FINAL REPORT OF A MISSION
CARRIED OUT IN GREECE
FROM 17 TO 21 SEPTEMBER 2001 IN ORDER TO EVALUATE
THE IMPLEMENTATION OF CERTAIN PROTECTIVE MEASURES
AGAINST
BOVINE SPONGIFORM ENCEPHALOPATHY

Please note that factual errors in the draft report have been corrected in bold, italic, type.

Clarifications provided by the Greek Authorities are given as footnotes, in bold, italic, type, to the relevant part of the report.
TABLE OF CONTENTS

1. INTRODUCTION .......................................................................................................5

2. OBJECTIVES OF THE MISSION .............................................................................5

3. LEGAL BASIS FOR THE MISSION.........................................................................6

4. BACKGROUND .........................................................................................................7
   4.1. Background to present mission........................................................................7
   4.2. General information...........................................................................................7

5. MAIN FINDINGS .......................................................................................................8
   5.1 BSE epidemio-surveillance and testing of bovine animals ...............................8
      5.1.1 Follow up of the recommendations of the previous mission..............8
      5.1.2 BSE epidemiological situation.................................................................10
      5.1.2 Active epidemio-surveillance ...............................................................11
      5.1.3 Passive epidemio-surveillance..............................................................19
      5.1.4 Eradication measures .....................................................................19
   5.2 Feeding of processed animal proteins (total feed ban) ....................................20
      5.2.1 Follow up of the recommendations of the previous mission............20
      5.2.2 Transposition of Community legislation ...........................................21
      5.2.3 General information on the feed industry ........................................21
      5.2.4 Information provided to the operators ...............................................21
      5.2.5 Approval procedure for the production and the use of derogated processed animal proteins .................................................................21
      5.2.6 Official control..................................................................................22
      5.2.7 Withdrawal of processed animal protein from the market, distribution channels and from on-farm-storage..................................24
      5.2.8 Trade of processed animal proteins ...................................................24
      5.2.9 Channeling of processed animal protein............................................25
      5.2.10 Measures implemented in farms (animal holders)............................26
5.2.11 Tallow ................................................................. 26
5.3 Specified Risk Material .............................................. 26
  5.3.1 Follow up of the recommendations of the previous mission ......... 26
  5.3.2 Legal provisions and administrative instructions ....................... 26
  5.3.3 Official controls .................................................................. 27
  5.3.4 Removal ............................................................................. 28
  5.3.5 Separation .......................................................................... 28
  5.3.6 Staining .............................................................................. 28
  5.3.7 Channelling ........................................................................ 28
  5.3.8 Processing, storage and destruction ....................................... 29
5.4 Other findings .......................................................................... 29

6 CONCLUSIONS ........................................................................ 30
  6.1 Epidemio-surveillance ............................................................. 30
  6.2 Feeding of processed animal proteins ........................................ 31
  6.3 Specified Risk Material ............................................................ 32
  6.4 Others: public health issues regarding the slaughterhouses’ hygiene .......... 33
  6.5 Overall conclusion .................................................................. 33

7 FINAL MEETING ..................................................................... 34

8 RECOMMENDATIONS TO THE GREEK AUTHORITIES ............. 34
  8.1 With regard to epidemio-surveillance ........................................ 34
  8.2 With regard to the feeding of processed animal proteins ............... 35
  8.3 With regard to Specified Risk Material ...................................... 36
  8.4 With regard to Public health ..................................................... 36
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Active surveillance</strong></td>
<td>Sampling and testing of animals in the framework of the annual monitoring programme or subject to routine examination at slaughter, as laid down in Annex IV, point 2(2) of Commission Decision 98/272/EC and Annex III-1 to Regulation (EC) No 999/2001</td>
</tr>
<tr>
<td>BSE</td>
<td>Bovine Spongiform Encephalopathy</td>
</tr>
<tr>
<td>CA</td>
<td>Competent authority: Directorate-General for Veterinary Matters</td>
</tr>
<tr>
<td>CFS</td>
<td>Compound Feedstuff</td>
</tr>
<tr>
<td>Fallen stock</td>
<td>Bovine animals that have died on the farm</td>
</tr>
<tr>
<td>FVO</td>
<td>Food and Veterinary Office</td>
</tr>
<tr>
<td>HRM</td>
<td>High-risk material, as defined in Council Directive 90/667/EEC, Article 3</td>
</tr>
<tr>
<td>LRM</td>
<td>Low-risk material, as defined in Council Directive 90/667/EEC, Article 5</td>
</tr>
<tr>
<td>LVS</td>
<td>Local Veterinary Station</td>
</tr>
<tr>
<td>(M)MBM</td>
<td>(Mammalian) meat and bone meal</td>
</tr>
<tr>
<td>MRM</td>
<td>Mechanically recovered meat, as defined in Commission Decision 2000/418/EC, Article 4 and Annex XI to Regulation (EC) No 999/2001</td>
</tr>
<tr>
<td>OTM</td>
<td>Over thirty months of age</td>
</tr>
<tr>
<td>PAP</td>
<td>Processed animal proteins, as defined in Council Decision 2000/766/EC, Article 1</td>
</tr>
<tr>
<td>Passive surveillance</td>
<td>Sampling and examination of bovine animals, which have been notified by farmers or veterinarians as showing clinical signs that might clearly or remotely indicate BSE</td>
</tr>
<tr>
<td>PFD</td>
<td>Purchase For Destruction scheme implemented by Commission Regulation (EC) 2777/2000 which was applicable from 1/1/2001 until 30/6/2001</td>
</tr>
<tr>
<td>Pithing</td>
<td>Laceration, after stunning, of central nervous tissue by means of an elongated rod-shaped instrument introduced into cranial cavity</td>
</tr>
<tr>
<td>PVS</td>
<td>Prefectural Veterinary Services</td>
</tr>
<tr>
<td>Rapid test</td>
<td>Approved rapid test, as set out in Annex IV A of Commission Decision 98/272/EC and Annex X Chapter C point 4 of Regulation (EC) No 999/2001 as amended</td>
</tr>
<tr>
<td>RL</td>
<td>Rapid test Laboratory</td>
</tr>
<tr>
<td>SRM-MBM</td>
<td>Meat and bone meal originating from the pre-treatment of Specified Risk Materials</td>
</tr>
<tr>
<td>TSE</td>
<td>Transmissible Spongiform Encephalopathies</td>
</tr>
<tr>
<td>UTM</td>
<td>Under Thirty Months of age</td>
</tr>
<tr>
<td>VI</td>
<td>Veterinary Inspector</td>
</tr>
</tbody>
</table>
1. INTRODUCTION

The mission was carried out in Greece from 17 to 21 September 2001. The mission team was composed of three inspectors of the Food and Veterinary Office (FVO) and was accompanied during the whole mission by representatives from the Central Competent Authorities.

This mission was undertaken as part of the FVO's planned mission programme.

An opening meeting was held on 17 September 2001 with the Central Competent Authorities (CCA), the Directorate General of Veterinary Services (the Animal Health Directorate for the epidemio-surveillance, and the Veterinary Public Health Directorate for the SRM) and the Directorate General for Animal Production for the Total Feed Ban issues. At this meeting, the objectives of, and the itinerary for the mission were confirmed by the inspection team, and additional information required for the satisfactory completion of the mission was requested.

2. OBJECTIVES OF THE MISSION

The main objective of the mission was to evaluate the implementation of certain reinforced protection measures against BSE, in particular:

- EC rules concerning epidemio-surveillance for transmissible spongiform encephalopathies (TSE), as laid down in Commission Decision 98/272/EC\(^1\), amended by Decision 2000/374/EC\(^2\), Decision 2000/764/EC\(^3\), and Decision 2001/8/EC\(^4\);
- EC rules concerning the testing of bovine animals for the presence of bovine spongiform encephalopathy (BSE) and amending Decision 98/272/EC on epidemio-surveillance for transmissible spongiform encephalopathies, as laid down in Commission Decision 2000/764/EC, as amended by Commission Decision 2001/8/EC;
- EC rules adopting exceptional support measures for the beef market, as laid down in Commission Regulation (EC) 2777/2000\(^5\) (Article 2 and 5);
- EC rules concerning the feeding of animal protein (total feedban), as laid down in Commission Decision 2000/766/EC\(^9\), as amended\(^{10}\).

---

\(^2\) OJ L 135, 8.6.2000, p.27.
\(^3\) OJ L 305, 6.12.2000, p. 35.
\(^4\) OJ L 2, 5.1.2001, p. 28.
\(^7\) OJ L 173, 27.6.2001, p.12
\(^8\) OJ L 177, 30.6.2001, p.60
• EC rules regulating the use of material presenting risks as regards transmissible spongiform encephalopathies and amending Decision 94/474/EC (Specified Risk Material, SRM), as laid down in Commission Decision 2000/418/EC\textsuperscript{11}, as amended\textsuperscript{12}.

In terms of scope, and with regard to both epidemi-surveillance and SRM, the mission concentrated on implementation of the EC provisions in relation to bovine animals, from the time of the previous mission (February 2001) until mid-September 2001.

In pursuit of the above objectives, the following were visited:

<table>
<thead>
<tr>
<th>COMPETENT AUTHORITY VISITS</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Competent Authority</td>
<td></td>
</tr>
<tr>
<td>Central</td>
<td>2</td>
</tr>
<tr>
<td>Opening meeting (Athens)</td>
<td></td>
</tr>
<tr>
<td>and final meeting</td>
<td></td>
</tr>
<tr>
<td>(Axioupolis)</td>
<td></td>
</tr>
<tr>
<td>Regional</td>
<td>2</td>
</tr>
<tr>
<td>Prefectoral Veterinary</td>
<td></td>
</tr>
<tr>
<td>Services (Serres and Kilkis)</td>
<td></td>
</tr>
<tr>
<td>Local</td>
<td>2</td>
</tr>
<tr>
<td>Local Veterinary Stations</td>
<td></td>
</tr>
<tr>
<td>(Serres and Axioupolis)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LABORATORY VISITS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>National</td>
<td>1</td>
</tr>
<tr>
<td>National Reference Laboratory for Rapid Tests working also as laboratory for routine rapid tests (Thessaloniki)</td>
<td></td>
</tr>
<tr>
<td>Regional</td>
<td>1</td>
</tr>
<tr>
<td>Laboratory for the rapid tests (Larissa)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ANIMAL PRODUCT PROCESSING SITES (non-human consumption)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Animal feed manufacturers</td>
<td>1</td>
</tr>
<tr>
<td>One feed mill with a production line for ruminants and another one for non ruminants where fishmeal is used (Stylida)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FOOD PROCESSING ESTABLISHMENT</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Slaughterhouses</td>
<td>2</td>
</tr>
<tr>
<td>Two slaughterhouses (Thessaloniki and Serres)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FARMS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
</tr>
<tr>
<td>The farm where the first Greek BSE case occurred (Pontoiraklia)</td>
<td></td>
</tr>
</tbody>
</table>

### 3. LEGAL BASIS FOR THE MISSION

The mission was carried out under the general provisions of Community legislation and, in particular:

- Commission Decision 98/139/EC\textsuperscript{13} laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in the Member States,

\textsuperscript{11} OJ L 158, 30.6.2000, p. 76
\textsuperscript{13} OJ L 38, 12.2.1998, p. 10
- Art. 6 of Commission Decision 98/272/EC concerning epidemio-surveillance of TSEs,
- Art. 3 (4) of Commission Decision 2000/764/EC on the testing of bovine animals for the presence of BSE,

4. BACKGROUND

4.1. Background to present mission

- A previous FVO mission (reference number DG(SANCO)/3234/2001 – MRfinal) concerning BSE epidemio-surveillance, feed ban and specified risk material had been conducted in Greece from 12 to 16 February 2001.

The report of this mission is available on the Commission’s internet site:
http://europa.eu.int/comm/food/fs/inspections/vi/reports/greece/index_en.html

- The current mission was carried out to evaluate the set of Community legislation adopted to enhance TSE controls and in particular the Community rules on epidemio-surveillance, testing of bovine animals for the presence of BSE and the temporary total feed ban, which came into force from 1 January 2001.

In addition to the evaluation of the legislation mentioned above, the mission was undertaken as a follow up mission. The main recommendations of the previous mission related to the scope of the present mission are outlined in italics under the appropriate headings in section 5.

4.2. General information

- Ruminant population:

  Dairy cattle: 337,319 animals in 19,884 holdings (210,373 aged over 24 months)
  Beef cattle: 188,626 animals in 7,706 holdings (107,308 aged over 24 months)
  Free grazing cattle: 155,911 in 3,880 herds
  Buffaloes: 826 animals in 12 holdings

  TOTAL: 682,682 bovine animals, including at least 317,681 aged over 24 months

  Sheep: 5,107,039 animals in 62,900 single species flocks
  Goats: 2,975,266 animals in 22,300 single species flocks
  Sheep and goats: 4,248,545 animals in 38,040 mixed flocks

  TOTAL: 12,330,850 small ruminants

- Slaughterhouses: 64 including 33 with an EU approval number, where 14,295 bovines aged over 24 months were slaughtered in 2000.
5. MAIN FINDINGS

5.1 BSE epicemi-surveillance and testing of bovine animals

5.1.1 Follow up of the recommendations of the previous mission

- (1) "The CCA should take measures to ensure the awareness of farmers with regard to TSE, by ensuring the transmission of adequate documentation to the farmers".

A leaflet has been produced and distributed indirectly to farmers through the Prefectoral Veterinary Services, farmers and private vet's Unions and associations and directly to individual large cattle owners. However the number of leaflet available is not sufficient to provide one copy to each farmer.

An agency providing courses to farmers (DIMITRA) will include veterinarian issues in the normal training.

- (2) The Greek Authorities should improve the training of official staff and the private veterinary practitioners, taking into consideration the necessity to improve the targeting of the courses to the real needs of the staff and practitioners;

A programme of training is currently planned and will consist in seminars (3 per year, the first one should take place in the first half of November 2001 (Circular Letter of 7/9/2001 from CA to PVS)); it is foreseen that by October 2003 all official veterinarians (around 6-700) will have attended one of these seminars. Their aim is to increase the general knowledge of the official veterinarians not only on BSE but also on public health, animal health and animal welfare.

No specific action has been planned for private veterinary practitioners.

- (3) The Greek Authorities should extend compulsory notification to include TSE suspects and not only confirmed cases, and should take measures to enforce the compulsory use of the form gathering clinical and epidemiological information on TSE suspects.

The policy of the Greek CA is to consider that the TSE suspects shall be notified at regional (Prefectoral Veterinary Services) or local (Local Field Stations) level. Only the positive results shall be declared to the central administration. A reminder has been sent to the headquarters of the insurance agencies on the 23/2/2001 (see below 5.1.2.2- sampling of fallen stock).

Moreover, laboratories will not accept any samples without the official form signed by an official veterinarian.

---

14 In their response to the draft report the Greek Authorities noted that despite no concrete plans for PVP the intention is to pursue awareness and co-operation on a case-by-case basis at regional and local level, and that PVP are largely replaced by official ones.

15 In their response to the draft report the Greek Authorities noted that from 1/1/2002, a new database has been set up at headquarters aiming to collect, co-relate and assess TSE epidemiological data coming from the field.
(4) The Greek Authorities should take measures to ensure that staff in laboratories and on farms consider the ruling out of TSE as an obligatory step in standard procedures to ensure that no under-estimation or under-notification of TSE takes place.

The CA declared to the mission team that a reminder has been sent to the regional laboratories (17) but no new instructions have been sent to PVS or to LVS despite the main role of the latter in passive epidemi-surveillance (official veterinarians of LVS act mainly as practitioners; this service is free of charge for farmers). The mission team found in the logbooks of sick animals in the LVS (where all on farm visits are registered) that several bovines with neurological or behavioural signs did not respond to the treatment and finally the animals died. In the best situation, the animals if aged over 30 months (before 1/7/2001) or 24 months (after 1/7/2001) were sampled as fallen stock in the monitoring programme but were not declared as official BSE suspect.

(5) The Greek Authorities should take measures to ensure the full involvement of the slaughterhouses in TSEs surveillance activities.

The CA sent a reminder to the slaughterhouses' staff on the 23/2/2001 (Circular Letter 344841) but it concerned only the identification checks.

The implementation of the active surveillance in Greece from January 2001 imposes the involvement of the slaughterhouses' staff to implement the procedure to sample the relevant bovine sub-populations. However due to the lack of an ante-mortem inspection register (see Directive 64/433/EEC), there is no written evidence of any ante-mortem inspection. The mission team understood that a first physical check is carried out on the farm by the LVS and if favourable, the movement permit is issued. Upon arrival to the slaughterhouse when an identification problem is detected or when accompanying documents are missing the animal is sent back to its farm of origin.

(6) The Greek authorities should take measures to implement an ongoing programme of monitoring of the performance of all the parties involved in TSE controls (training activities, the monitoring programme, TSE suspicions and the laboratories' activities) taking into account that the information from the PVS, LVS and PVPs is available to improve the overview of the surveillance programme.

According to the CA, their policy is "based on trust". However a project exists to create inter-prefectoral services in charge of co-ordination and control of the PVS which should be in place by the end of the year, after the Ministrer of Agriculture committed himself to the Commissioner in charge of Health and Consumer Protection. There should be 13 inter-prefectoral services for 54 PVS.

(7) The Greek authorities should implement clear procedures in collaboration with the National Reference Laboratory to ensure proper administrative management and handling of all samples received;

All samples taken must be accompanied with an official form signed by an official veterinarian. The laboratories cannot accept the samples without this form. A central database of all samples taken all around the country has been operating since January 2001 and is updated by the laboratories once or twice a month (transmission by e-mail).
5.1.2 BSE epidemiological situation

Since the last mission in Greece (12 to 16/02/2001) the first BSE case occurred in a dairy farm in the northern part of the country (prefecture of Kilkis) after having been found positive in a slaughterhouse in the prefecture of Serres (bovine aged over thirty months slaughtered for human consumption and sampled in the monitoring programme). The first rapid test was repeated and confirmed by an histopathological examination carried out in the National Reference Laboratory in Thessaloniki. The eradication measures applied concerned the slaughtering and the destruction of the total herd (around 150 animals), and the BSE testing of the relevant bovines (94 animals aged over 24 months).

The number of bovine brains analysed with histopathology was 20 in 1999 and 22 in 2000 (the last mission team demonstrated that in fact only 1 in 1999 and 4 in 2000 of these samples were linked to a BSE clinical suspicion as defined in Commission Decision 98/272/EC). In 2001, 4 brains were examined at the time of the mission.

Before the publication of Regulation (EC) No 999/2001, CD 98/272/EC provided that the minimum number of samples to be taken should be 1950 in 2001 for the fallen stock aged over 30 months.

The results of the BSE testing programme from January to July 2001 are detailed in the following table:

<table>
<thead>
<tr>
<th>Legal basis</th>
<th>Legal basis</th>
<th>Type of animal</th>
<th>Analytic method</th>
<th>Nb</th>
<th>Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;= 30/06/2001</td>
<td>&gt;= 01/07/2001</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CD 98/272/CE</td>
<td>Regulation (EC) 999/2001</td>
<td>Dead bovines</td>
<td>Rapid test</td>
<td>703</td>
<td>0 positive</td>
</tr>
<tr>
<td>CD 2000/764/CE</td>
<td>Regulation (EC) 999/2001</td>
<td>Emergency slaughter</td>
<td>Rapid test</td>
<td>90</td>
<td>0 positive</td>
</tr>
<tr>
<td>Art 1 - 1st indent</td>
<td>Annex III-A-I-2.1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CD 2000/764/CE</td>
<td>Regulation (EC) 999/2001</td>
<td>Sick slaughter</td>
<td>Rapid test</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Art 1 - 2nd indent</td>
<td>Annex III-A-I-2.1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CD 2000/764/CE</td>
<td>Regulation (EC) 999/2001</td>
<td>Bovines dead during the transport to the slaughterplant</td>
<td>Rapid test</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>CR 2777/2000</td>
<td>Regulation (EC) 999/2001</td>
<td>Healthy animals slaughtered for human consumption</td>
<td>Rapid test</td>
<td>7357</td>
<td>1 positive</td>
</tr>
<tr>
<td>Art 2 - 1</td>
<td>Annex III-A-I-2.2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CR 2777/2000</td>
<td>Regulation (EC) 999/2001</td>
<td>Bovines slaughtered in eradication measures</td>
<td>Classic tests and/or Rapid test</td>
<td>94</td>
<td>0 positive</td>
</tr>
<tr>
<td>Art 2 - 1</td>
<td>Annex III-A-I-5</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CD 98/272/EC</td>
<td>Regulation (EC) 999/2001</td>
<td>BSE suspect bovines</td>
<td>Classic tests</td>
<td>4</td>
<td>0 positive</td>
</tr>
<tr>
<td>Annex I - A - 1</td>
<td>Annex 12</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

8248 1 positive
5.1.2 Active epidemi-surveillance

5.1.2.1 National legal provisions

Ministerial Decision No 409990 of 18/12/2000 implemented a monitoring and control programme in respect to Transmissible Spongiform Encephalopathies. It transposed into Greek law the provisions of EC legislation concerning active epidemi-surveillance in force at that time. No modification or upgrade has been made so far to take account of Regulation (EC) No999/200116.

- Epidemio-surveillance in slaughterplants

The compulsory sampling of bovines slaughtered for human consumption and special emergency slaughters aged over 30 months was legally implemented from 1/1/2001. The age limit for sampling was lowered to 24 months for the 2 last sub-populations from 1/7/2001 (Circular letter 374725 of 6/6/2001).

According to Circular letter 333452 of 26/1/2001, the slaughtering of OTM bovines shall take place on Mondays, Tuesdays and Wednesdays in specifically approved slaughterhouses where statutory requirements are met and have refrigeration units to store carcasses until the results of the rapid tests are available (list of slaughterhouses attached to Circular letter 335704 of 10/1/2001 as amended at the latest by Circular letter 379306 of 13/6/2001). The cold storages shall be locked and the health mark shall not be applied before favourable results are known.

- In case of positive results there is no clear official instruction concerning the fate of the carcasses of animals slaughtered the same day in the same slaughterhouse as is the case for the positive bovines.

A reminder has been sent to PVS on 31/8/2001 (Circular letter 391935) concerning the Special Emergency Slaughters: definition, specific procedure for slaughtering, compulsory sampling if animal aged over 24 months.

- Epidemio-surveillance of fallen stock

There is no collection system in place for fallen stock which are simply buried on the farms or in "sanitary landfill sites". The Greek legislation foresees the sampling of every dead bovine aged over 24 months which is declared to official services (LVS or PVS).

- In the Ministerial decision 409990 of 18/12/2000, it is planned that the number of animals sampled as fallen stock must constitute at least 10% of the number of animals sampled as emergency slaughters. This is a provision of repealed Commission Decision 2000/374/EC.

---

16 In their response to the draft report the Greek Authorities (GA) noted that 2 Circular Letters were issued in October 2001 to remove the age limit of BSE clinical suspects and to clarify the sequence of laboratory examinations.
5.1.2.2 Implementation of the sampling programme


The sampling of emergency slaughters began in January 2001 and 90 animals of this sub-population have been sampled during this period.

The sick animals are never sampled as such: a first check/filter is carried out in the farm and in case of any problem in the slaughterhouse (identification problem or missing accompanying document) the animals are sent back to their farm. If animals are detected sick at the ante-mortem inspection they will be included in the sub-population of "emergency slaughters" (this is the explanation provided by the CA).

The lack of an ante-mortem inspection register did not permit the inspection team to control this procedure. Furthermore, Circular Letter 391935 of 31/8/2001 (see above) was a secondary reminder on the definition of a Special Emergency Slaughter (SES) and the procedures to slaughter and sample them, cited by the CA as the basis to sample sick animals in the sub-population of SES. However, this Circular did does not make any reference to animals detected sick at ante mortem inspection.
Sampling of bovines aged over 30 months in conformity with Commission Regulation 2777/2000 (from 1/1 to 30/6/2001) and Regulation (EC) No 999/2001 (from 1/7/2001 onwards)

7357 OTM bovines have been sampled during the seven first months of 2001 (NB: 14,295 bovines aged over 24 months were slaughtered in 2000) and one was positive.

- Measures concerning healthy animals:

  The age check is based on the passport check, the movement permit and the ear tag and is carried out first in the farm (by the LVS) and secondly in the slaughterhouse. In case of an identification problem (absence of identification documents or problem with eartags) an official instruction (circular letter 344841 of 23/2/2001) provides that the animal shall not be slaughtered but returned to its place of origin.

  In the first slaughterhouse visited a maximum of 2 or 3 bovines are slaughtered per day and it is easy for the official veterinarian to determine the animals to be sampled. In the second one the animals aged over 30 months are slaughtered only on Tuesday and a list of the animals slaughtered indicating the kill number, the eartag number and the date of birth is established by the official veterinarian at the beginning of the slaughter-line. On the basis of this list the official staff declared to the mission team to be able to determine which animal to sample (and which SRM to remove). The carcasses and all other parts are stored in a locked cold storage pending the results of the rapid test (which are generally available the day after the day of slaughter).

  The skins are not stored separately but with all other skins in a specific room for skins.

  The veterinary inspector of the plant is responsible for taking the samples of the OTM animals. The samples are sent by courier to the laboratory the same day of sampling and the results are available to the VI within two days.

  The system works reasonably well. However, the cross check between the bovines slaughtered and the animals sampled as OTM animals slaughtered for human consumption is not done. In the second slaughterhouse visited it is currently not done despite the availability of the relevant documentation.

  The first BSE case in Greece was discovered in this sub-population.

- Measures concerning emergency slaughter or special slaughter:
The mission team found that at least one sick animal was accepted in the PFD scheme without being tested beforehand\(^\text{17}\). The director of the PVS where the slaughterhouse accepted this case was not aware of this legal provision.

- **Sampling of fallen stock**

In the first 7 months of 2001, 703 dead bovines were sampled from a live population of 317,681 aged over 24 months (2.2 %). In Greece the fallen stock are either buried on the farm without any licence or buried in "sanitary landfill sites". There is no collection system and the rendering plants do not process any fallen stock. The sampling takes place when the farmer notifies the LVS in due time the death of one of his bovines and when the veterinarian of the LVS considers the animal not too putrefied.

\[\begin{array}{cccccc}
\text{January} & \text{February} & \text{March} & \text{April} & \text{May} & \text{June} & \text{July} \\
0 & 25 & 75 & 100 & 125 & 150 & 225 \\
\end{array}\]

- In one of the LVS visited, the sampling only started on 24/4/2001 even though these stations received the official instructions on 12/1/2001.

- The laboratory of Thessaloniki (which is also the National Reference Laboratory for Rapid Tests) informed the samplers delivering the samples to it of not sampling putrefied animals where the brainstem is autolytic and the obex cannot be surely located.

- Animals were not sampled if they died on Friday or Saturday as the sampler came on Monday and the cadavers were already buried or too putrefied.

  - **Determination of the number of animals to be sampled**

According to the Greek legal provisions all notified fallen stock shall be sampled if aged over 30 (before 1/7/2001) or 24 (after 1/7/2001) months.

A state-owned insurance company refund, after a compulsory post-mortem examination, all farmers whose bovines died from certain diseases such as anthrax (comprehensive list not provided by the CA); a letter (No344844 of 23/2/2001) has been sent to this company by the CA requesting their cooperation: every declaration of "at-risk" animals (fallen stock, BSE clinical suspects, bovines sent to the slaughterhouse for emergency slaughter) made to the insurance company should be forwarded to the local Veterinary Services.

\[^{17}\text{In their response to the draft report the Greek Authorities noted that despite the diagnosis of a pelvis cracking fracture by the LVS veterinarian, the ante-mortem examination carried out few weeks later did not raise any suspicion to the inspecting veterinarian in the slaughterhouse and the animal was consequently accepted in the PFD scheme by the agronomical services.}\]
• Despite financial incentives and legal obligations (compulsory notification of dead animal to the LVS, where the herd registers are kept), the number of samples already taken from this sub-population is under target for a random sampling as defined in CD 98/272/EC, as amended and in Annex III-A-3 of Regulation (EC) No999/2001 (1950 in 2001 for the fallen stock aged over 30 months) : during the first seven months of 2001, 703 fallen stock were sampled:

• The system in place to ensure that all the prefectures are correctly monitored is only based on the compulsory sampling of all relevant cadavers. No further monitoring is carried out later on.
According to the information given by the CA the following graph can be established:

NB: - on the basis of a minimum rate of mortality of 4% with half of the fallen stock being old enough to be sampled, the rate of sampling of all fallen stock would reach 100 per 5,000 bovines when the national rate of sampling of fallen stock is 5.7 per 5,000 bovines (i.e. 0.114%) for a 7 months period (see above chart).

- according to the CA the fallen stock samples are geographically located for the statistics on the basis of the eartag number which refers to the farm of birth. If the animal has been moved, and died on another farm, the information concerning the sampling location will be lost.

- No samples can be attributed to the following prefectures for the first 7 months of the year 2001: Evia, Evritania, Arkadia, Korinthia, Lakonia, Messinia, Zakinthos, Kerkira,
Keffalinia, Lefkada, Arta, Magnesia, Trikala, Kozani, Dodekanisa, Samos, Iraklio, Lasithi, Rethmino, Attiki (Athens), Attiki East, Attiki (Piraeus), where 95,124 bovines are living (14 % of the Greek cattle population)^18.

- The date of sampling never appears on the form sent by the LVS or the PVS to the laboratories. By default the date taken into account by the laboratory and the CA is the date of the accompanying letter.

5.1.2.3 Restriction measures applied to sampled animals (Art. 2 of CD 2000/764/EC and Annex III-A-I-6 of Regulation (EC) No999/2001)

The CA informed the mission team that all parts (carcass and offals) of animals sampled in the slaughterhouses must be retained under official supervision (locked cold stores) pending the results from the laboratory.

In the slaughterhouse visited where the first Greek BSE case was diagnosed, when the rapid test has been confirmed, all the carcasses and offals coming from the same batch of OTM bovines slaughtered and stored in the same cold storage where destroyed (34 animals).

- The skins are not stored separately but with all other skins in a specific room for skins.

The health mark is not applied on the carcass until a negative result of the rapid test is received.

5.1.2.4 Laboratory analysis

- Approval of the laboratories - relations with the National Reference Laboratory (NRL)

The NRL has been designed as such during a Scientific Advisory Committee's meeting held in Athens on December 2000 and a contract was signed on 29/12/2000 between the laboratory and the CA. This contract was based on EC legislation in force at the time and does not take account of Regulation (EC) No999/2001. No update has been made or foreseen so far.

There are also 4 laboratories (Thessaloniki, Larissa, Athens Centre of Veterinary Institute and Athens National Public Health Institute) carrying out the routine rapid test analysis including the NRL for rapid tests itself (Thessaloniki) which carries out also routine tests. All these laboratories are dependent on the Ministry of Agriculture and have been officially approved by the Ministerial Decision No 409990 of 18/12/2000. As well as for the NRL a contract has been signed between each approved laboratory and the CA. The green light for the approval was given by the director of the NRL during a meeting held on 20/1/2001.

A blind trial organised by the NRL will take place in October 2001^19, when the ring test organised by the Central Reference Laboratory (European Community joint research centre of Geel, Belgium) will be ended (samples received on 6/9/2001, deadline 3 weeks later).

---

^18 In their response to the draft report the Greek Authorities noted that samples were taken during the last 5 months of 2001 in additional prefectures: Rethmino, Lakonia, Messinia, Arkadia, Magnesia, Kozani and Trikala.

^19 In their response to the draft report the Greek Authorities noted that the inter-laboratory test was organised with satisfactory results in November 2001.
• The NRL has not yet regularly visited and audited the RLs in order to check regularly the correct implementation of the diagnostic methods and protocols\textsuperscript{20}.

• Except for the blind trial which will be carried out in October, no specific tests have been implemented to regularly check the validity of the results of the RLs.

• The quality of the samples received in the RLs is not checked and registered. In one of the laboratories visited around 1\% of the samples received (total received 991) were declared autolytic but however analysed without any comments neither to the NRL nor to the CA, or any record kept. There is no procedure valid for all the laboratories to register and inform the NRL and/or the CA of possible variations of the quality of the samples received\textsuperscript{21}.

• **Specific cases:**
  
  • There have never been any false positives in the RLs = the only positive found in a RL has been confirmed in the NRL;
  
  • Due to the lack of an appropriate system in the RLs, no accurate statistics were available either to the mission team or to the NRL e.g. for the cross checks between the parameters available (number of samples received, of analysis results, of samples not analysed, of samples not conforming,...) or for the overview of each category of sample received (number of autolysed samples coming from the LVS/PVS, etc...)\textsuperscript{22};
  
  • The procedure in place to confirm any positive sample to the rapid test involves a second rapid test with a method different that the one used for the first rapid test. If this second rapid test is positive, the sample is sent for an histopathological examination.
  
  • Although the routine use in Greece of two different rapid tests (Bio-Rad Platelia test and Prionics Check test) the NRL can only carry out Platelia. However it was explained to the mission team that the administrative procedure to implement the Prionics check-test is ready and would be in place before the end of the year\textsuperscript{21}.
  
  • In one of the laboratories visited the link between the samples received and the result is the reference number of the accompanying letter.

\textsuperscript{20} In their response to the draft report the Greek Authorities noted that the NRL has satisfied itself on this point with visits or approved laboratories expert recalling.

\textsuperscript{21} In their response to the draft report the Greek Authorities noted that the new form accompanying the samples include a reference to the condition of the sample at sampling time and at laboratory delivery time.

\textsuperscript{22} In their response to the draft report the Greek Authorities noted that they implemented a database allowing the recording and co-relation of all relevant data.

\textsuperscript{23} In their response to the draft report the Greek Authorities noted that the NRL was fully equipped in early November 2001 to dispense its duties with diligence and due authority.
5.1.3 Passive epidemi-surveillance

5.1.3.1 National legal provisions

- Ministerial Decision No 409990 of 18/12/2000 implements the epidemi-surveillance. However some shortcomings were noted by the mission team:

  - The age limit for BSE suspicions is fixed at 24 months (confirmed in Circular letter 374725 of 6/6/2001). It was not in compliance with CD 98/272/EC as amended where the age limit is 20 months and it is not in compliance with Art. 3-1-h of Regulation (EC) No 999/2001 where there is no more any age limit;\(^\text{24}\)

  - The suspicion diagnosis for BSE relies on the presence of neurological signs or behavioural changes and the absence of satisfactory laboratory diagnosis and the lack of response to treatment within 15 days.

5.1.3.2 Implementation

A letter has been sent to the State-owned insurance company to ask them to notify BSE clinical suspects to Veterinary Services.

- In a LVS, one of the official veterinarian asked by the mission team to describe the common signs of BSE answered that fever and anorexia are part of BSE signs.

- As already presented above (5.1.1-(4)), no procedure to rule out alternative diagnosis has been implemented so far.

5.1.4 Eradication measures

After the first Greek case of BSE the eradication measures were strictly applied: destruction of the herd (slaughtering, pre-processing and incineration in a specific slaughterhouse with disinfection of the trucks and the plant), test of bovines aged over 24 months (94 animals), incineration of the feedingstuff found on the farm, disinfection operations on the farm, epidemiological investigations and compensation. However, the mission team found some shortcomings;\(^\text{25}\)

- At the time of the culling out, 14 animals listed in the official holding register were missing. The farmer declared that 4 died and the others were sold in 2000. On the 11/7/2001, the PVS of Kilkis informed the Police Department of Kilkis of what happened on this farm. Other serious identification problems were found (3 cows without ear tags, 4 cows imported from the Netherlands on February 2000 missing).

- One official veterinarian of the LVS noticed several months prior to the mission this discrepancy but he only served oral notice by way of an official warning to the farmer without imposing any restrictive measure or follow-up.

\(^{24}\) In their response to the draft report the Greek Authorities noted that the age limit of BSE clinical suspect was removed by Circular Letter No 396787 of 1/10/2001.

\(^{25}\) In their response to the draft report the Greek Authorities noted that they were already aware of these findings which were already released in reports published on their internet site.
5.2 Feeding of processed animal proteins (total feed ban)

5.2.1 Follow up of the recommendations of the previous mission

- (1) "For the next inspection in Greece, the Central Competent Authorities should try to meet the requirement of the mission team of the FVO as regards the premises to be visited."

The feed mill visited complied with the requirements of the mission team: two different production lines, one for the production of non-ruminant feed where fishmeal are used and another for the production of ruminant feed.

- (2) "The Animal Feed controls, including the feed ban, should be reviewed to take due account of the requirements of Council Directive 95/53/EC fixing the principles governing the organisation of official inspections in the field of animal nutrition (OJ L265 of 8/11/1995), and particularly its article 4."

According to the feed control competent authority's comments sent on 11 September 2001, the local officers make the risk-assessment on the basis of structural conditions and experience gained. See 5.2.5 Approval procedure for the production and the use of derogated processed animal proteins.

- (3) "As a result of the specific organisation of animal feed production in Greece, the Greek authorities should take measures to ensure the inclusion of farms producing their compound feed stuff in the official feed control programme."

According to their comments, the feed control competent authority stated they were not able to do so due to the lack of resources. However, the production of feedstuff by home compounders represents 34% of the total Greek production of feed.

- (4) "The Greek authorities should make available to the control services and to the persons in charge of the premises where contamination of animal feed by MBM cannot be excluded (feed mills, farms, etc) the value of the detection limit of the presence of MBM in the feed stuff."

According to the feed control CA's comments, the level of the detection limit is less than 0,1% and the staff of laboratory is only competent to interpret the results. However the operators still do not receive any results of the analysis carried out on samples taken in their premises.

- (5) "The Greek authorities should issue clear instructions on the actions to be taken when MBM contamination of animal feed is confirmed or suspected in farms or feed mills."

The competent authority did not provide these instructions. See 5.2.6.b Control plan.

- (6) "The Greek Authorities should take measures to ensure that the results of TSE examinations from the laboratory are available promptly to the competent authorities."

According to their comments, the microscopic analyses are only done in the Central Feed Control Laboratory in Lycovrisi, Attikis which has been refurbished. The time delay between sampling and obtaining results has decreased to within 1-5 days, since the reconstruction work was completed. See 5.2.6.c Results.
5.2.2 Transposition of Community legislation


The Joint Ministerial Decision 408169 of 22/11/2000 implemented the ban of feeding livestock animals with MMBM with a seizure of compound feedstuffs which contained such ingredient from 22/11/2000 to 31/1/2001.

Council Decision 2000/766/EC (prohibition on feeding processed animal proteins for farmed animals) was transposed by Circular letter 333402 of 3/1/2001. The Directorate-General for Veterinary Affairs sent this Circular letter to the prefectural Agricultural Development Directorates, Prefectural Veterinary Services, animal feedingstuff laboratories and association of feedstuff industry.

Commission Decisions 2001/9/EC and 2001/165/EC (approval requirements for feeding dicalcium phosphate and hydrolysed proteins derived from fish, feather and hides and skins feeding to farmed non-ruminant animals) were not transposed at the time of the mission. CD 2001/9/EC was simply sent to feed inspectors for information and action by circular letter No333417 of 12/1/2001, announcing a specific circular which has not yet been released.

5.2.3 General information on the feed industry

From a total of 40 feedmills, the majority produce non-ruminant feed (38 feedmills) of which some incorporate fishmeal to the pig or poultry rations. Two of the 40 feedmills manufacture both ruminant and non-ruminant feed. According to the CA, only one produces both non-ruminant feed containing fishmeal and ruminant feed.

5.2.4 Information provided to the operators

In the feedmill visited, the staff explained that they mainly received information on the ban on processed animal proteins (PAP) via the Feed producer’s association (SEVIZ) and daily via Internet (EC Official Journal site). They also confirmed to have received the circular letter sent by the competent authority in November 2000 on the ban on feeding PAP. However, this letter was not available in the plant visited at the time of the mission.

5.2.5 Approval procedure for the production and the use of derogated processed animal proteins


- The feed control CA was not able to provide the mission team with information concerning the feed mills or home compounders using fishmeal, which establishment should have been officially approved according to Annex I to CD 2001/9/EC.

The competent authority explained that the use of fishmeal in the feed mills was known on the basis of consultation with the Feed Producers Association and the outcome of recall visits to the plants.
According to the CA, the other two derogated PAPs (di-calcium phosphate and hydrolysed proteins) are neither produced nor imported into Greece. However, suppliers for inorganic di-calcium phosphate are one Greek chemical plant and some Dutch traders.

In the feedmill visited, one line is designated to the ruminant and rabbit feed production and the other for non-ruminant feed manufacturing containing also fishmeal in some rations. The first consignment of fishmeal in 2001 arrived in January to the feedmill visited. The feed mill also had some fishmeal in stock in December 2000. The local agricultural official's (feed controller) explanations led the mission team to these findings:

- He only received the EC legislation (CD 2001/9/EC) without any detailed instructions from his hierarchy concerning its implementation;

- The approval foreseen in Annex I-6 to CD 2001/9/EC was only given orally to the feedmill's staff on the basis of administrative checks, visual check of the separation of the two production lines and discussion between local officials and staff of the plant;

- The complete separation appeared disputable to the mission team because:
  - according to the flow chart in the feed mill visited, connection between the ruminant and monogastric silos for end products was possible. However, the staff stated the connection does not exist,
  - the intake bins are two covered gutters in the same warehouse, ten metres away one from the other,
  - the cross-contamination between the two production lines has never been tested by any sampling procedure with use of tracers.

- There has never been any official or private (own-checks) sample taken in the plant for checking the presence of prohibited proteins: MBM from ruminant feed in 1999 and 2000, and from all feed in 2001, and fishmeal from ruminant feed in 2001. The feed controller explained this fact to the lack of suspicion of PAP's fraudulent use as well as the sampling programme implemented by the feed laboratory (see below);

5.2.6 Official control

(a) Responsibilities

The Directorate of Animal Production is in charge of official feed control in the feedmills, on the farms and at retail level. The Directorate-General for Veterinary Affairs is responsible for control in the Border Inspection Posts (BIP)(import of fishmeal), in the rendering plants (processing of animal wastes in MBM and tallow) and for detection of residues. Both Directorates belong to Ministry of Agriculture.

A three-member committee established at the regional level in each prefecture verifies the implementation of the feed ban and the compliance with labelling requirements and also carries out sampling on the spot. It is accountable to the Directorate of Animal Production. The committee is comprised of an agronomist, a veterinarian of the PVS and a clerk of the regional Trade Department. The agronomist is the leader of this committee and decides the schedule and frequency of inspections. He can also act alone.
b) Control plan

The veterinary CA sent to the BIPs a specific circular letter concerning the ban on feeding PAP to farmed animals (specific procedure in case of import of fishmeal as described in Annex I of CD 2001/9/EC).

- The feed control CA did not send any detailed instructions on official control (annual programme for feed control, guideline on number of official feed samples to be taken from plants, measures in case of positive samples) to the regional committees at the time of the mission. They explained that instructions on official control are included in the draft circular letter on approval requirements for using derogated PAP but it is still not signed.

Circular Letters addressed to all three-members' committees were sent to remind the inspectors: "to send samples to the relevant laboratory at regular intervals" on 7/10/1999 (No385673), "to perform the necessary sampling checks" on 20/4/2000 (No351318) and "the need for systematic feedingstuffs controls including sampling and labelling checks" on 1/11/2000 (No399322).

The CA explained to the mission team that one official laboratory dealing with feedstuff has established its sampling programme (once a month in the feed mill visited). The mission team found that:

- This programme is applied without cooperation with the feed controller of the prefecture concerned;
- This sampling programme lead the feed controller not to take any samples in the establishments visited because he considers that the laboratory has already done it.

c) Results

- The feed control CA could not provide any information on total annual number of visits to feed mills.

According to the veterinary CA, at the time of the mission, a total of a thousand veterinary visits were made to the farms where the ban on feeding PAP could be checked as well (visits of the LVS' veterinarians).

The samples taken on feedstuffs for microscopical analyses (detection of MBM with the method described in Directive 98/88/EC) were 71 in 1998 (all on ruminant feed, 0 positive), 27 in 1999 (all on ruminant feed, 0 positive), and 64 in 2000 (21 on ruminant feed, 17 positives on pig, fish and poultry feeds).

In 2001, a total of 255 official feed samples were taken mainly in BIPs (141 on imported fishmeal consignements). The samples were taken on: fishmeal (142), fish feed (21), mixtures (70 including 37 for ruminants), poultry feed (18), soya and soya meal (2), vegetable fat in powder form (1) and dicalcium phosphate (1). All results were negative, except 3 fishfeed samples where blood meal was detected.

The mission team found the following deficiencies related to official control in the feed mill visited:

- After an inspection visit, the feed controller does not write any report to his hierarchy or for his files and sends no letter to the operators visited,
• The feed controller described the procedure to take official samples (the last one was for Salmonella analyses): the plant's staff takes the feed sample in his presence;

• The feed controller explained that the staff from the official feed laboratory is responsible for other sampling (MBM, fishmeal);

• The results of laboratory analyses are generally not forwarded to the feedmill visited.

5.2.7 Withdrawal of processed animal protein from the market, distribution channels and from on-farm-storage

Joint Ministerial Decision 408169 of 22/11/2000 implemented the ban of feeding livestock animals with M(?)MBM with a seizure of MBM or compound feedstuffs which contained such ingredient from 22/11/2000 to 31/1/2001. The Greek decision was completed when CD 2000/766/EC was published (OJ L 306 of 7/12/2000).

The result of such seizure procedure is as follows:

<table>
<thead>
<tr>
<th>Seized feedingstuffs</th>
<th>Quantity (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>MBM, meat meal</td>
<td>720</td>
</tr>
<tr>
<td>Concentrates</td>
<td>410</td>
</tr>
<tr>
<td>Compound feedstuffs</td>
<td>930</td>
</tr>
<tr>
<td>Blood meal</td>
<td>100</td>
</tr>
<tr>
<td>Fishmeal</td>
<td>160</td>
</tr>
<tr>
<td>Other PAP</td>
<td>20</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>2350</strong></td>
</tr>
</tbody>
</table>

According to the competent authority (see table above), 2,350 tons of feedstuffs were withdrawn from the market, distribution channels and from on-farm-storage; the majority is waiting for the compensation system to be adopted (proposal sent to relevant financial services on 6/6/2001) before being sent for destruction (burial in approved landfill sites or incineration in cementries). Compensation should only be paid for the estimated value of the feedstuffs, all other costs including destruction would be paid by the recipient of the compensation.

The feed mill visited requested the veterinary CA for exporting a remaining stock of 40 tons MBM to third countries for petfood production in late 2000. The veterinary CA gave this permit to export in January 2001.

At the time of the mission, 6-7 tons of monogastric compound feedstuff returned by a customer were in the feed mill visited waiting for destruction under official supervision. This feed was produced in September and in November 2000.

The feedmill visited ceased using meat and bone meal (MBM) in ruminant feed in 1996, on a voluntary basis for domestic monogastric feed in June 2000 and for exported monogastric feed in November 2000.

5.2.8 Trade of processed animal proteins

(a) Fishmeal

According to the competent authority, a yearly total of 40,000 tons fishmeal is either mainly traded from Denmark or imported from third countries (Peru, Chile, and Norway). No plant processing low risk material for fishmeal production was approved in Greece.
b) MBM and Poultry offal meal

According to the competent authority, MBM was mainly traded from Denmark and France to Greece. However, the quantity of traded MBM from Denmark in 2000 was 6 times higher than the quantity in 1999.

![Introduction of MBM in Greece](image)

The competent authority explained that one of the reasons for this significant increase was an improved awareness in the use of ANIMO-messages between Member States but no specific investigation has been carried out so far to confirm this assumption.

5.2.9 Channeling of processed animal protein

a) Fishmeal (derogated PAP)

- The consignments coming from another Member States or EFTA-countries to the feedmill visited is accompanied by the Veterinary certificate indicating the outcome of Salmonella analyses without mentioning the number of units comprising the sample and results of Enterobacteriaceae analyses.

According to the feed control CA, no intermediary storage for fishmeal is approved in Greece.

In the feed mill visited, it was possible to crosscheck between the received and consumed fishmeal within the feed mill on the basis of intake and outgoing records. However, the committee had not carried out this crosscheck.

In the feedmill visited, the labels for non-ruminant feed including fishmeal and invoices for this kind of bulk feed indicated the compulsory sentence (Annex I to CD 2001/9/EC) : “it contains fishmeal —cannot be fed to ruminants”.

- No records of inspection measures in place on the farms using or incorporating feed containing fishmeal or concentrates were available at the time of the mission.
• Due to the lack of a list of approved premises (feed mills, home compounders, warehouses) where fishmeal can be used or stored, the BIP staff is not able to verify the correct destination of the consignments.

5.2.10 Measures implemented in farms (animal holders)

According to the CA, no detailed instructions for official control on the farm level were sent to the regional committees. The total number of farms using or incorporating fishmeal was not available at the time of the mission.

The feed controller described the check of the eligibility of the farmers ordering compound feedstuff with fishmeal as based on the knowledge of the farmers, and random checks in the farms.

• As the feed controller does not keep any record of his checks it was not possible for the mission team to verify the objective outcome of these checks.

5.2.11 Tallow

The EC legislation concerning the purification of tallow (Art. 2.1 of CD 99/534/EC) is not transposed.

The competent authority assumed that tallow produced in Greece is used as fuel. However, the responsible authority for the control of the purification of tallow when used as a raw material in the feed mills was not clarified at the time of the mission (as discussed between the Veterinary Services and the Feed Control Services).

5.3 Specified Risk Material

5.3.1 Follow up of the recommendations of the previous mission

• (1) Detailed instructions as regards the control measures for the removal and the disposal of SRM should be issued by the CCA in its supervisory capacity to enhance a uniform application of the legal measures in place, and assist the regions, as the executive bodies, in establishing or adapting the control measures.

This recommendation has not been followed-up the Greek authorities having not yet issued comprehensive instructions in order to achieve the necessary improvement in the control system along the SRM chain.

• (2) The present SRM disposal controls in place should be reviewed and reinforced (taking into consideration the real capacity of incineration of the approved slaughterhouses) and the Greek authorities should take measures to implement a complete control system for SRM removal and disposal as foreseen in Commission Decision 2000/418/EC.

Some information has been provided to the mission team during the initial meeting concerning the destruction capacity in Greece (26 authorised land fill sites and 7 kilns in cement works) mainly used for disposal of MBM and feeding stuffs containing MBM.

5.3.2 Legal provisions and administrative instructions

Measures to exclude SRM from the food and feed chain have been already described in the mission report DG(SANCO)/3234/200 available on the internet at http://europa.eu.int/comm/food/fs/inspections/vi/reports/index_en.html. This report focuses on the system as it was found at the time of this mission (February 2001).
Since the last mission the following administrative provisions (circular letters) and instruction have been issued in order to implement the relevant EC legislation referring to SRM:

- Circular letters NO 352828 of 8 March 2001, NO 352896 of 4 April 2001 and NO 361408 of 5 April 2001 by which the Commission Decisions 2001/233/EC and 2001/270/EC (in draft and final version) concerning MRM from bovine ovine and caprine bones, removal of the vertebral column from bovine animals and import conditions related to SRM have been forwarded to prefectural veterinary services.

- Guidelines have been issued by the Meat Trade Institutes (Athens and Thessaloniki) concerning the technique of the removal of the vertebral column and dorsal root ganglia; the Veterinary CA has included in circular letter NO 352828 these guidelines for their practical implementation.

5.3.3 Official controls

(a) Responsibilities

The official controls of EU approved slaughterhouses and cutting plants are carried out by official veterinarians appointed to the plants by the PVS.

Domestic and small-scale slaughterhouses and cutting plants are under official control of official veterinarians from the LVS; these veterinarians also supervise retailer and wholesaler outlets.

The second level of official control is carried out by the PVS.

The Meat Trade Institutes in co-operation with the CCA organised training sessions on the correct implementation of CD 2000/418/EC. These sessions also include a demonstration on the practical aspects of the removal of SRM in the two slaughterhouses (Veroia and Asprogiros).

b) Official controls in practice

Since the two EU approved slaughterhouses (one with an attached cutting plant) visited by the mission team were under the official control of the PVS this section will mainly cover controls carried out by their staff.

➢ In the slaughterhouses

- Staff in the slaughterhouse visited confirmed attendance to training sessions organised (in year 2000 and 3/2001) by the Meat Trade Institute in Thessaloniki concerning certain technical aspects of the removal of SRM (i.e. removal of the vertebral column).

- In both slaughterhouses visited records/documentation of official controls on removal and further handling of SRM were not available. The in-plant veterinary services have not received instructions on how to perform such controls. Moreover, the second level of supervision from the PVS was not documented.

- The system in place for the removal of SRM was not built into the company’s own check programmes in both the slaughterhouses visited. Preventive measures were in place in order to avoid contamination during removal and separation of SRM; however deficiencies were noticed in this regard in the slaughterhouses visited (see below)
Independent cutting plant

There are no independent cutting plants approved for deboning of bovine heads and the removal of vertebral column.

Domestic establishments

No visits have been carried out in such establishments during the mission.

5.3.4 Removal

A system to assure a proper identification during slaughter of eligible bovine animals (which have already passed through age checks at the ante-mortem inspection) for the removal of SRM was not available in one slaughterhouse visited. In the second one a record sheet mentioning the progressive slaughter number, the date of birth and identification number for each animal slaughtered has been presented as the “tool” used by the slaughtermen for the proper identification of animals “giving” SRM.

In practice the removal of SRM presented the following problems:

• the removal of the vertebral column leaves on the carcasses part of the bones, which, in the opinion of the mission team and of the Commission Services (consulted after completion of the mission), shall be considered as SRM.

• in one slaughterhouse visited the system used (a guillotine) for the separation of the skull from rest of the bovine head does not seem to allow the proper removal of the entire skull; in the other one a saw is being used to sever the skull from the head which assures a proper separation of SRM;

• some hygiene malpractice was noted in regard to the removal of SRM in one slaughterhouse visited. Wastewater with bone dust (vertebral column) ejected from the electric saw used at splitting of the carcasses was not collected; therefore carcasses were contaminated by water splashing onto them and that part of the slaughter line concerned. Moreover remnants of spinal cord removed by means of a spoon were thrown on the ground and collected with waste water in the drain, cause of contamination by SRM.

5.3.5 Separation

The separation of SRM in the slaughterhouses visited was generally acceptable.

5.3.6 Staining

Staining of SRM was carried out sufficiently in both the establishments visited by the mission team. SRM was stained blue.

5.3.7 Channelling

(1) Fallen stock

All fallen stock are simply buried in “sanitary” landfill sites without any pre-processing; this system of disposal of fallen stock (high risk material, and SRM as such), which is regarded in
the EC legislation as an exemption to the general rule (Art.3-2 to Directive 90/667/EEC), is used as a common practice in Greece.

(2) SRM

A document signed by the official veterinarian, accompanying SRM from the establishment where SRM are collected to the plant for the destruction has been defined. This document, signed by the official veterinarian in the recipient plant, is returned to the origin. This procedure has been witnessed as satisfactory by the mission in one slaughterhouse visited.

5.3.8 Processing, storage and destruction

In both slaughterhouses visited the SRM produced were incinerated in an oven located in the precinct of the plant. According to the CA all EU approved establishments must be equipped with an incinerator.

In both the slaughterhouses visited the existence of facilities for rendering of animal waste (low risk and high-risk material) was also noted. It was explained that the rendered products (pre-processed wastes) are subsequently incinerated in the in-plant incinerator and ashes are disposed in landfill sites.

- A cross check between the number of animals slaughtered and the weight of SRM produced is not carried out. In one slaughterhouse visited the records (regularly examined and signed by the official veterinarian) of the SRM produced and destroyed showed obvious discrepancies (i.e. 30 Kg of SRM for more than 30 animals slaughtered); the official veterinarian was not able to account for such discrepancies.

- The mission team has doubts concerning the actual capacity of destruction of the in-plant incineration facilities mainly when considerable amounts of SRM are to be destroyed. In particular the mission team noticed that bovine carcasses, which contain SRM, purchased for destruction under Regulation (EC) No 2777/2000 (PFD scheme) have been destroyed in the in-plant incinerators even if the capacity of incineration seemed not to be adequate for such an operation. The same remark can be made concerning the destruction of the bovines from the first Greek BSE case's herd (around 150 animals of all ages destroyed in 2 days).

5.4 Other findings

- Several shortcomings concerning operational hygiene were noticed in one slaughterhouse visited. In particular hygiene malpractice leading to contamination of the carcasses were observed and notably faecal contamination of the carcasses at de-hiding, carcasses coming into contact with installation and equipment, sterilisers non available or not in operation, poor maintenance and lack of cleanliness, preventive measures against flies not adequate, suspended hoses not properly used, cobwebs. The mission team immediately reported these deficiencies to the Greek authorities requesting prompt action for rectification in order to ensure that consumer health is being adequately protected.

- The ante-mortem inspection is only recorded in a commercial register kept by the operator, and only notes the carrying out of the inspection on the bovines accepted in the commercial chain.
6 CONCLUSIONS

6.1 Epidemio-surveillance

• 1) Some discrepancies were found in the current Greek legislation implementing the EU rules; Regulation (EC) No999/2001 is not yet taken as the reference for the Greek legislation26.

• 2) As regards the passive epidemio-surveillance, the CA is making efforts to increase the awareness of farmers with regard to BSE as well as the general awareness of official staff. However, due to current shortcomings, the number of BSE clinical suspicions as defined in CD 98/272/EC as amended and Regulation (EC) No 999/2001 as amended is still too low;

• 3) The monitoring programme has been implemented; however weaknesses were found out:

  – Despite financial incentives and legal obligations to declare fallen stock, the number of animals of this sub-population already sampled is low. Moreover, the level of sampling varies significantly between prefectures without justification. The lack of a system to collect and dispose of the fallen stock in compliance with Directive 90/667/EEC and Annex V-3 and 4 of Regulation (EC) No 999/2001 complicates the task of the samplers. No national official instruction is available to the samplers to deal with putrefied cadavers in a uniform way;

  – For OTM bovine slaughtered for human consumption, the cross-check between slaughtered animals and sampled animals is not carried out on a routine basis to be sure that all eligible animals are actually sampled; the skins of sampled bovines are not stored separately and therefore not really retained under official control as foreseen in Annex III-6-3 of Regulation (EC) No 999/2001;

  – The sub-population of bovines detected as sick at the ante-mortem inspection as defined in Annex I, Chapter VI, point 28(c) to Directive 64/433/EEC is not being specifically considered; this is not in compliance with Art. 1 of CD 2000/764/EC and Annex III-A-2-1 of Regulation (EC) No 999/2001;

  – The specific provisions regarding the testing of animals accepted in the PFD scheme (Art. 3-2 of Regulation (EC) No 2777/2000.

• 4) Despite efforts from the CA, mainly for the epidemio-surveillance, an effective monitoring of the performance of the different levels of veterinary services is still not in place;

• 5) The eradication of the herd of the 1st BSE case in Greece revealed some weaknesses in the animal identification system. No action is taken by official veterinarians of the local veterinary services when they identify irregularities27.

26 In their response to the draft report the Greek Authorities (GA) highlight that 2 Circular Letters were issued in October 2001 to remove the age limit of BSE clinical suspects and to clarify the sequence of laboratory examinations.
• 6) The rapid test NRL has only limited capability to carry out routine verification of the diagnostic methods used in the approved laboratories:

• 7) The procedure implemented to confirm a positive sample to the rapid test is not in compliance either with CD 98/272/EC as amended or with Annex X-C-3-1-b of Regulation (EC) No 999/2001 as amended\(^2\); 

• 8) Due to the lack of system to collect and dispose of fallen stock, and the obvious under-notification of bovine mortality to official services, it cannot be excluded that potentially BSE clinical suspects are being buried without having being examined and sampled.

6.2 Feeding of processed animal proteins

• The competent authority has only taken limited actions to address the previous recommendations.

• The competent authority does not fully respect the principles laid down in Council Directive 95/53/EC (fixing the principles governing the organisation of official inspections in the field of animal nutrition), in particular Article 4. Random sampling is not the most efficient way to control the products most likely to be contaminated. As well, taking samples only in case of suspicion is not a good strategy. Certain raw materials could be classified as higher risk materials and should be taken into consideration in a true risk-based sampling programme either by targeting the sampling on the relevant raw material(s) or product(s) derived from it.

• The official controls concerning the feed ban are not organised in a consistent way. Their efficiency is lowered by the lack of written records of activities of the feed controllers;

• The results of the laboratory (microscopical examination of samples to detect the presence of MBM) are still not sent to the operators concerned;

• Although the feed control competent authority forwarded to prefectural level Council Decision 2000/766/EC (ban on use of MBM) and Commission Decision 2001/9/EC (Conditions for feeding certain processed animal proteins), it did not provide the feed controllers with detailed instructions for their implementation, including actions to be taken when prohibited processed animal proteins are detected;

• In the feed mill visited, the official services could not provide any evidence that controls have been implemented concerning the prohibited use of PAP (MBM in ruminant feed in 1999 and 2000, and fishmeal in ruminant feed and MBM in feed for other farm animals in 2001): visit reports are not foreseen neither for the official files nor for the operator, no samples taken (official or for own-checks), no written information given or sent to the operator;

\(^2\) In their response to the draft report the Greek Authorities noted that they were already aware of the bovine identification problems which were already described in reports published on their internet site.

\(^2\) In their response to the draft report the Greek Authorities noted that Circular Letter No 396786 of 1/10/01 clarifies the sequence of laboratory examinations.
• Investigations have not been carried out to determine the origin and the consequences of the dramatic increase of MBM import in Greece in 2000

• The procedure to take official samples is not in compliance with the relevant EC legislation (Annex, point 2 of First Commission Directive 76/371/EC establishing Community methods of sampling for the official control of feedingstuffs);

• The number of samples taken has increased in 2001 but the sampling procedure is not based on a risk analysis (e.g. no samples taken since at least 1999 in the feedmill visited which is one of the two feedmills producing feed for ruminants and for non-ruminants);

• The sampling of fishmeal consignments imported in the BIP is correctly carried out but due to the lack of official approval at regional level and consequently the lack of knowledge at central level of the premises where fishmeal can be sent (warehouses, feed mills, home compounders), the channelling of the fishmeal is not implemented; that is not in compliance with Annex I to CD 2001/9/EC.

• The feed mills commenced their production for non-ruminant feed containing fishmeal without authorisation, which is not in compliance with Annex I, 6 of the Commission Decision 2001/9/EC.

• In the feed mill visited, the approval for using fishmeal was orally given without any written report; no specific sampling to check the functional separation of the 2 lines (one for ruminants, and one for non-ruminants with fishmeal) ever took place;

• The labelling of feedingstuffs containing fishmeal is in compliance with Annex I, point 7 of Commission Decision 2001/9/EC.

• The certificate accompanying the fishmeal consignment from the other Member States did not indicate the number of units comprising the sample and the results of Enterobacteriacea analyses. Thus the certificate is not in compliance with Annex II, Chapter III, point 2 Council Directive 90/667/EEC (laying down the veterinary rules for the disposal and processing of animal waste).

• Commission Decision 2001/165/EC (amending conditions for using hydrolysed proteins) was not transposed to the Greek legislation at the time of the mission.

• Due to the general low level of controls on farms and of home compounders, concerning incorrect or illegal use of prohibited processed animal proteins (fishmeal to ruminants, MBM to farm animals), cross-contamination and cross-feeding can not be excluded;

• The controls to ensure that all rendered fats derived from ruminant waste are purified or treated in accordance with Art. 2 to Council Decision 1999/534/EC are not in place.

6.3 Specified Risk Material

• 1) The amendments of Commission Decision 2000/418/EC occurred after last mission were forwarded to the veterinary services for implementation.

• 2) A documented system for official control of SRM has not been set up in Greece. Therefore records of official controls were not available and there were no standardised
forms and guidelines used on how to carry out and document the supervision performed at local and prefectural level\(^\text{29}\).

- 3) The removal of SRM was not always performed without contamination of the environment\(^\text{30}\); moreover the removal of the vertebral column (as being implemented in Greece) and of the skull (in one case) is not in accordance with the relevant EU provisions.

- 4) Staining was satisfactory.

- 5) The capacity of incineration of the in-plant incinerators seemed not to be always adequate.

- 6) A reconciliation procedure, which could ensure the control of SRM from the removal to the destruction, was not in place.


6.4 Others : public health issues regarding the slaughterhouses’ hygiene

- There is no register to record the results of the ante-mortem inspection; this is not in compliance with Directive 64/433/EEC\(^\text{31}\);

- Some hygiene deficiencies were noticed during the visits to the slaughterhouses\(^\text{32}\).

6.5 Overall conclusion

Epidemio-surveillance : Despite efforts from the Greek competent authorities the epidemio-surveillance still needs improvements : passive surveillance still presents shortcomings, and the monitoring programme (sampling of the healthy bovine aged over thirty months, of special emergency slaughter and sick animals, and fallen stock) although implemented, shows deficiencies in the sampling of some sub-populations (fallen stock and animals detected sick at the ante-mortem examination). The level of epidemio-surveillance varies significantly throughout the country without reason (sampling of fallen stock and level of detection of BSE clinical suspects). The National Reference Laboratory does not use sufficient tools to ensure its role as defined by Annex X-A-1 of Regulation (EC) No999/2001.

Feed ban : The controls on the feed ban are not satisfactory, as the national rules are insufficient and the inspection systems are not verifiable.

\(^{29}\) In their response to the draft report the Greek Authorities noted that the Circular Letter 421684 of 27/12/2001 implemented a standardised book recording the destruction of SRMs.

\(^{30}\) In their response to the draft report the Greek Authorities noted that they alerted in circular letters and in oral instructions the regional veterinarians on this point, providing equipments (bucketts) to slaughterhouses.

\(^{31}\) In their response to the draft report the Greek Authorities noted that the Circular Letter 421684 of 27/12/2001 implemented such a register.

\(^{32}\) In their response to the draft report the Greek Authorities noted that the hygiene deficiencies noticed in one slaughterhouse were promptly corrected under the supervision of the PVS.
The possibility of cross-contamination along the feed production chain as well as the direct use of PAP to ruminants cannot be excluded.

SRM: deficiencies were noted with regard to the organisation and the performance of the veterinary supervision of the removal and the destruction of SRM. The practical implementation of the EC provisions concerning removal of the vertebral column (in all slaughterhouses) and skull (in one slaughterhouse visited) is not in compliance with EC legislation.

7 **FINAL MEETING**

The competent authorities took note of the mission team main findings and preliminary conclusions but the CA introduced a general reservation on all the points concerning the epidevio-surveillance and the SRM until the draft report had been received and examined. However, none of the points described above raised specific opposition or rejection.

The feed control competent authority did not attend the final meeting.

8 **RECOMMENDATIONS TO THE GREEK AUTHORITIES**

Unless another deadline is indicated, the competent authorities are requested to provide details of the action taken and planned, including deadlines for completion, with regard to the following recommendations, within 25 working days following the receipt of the final report.

8.1 **With regard to epidevio-surveillance**

(1) The Greek Authorities should modify the current national legislation in order to comply with the EU legislation, particularly for the definition of a BSE clinical suspect and the procedure in case of positive rapid test. Regulation (EC) No 999/2001 should be used as the legal basis,

(2) The Greek Authorities should take additional action to improve the detection of BSE clinical suspects (farmers and official veterinarians' knowledge of clinical signs, systematic procedure to rule out alternative diagnosis),

(3) With regard to the sub-populations sampled, the Greek Authorities should:

- put in place appropriate action to ensure that animals slaughtered in accordance with Annex I-VI-28-c to Directive 64/433/EEC (sick animals detected at the ante-mortem examination in the slaughterhouses) are sampled as a sub-population as such in order to comply with Art.1-1 of Commission Decision 2000/764/EC and Annex III-A-2-1 of Regulation (EC) No 999/2001,

- take all necessary measures regarding the sampling of fallen stock, in order to comply with Annex XI-B-1-2nd bullet point to Regulation (EC) No 999/2001 (collection of fallen stock, early declaration of fallen stock, restrictive measures to farmers in case of failure of compliance),

- ensure that all notified fallen stock aged over 24 months are sampled by issuing official instructions to all samplers,
• implement a reconciliation system in order to make sure that all OTM bovine slaughtered for human consumption is effectively sampled; the hides should be retained under official supervision until the result of the rapid test is known,

(4)  The Greek Authorities should ensure an equivalent level of epidemiological surveillance by the Veterinary Services of the Prefectures throughout the country (detection of clinical suspects, sampling of fallen stock),

(5)  The Greek authorities should ensure that the National Reference Laboratory implement all necessary procedures to improve its level of routine supervision on the diagnostic laboratories as defined in Annex X-A-1 to Regulation (EC),

(6)  The Greek authorities should implement a system to monitor the performance of all the parties involved in TSE controls (training activities, the monitoring programme, TSE suspicions and the laboratories' activities) using the information already available from the PVS, LVS and PVPs,

(7)  The Greek authorities should take measures to improve the bovine identification system and its control33.

8.2  With regard to the feeding of processed animal proteins

(1)  The competent authority should take the necessary measures to ensure that:

• The feed control services implement a sufficient level of control in each kind of establishments concerned (including farms and home compounders),

• The sampling programme is based on risk analysis,

• Reporting is implemented (to the hierarchy and to operators) and

• Instruction are provided describing the actions to take when prohibited processed animal proteins are detected,

(2)  The competent authority should include risk assessment (see Council Directive 95/53/EC fixing the principles governing the organisation of official inspections in the field of animal nutrition, in particular Art. 4) in targeting official feed controls and sampling procedures,

(3)  The competent authority should improve collaboration between different official levels, including laboratory services,

(4)  The competent authority should provide instructions for practical implementation of Commission Decision 2001/9/EC, and ensure particularly that specific requirements laid down in Annex I to Commission Decision 2001/9/EC are fulfilled,

(5)  The competent authority should take measures to ensure that authorised officers take official samples in compliance with Annex, point 2 of First Commission Directive

33 In their response to the draft report the Greek Authorities noted that this recommendation is being addressed in an horizontal manner by the competent veterinary department.
(6) The competent authority should implement controls to ensure that rendered ruminant fats used in the feed mills are purified or treated in accordance to Commission Decision 99/534/EC,

(7) The competent authority should implement Commission Decision 2001/165/EC,

(8) The competent authority should ensure that the certificates accompanying fishmeal meet requirements for the number of units comprising sample and appropriate sampling requirements in compliance with Annex II, Chapter III, point 2 of Council Directive 90/667/EC.

8.3 With regard to Specified Risk Material

(1) The Greek authorities should officially establish a proper documented system with regard to the official control all along the SRM chain. This should include:

- detailed instructions as regards control measures (including preventive measures to be defined and implemented by the slaughterhouses management) for the removal and disposal of SRM,
- guidelines on how to carry out a proper supervision both from the in-plant official veterinarian and regional (prefecture) veterinary services; harmonised recording (forms, check lists) and reporting systems of the results of supervision should also be addressed in these guidelines,
- a reconciliation procedure assuring that all SRM material collected has been effectively destroyed.

(2) The Greek authorities should reassess the destruction capacity for SRM in order to assure that their disposal can be carried out in all circumstances,

(3) The Greek authorities should assure that the system of collection and destruction of fallen stock is in line with Council Directive 90/667/EEC,

(4) The Greek authorities should assure the proper removal of the vertebral column.

8.4 With regard to Public health

(1) The Greek authorities should implement the ante-mortem inspection register in compliance with Directive 64/433/EEC;

(2) The Greek authorities should implement the necessary actions to correct the hygiene deficiencies noticed during the visits to the slaughterhouses.
ADDENDUM

This addendum is added to the final report to provide an indication of the reactions received from the Greek Authorities in response to the draft report:

Recommendation No 8.1 (1): the Greek Authorities noted that this recommendation has already been addressed by interim Circular Letters and in the framework of epidemi-surveillance launched on 1/1/2002 on the basis of Regulation (EC) No 999/2001.

Recommendation No 8.1 (2): the Greek Authorities noted that this recommendation has already been addressed.

Recommendation No 8.1 (3): the Greek Authorities noted that first, second and third dots of this recommendation have already been addressed in the framework of epidemi-surveillance launched on 1/1/2002 on the basis of Regulation (EC) No 999/2001.

Recommendation No 8.1 (4): the Greek Authorities noted that they will renew their efforts to satisfy this recommendation in 2002.

Recommendation No 8.1 (5): the Greek Authorities noted that this recommendation has been satisfied since November 2001.

Recommendation No 8.1 (6): the Greek Authorities noted that this recommendation will be addressed when the reorganisation described in part 5.1.1.6 of the report will be implemented.

Recommendation No 8.1 (7): the Greek Authorities noted that this recommendation is being addressed in an horizontal manner by the competent veterinary department.

Recommendation No 8.3 (1): the Greek Authorities noted that they implemented an official booklet recording the destruction of SRMs.

Recommendation No 8.3 (2): the Greek Authorities noted that where necessary the capacity of incinerators has been increased.

Recommendation No 8.3 (4): the Greek Authorities noted that Circular Letter No 421684 of 27/12/2001 reminded the PVS that paravertebral nerve ganglions shall absolutely be removed.

Recommendation No 8.4 (1): the Greek Authorities noted that Circular Letter No 421684 of 27/12/2001 implemented such a register.

Recommendation No 8.4 (2): the Greek Authorities noted that the hygiene deficiencies noticed in one slaughterhouse were promptly corrected under the PVS supervision.

The Greek Authorities did not send any comments on the feed ban part.