FINAL REPORT OF A MISSION CARRIED OUT IN GREECE

FROM 18 TO 20 NOVEMBER 2002

IN ORDER TO VERIFY THE FOLLOW UP TO THE RECOMMENDATIONS OF MISSION REPORT DG (SANCO)/1133/2000-MR

CONCERNING POULTRY MEAT CARRIED OUT FROM 28 FEBRUARY TO 10 MARCH 2000
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1. **INTRODUCTION**

The mission took place in Greece from 18 to 20 November 2002 and was undertaken as part of the Food and Veterinary Office's (FVO) planned mission programme.

The mission team comprised 3 inspectors from the FVO.

1.1. **Background to the mission**

From the beginning of 1999 onwards to the middle of 2000 the Food and Veterinary Office (FVO) of the Health and Consumer Protection Directorate (DG SANCO) carried out a series of missions to all the Member States in regard to the production and placing on the market of poultry meat.

The objective of those missions was to assess the systems the competent authorities (CA) of the Member States have in place in order to ensure compliance within the relevant Community legislation. In particular the following main issues were assessed:

- Structure of the competent authority (CA).
- Approval procedures for poultry meat establishments.
- Veterinary supervision of establishments, slaughter hygiene and ante and post mortem inspection.
- Veterinary supervision of poultry farms.
- Supervision and checks on trade in poultry meat with particular attention to controls at origin and destination and the related documentation.

After each mission the mission reports were published according to the procedures of the FVO and the Central Competent Authority (CCA) was asked to supply, within a defined time, information on actions or planned actions in order to improve the situation in cases where deficiencies had been found to exist during the mission.

The relevant mission to Greece was carried out from 28 February to 10 March 2000 and the report of that mission (N° 1133/2000) was published on the Internet and sent to all the other Member States and the European Parliament.

The information asked for by the FVO was supplied in several communications by the Ministry of Agriculture of Greece between 2000 and September 2002.

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1 List of abbreviations and special terms are mentioned in Part 1 of the Annex to this report.

2 References to legal basis for the mission are mentioned in Part 2 of the Annex to this report.

3 (http://europa.eu.int/comm/food/fs/inspections/index_en.html)
The FVO accordingly scheduled a follow-up mission in November 2002 in order to verify the actions the CCA of Greece had described.

1.2. Mission objectives and proceeding

The objective of the mission was to verify the measures the CA has taken in order to improve the situation found during the above-mentioned mission.

In pursuit of these objectives, the mission team proceeded as follows:

An opening meeting was held on 15 November 2002 with representatives from the CCA, Directorate general for Veterinary Matters, Ministry of Agriculture. At this meeting the inspection team confirmed the objectives of, and itinerary for, the mission, and requested additional information required for the satisfactory completion of the mission.

The following sites were visited:

<table>
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<tr>
<th>Competent authority visits</th>
<th>Comments</th>
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<tr>
<td>Competent authority</td>
<td>3 Headquarter, Nomos, District Office</td>
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<td>Laboratory visits</td>
<td>Comments</td>
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<tr>
<td>Food processing establishments</td>
<td>Comments</td>
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<td>Poultry meat slaughterhouses</td>
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<td>Poultry farms</td>
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Representatives from the CA accompanied the inspection team during the whole mission.

2. MAIN FINDINGS

2.1. Competent authority performance

2.1.1. Co-ordination and supervision of prefectural administrations (see also Error! Reference source not found.)

Conclusions described in previous missions:

The central authorities do not systematically verify the implementation of measures by the prefectural authorities. Prefectural authorities fail to provide up-to-date information on the outcome of official controls to the central authorities.

Comments given by CCA in reaction to initial mission findings:

(1) As regards the co-ordination and supervision of prefectural administrations, a proposal to create a new “Veterinary Surveillance and monitoring Directorate” in the General Veterinary Directorate, of the Ministry of Agriculture has been presented to its legal Service and the political level. The purpose of this new Division is to improve the monitoring and to ensure that the implementation of the veterinary legislation is policed.
The Veterinary Service monitors the activities of the prefectures as follows:

- as regards routine activities, monitoring is assured via the activity reports, which have to be submitted either on a monthly, two-monthly or quarterly basis.

- as regards measures to be taken immediately, the veterinary directorates notify the Central Service by fax, e-mail or phone with a view to eliciting appropriate guidelines from the Central Service.

- on-the-spot visits on the part of officials from the Central Service to the Veterinary Directorates facing serious problems or in respect of which it is clear from the data that they are failing to implement the legislation properly. If it is ascertained that the Veterinary Directorates are not working properly the Central Service highlights the problems encountered, proposes solutions and transmits them to the Veterinary Director, while at the same time notifying the Prefect and the political leadership of the Ministry of Agriculture. In the event of non-compliance, the Central Service ordains a sworn administrative investigation and to identify responsibilities and impose penalties.

Findings by FVO-team during follow-up mission

- The report DG(Sanco)/1133/2000-MR concerning poultry meat had been transmitted to the Prefectural and District level.

- No structural changes have been made so far to create this new Division and the coordination and supervision of the veterinary activities of the prefectural services is still unchanged and inadequate.

- Evidence seen that the instructions from the CCA are insufficiently followed by the Prefectural and District level.

- No documentary evidence was seen indicating that:
  
  - Serious problems in the Veterinary Directorates have been detected by the CCA through the evaluation of the activity reports.
  
  - Veterinary Directorates are working properly.
  
  - Visits are carried out by the officials from the Central Service to the Veterinary Directorates.

- The political and administrative power remains with the Prefect.

2.1.2. Approval procedures

Conclusions described in previous mission:

Not all eligible establishments are approved according to Community legislation, e.g. red meat, poultry meat, meat products, milk processing premises.

Comments given by CCA in reaction to initial mission findings:

Strict instructions have been issued to the prefectural services to approve all the establishments in accordance with Community law by the end of 2002. Establishments
which do not meet Community specifications will be closed down and their operating permits will be withdrawn.

Findings by FVO-team during follow-up mission

- A new poultry slaughterhouse has been approved without fulfilling all the requirements of Council Directive 71/118/EEC. The deficiencies could have been avoided and can be corrected easily.

- No evidence seen that the prefectural services have revisited and approved all establishments before the end of 2002.

2.1.3. Training

Conclusions described in the initial mission:

- Inadequate numbers of trained, properly qualified staff.

Comments given by CCA in reaction to initial mission findings:

- Training of the Prefectural veterinarians is organised throughout 2002. Details on the subjects and the number of participants are available.

Findings by FVO-team during follow-up mission

- Several training courses have been organised, covering several topics related to veterinary controls, however not in particular concerning poultry meat.

- These seminars are attended in general by one official veterinarian (OV) of the Prefecture, in some cases by more. It is understood that the OV is supposed to transmit the information gathered at these seminars to the other colleagues in the Prefecture and that other OVs will be designated to take part in the future at these seminars. However, only in one out of the two Prefectures visited, was the documentation transmitted to the other OVs.

- More seminars are programmed for the near future (December 2002 and in 2003).

2.2. Official controls

2.2.1. Veterinary supervision of establishments

Conclusions described in the initial mission:

- There are not enough veterinarians in the establishments to perform all the tasks required for a proper veterinary supervision.

- The veterinary supervision of slaughter hygiene is insufficient.

- The frequency of veterinary presence in cutting plants is not in compliance with Community requirements.

- In the establishments, the main remarks made concerned: layout problems, inadequate separation between the inside and outside of the establishments and within them and a number of breaches of hygiene principles.
Comments given by CCA in reaction to initial mission findings:

For the Prefectural Services, 144 additional veterinarians have been recruited for all veterinary tasks to be carried out.

Findings by FVO-team during follow-up mission

- The staff recruited is for all veterinary tasks and some priority is given to the animal health related tasks such as eradication programmes. It was not possible to obtain the detailed information indicating how many additional veterinarians are allocated to the veterinary controls of poultry and poultry meat.

- Veterinary presence is now guaranteed in poultry slaughterhouses during slaughter. Ante mortem inspection is now carried out in the farms.

- Staff is still insufficient to carry out all the tasks in poultry slaughterhouses. Conditions to perform post-mortem inspection in an acceptable way are not yet fulfilled.

- In some cases, the OV has detected and informed the company of the deficiencies, however neither corrective action was requested nor deadlines fixed.

- In the establishments, many deficiencies concerning layout problems, structure, installation maintenance, hygiene and operational procedures, which had been noted during the previous mission in other establishments, were found even in a newly build slaughterhouse.

2.2.2. Ante-mortem inspection

Conclusions described in the initial mission:

The lack of information in the flock record charts creates difficulties for the ante-mortem inspection done on the farm by the OV.

Comments given by CCA in reaction to initial mission findings:

A circular has been sent to notify the firms on the need for strict implementation of the ante-mortem inspection and keeping of a register of poultry holdings with all data referred to in Chapter VII of Annex I of Council Directive 71/118/EEC. Additional circulars have been sent to the prefectures calling for written confirmation of compliance with a) the poultry keepers’ register and b) the logbook recording details of the veterinarian’s visit to the poultry farm in connection with the performance of the ante-mortem inspection.

Findings by FVO-team during follow-up mission

- The circulars above mentioned were available in the two prefectures visited, however no written confirmation of compliance has been sent by the Prefectures to the CCA.

- The ante-mortem inspection is carried out at farm level.

- Flock records and registers in farms do not contain all the information required. Documentation concerning previous flocks was not available in the farms.
• The Annex IV of Council Directive 71/118/EEC, the health attestation, often covers the whole flock which is sent to the slaughterhouse in different stages. The documentation available does not allow cross-checks.

2.2.3. Post-mortem inspection

Conclusions described in the initial mission:

The small number of inspectors did not allow an adequate post-mortem inspection of carcasses and offal.

In one of the establishments visited by the mission team an official auxiliary and a company auxiliary were performing post-mortem inspection without the knowledge of the CCA.

Comments given by CCA in reaction to initial mission findings:

No comments given

Findings by FVO-team during follow-up mission

The post-mortem inspection is carried out by a veterinarian however, some problems still remain:

• Insufficient staff: one veterinarian in charge of the post mortem inspection at a line speed of between 5000 and 6500 birds per hour, and of the evaluation of the birds at arrival, as well as being responsible for the general supervision in the establishment.

• Not all birds are inspected: in one slaughterhouse visited, the veterinarian only inspected 300 birds of the flock, the rest of the flock was not inspected.

• Due to the above mentioned findings, the recording of the post-mortem findings strictly limited to some general causes, cannot be considered as reliable.

• The facilities for the post-mortem inspection were not completely satisfying in the establishments visited.

2.2.4. Own checks

Conclusions described in the initial mission:

Own check programs are being implemented but the set-up of the own checks is, in general, not satisfactory.

Comments given by CCA in reaction to initial mission findings:

During a seminar a short presentation was dedicated to the overview of own checks.

Additional seminars will be given (December 2002 and 4 cycles in 2003) to train the OVs how the supervision of the own checks should be carried out.

Findings by FVO-team during follow-up mission
• The majority of the own checks are carried out by the companies however these own checks are not yet sufficiently sophisticated and at the level required.

• The controls by the OVs of these own checks is insufficient and without accurate documentary evidence.

• The findings made in the previous and this missions lead to the conclusion that the meaning for the requirements of own-checks is still not fully understood by the people involved.

2.2.5. Use of immersion chillers

Conclusions described in the initial mission:

Immersion chillers are not operated in compliance with the Directive.

Comments given by CCA in reaction to initial mission findings:

This observation concerns a small number of cases in respect of which the necessary instructions have been issued and all the corrective measures have already been put in place.

Findings by FVO-team during follow-up mission

The immersion chiller in the establishment visited is not fully in compliance.

2.2.6. Supervision of the potability of water

Conclusions described in the initial mission:

The use of potable water is not properly supervised.

Comments given by CCA in reaction to initial mission findings:

Special training on drinking water and implementation of Directive 71/118/EEC in conjunction with Directive 80/778/EEC is included in seminars which are to be held from 15 to 19 April 2002 and which are intended for all the Veterinary Directorates of the prefectures. The recruitment of additional veterinarians will provide further opportunities for better implementation of the abovementioned directives.

Findings by FVO-team during follow-up mission

The situation is similar and no changes noted:

– No blueprint that included the internal water-piping network was available.

– Internal potable water testing is done without deactivating the free residual chlorine.

– No documentation of testing of free residual chlorine; no alarm installed for failure in the chlorinating system.

– Some bad results were recorded, however neither verification, corrective action nor follow-up was initiated.
2.2.7. Veterinary supervision of poultry farms

Conclusions described in the initial mission:

There is no prescribed procedure for supervision of farms and there is insufficient evidence to be found that the OVs are supervising the farms in a satisfactory way.

Comments given by CCA in reaction to initial mission findings:

Same comment as under.

Findings by FVO-team during follow-up mission

- The supervision is carried out during the visits for ante-mortem inspection.
- Feed samples are taken by another service, the “Agricultural Certification Service” who should inform the OV if non-compliances are detected.
- Flock records and registers in farms do not contain all the information requested and data of previous flocks were not available in the farms. The OVs do not have all the information at their disposal to verify all aspects.
- Health certificates covering the one day old pullets leaving the hatchery and the flock records showed a difference of 8% (the numbers in the farms being higher than on the documents from the hatchery).
- The documentary evidence of farm inspection was not available or insufficient.

2.2.8. Veterinary supervision during transport and at the time of slaughter regarding animal welfare

Conclusions described in the initial mission:

There was insufficient evidence that welfare during transport or at the time of slaughter is being supervised and severe deficiencies in stunning procedures were found.

Comments given by CCA in reaction to initial mission findings:

No comments received.

Findings by FVO-team during follow-up mission

Deficiencies in the stunning procedure such as pre-stunning shocks, water stunner too short, birds not properly stunned (gasper and cornea reflex after cutting) were found in one of the two slaughterhouses visited.

2.2.9. Trade in poultry meat

Conclusions described in the initial mission:

- Adequate systems to register incoming and outgoing meat have not yet been developed in order to facilitate an easy and accurate trace back.
– There are shortcomings in regard to health marking and to information on commercial documents.

– The trace back of products is not completely reliable.

Comments given by CCA in reaction to initial mission findings:

A reminder has been circulated drawing attention to an earlier circular concerning the obligation to comply with the conditions governing the cutting of poultry meat, the equipment used and the placing of poultry on the market, with a view to ensuring traceability.

Findings by FVO-team during follow-up mission

In general, the same findings have been made:

– Adequate systems to register incoming and outgoing meat have not yet been developed in order to facilitate an easy and accurate trace back.

– The trace back of products is not completely reliable.

3. ACTION TAKEN DURING AND AT THE END OF THE MISSION

At the end of the visits to establishments and other sites, all observations and deficiencies found were discussed in the presence of the accompanying officials as well as the management.

4. CONCLUSIONS

The Greek authorities have undertaken some actions to correct the deficiencies in a number of areas and limited progress has been noticed. Efforts have been made to recruit staff and increase the knowledge of staff by organising seminars. However, the situation is not yet fully satisfactory. In general actions have been restricted to issuing circulars, rather than covering also the in-the-field implementation and enforcement of those measures. The main problem remains the lack of supervision by the CCA of the activities of the Prefectural and District level and the lack of staff.

– The co-ordination and supervision of the veterinary services of the Prefectural and District level is not achieved. The line of command and the flow of information between the CCA and the decentralised services are not yet fully operational.

– The numbers of staff and the level of the technical and administrative knowledge of staff are not yet sufficient to guarantee correct understanding and implementation of Community requirements.

– The majority of the deficiencies reported in 2000 concerning the establishments (structure, installations, maintenance, hygiene and operational procedures), own checks, immersion chillers, traceability are still valid.
– Although veterinary presence is now guaranteed in poultry slaughterhouses during slaughter, control staff is still insufficient to carry out all the tasks required.

– The involvement of the OV in regard to the supervision of own checks is still inadequate. Since the previous mission, the situation remains in general unchanged and is unsatisfactory.

– The supervision of the farms and the ante-mortem inspection at the farms is carried out, however the data collected are not sufficient.

5. CLOSING MEETING

A closing meeting was held in Athens on 20 November 2002 with representatives of the CCA. At this meeting, the main findings and conclusions of the mission were presented by the inspection team.

The CCA representatives accepted these findings and conclusions, and gave their commitment to visit the two Districts visited and to ensure that the deficiencies noted are corrected prior to the publication of the report.

6. RECOMMENDATIONS

6.1. To the competent authorities of Greece.

The competent authorities (CAs) should rectify the shortcomings found in the various establishments visited during this mission and mentioned in this report. They should inform the Commission within three months after the receipt of the final report about the following more detailed recommendations:

(1) The competent authorities of Greece should take urgent and appropriate measures to continue the action initiated to rectify the deficit in the frequency and duration of the presence of the OVs (e.g. recruiting more staff).

(2) The competent authorities of Greece should inform the Commission of the number of staff still needed in the different prefectures and should transmit a report every six months on the progress in the recruitment until the recruitment programme has been put in place completely.

(3) The competent authorities of Greece should take urgent and appropriate measures to improve the co-ordination and supervision of prefectural administrations.

(4) The competent authorities of Greece should take appropriate measures to rectify any deficiencies of the same type found during this and the initial mission in all the other approved plants and farms.

(5) The competent authorities of Greece should take appropriate measures to rectify any deficiencies concerning the stunning and should inform the Commission Services within three months after the receipt of the final report.
7. ADDENDUM TO MISSION REPORT DG (SANCO) 8729/2002

Competent Authority’s (CA) response to the recommendations in the report

The CA has stated, in their letter of 12 May 2003, that the translated Draft Report was sent to all Prefectures in Greece, to make them aware of the deficiencies found by the mission team. In addition, it stated that the competent sections at Central level are preparing circular letters with clear guidelines on how to address the different issues.

• With regard to recommendation 6.1.2:
  – The Ministry of Agriculture plans to recruit 30 veterinarians for 2003 as inspection staff.
  – The prefectural authorities have requested the Ministry of Domestic Affairs, Public health Administration and Decentralisation to approve the recruitment of permanent staff. However, they note that this Ministry and the Ministry of Finance in many cases does not approve the recruitment of permanent staff because of financial problems.

• With regard to recommendation 6.1.3 measures to improve co-ordination and supervision of the prefectural administrations:
  – The Directorate-General of Veterinary Matters intends to create a Directorate of Veterinary Inspections and Controls. The bill has already been discussed at first reading by the Greek Parliament’s Legislative Commission.
  – During May 2003 the Directorate General of Veterinary Matters will co-operate with other agencies, which implement already an Internal Control System.

• With regard to recommendation 6.1.4 deficiencies encountered in the two Prefectures inspected: A letter and response were received that measures have been taken to correct the deficiencies. Both Prefectures acknowledge the lack of staff to carry out all the necessary inspections.
ANNEX

1. Abbreviations and special terms used in the report

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<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tr>
<td>EU</td>
<td>European Union</td>
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<tr>
<td>FEHD</td>
<td>Food and Environmental Hygiene Department</td>
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<td>FVO</td>
<td>Food and Veterinary Office</td>
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<tr>
<td>CCA</td>
<td>Central Competent Authority</td>
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<tr>
<td>CA/s</td>
<td>Competent Authority/ies</td>
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<tr>
<td>OV</td>
<td>Official veterinarian</td>
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2. 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 of 04 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in the Member States\(^11\).

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\(^4\) OJ No L 55 of 8.03.1971, p. 23
\(^5\) OJ No L 62 of 15.03.1993, p. 1
\(^6\) OJ No L 74 of 19.03.1988, p. 83
\(^7\) OJ No L 395 of 30.12.1989, p. 13
\(^8\) OJ No L 340 of 11.12.1991, p. 17
\(^9\) OJ No L 62 of 15.03.1993, p. 38
\(^10\) OJ No L 340 of 31.12.1993, p. 21
\(^11\) OJ No L 38 of 12.02.1998, p. 10