



EUROPEAN COMMISSION
HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL
Directorate F - Food and Veterinary Office

DG(SANCO)/9002/2003 – MR Final

FINAL REPORT OF A MISSION
CARRIED OUT IN GREECE
FROM 13/01/03 TO 17/01/03
IN ORDER TO EVALUATE THE SYSTEM FOR CHECKS
ON ANIMAL WELFARE
DURING TRANSPORT AND AT THE TIME OF SLAUGHTER

Please note that clarifications provided by the Greek Authorities are given as footnotes, in bold, italic type, to the relevant part of the report.



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ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

ANIMO	Animal Movement System
BIP	Border Inspection Post
CA	Competent Authority
CCA	Central Competent Authority
DG SANCO	Directorate General of the European Commission for Health and Consumer Protection
DVS	Directorate of Veterinary Services
EC	European Community
EU	European Union
FVO	Food and Veterinary Office
FMD	Foot-and-mouth disease
MA	Ministry of Agriculture
OV	Official Veterinarian
RVO	Rural Veterinary Office
TB	Tuberculosis

1. INTRODUCTION

The mission took place in Greece from 13/01/03 to 17/01/03. The mission team comprised 3 inspectors from the Food and Veterinary Office (FVO).

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

The inspection team was accompanied during part of the mission by a representative from the central competent authority (CCA), the Greek Ministry of Agriculture – Directorate General of Veterinary Services.

An opening meeting was held on 13 January 2003 with the CCA. At this meeting, the objectives of, and itinerary for, the mission were confirmed by the inspection team, and additional information required for the satisfactory completion of the mission requested.

2. OBJECTIVES OF THE MISSION

The objective of the mission was to evaluate the system for checks of animal welfare during transport and at the time of slaughter in Greece. This was a follow-up mission in this regard.

In pursuit of this objective, the following sites were visited:

COMPETENT AUTHORITY VISITS			Comments
Competent authority	Central	2	Opening and closing meetings
	Regional	3	Prefectural Directorate of Veterinary Services (DVS) offices
SITES VISITED			
Slaughterhouses		3	In the letter announcing the inspection, visits to 2 slaughterhouses, where major problems had been identified during previous missions, were requested. 1 more, also visited in a previous mission, was added during the mission.
Port		1	The ferry arriving the day of the visit did not carry any vehicle with live animals. There were 5 vehicles with live animals two days before and 4 vehicles one day after the visit.

3. LEGAL BASIS FOR THE MISSION

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

- Article 10 of Council Directive 91/628/EEC¹ of 11 November 1991 (as amended) on the protection of animals during transport

- Article 14 of Council Directive 93/119/EC² of 31 December 1993 on the protection of animals at the time of slaughter or killing, and

¹ OJ L 340 of 11.12.1991, p. 17

² OJ L 340 of 31.12.1993, p. 21

- Commission Decision 98/139/EC of 4 February 1998 laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in Member States³.

4. BACKGROUND

4.1. Summary of previous mission results

The previous mission with the same objective to Greece was undertaken from 20 to 24 November 2000. The report of this mission is available under reference number DG SANCO/1060/2000 on the DG (Health and Consumer Protection) Internet site at <http://europa.eu.int/comm/dg24/>. This report concluded that supervision was inadequate and no progress had been made when compared to the findings of the previous mission with the same objective (reference DGXXIV/1470/98). The European Commission opened an infringement procedure against Greece by letter of formal notice of 09.11.1999 (No. 99/2195) for failure to enforce Council Directives 91/628/EEC and 93/119/EC after the results of that mission DGXXIV/1470/98.

The report also recommended the Commission Services to monitor the corrective actions taken by the Greek CCA.

4.2. Production and trade information

A considerable number of ruminants and pigs are transported each year to Greece, while the trade of animals from Greece to other Member States or third countries is insignificant. The number of animals from Member States (based on ANIMO data for 2001 and 2002) are as follows:

	2001	2002
Bovines for slaughter	5,308	4,184
Bovines for breeding	8,726	5,206
Bovine for production	34,199	27,963
Small ruminants for slaughter	131,385	140,148
Small ruminants for breeding	1,949	994
Small ruminants for fattening	3,111	6,777
Pigs for slaughter	7,193	2,703
Pigs for breeding	9,143	9,854
Pigs for production	17,266	14,104

5. MAIN FINDINGS

5.1. Competent authority

The reports of missions DG(SANCO)/1060/2000 and DG(SANCO)/8522/2002 provide information on the structure of the competent authorities.

In respect to this information, a second veterinarian started work for the central animal welfare department in October 2002.

³ OJ L 38 of 12.02.1998, p. 10

At Prefectural level, 109 new veterinary staff was recruited in 2001. However, the serious understaffing already outlined during previous missions, does not seem to be substantially improved, as the new staff balances those retired. A certain number of contracted private veterinarians work in most of the DVSs and RVOs. Staff at Prefectural and local level perform all kinds of animal health and public health activities.

5.2. Applicable legislation

The currently applicable legislation on animal welfare during transport and at slaughter has not changed since the previous mission in 2000.

5.3. Implementation

In the previous report 1060/2000, the enforcement of the national legislation and the establishment of an effective control system in order to monitor animal welfare during transport and at slaughterhouses, were recommended. The CCA gave a commitment that all DVSs and BIPs would be informed about their duties and obligations. In 2002 the CCA sent to the DVSs three instructions in relation to animal welfare for journeys of more than 8 hours, explaining which requirements have to be respected and checked by the CAs.

A second recommendation was to provide all relevant veterinary personnel with appropriate training and information. A seminar was held in October 2001 on the application of Council Directive 93/119/EC, where 80 officials (out of 600 total veterinary staff) from the 54 DVSs, the 4 BIPs and the two “meat schools” (where official veterinarians train the workers of slaughterhouses) participated. A series of seminars was then organised during 2002 (it is continuing during the first months of 2003) on the legislation regarding animal welfare, animal health and public health. At these seminars, the procedures for inspections and actions to be taken were explained. All officials, on a rotation basis, were (or will be) involved. The official veterinarians met during the mission were fully aware of their duties.

Figures were provided for checks carried out in 2000 and 2001, but since a new reporting system was introduced in the last quarter of 2001, future data will be more reliable.

Controls are mainly performed at slaughterhouses as places of arrival and at ports (as checks during transport); there are neither approved assembly centres nor staging points or livestock markets. There is no relationship with the Police regarding roadside checks.

In the three Prefectures visited the controls performed during the first 9 months of 2002 regarding transport, indicated that

- in one 102 vehicles had been checked at a port and one infringement detected;
- in the second, 137 vehicles had been checked both at departure and arrival and no infringements had been detected;
- in the third, 79 vehicles had been checked both at departure and arrival and no infringements had been detected.

Neither the CCA nor the Prefectural CA set an annual target of controls to be performed and had therefore not made an interpretation of “adequate sample of animals transported each year” to be checked (Article 8 of Council Directive 91/628/EEC).⁴

5.4. Surveillance

5.4.1. Authorisation of transporters and means of transport

Mission report 1060/2000 recommended to improve the approval system for transporters in order to ensure that hauliers fulfil the requirements EU legislation and are capable of handling animals during transport. The Greek authorities replied that:

- all transporters would be granted an authorisation by the end of 2001, registered in the Register of Transporters and been given a registration number;
- within the same period, all transporters would be re-inspected;
- Presidential Decree 126/2000 would be amended in order to ensure formal training for transporters and their staff.

The first two commitments have been partially achieved, as the number of authorised transporters was 41 at the beginning of 2000 and 329 at the end of 2001. There are not yet data available for 2002 at national level. In the DVS visited 31 transporters received an authorisation in 2002. Since 5.11.2002 the authorisation of transporters has been amended so that a checklist for each vehicle is completed as part of the procedure. In one DVS office the transporters had been already authorised under the previous arrangement where the official veterinarian annotated the application following his check. The authorisation expires in two years and vehicles are re-inspected after this period. The CCA has recently contracted a company for the preparation of a centralised computerised register of transporters. It is foreseen to be fully operative after April 2003, and will be accessible by DVSs.

The third commitment has not yet been achieved.

During the mission the FVO team did not see any transport of live animals within the scope of Council Directive 91/628/EEC.

5.4.2. Documentation, route plans and journey times

The documentation (health certificate) accompanying animals during national transport did not include the time of departure. Although outside of the scope of this mission, the health status of the animals was not indicated in the health certificate accompanying a consignment of six cows sent to the slaughterhouse. A “T” punch hole in the ear and an order from the Prefect for compulsory slaughter would indicate that these were TB reactors.

⁴ *In their response to the draft report the CA noted that, even if no targets had been set, the number of inspections carried out in 2002 were approximately 50% higher than in the two previous years.*

Deficiencies, not detected by the CA, were found in some of the documents already checked by the CA. Copies of health certificates and route plans accompanying sheep, bovines and pigs for slaughter respectively from Spain, France and The Netherlands were inconsistent and missed important information. The journey times indicated in most of the route plans were inconsistent and unfeasible; the mid-term rest during the second leg of the journeys (from the staging points in Southern Italy to the final destinations in Greece) was not recorded. The additional paragraph requested by Commission Decision 2001/298/EC⁵ (regarding the fitness of the animals for the intended journey) was also missing in some documents. Greek CA had accepted most of these consignments and the documents concerned without any action.

There is an ongoing trade of ruminants and pigs intended for slaughter with origin in Spain, France and The Netherlands, arriving to Greece by ferry after a 24 hours stop in a staging point in Southern Italy. This resting period is in compliance with animal welfare regulation on transport. However, the movement through staging points of ruminants and pigs for slaughter is contrary to the provisions of Commission Decision 2001/327/EC, as amended (restrictions to the movement of animals of susceptible species with regard to foot-and-mouth disease)⁶. A representative of the CA was aware of the aforementioned Decision, but acknowledged that it was not being enforced, and indicated that it would make the trade of those animals very difficult.

There are no facilities in the vicinity of ports where animals can have the 12 hours rest when journey times were exceeded during sea crossing, as foreseen in Chapter VII(7)(b) of the Annex of Council Directive 91/628/EEC, as amended. These facilities in Greek ports could be used where the second leg of the land journey for ruminants to Bari and Brindisi was up to 14 hours.

5.4.3. Fitness for transport

The CCA provided guidelines regarding the fitness of animals for transport. During the mission, only small numbers of animals were at the slaughterhouses visited, and no unfit animals were seen among these. In the ante-mortem records of one slaughterhouse, there was no mention of unfit animals, although in the post mortem records there were some cases of piglets whose carcasses had been confiscated because of emaciation.

5.4.4. Animal handling and facilities at slaughterhouses

A recommendation in report 1060/2000 regarding slaughterhouses was to improve the system for their approval in order to fulfil the EU requirements. In response to this recommendation, the Greek authorities committed to re-inspecting all slaughterhouses by the end of 2001 in order to ensure compliance and to include a recital in the authorisation procedure that deals with stunning and slaughter requirements.

⁵ OJ L 102 of 12.04.2001, p. 63

⁶ OJ L 115 of 25.04.2001, p. 12

Three slaughterhouses were visited during the mission. One of them was not usually operating on the day of the visit; consequently a demonstration slaughtering of 30 pigs was organised for the mission team.

The lairages were generally adequate, although in one slaughterhouse some fences and troughs were rusty and had sharp edges. The stunning equipment in the three slaughterhouses was in compliance with EU requirements, as well as the back up system. The maintenance of this equipment was generally adequate, with the exception of one slaughterhouse where one electrical stunning tong was rusty. The procedures used for stunning and bleeding were on the whole in compliance with EU requirements. However:

- It took one hour for restraining, stunning and bleeding three cows; the animals were reluctant to go inside the stunning box and the operators were giving so much attention to respect animal welfare regulation that it is likely not representative of routine procedures. The interval recorded from shooting to sticking of two bovines was 120 seconds, which may allow recovery.
- Two sheep out of 12 seen received a pre-stunning electrical shock. The operator used a brand new watering can to wet the head of the sheep before stunning, but sometimes the official veterinarian reminded him to use it, again indicating that this was not a routine procedure. The interval from stunning to sticking was 37 seconds, again making recovery possible.
- The fasting period for pigs prior to slaughter was 12-24 hours in one slaughterhouse.
- In one pig slaughterhouse the electrical stunning was initially operating at 85V and after intervention of the electrician, requested by the official veterinarian, was brought to 115V. Nevertheless, pigs did not show a tonic stage and only showed a clonic phase, indicating that this may not be a completely reliable stun. The stun to stick interval was short and no recovery was seen. The steriliser for knives was not operational.

Ritual slaughtering currently is not permitted in Greece. The Muslim Communities from two Prefectures accepted the normal slaughtering. A Community from another Prefecture recently asked CCA for the authorisation of ritual slaughtering; this request was not decided yet upon at the time of the mission.

5.4.5. Reporting, sanctions and collaboration with other Member States

Report 1060/2000 recommended to enforce the national legislation, to establish an effective control system and to ensure the effective implementation of sanctions. In response to these recommendations, the commitments given by the Greek authorities were to set up a reporting system and instructions for sanctioning infringements.

By means of an instruction, the CCA introduced a system of monitoring compliance with the legislation on animal welfare during transport and at the time of slaughter. This system entails the use of checklists for documenting the inspections both during transport and at slaughter. The results of the inspections are then summarised. The RVOs send all relevant reports every three months to the DVSs. The DVSs visited had sent such summary reports quarterly to the CCA.

With the current sanctioning system in place any case of first infringement of animal welfare legislation is followed by a written caution. A second infringement is then punished with administrative penalties (for transport: economic sanction from 3,000 to 15,000 € and suspension / withdrawal of the authorisation; at slaughter: economic sanction from 1,500 to 3,000 €). In case of a third infringement, a criminal prosecution would start.

In the sites visited the documentation regarding previous checks on animal welfare and actions taken was examined. According to the CA, only major deficiencies were reported. Examples were as follows:

- In early 2002, a Prefectural Order suspended the slaughter of small ruminants in one abattoir until the electrical stunning equipment was in compliance.
- A consignment of 2,345 piglets from The Netherlands, where 184 animals were dead on arrival and 150 were in a poor state, had been reported to the Greek CCA, who in turn had informed the Dutch CCA and the Commission.
- Information was sent by the Greek CCA to the Spanish CCA regarding two consignments of sheep for slaughter following complaints from a NGO.

The CCA also sent a letter informing Bulgarian authorities about deficiencies detected at BIPs on consignments of horses for slaughter transiting through Greece to Italy. 6 consignments were rejected between February and June 2002.

6. CONCLUSIONS

6.1. Competent Authority

Although there is a relative improvement in the number of staff both at central and peripheral levels, the current resources are still insufficient to ensure that adequate and satisfactory (for number and quality) inspections are carried out.

6.2. Implementation

Information and training, as well as the checklists for inspections, although only recently provided to official veterinarians, represent important tools and positively contribute to guide the job of veterinary officials.

The lack of a target set by the CCA regarding a certain number of controls to be performed each year does not provide OV's with further necessary guidance.

6.3. Surveillance

6.3.1. On transport

The following conclusions are based on the documentary evaluation, as no vehicles within the scope of Council Directive 91/628/EEC, as amended, were seen during the mission.

- The number of authorisations of transporters in Greece has increased considerably. The inspections of vehicles as part of the procedure represent a

positive additional requirement to EU regulation. However, CCA commitment that transporters and their staff would be trained has not been achieved.

- Documents accompanying animals during national transport do not enable the competent authority to check the time of departure, as required by Article 4 of Council Directive 91/628/EEC.
- The acceptance of deficient documentation accompanying animals from other Member States indicates that the controls performed on these documents were not adequate.
- Ruminants and pigs for slaughter from Spain, France and The Netherlands were not in compliance with the provisions of Commission Decision 2001/327/EC on foot-and-mouth disease, in particular with regard to Article 2(f) and 2a(4).
- There was no evidence that bovines and small ruminants transported by ferry from Southern Italy (Bari and Brindisi) to Greece are given the mid-term resting period foreseen in Chapter VII (7)(b) of Council Directive 91/628/EEC, as amended.
- The number of infringements detected indicate a low quality of checks.

6.3.2. At slaughterhouses

Apart from minor deficiencies, facilities were generally in compliance with EU requirements on animal welfare and handling of animals was careful. However procedures seen were not routine.

- There was insufficient surveillance of electrical stunning of pigs and sheep with the result that all animals may not be effectively stunned (Articles 3 and 6(1) of Council Directive 93/119/EC). Also stun to sticking intervals were too long with the result that animals may recover (Annex D(1) of Council Directive 93/119/EC).
- The requirement, set out in Annex A(II)(9) of Council Directive 93/119/EC, that animals which have not been slaughtered within 12 hours of their arrival must be fed, was not adhered to.
- The records seen regarding ante-mortem and post-mortem inspections were not consistent.

6.3.3. Reporting, sanctions and collaboration with other Member States

The reporting system implemented by the Greek CCA represents an improvement in their ability to comply with the reporting requirements of Article 8 of Council Directive 91/628/EEC, as amended.

The procedure regarding sanctions indicates that little progress was made. A written caution in case of first infringement without any regard to its kind and seriousness is not necessarily appropriate.

Collaboration with other Member States in order to ensure compliance with the provisions of Council Directive 91/628/EEC has started, and given the fact the

Greece is place of destination of a significant number of livestock, should be further improved.

6.4. Overall conclusion

When compared with the results of the previous missions, there is evidence that the CA has made efforts to improve the level of compliance with the EU requirements for animal welfare during transport and at slaughter. In particular, the reporting system, instructions and training represent a good improvement. However, the very low number of infringements detected and the mild penalty measures represent insufficient progress with surveillance and enforcement.

Nevertheless, given the seriousness of the findings in the previous reports and the lack of representative activity at locations visited during this mission, there is not yet conclusive evidence that real progress has been achieved.

7. CLOSING MEETING

A closing meeting was held on 17 January 2003 with the CCA. At this meeting, the inspection team presented the main findings and conclusions of the mission and the representatives of the CCA indicated their willingness to address the failures highlighted. The mission team indicated the problems experienced in fulfilling their objectives and proposed that a further mission would be necessary before the end of 2003.

8. RECOMMENDATIONS

8.1. To the competent authorities of Greece

The CCA are requested to inform the Commission Services of the actions taken and planned to address the following recommendations and to provide a timetable for the completion of these actions. This should be done within one month of the receipt of the final mission report. The CCA should ensure that:

- (1) adequate resources are employed at all levels for effective inspections on an adequate sample of the animals transported each year in Greece (Article 8 of Council Directive 91/628/EEC as amended)
- (2) thorough checks are performed in order to ensure that deficiencies are detected and recorded and appropriate actions are taken
- (3) facilities and equipment in slaughterhouses are in compliance with requirements laid down in Council Directive 93/119/EC, in particular:
 - (a) fasting of animals before slaughtering is in accordance with the requirements of Annex A (II)(9) of Council Directive 93/119/EC
 - (b) the use of electrical stunning equipment is in compliance with the provisions of Articles 3 and 6(1) and Annex C (II)(3) of Council Directive 93/119/EC

- (c) bleeding of animals starts as soon as possible after stunning, in compliance with the provisions of Annex D (1) of Council Directive 93/119/EC
- (4) documents accompanying animals during transport enable the CA to check the time of departure, as foreseen in Article 4 of Council Directive 91/628/EEC, as amended
- (5) ruminants and pigs for slaughter from other Member States are accepted only if all requirements of Commission Decision 2001/327/EC are respected
- (6) there should be a system in place to verify that journey times indicated on route plans are in fact feasible
- (7) the level of sanctions is proportionate to the offence.

9. ADDENDUM

CA RESPONSE TO THE RECOMMENDATIONS IN THE DRAFT REPORT

With regard to recommendation (1), the CCA states that a programme of inspections, including the drafting of annual inspection targets, will be considered.

With regard to recommendation (3) (b), the CCA declares that deficiencies observed in stunning will be corrected through training and continuous checks.

With regard to recommendation (5), the CCA states that inspections at ports and places of destination have been intensified. Additionally, a communication was sent to the CCA of Spain, Italy and France requesting those Authorities not to permit dispatch of further consignments of those animals. Since then, the Greek CA has not received any ANIMO message concerning the dispatch of animals whose presence is not allowed in a staging point according to Commission Decision 2001/327.

With regard to recommendation (6), the CCA states that a Circular letter has been sent to the Prefectures providing instructions on how to assess feasibility of route plans issued by transporters under their jurisdiction. According to this, transporters will have to submit to the CA detailed information about the regular routes of their journeys, information that will be double-checked by the Veterinary Services.

