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FINAL REPORT OF AN AUDIT
CARRIED OUT IN
GREECE
FROM 09 TO 19 APRIL 2013
IN ORDER TO EVALUATE THE USE OF THE TRACES SYSTEM

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

Executive Summary

This report describes the outcome of an audit carried out by the Food and Veterinary Office in Greece from 9 to 19 April 2013.

The overall objective of the audit was to determine whether the system in place ensures that official staff enter in TRACES all required data, and whether this information is entered correctly and timely.

Overall, the report concludes that the Department of Sanitary Veterinary Controls (DSVC) has overall responsibility for the implementation and coordination of TRACES. Other Directorates and Departments of the DGVS and the Ministry of Rural Development and Food also use TRACES.

There are instructions and training for the TRACES users in place. Overall, there was good knowledge of the TRACES system, even though, for some specific issues, there were no instructions or these were insufficiently detailed. The instructions are generally more complete and detailed for BIPs than for the Local Veterinary Units (LVUs).

The BIPs use TRACES as required. Shortcomings were noted in the use of TRACES at LVU, in particular as regards the confirmation of receipt of incoming consignments at the controlled destinations and confirmation of controls carried out at the destination.

Verification of the correct use of TRACES is carried out by the central competent authority at BIPs as part of the inspection visits to each BIP, which are planned to take place every two years. There is no formal plan to verify the correct use of TRACES at LVUs with the exception of follow-up of a few consignments.

The report makes a number of recommendations addressed to the Greek competent authorities, aimed at rectifying the identified shortcomings and further enhancing the control measures in place.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
animal by-products	Animal by-products
AHD	Animal Health Directorate of the Directorate General of Veterinary Services (Διεύθυνση Υγείας Ζώων)
BIP	Border Inspection Post
BTSF	Better Training for Safer Food – Commission training initiative covering food and feed law, animal health and welfare and plant health rules
CED	Common entry document for certain products of non-animal origin
CVED	Common veterinary entry document for products of animal origin and for live animals
DGVS	Directorate-General of Veterinary Services within the Ministry of Rural Development and Food (Γενική Διεύθυνση Κτηνιατρικής)
DI	Directorate of Informatics (Διεύθυνση Πληροφορικής)
DPE	Designated Point of Entry
PSQCPPO	Directorate of Processing, Standardization and Quality Control of Products of Plant Origin (Διεύθυνση Μεταποίησης, Τυποποίησης και Ποιοτικού Ελέγχου Προϊόντων Φυτικής Παραγωγής)
DSCV	Department of Sanitary Veterinary Controls (Τμήμα Υγειονομικού Κτηνιατρικού Ελέγχου) - the central competent authority for the implementation of TRACES
ELOGAK	Hellenic organisation for milk and meat (Ελληνικός Οργανισμός Γάλακτος και Κρέατος)
EU	European Union
FVO	Food and Veterinary Office
INTRA	Harmonized model certificate for intra-EU trade of live animals and products of animal origin
LVU	Local veterinary unit
MRDF	The Ministry of Rural Development and Food (Υπουργείο Αγροτικής Ανάπτυξης και Τροφίμων)
POAO	Products of animal origin
RASFF	Rapid Alert System for Food and Feed of the European Commission

SLVU	Super local veterinary unit – a virtual TRACES entity for covering specific TRACES tasks
TRACES	TRAdE Control and Expert System

1 INTRODUCTION

This audit took place in Greece from 9 to 19 April 2013. The audit team comprised three auditors from the Food and Veterinary Office (FVO). The audit team was accompanied throughout the audit by representatives from the central competent authority.

An opening meeting was held on 9 April 2013 with the representatives from the central competent authority, which for the scope of this audit is the Department of Sanitary Veterinary Controls (DSVC - Τμήμα Υγιεινής κτηνιατρικών ελέγχων), other Departments of the Directorate-General of Veterinary Services (Γενική Διεύθυνση Κτηνιατρικής) and Directorates of the Ministry of Rural Development and Food (Υπουργείο Αγροτικής Ανάπτυξης και Τροφίμων).

At this meeting, the objectives of and the itinerary for the audit were confirmed. Additional information required for the satisfactory completion of the audit was provided by the central competent authority.

2 OBJECTIVES

The objective of the audit was to determine whether the Greek competent authorities are filing into TRACES (TRAde Control and Expert System) all required data and whether this information is entered correctly and in a timely manner.

Regarding the scope:

1. The audit covered products of animal origin, live animals and products of non-animal origin.
2. The activities covered during the audit included intra-EU trade, import and export of live animals and products of animal and non-animal origin.
3. The audit covered all the user levels for TRACES within the Greek competent authorities.
4. The use of TRACES by private operators and authorities in Third Countries was excluded from the scope of this audit.
5. The following data were assessed:
 - Part I and II of TRACES intra-EU trade animal health certificates for animals and products of animal origin, where such certificates are required by EU legislation and Part III where a check is undertaken;
 - Part I and II of Common Veterinary Entry Documents for products (CVEDP) and live animals (CVEDA) imported into or transiting through the EU;
 - Common Entry Documents (CED) for imported products of non-animal origin, and
 - TRACES commercial documents for intra-EU trade of animal feed.

The table below lists the sites visited and the data covered in order to achieve the above objective:

Location	Competent authority	Comments and data covered
DSVC Headquarters	DSVC	Opening and closing meeting
BIPs: - Piraeas Port - Kakavia Road - Thessaloniki Airport		- CVEDs (imports, transits, laboratory results, re-imports, transhipments)

LVUs: - Ioannina - Thessaloniki		- CVEDs (imports, checks at destination, confirmation of arrival to controlled destination) - INTRA (intra-EU trade of live animals and POAO)
SLVU: - Heraklion		- CVEDs (imports, transits, laboratory results, re-imports, transhipments, Decision 94/641/EC)
DPE: - Thessaloniki Port	DPSQCPPO	- CEDs (imports of certain products of non-animal origin)

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.

EU legal acts quoted in this report refer, where applicable, to the last amended version.

4 BACKGROUND

TRACES is an integrated web-based system to support veterinary controls, maintained by the European Commission 'Health and Consumers Directorate General' (DG SANCO), which notifies, certifies and monitors imports, transits, exports and intra-EU trade in animals and animal products. Economic operators (private sector) and competent authorities all over the world can use this web-based network to trace back and forth animal and animal product movements.

The specific situation of the EU common border requires fluent and complete communication between the different border inspection posts dealing with import/transit controls of live animals and products of animal origin, allowing each official to take decisions in accordance with the information available from other entry points and what is available in TRACES when the system is correctly used.

All the information contained in the common veterinary entry documents provided for in Commission Regulation (EC) No 136/2004 (for products of animal origin), in Regulation (EC) No 282/2004 (for live animals) and in the certificates for intra-Union trade as harmonised by Commission Regulation (EC) No 599/2004 must be entered into TRACES by Member States. This requirement was introduced over a period and was fully applicable as from 1 January 2006.

Traditionally, the use of TRACES for import controls of products of animal origin and live animals was included within some FVO audits to Member States. Those audits uncovered non-compliances and FVO reports included recommendations in those areas.

Some of the problems detected included mismatching of data between documents accompanying products and/or animals and the information recorded in TRACES, delayed entry of data, incomplete entry of data and lack of feedback from controlled destinations. The system has been continuously evolving and has been upgraded numerous times to adapt it to new needs. Although new versions are usually notified via relevant release notes, TRACES users in Member States were not always found to be aware of the changes.

The Commission continues encouraging competent authorities of Member States and Third Countries, and private operators to use TRACES and its correct use is paramount to ensure fluent cross-border communication and effective EU import and animal movement controls. The use of the system is expanding to cover other areas such as products of non-animal origin. In this context,

the Commission considered it important to audit TRACES implementation and its use in more depth with the aim of identifying the root cause of the shortcomings so they can be addressed in an effective and efficient manner, contributing to increase the effectiveness of the controls at EU level.

Based on the information available in TRACES, during 2012 in total 9,732 consignments of POAO and 788 consignments of live animals were presented for veterinary controls at Greek BIPs and to competent authorities at certain Greek islands. Another 3,111 consignments of live animals and POAO were traded within the EU from/to Greece.

In relation to imports of products of non-animal (plant) origin, an assessment of use of the CED (Common Entry Document) module was implemented in June 2011: it is used by 16 Member States. 25 to 30% of the imports covered by CED legislation (Regulations (EC) No 669/2009 and 1152/2009 of the Commission) are recorded in TRACES.

The Commission is currently working intensively to increase the awareness amongst officers of the competent authorities of the Member States on the use of TRACES application at DPE level. For this purpose there are several courses developed within the BTSF programme.

5 FINDINGS AND CONCLUSIONS

5.1 COMPETENT AUTHORITIES

Legal Requirements

Article 1 of Decision 92/486/EEC requires Member States to designate an authority to be responsible for coordination between authorities within each Member State.

Articles 2 and 3 of Decision 2004/292/EC require Member States to ensure that certain data are entered into TRACES.

Article 4 (3) of Regulation (EC) No 882/2004 requires efficient and effective coordination and cooperation between different competent authorities. Article 4 (5) requires that, when more than one unit within the same competent authority is competent to carry out official controls, efficient and effective coordination and cooperation is ensured between those units.

Findings

MRDF has the general responsibility for the implementation and coordination of TRACES, but the main responsibility for implementation and coordination of TRACES is with the DSCV. More details on the organisation of competent authorities can be found in the country profile for Greece available at:

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

There are two national TRACES coordinators in Greece, one from the DSCV and one from the Directorate of Informatics within the MRDF (DI). The former deals with veterinary issues and has overall responsibility for the tasks performed within TRACES while the latter is responsible for the technical issues (network, login failures etc.). The coordinators are also responsible for training.

DSCV staff are using TRACES for recording the results of import/transit controls on live animals and products of animal origin by issuing the CVEDs at the BIPs and the SLVUs, and for recording the results of official controls on live animals and products of animal origin in intra-EU trade by issuing the INTRA certificates at the LVUs.

The following Directorates and Departments are also involved in issuing instructions and/or using TRACES:

- Department of Feedingstuffs: for intra-EU trade of animal by-products (animal by-products) by LVUs;
- Directorate of Veterinary Support, Drugs, Application and Animal Welfare: for recording and planning of animal welfare controls during transport, at control posts and at destination;
- Staff of different DGVS Directorates for monitoring/planning specific activities: internal audits, controls at establishments (slaughterhouses, dairies) etc.);
- Directorate of Processing, Standardisation and Quality Control of Products of Plant Origin (DPSQCPPO): for import controls of certain products of non-animal origin for human consumption by two DPEs within the Pilot Project on implementation of TRACES for the controls under the Regulation (EC) No 669/2009;
- Hellenic Food Authority: for receiving proposals for launching the RASFF notifications and subsequent re-enforced check trials as the national RASFF contact point;
- ELOGAK: for monitoring and controlling the financial balance of meat imported from third countries;
- Office of Controls on Imported Goods: controls on a daily basis the amount of imported products of animal origin and non-animal origin.

According to the statement of the DSVC, the Customs could be a new user of TRACES in the future based on the results of the recent meeting from December 2012. The final decision, however, shall be taken at “high” level, as DSVC representative stated.

DVSC is the main contact point for queries related to TRACES from other Member States or from the Commission. Officials from that department participate in the TRACES working group meetings.

The audit team noted the following:

- Data related to checks carried out at slaughterhouses in Greece on intra-EU trade of animals for slaughter are not currently being entered into TRACES. The competent authorities have not considered that the controls carried out at the destination (e.g. animal welfare at arrival to destination, ante-mortem checks) should be notified in the Part III of the INTRA certificate. No instruction was issued in relation to the LVU staff yet.

Conclusions on competent authorities

The competent authorities have been designated and the responsibilities allocated to various divisions are clear. Generally, the DSCV effectively coordinates TRACES-related questions between the relevant authorities.

5.2 RESOURCES FOR THE PERFORMANCE OF CONTROLS

5.2.1 Staff and provision of facilities

Legal Requirements

Decision 2009/821/EC defines ‘veterinary unit’ and it states that TRACES shall cover all veterinary units and Member States and shall designate a veterinary unit only if that unit has the adequate equipment to make it compatible with the functioning of TRACES and ensure that all parts of their territory fall within the responsibility of a local unit and, where appropriate, of a regional unit.

Article 4 (2) (c) of Regulation (EC) No 882/2004 requires the competent authority to ensure that they have access to a sufficient number of suitably qualified and experienced staff.

Article 4 (2) (d) of Regulation (EC) No 882/2004 requires the competent authority to ensure that they have appropriate and properly maintained equipment.

Findings

All BIP staff and certain LVU/SLVU staff have access to TRACES.

Officials at some LVUs are divided into departments at the main office and the satellite units (Veterinary Centres). Generally, and it was also the case of the LVUs visited, the main office staff had access to TRACES, but not the staff at Veterinary Centres. In that case, the staff from the Veterinary Centres sent the relevant documents manually filled in (intra-EU trade certificates, confirmations of arrival of consignment to controlled destination, notification of control on consignment etc.), usually by fax, and the officials at the department at the main office entered the data into TRACES on behalf of the officials from the Veterinary Centres.

The audit team noted the following:

- Appropriate facilities and all the necessary equipment were available at all locations visited during the audit.

5.2.2 Staff qualifications and training

Legal Requirements

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

Findings

Veterinarians and administrative officials at the BIPs, LVU/SLVU enters data into TRACES. At DPE other officials, who are graduates, enter data into TRACES under the Pilot Project (food of plant origin).

A training group established to identify needs has recently been established (Ministerial Decision, December 2012). Its main aim is to identify needs for training and provide knowledge and improve the skills of the officials. In planning for training, the group is taking into consideration the emerging issues, FVO audits' findings, new legislation and the results of their own verification system (monitoring, supervision and audit processes).

A new initiative has been started aiming to capture the present state of knowledge within the organisation and identify the key links that connect knowledge and performance. This project designed by the National Center for Public Administration training department uses appropriately designed questionnaires to identify knowledge inventory and needs for training. Officials can download it and fill it to assess and report their needs.

Formal annual TRACES training has been provided by National Center for Public Administration and DSVC at National level since 2004. When necessary, individual training is taken into consideration (new BIP staff, exchange of staff). The system also relies on on-the-job training at local level, updating knowledge via information provided by the competent authority and the regular use of TRACES.

Officials from different Units participated in BTSF (Better Training for Safer Food) training on the use of TRACES. There is a systemic approach to disseminate the received knowledge and the

training materials, using e-mails, phone communication and presentations on the next training prepared by the BTSF participants.

The officials of DSCV stated that the Intranet is currently being upgraded and that not all TRACES users nationwide have access to it. They also noted that the Intranet is planned to be used for sharing the entire body of knowledge and information flow, including training, legislation, working instructions etc.

The Directorate of Informatics (DI) within the MRDF has developed a module for TRACES training on an electronic platform (*Moodle*) in May 2012. The successful user of this training module, using the simulations of a real case scenario of live animals or POAO import/transit, is granted a certificate. The officials of the DSCV stated that this training initiative targets to improve the efficiency and effectiveness of the TRACES system operation through a learning-by-doing process for the TRACES users.

The audit team noted the following:

- Officials met at all locations visited during the audit had a good understanding of TRACES and its use.
- Training plans are targeted to address the training needs of the users.
- Only four users of the Moodle training platform were registered and have undergone training at the time of the FVO audit.

5.2.3 Procedures for performance and reporting of control activities

Legal Requirements

Article 8(1) of Regulation (EC) No 882/2004 requires that competent authorities carry out their official controls in accordance with documented procedures, containing information and instructions for staff performing official controls.

Article 4(4) of Regulation (EC) No 882/2004 requires the competent authorities to ensure the impartiality, consistency and quality of official controls at all levels.

Article 4(2) (f) of Regulation (EC) No 882/2004 requires the competent authority to ensure that they have contingency plans in place and that they are prepared to operate such plans in the event of an emergency.

Article 9(1) of Regulation (EC) No 882/2004 requires the competent authority to draw up reports on the official controls that it has carried out.

Findings

Information on TRACES related issues (e.g. updates, new version, system failures, and new guidelines) is communicated to TRACES users by circulars via e-mail and post. The TRACES manuals translated into Greek are also available on the TRACES website.

There are two TRACES Help Desks for on-line/on-call problem solving; DSCV for veterinary matters and the issues relevant for the DPEs and DI for technical issues (e.g. network, log-in failure, etc.). In cases where a written solution is issued by one Unit, the other is sent a copy to ensure consistency. Essential contact details are written on the official documents circulating, and also communicated to all participants during training.

The BIP manual contains an official contingency plan for an event that access to TRACES is unavailable for an extended period of time. The instruction requires the issuing of a hard copy with

the data being subsequently entered into TRACES once available. If the unavailability time-period exceeds 24 hours, the information on issued CVED/INTRA shall be sent to the LVU/BIP of destination by fax or e-mail.

The audit team noted the following:

- Officials met were aware of the available information on the TRACES website.
- No comprehensive list of distributed circulars was available at the time of the FVO audit, which did not facilitate the relevant users to be sure they have all the circulars available. This also makes supervision/audit difficult.
- Some TRACES related issues were implemented in different Units visited with a significant variation (confirmation of arrival to the controlled destination, notification of carried out controls at destination etc.).
- All users met were aware of the Help Desk contact details and they stated that they use the Help Desk regularly.
- Staff at the BIPs visited, were aware of the contingency plan for TRACES unavailability. This was verified at one of the BIPs visited. Although there was no such case recorded within the checked time period of 2012, the preparedness for it was demonstrated.
- No contingency plan for the TRACES unavailability was issued for the LVU staff using TRACES. The competent authorities stated that a manual for the LVUs is currently being drafted.

Conclusions on resources for the performance of controls

Staff with appropriate knowledge and infrastructural resources are available. An administrative framework provides information and instructions to TRACES users mainly via an email and post and through the TRACES website. The lack of a contingency plan for the LVUs in the case of TRACES unavailability means that the competent authority cannot ensure that this type of contingency would not disrupt the implementation of controls.

5.3 VERIFICATION AND REVIEW OF OFFICIAL CONTROLS AND PROCEDURES

5.3.1 Verification procedures

Legal Requirements

Article 4 (2) (a) of Regulation (EC) No 882/2004 requires competent authorities to guarantee the effectiveness and appropriateness of official controls.

Article 8 (3) of the same Regulation requires 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.

Findings

The DSVC is responsible for the verification of the correctness of the use of TRACES by the BIPs and LVUs/SLVUs. However, the DSVC representatives stated that, because the verification at the LVU level does not appertain to the responsibilities of the central competent authority, but to those of the provincial authorities, their task is more of consultation or advice, not enforcement.

The DPSQCPPO is responsible for the verification of the correctness of the use of TRACES by the two DPEs involved in the Pilot Project on implementation of TRACES for the controls under the Regulation (EC) 669/2009.

Ministerial Decision 261390/2009 requires the central competent authority to carry out the BIP supervision with the minimum frequency of one visit every two years. The use of TRACES is verified during these supervision visits

There are documented procedures for the BIP supervision in place, which include check lists, reporting, and if needed corrective actions. Follow-up of implementing the corrective action is foreseen, however, according to the statement of the competent authorities due to the lack of resources, mainly financial, this is not always followed.

The audit team noted the following:

- The competent authorities representatives stated, due to good cooperation and communication between DSVC and the LVUs, informal supervision is in place; however, it is not documented properly (no informal supervision reports are issued) and the enforcement of the corrective actions is challenging.
- The DSVC stated that they do random checks of the CVEDS and INTRA certificates entered into TRACES; however, no records of these random checks are kept. Irregularities are communicated without delay to the relevant BIP or LVU. The results of these checks serves as a background for the next supervision or training purposes.
- The DSVC supervision of the use of TRACES at the BIPs followed the frequency laid down by the Ministerial Decision. Six out of ten BIPs in Greece were supervised in 2012 and the rest are planned for 2013.
- The DSVCs supervision reports of the BIPs visited during the FVO audit did not indicate any shortcomings with the use of TRACES, even though, the FVO audit team identified repeated irregularities of the data in the Part I of the CVED accepted by the BIPs and entered into TRACES compared with the data in the relevant health certificates.
- At the entry BIPs visited, all notifications of arrival to controlled destination were received; however, it was not always done by LVUs via TRACES and no effective enforcement of the implementation of the corrective actions was demonstrated by the DSVC.
- No supervision on the use of TRACES by the SLVUs staff, located at certain Greek islands for carrying out import controls under the derogation laid down in Decision 94/641/EC, has been carried out yet. One of the SLVU only started to use TRACES just before the FVO audit.
- Supervision on the use of TRACES at LVU level was not carried out by any of the Authorities.
- Not all results of controls carried out at the destination were entered into Part III of the INTRA certificate in a case of intra-EU trade of live animals (e.g. animal welfare checks, checks at slaughterhouses of the slaughter animals) even though such controls were done. This was not identified by the competent authorities verification.

5.3.2 Audits

Legal Requirements

Article 4 (6) of Regulation (EC) No 882/2004 requires competent authorities 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.

Findings

An internal audit unit (Directorate of Veterinary Audits and Controls) carries out audits in relation to all control activities carried out by the DSVC according to a five-year risk based audit plan. This includes control activities related to intra-EU trade and BIPs and also includes matters related to the use of TRACES.

The audit team noted the following:

- There was an audit series on import/control system which also covered the use of TRACES during 2006 to 2008. One of the BIPs visited during the FVO audit was audited in 2007 by the internal audit unit. Two recommendations regarding the training and a use of TRACES were given to the audited BIP.
- Since 2007, these audits are carried out in compliance with the Decision 2006/677/EC.
- A new audit of the BIPs is planned for 2014. According to the representatives of the competent authority, the objectives and scope for the audits will be detailed by December 2013.
- Verification at LVUs and SLVUs does not fall under the remit of the central competent authority, it is responsibility of the Prefectures, which report to the Ministry of Internal Affairs. The findings described under headings 5.4 and 5.5 indicate that at this levels the verification was not effective.

Conclusions on verification and review of official controls and procedures

Verification activity, including audit, in relation to the correct use of TRACES at BIPs is well developed and contributes to improving data entry, even though some shortcomings noted by the FVO audit team had not been identified by the Greek competent authorities.

The verification is less developed at the LVU and SLVU levels, where this is competence of the Prefectures, and repeated errors remain undetected.

5.4 USE OF TRACES

Legal requirements

All the information contained in the common veterinary entry documents provided for in Commission Regulation (EC) No 136/2004 (for products of animal origin), in Regulation (EC) No 282/2004 (for live animals) and in the certificates for intra-Union trade as harmonised by Commission Regulation (EC) No 599/2004 must be entered into TRACES by Member States.

5.4.1 USE OF TRACES AT BIPs AND SLVUs

Findings

About 90% of the consignments are pre-notified electronically via TRACES. E-mail and fax notifications are accepted as well. There is no difference in the fee charged between electronic or other forms of notification of consignments prior arrival.

The staff at BIPs and SLVU visited were aware of the TRACES functionality and they use the lists of establishments and the model certificates provided on the TRACES website regularly.

BIPs usually correct incorrect data in Part I of CVED, occasionally they return them for correction to the person responsible for the load when more significant problems are detected, but in some cases incorrect Part I of the CVED were entered into TRACES by the BIPs.

The competent authority indicated that they carry out checks of all incoming TRACES messages at least once a day. There is no written instruction related to the frequency for checking incoming messages.

There is an instruction that the results of laboratory tests should be entered into TRACES by the BIP when received. In most cases, this instruction was followed.

There is no detailed instruction on how it is ensured that confirmation of receipt (Box 41 of CVED) of consignments is completed by LVUs within TRACES when required by Article 3 (2) (c) of Decision 2004/292/EC. Confirmation of exit for the majority of transits were notified via Box 41 of CVED correctly and timely.

No transshipment operation was reported by the competent authorities. According their statement, no such operation was notified by the person responsible for the load or identified during BIP cross-checks of manifests provided by the shipping agents or airlines at the BIPs visited.

The audit team noted the following:

- 70 CVEDs selected randomly at three BIPs visited did not present significant issues regarding the use of TRACES.
- The audit team noted shortcomings in a number of pre-selected CVEDs. The most repeated issues were incorrect descriptions of goods in Part I of the CVED and missing confirmation of arrival at the controlled destinations in Box 41 of the CVED by the LVUs, even though the e-mail or fax confirmations were documented in the BIPs. These issues were discussed and clarified with the central competent authority and BIP staff.
- During the audit, a person responsible for the load for one consignment was asked by the BIP staff at one of the BIPs visited to correct the data in Part I of the CVED.
- The audit team did not note shortcomings related to the delayed checks of TRACES notifications.

5.4.2 USE OF TRACES AT LVUs

Findings

Most of intra-EU trade in Greece are incoming movements. During 2012, the Greek LVUs issued 274 intra-EU trade certificates and received 2837 intra-EU trade consignments.

Outgoing trade

1.- Live animals

Different procedures are applied at individual LVUs visited, partially due to lacking detailed instructions for LVUs and to different structures of the LVUs visited.

At one LVU visited, the same staff were responsible for the whole process of certification including the issue of the INTRA certificates in TRACES.

At another LVU visited, different staff were involved in the process: the certifying official veterinarian of the Veterinary Centre responsible for the holding/assembly centre, checked the document authorising the movement of live animals from the holding to the assembly center and approved the issuing of an INTRA certificate by LVU. The official veterinarian at LVU department entered the data into TRACES and the printed copy of the INTRA certificate was sent back to the Veterinary Centre for verification of correctness and further authorisation of the certificate (by stamp and signature). The hard copy of the certificate accompany the consignment and the LVU department official veterinarian completes the TRACES certificate to trigger the TRACES notification to competent authority at destination.

2.- Products

Very few animal by-products are traded from Greece to other Member States and no INTRA certificate has been created via the DOCOM module within TRACES as the registration of Economic Operators is not prepared yet from the central competent authority.

No animal by-products of category 1 and 2 as defined in Articles 8 and 9 of Regulation (EC) No 1069/2009 were traded by Greece in 2012, which would require prior agreement by the competent authorities of destination and notification on arrival.

Incoming trade

1.- Live animals

LVUs cover geographical areas and within them, the competent authorities are usually organised on a sectoral basis (e.g., public health animal health, animal by-products, animal welfare).

There is no formally harmonised system for LVUs to cover screening of incoming messages. In some LVUs visited, staff from each department screened the TRACES notifications for messages within their own area of responsibility, In other LVUs one official screened all messages and printed, registered and distributed them to the relevant department, who later takes action.

2.- Products

The screening of TRACES messages on incoming consignments was organised in the same way as described for live animals above.

In cases where consignments that require confirmation of receipt at destination, e.g., channelled, re-imported consignments or consignments imported under national rules, big variation in use of TRACES was noted by the audit team. While, in one region, the LVU confirmed the arrival of the consignment to the controlled destination via TRACES (Box 41 of the CVED), in another, the LVU sent the confirmations only by fax or e-mail and did not confirm receipt via TRACES. No instructions in this respect were issued for LVUs as yet.

The issues of animal by-products trade were discussed at only one LVU visited as at the other one, the responsible person was attending a training course and no other staff were dealing with this matter. According to the statement of the LVU staff and the central competent authority, only category 3 material was traded to Greece, where no confirmation of arrival is foreseen.

The audit team noted the following:

- No shortcomings related to outgoing trade were noted by the audit team. However, the completion of registration of the Economic Operators will facilitate the use of TRACES for intra-EU trade of animal by-products.

- Incoming trade: most LVUs include a wide range of sectors who are interested in messages related to issues which fall within their area of responsibility (e.g. animal health, public health).
- No control on consignments of live animals intended for slaughter was confirmed in Part III of the INTRA certificate by relevant LVU in TRACES, which is not in compliance with Article 3.2(a) of Decision 2004/292/EC. The central competent authority stated, they haven't considered the need for confirmation of the animal welfare or ante-mortem checks in TRACES.

5.4.3 USE OF TRACES AT DPEs

Findings

Only two DPEs are participating on the Pilot Project on the use of TRACES for certain products of non-animal origin imported for human consumption.

The competent authorities showed the audit team their feedback to the Commission describing the difficulties and problems identified. During the Pilot Project, the competent authorities did not take a decision to provide for electronic notification of incoming consignments.

The DPE staff and the competent authorities suggested filtering the TRACES messages to distinguish between CEDs and CVEDs, in order to increase the efficiency of the controls. They considered time-consuming to screen all incoming messages where only a few are of interest to the DPE.

The audit team noted the following:

- According to the national requirements the consignments should be notified at least 24 hours prior to arrival. Often the notification in PART I of the CED is sent to the DPEs via fax only one or two days after arrival of the consignment.
- Following the official checks in the presence of the customs agent, the hard copy of the CED is issued on-the-spot and later entered into TRACES. This could delay some two-three days, as stated by the DPE staff.

Conclusions on the use of TRACES

Overall, BIPs and the SLVUs are using TRACES correctly. The absence of effective verification of the controls leads to repetition of the identified issues (e.g. correct data in Part I of the CVED, confirmation of arrival of the consignments to the controlled destination via TRACES).

LVUs are using TRACES correctly. However, inadequate implementation of Article 3.2 of Decision 2004/292/EC from the central level leads to the absence of instructions about which consignments need confirmation of controls at destination, therefore those controls are not filled into TRACES by LVUs.

The use of TRACES by DPEs is only at the pilot phase. The DPE visited contributes actively on identifying difficulties in the use of TRACES.

6 OVERALL CONCLUSIONS

The Department of Sanitary Veterinary Controls within the Animal Health Directorate of the Directorate General of Veterinary Services has the overall responsibility for the implementation and

coordination of TRACES. Other Directorates and Departments of the DGVS and the Ministry of Rural Development and Food also use TRACES.

There are instructions and training for the TRACES users in place. The instructions are more complete and detailed for BIPs than for the LVUs. Overall, there was good knowledge of the TRACES system, even though, for some specific issues, there were no instructions or these were insufficiently detailed.

Generally, the BIPs use TRACES as required by EU legislation. Some shortcomings with the use of TRACES at Local Veterinary Units (LVUs) were noted, in particular as regards the confirmation of receipt of incoming consignments at the controlled destinations and confirmation of controls carried out at the destination.

Verification of the correct use of TRACES is carried out by the central competent authority at BIPs as part of the inspection visits to each BIP, which are planned to take place every two years. There is no formal plan to verify the correct use of TRACES at LVUs with the exception of follow-up of a few consignments detected via desktop analysis by the competent authorities or notified by other Member State.

7 CLOSING MEETING

A closing meeting was held on 19 April 2013 with representatives of the central competent authority. At this meeting, the main findings and preliminary conclusions of the audit were presented by the audit team. The Authorities commented upon and did not express disagreement with the findings and conclusions presented.

8 RECOMMENDATIONS

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

Nº.	Recommendation
1.	To ensure correct and uniform use of TRACES by all users, and in particular in relation to the confirmation of arrival of the consignments to a controlled destination, in accordance with Article 3.2(c) of Decision 2004/292/EC, and the consequent controls carried out at the destination in accordance with Article 3.2(a) of Decision 2004/292/EC.
2.	To ensure that the procedures laid down in Article 8 (3) of Regulation (EC) No 882/2004 to verify the effectiveness of official controls cover all TRACES users, and specifically LVUs, in order to guarantee the effectiveness and appropriateness of the controls.
3.	To ensure that the contingency plan required in Article 4.2(f) of Regulation (EC) No 882/2004, for an event whereby access to TRACES is unavailable for an extended period of time, covers all TRACES users, including LVUs.

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=2013-6895

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Reg. 1069/2009	OJ L 300, 14.11.2009, p. 1-33	Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation)
Reg. 136/2004	OJ L 21, 28.1.2004, p. 11-23	Commission Regulation (EC) No 136/2004 of 22 January 2004 laying down procedures for veterinary checks at Community border inspection posts on products imported from third countries
Reg. 282/2004	OJ L 49, 19.2.2004, p. 11-24	Commission Regulation (EC) No 282/2004 of 18 February 2004 introducing a document for the declaration of, and veterinary checks on, animals from third countries entering the Community
Reg. 599/2004	OJ L 94, 31.3.2004, p. 44-56	Commission Regulation (EC) No 599/2004 of 30 March 2004 concerning the adoption of a harmonised model certificate and inspection report linked to intra-Community trade in animals and products of animal origin
Reg. 669/2009	OJ L 194, 25.7.2009, p. 11-21	Commission Regulation (EC) No 669/2009 of 24 July 2009 implementing Regulation (EC) No 882/2004 of the European Parliament and of the Council as regards the increased level of official controls on imports of certain feed and food of non-animal origin and amending Decision 2006/504/EC
Reg. 1152/2009	OJ L 313, 28.11.2009, p. 40-49	Commission Regulation (EC) No 1152/2009 of 27 November 2009 imposing special conditions governing the import of certain foodstuffs from certain third countries due to contamination risk by aflatoxins and repealing Decision 2006/504/EC
Dir. 97/78/EC	OJ L 24, 30.1.1998, p. 9-30	Council Directive 97/78/EC of 18 December 1997 laying down the principles governing the organisation of veterinary checks on products entering the Community from third countries

Legal Reference	Official Journal	Title
Dir. 91/496/EEC	OJ L 268, 24.9.1991, p. 56-68	Council Directive 91/496/EEC of 15 July 1991 laying down the principles governing the organization of veterinary checks on animals entering the Community from third countries and amending Directives 89/662/EEC, 90/425/EEC and 90/675/EEC
Dec. 94/641/EC	OJ L 248, 23.9.1994, p. 26-27	94/641/EC: Commission Decision of 8 September 1994 laying down rules applicable to veterinary checks to be carried out on products imported into certain Greek islands from third countries
Dec. 2004/292/EC	OJ L 94, 31.3.2004, p. 63-64	2004/292/EC: Commission Decision of 30 March 2004 on the introduction of the Traces system and amending Decision 92/486/EEC
Dec. 2006/677/EC	OJ L 278, 10.10.2006, p. 15-23	2006/677/EC: Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules
Dec. 2009/821/EC	OJ L 296, 12.11.2009, p.1	2009/821/EC: Commission Decision 2009/821/EC of 28 September 2009 drawing up a list of approved border inspection posts, laying down certain rules on the inspections carried out by Commission veterinary experts and laying down the veterinary units in Traces

TRACES TOOLKIT is available at:

https://circabc.europa.eu/webdav/CircaBC/Sanco/TracesToolkit/Information/traces_toolkit.html