratory also took samples of surfaces to evaluate the cleanliness. However samples are only taken from equipment in direct contact with the meat.

In one slaughterhouse visited, in 2011 the FBO had taken microbiological samples from one ovine carcass of 70 000 ovine/caprine animals slaughtered. In 2012 five ovine carcasses were sampled on one day, all from the same holding of origin. At this slaughterhouse a high number of carcasses were identified by the FVO audit team with faecal contamination, whilst the test results of microbiological sampling were favourable (below m). The test results of official samples of one day slaughter indicated bacterial growth (below M but above m).

In one establishment visited although the procedures require microbiological testing, there were no defined procedures for sampling and for the parameters to be tested.

Conclusion

Most of the establishments visited had a sampling plan in place. Progress was made in relation to the implementation of Regulation (EC) No 2073/2005 but the situation remains unsatisfactory.

5.2.5 Traceability, labelling and identification marking

Legal requirements

According to Article 18 of Regulation (EC) No 178/2002 the traceability of food and food-producing animals and any other substance intended to be incorporated into a food shall be established at all stages of production, processing and distribution. The FBO shall have in place systems and procedures to identify from whom they have been supplied and the other businesses to which their products have been supplied. Article 4(6) of Regulation (EC) No 854/2004 requires that the verification of compliance with traceability requirements takes place in all approved establishments.

Provisions for the identification marking of a product of animal origin are made in Article 5 and Annex II, Section I to Regulation (EC) No 853/2004 and verification of compliance with these requirements is foreseen by Article 4(6) of Regulation (EC) No 854/2004. Article 3 of Directive 2000/13/EC sets out the particulars on the labelling of foodstuffs to be delivered as such to the ultimate consumer. Regulations (EC) No 1760/2000 and 1825/2000 set out specific labelling requirements for beef meat.

Audit findings

The labelling of bovine meat checked by the FVO audit team with the exception of one cutting plant was compliant with the relevant EU Regulations.

In one slaughterhouse visited fat intended for human consumption stored in the freezer gathered over several slaughter days did not bear any labelling. In four establishments the containers with animal by-products were not identified.

In one meat product establishment visited, one of the two containers with natural casings in the chiller were not identified and labelled with an identification mark.

Traceability systems for meat were in place in all the establishments visited. When requested by the FVO audit team the FBO was able to demonstrate backwards and forwards traceability of the animals and the fresh meat in the slaughterhouses visited.

The traceability system in place in two meat product establishments visited did not allow reconciliation of the meat used for the production of sausages. In both cases examples were seen where significantly higher amounts of sausages were produced compared to the meat used for the production and or delivered. Moreover, in one cutting plant visited, the live weight of the pigs slaughtered was indicated on the delivery documents rather than the weight of the carcasses delivered.

Conclusion

The situation in relation to labelling, traceability and identification marking was found to be acceptable in most of the establishments visited although deficiencies were identified in some of the establishments visited.

5.2.6 Food Chain Information

Legal requirements

According to Article 3 of Regulation (EC) No 853/2004, the FBO shall comply with the relevant provisions of Annex II and III to this Regulation. In particular the FBOs operating slaughterhouses must as appropriate, request, receive, check and act upon food chain information (FCI) in respect of all animals, other than wild game, sent or intended to be sent to the slaughterhouse. According to Article 5(1) of Regulation (EC) No 854/2004 the OV shall carry out inspection tasks in slaughterhouses also as regards FCI.

Audit findings

The FCI was provided in accordance with the official template. Nevertheless some of the FCI presented was not fully completed, in particular the information on transport and identification of the animals were missing.

Conclusion

The situation in relation to FCI was, with a few exceptions, satisfactory.

5.2.7 Ante-mortem and post-mortem inspection

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including ante-mortem inspection of all animals before slaughter in accordance with the general requirements of Section I, Chapter II of Annex I to Regulation (EC) No 854/2004 and post-mortem inspection in accordance with the general requirements of Section I, Chapter II of Annex I and the specific requirements of Section IV, Regulation (EC) No 854/2004.

Specific rules on official controls for *Trichinella* in meat are laid down in Regulation (EC) No 2075/2005.

Audit findings

In all cases evaluated by the FVO audit team the ante-mortem inspection was properly carried out and the results were documented.

The post-mortem inspection was carried out by OVs in all seven slaughterhouses where it was evaluated. In six slaughterhouses visited the post-mortem inspection of the carcasses was only visual. In six establishments, green offal was not inspected; in one establishment the red offal was not inspected. In four slaughterhouses, the renal fat was not in all cases removed from the kidneys and consequently not all kidneys were subjected to post-mortem inspection. It was visible in one cutting plant visited that the renal fat was also not removed from kidneys slaughtered in one recently approved slaughterhouse not visited by the FVO audit team. In three slaughterhouses the spleen was not subjected to post-mortem inspection. In one cutting plant it was found that a significant number of carcasses with faecal contamination had passed the post-mortem inspection in the slaughterhouse that had provided the carcasses.

Conclusion

Ante mortem inspection was carried out satisfactorily in all slaughterhouses visited. Significant deficiencies were identified in relation to post-mortem inspection, in particular of green and red offal and also concerning the acceptance of carcasses with faecal contamination.

5.2.8 Health marking

Legal requirements

Article 5(2) of Regulation (EC) No 854/2004 requires that health marking of carcasses of domestic ungulates, farmed game mammals other than lagomorphs and large wild game as well as half-carcasses, quarters and wholesale cuts shall be carried out in slaughterhouses and game-handling establishments by, or under the responsibility of, the OV when official controls have not identified any deficiencies that would make the meat unfit for human consumption.

Audit findings

The colours used for health marking must be authorised in accordance with EU rules on the use of colouring substances for use in foodstuffs. Nevertheless, the ink authorised for the health marking is E133 – bright blue - for carcasses with Greek or Member State origin, and the ink authorised for carcasses with third country origin is E155 – brown. In addition the name of the country of origin has to be stamped onto the carcasses. The health marking was properly carried out in the slaughterhouses visited. However, in one slaughterhouse visited, the markings of 3 out of 15 carcasses were not fully legible. The health mark on many carcasses present in one cutting plant visited were not legible. The carcasses originated from a recently approved slaughterhouse not visited by the FVO audit team.

Conclusion

Health marking was carried out satisfactorily in all slaughterhouses visited. Only minor deficiencies were identified. Greece is limiting the colours authorised to be used for health marking.

5.2.9 Animal welfare at the time of slaughter or killing

Legal requirements

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including animal welfare. Council Directive 93/119/EC sets out EU rules with regard to the protection of animals at the time of slaughter or killing.

Audit findings

The stunning was not properly carried out in four slaughterhouses visited. In two slaughterhouses visited, the correct voltage was not used but the FBO took immediate corrective action. In another establishment, the equipment allowing the control of the voltage used had not been repaired for more than six weeks. In another slaughterhouse visited, the animals were not properly fixed before stunning and all animals from the same lot were collected in the stunning area during the slaughter process. In a fifth one, the home made equipment did not allow the electricity to go through the brain at the time of stunning. Nevertheless, the animals were properly stunned.

Conclusion

Stunning of animals was properly carried out in the majority of the slaughterhouses visited, but deficiencies were identified in the others, some of them significant.

5.2.10 Documentation of official controls

Legal requirements

Article 9 of Regulation (EC) No 882/2004 requires CAs to draw up reports on the official controls carried out, including a description of the purpose of official controls, the methods applied, the results obtained and any action to be taken by the business operator concerned.

Audit findings

The CAs issued reports on the official controls carried out at the established frequency and they were available in all establishments visited. Nevertheless most of these reports contained only a factual listing of the existing facilities and documentation and provided no assessment of the level of compliance. As a consequence, few deficiencies were identified and, in particular, the non-compliances related to maintenance, cleaning, operational hygiene and animal welfare identified by the FVO audit team were not listed.

The supervision and documentation thereof was particularly inadequate in two establishments visited where the OV had found in a recent supervision audit that the situation was satisfactory although the FVO audit team identified significant or even very significant issues leading to immediate action from the CCA during the audit.

Conclusion

Official reports of official controls were drawn up, but sometimes these reports did not reflect the situation found by the FVO audit team, particularly in two slaughterhouses visited.

6 OVERALL CONCLUSIONS

A documented official control system was found to have been put in place in all regions audited.

Most officials met were highly motivated and well aware of their duties and of the EU legislation to be implemented. Nevertheless, in some establishments, the lack of commitment of the OV led to unsatisfactory situations.

The CCA has taken the necessary corrective actions in order to solve the issue of slaughterhouses working without approval.

Progress was made in relation to operational hygiene, microbiological sampling sampling of carcasses as well as the implementation of procedures based on HACCP principles although deficiencies were still identified in these areas.

Nevertheless in most of the establishments audited the maintenance as well as the cleaning and

disinfection of structures and equipment remain a significant issue.

7 CLOSING MEETING

A closing meeting was held on 4 May 2012 with the CCA. At this meeting the FVO audit team presented the findings and preliminary conclusions of the audit and advised the CCA of the relevant time limits for production of the report and their response.

The representatives of the CCA acknowledged the findings and conclusions presented by the FVO audit team. In addition, information on action already taken and planned in order to address particular findings in the establishments visited was provided. The CCA also informed the audit team that corrective action had been requested in the region where no health certificates were accompanying the animals to the slaughterhouses.

8 RECOMMENDATIONS

An action plan describing the action taken or planned in response to the recommendations of this report and setting out a time table to correct the deficiencies found should be presented to the Commission within 25 working days of receipt of the report.

N°.	Recommendation
1.	To continue the implementation of the documented official control system currently being put in place based on Article 8 of Regulation (EC) No 882/2004, paying particular attention to the effectiveness of official controls and to taking corrective actions.
2.	To take immediate strong action in all approved establishments in the country in order to improve the level of maintenance and cleanliness of structures and equipment in line with the requirements of Article 4 (2) and Annex II to Regulation (EC) No 852/2004.
3.	To take action in all slaughterhouses to correct the deficiencies identified in relation to operational hygiene requirements as described in Article 3 of Regulation (EC) No 853/2004.
4.	To improve the implementation of own checks and procedures based on Hazard Analysis Critical Control Point principles in line with the requirements of Article 5 of Regulation (EC) No 852/2004.
5.	To take appropriate action to implement the requirements of Article 3 of Regulation (EC) No 2073/2005, including the possibility of using the flexibility for slaughterhouses with low throughput provided for in Chapter 3.2 of Annex I to this Regulation.

N°.	Recommendation
6.	To ensure that the identification marking complies with the provisions of Article 5 of Regulation (EC) No 853/2004.
7.	To take strong action in all slaughterhouses to bring the post mortem inspection in line with the requirements of Article 5 and Annex I, Section I of Regulation (EC) No 854/2004.
8.	To take appropriate action to correct the deficiencies identified in relation to animal welfare at slaughter in line with the requirements of Article 6 of Council Directive 93/119/EC.
9.	To improve supervision of staff performing official controls from central and regional levels to ensure effectiveness of official controls, as required by Article 8 of Regulation (EC) No 882/2004.

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

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2012-6334

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97
Reg. 1825/2000	OJ L 216, 26.8.2000, p. 8-12	Commission Regulation (EC) No 1825/2000 of 25 August 2000 laying down detailed rules for the application of Regulation (EC) No 1760/2000 of the European Parliament and of the Council as regards the labelling of beef and beef products
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

Legal Reference	Official Journal	Title
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
Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 2075/2005	OJ L 338, 22.12.2005, p. 60-82	Commission Regulation (EC) No 2075/2005 of 5 December 2005 laying down specific rules on official controls for Trichinella in meat
Reg. 1162/2009	OJ L 314, 1.12.2009, p. 10–12	Commission Regulation (EC) No 1162/2009 of 30 November 2009 laying down transitional measures for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council
Dir. 93/119/EC	OJ L 340, 31.12.1993, p. 21-34	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing
Dir. 96/93/EC	OJ L 13, 16.1.1997, p. 28-30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
Dir. 98/83/EC	OJ L 330, 5.12.1998, p. 32-54	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption

Legal Reference	Official Journal	Title
Dir. 2000/13/EC	OJ L 109, 6.5.2000, p. 29-42	Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs