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Directorate F - Food and Veterinary Office

DG(SANCO)/8076/2006 – MR – Final

FINAL REPORT

OF A MISSION

CARRIED OUT IN GREECE

FROM 13 TO 23 JUNE 2006

CONCERNING

BOVINE SPONGIFORM ENCEPHALOPATHY (BSE)

23/10/06 - 42199

EXECUTIVE SUMMARY

This report describes the outcome of a mission carried out by the Food and Veterinary Office (FVO) in Greece, from 13 to 23 June 2006.

The objective of the mission was to evaluate the implementation of certain protective measures against Bovine Spongiform Encephalopathy (BSE).

In terms of scope, the mission concentrated on BSE epidemio-surveillance in bovines, measures taken after suspicion/confirmation of BSE, removal and handling of specified risk material (SRM) from bovines, and the prohibition of feeding products of animal origin to farmed animals and exceptions applicable to this ban (total feed ban). The evaluation included measures taken in response to the recommendations made in previous FVO missions regarding the afore-mentioned issues.

Overall, the report concludes that previous recommendations were partially addressed and some progress has been made. However, controls in relation to BSE epidemio-surveillance, SRM and the total feed ban remained quite ineffective, given that numerous gaps were still present in these areas. In particular, the BSE epidemiological picture was unreliable given the low level of testing of fallen stock; corrective actions to address this were announced following the mission.

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

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ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

Action plan	Actions announced/undertaken as submitted to the Commission services by the CCA in response to the recommendations made in mission reports 8635/2002 and 7252/2004
AHD	Animal Health Directorate, the CCA
BSE	Bovine Spongiform Encephalopathy
CA	Competent authorities
CCA	Central competent authority
Cross-feeding	Feeding of ruminants with feed intended for non-ruminants
DAPI	Directorate of Animal Production Input within the MRDF, a central authority responsible for co-ordination of feed controls
DGVS	Directorate General of Veterinary Services
Fallen stock	Dead on-farm bovines
FVO	Food and Veterinary Office
IR	Identification and registration
KAFE	The Directorate responsible for the management of the bovine IR database within the DGVS
MAT	Microscopic analytical method for the determination of constituents of animal origin for the official control of feedingstuffs according to Directive 2003/126/EC
Mission 8090/2006	Mission carried out in Greece from 13 to 23 June 2006 concerning animal by-products
MRDF	Ministry of Rural Development and Food (*ΥΠΟΥΡΓΕΙΟ ΑΓΡΟΤΙΚΗΣ ΑΝΑΠΤΥΞΗΣ ΚΑΙ ΤΡΟΦΙΜΩΝ)*
NRL	National Reference Laboratory
PA	Prefectural administrations for Rural Development
Report 8635/2002	Report of a mission carried out in Greece from 14 to 18 October 2002 concerning TSEs
Report 9191/2003	Report of a mission carried out in Greece from 10 to 14 November 2003 concerning the bovine tuberculosis eradication programme
Report 7252/2004	Report of a mission carried out in Greece from 26 to 30 April 2004 concerning the feed ban controls
Report 7295/2004	Report of a mission carried out in Greece from 22 to 26 November 2004 concerning controls in the field of animal nutrition
Report 7516/2005	Report of a mission carried out in Greece from 13 to 23 September 2005 concerning animal by-products
Report 7699/2005	Report of a mission carried out in Greece from 14 to 18 November 2005 concerning TSEs in sheep and goats
SRM	Specified risk material as defined in Art. 2 of Regulation (EC) No 1774/2002
Total feed ban	Prohibition of feeding products of animal origin to farmed animals and exceptions applicable to this ban, as laid down in Regulation (EC) No 999/2001
TSEs	Transmissible Spongiform Encephalopathies

1. INTRODUCTION

The mission took place in Greece from 13 to 23 June 2006.

The inspection team, which comprised three inspectors from the Food and Veterinary Office (FVO), was accompanied throughout the mission by a representative from the central competent authority (CCA), the Animal Health Directorate (AHD) of the Directorate General of Veterinary Services (DGVS) within the Ministry of Rural Development and Food (MRDF), and a representative from the Directorate of Animal Production Input (DAPI), as necessary.

An opening meeting was held on 13 June 2006 with the CCA, during which the mission objectives, itinerary, and the standard reporting and follow-up procedures were confirmed, and additional information required for the satisfactory completion of the mission was requested.

2. OBJECTIVES AND SCOPE OF THE MISSION

The objective of the mission was to evaluate the measures put in place to implement certain protective measures against Bovine Spongiform Encephalopathy (BSE), as laid down in Regulation (EC) No 999/2001 [1,2].

In terms of scope, the mission concentrated on BSE epidemio-surveillance in bovines, including animal identification insofar as it is relevant to BSE protective measures, measures taken after suspicion and/or confirmation of BSE, removal and handling of specified risk material (SRM) from bovines, and the prohibition of feeding products of animal origin to farmed animals and exceptions applicable to this ban (hereafter: total feed ban).

The evaluation included measures taken in response to recommendations made in previous FVO missions which addressed the above issues.

The mission itinerary included the following:

COMPETENT AUTHORITY VISITS			**Comments**
CA	Central	√	Opening and closing (de-briefing) meeting
	Regional	√	Prefectural officials met in various prefectural administrations
	Local	√	Local veterinarians and agronomists met on various sites
LABORATORY VISITS			
TSEs laboratory		**1**	National Reference Laboratory for rapid tests
ANIMAL PRODUCTS PROCESSING SITES (non-human consumption)			
Animal feed processors/manufacturers		**2**	One feed establishment and one home compounder using animal proteins
FOOD PROCESSING ESTABLISHMENTS			
Slaughterhouses		**4**	Slaughterhouses for bovines
Cutting plants		**1**	Stand-alone cutting plant

(1) Legal acts quoted refer, where applicable, to the last amended version.

(2) Regulation (EC) No 999/2001 of the European Parliament and of the Council of 22 May 2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies; OJ L 147, 31.05.2001, p. 1.

3. LEGAL BASIS FOR THE MISSION AND OTHER RELEVANT LEGISLATION

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

– Art. 21 of Regulation (EC) No 999/2001;

– Art. 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules [3].

– 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 the Member States [4];

Other legislation, including implementing measures, was considered during the mission, in particular:

– Regulation (EC) No 1774/2002 [5];

– Regulation (EC) No 1760/2000 [6].

4. BACKGROUND

The previous mission in Greece concerning BSE was carried out from 14 to 18 October 2002, the results of which are described in report DG(SANCO)/8635/2002 – MR Final (hereafter: report 8635/2002).

A separate follow-up mission on feed ban controls in Greece was carried out from 26 to 30 April 2004, the results of which are described in report DG(SANCO)/7252/2004 – MR Final (hereafter: report 7252/2004).

The reports 8635/2002 and 7252/2004 made a number of recommendations to the CCA, which subsequently informed the Commission of actions that had been or would be taken aimed at addressing the recommendations made (hereafter: action plan). Where appropriate, both the relevant recommendations and the action plan are outlined under the relevant parts of Section 5.

As regards previous recommendations made in the report 8635/2002 regarding the disposal of SRM and TSE laboratory diagnostics, these had been followed up during a previous mission carried out in Greece from 14 to 18 November 2005 concerning protective measures against TSEs in sheep and goats. The results of that mission are described in report DG(SANCO)/7699/2005 – MR Final (hereafter: report 7699/2005).

FVO mission reports are accessible at

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

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(3) OJ L 191, 28.05.2004, p. 1.

(4) OJ L 38, 12.02.1998, p. 10.

(5) Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption; OJ L 273, 10.10.2002, p. 1.

(6) Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97; OJ L 204, 11.08.2000, p. 1.

As regards the previous recommendation made in the report 7252/2004 concerning the approval of storage plants (e.g. for fish meal), it was followed up during the parallel mission carried out in Greece from 13 to 23 June 2006 regarding animal by-products (DG(SANCO)/8090/2006).

5. MAIN FINDINGS

5.1. COMPETENT AUTHORITIES

The structure of the competent authorities (CA) has been described in the above mentioned FVO mission reports.

Regarding the CA for epidemio-surveillance, and SRM, for a recent description, reference is made to report 7699/2005.

No changes in the competencies related to epidemio-surveillance, including bovine identification and registration (IR) and SRM have occurred since the last mission. The bovine IR database is managed by the Veterinary Support, Medicaments, Applications and Animal Welfare Directorate (KAFE) within the DGVS, and the AHD is in charge of cattle identification controls. As regards competencies related to feed ban controls, since the last mission, no changes occurred centrally and locally (i.e. the local feed committee comprising of an agronomist and a veterinarian) apart from a few central nominations.

Regarding the CA for feed controls, for a recent description, reference is made to a mission carried out in Greece from 22 to 26 November 2005 concerning controls in the field of animal nutrition, the results of which are described in report DG(SANCO)/7295/2004 – MR Final.

The relevant recommendations of report 7252/2004 (feed ban controls) concerned:

- sufficiency of staff for operating the control systems at the local level and in the feed control laboratory;
- the collaboration between the different services involved in feed ban controls, in particular the lists of approved feed establishments and records of the exchange of information.

In response to the above recommendations, the CA undertook to:

- consider re-organisation of the feed services, and expected that recruitment in prefectural services would occur soon;
- continue efforts to improve cooperation and to exchange information between the services responsible for checks on the use of animal proteins.

An extra employee was recruited in the feed control laboratory carrying out microscopic analytical test (MAT) in feedingstuffs after the last mission.

In 2005 and 2006, the DAPI has sent two separate proposals to appoint a feed specialist in each prefectural administration (PA) and a supervisory feed specialist in each region. In August 2004, it has also sent to the DGVS lists of approved feed establishments and home compounders using animal proteins.

The mission team noted that:

- In the most of the PA visited, local members of the feed committees met did not express concerns about the effect of limited resources on their ability to perform duties related to feed ban controls. In one of the PA visited, temporary staff were also allocated to feed ban controls.

- The feed laboratory staff met explained that the increase in personnel doubled the capacity to carry out MAT in feedingstuffs (see also section 5.4.2). It also allowed them to analyse additional samples for feed ban controls, outside the national control programme for feed ban.
- No updates of lists of approved feed establishments and home compounders using animal proteins were sent to the DGVS. The DAPI explained that this was due to the delayed issuing of national implementing rules on feed ban controls (see Section 5.4.1).
- Both at central level and in one PA visited, competencies related to feed ban controls at fish farms, had not been defined or agreed. Also no clear flow of information was established between the import control service and feed control service (i.e. the DAPI and the PA), where fish meal consignments had been imported.
- In all of the PA visited, the CA stated that information (not documented) was shared between the members of local feed committees.

5.2. BSE EPIDEMIO-SURVEILLANCE

The last time a case of BSE was confirmed was in 2001.

There was one suspect notified in 2003 following a positive rapid test result from a bovine slaughtered over 30 months of age. The negative result of the subsequent additional laboratory examination for BSE did not confirm the suspect animal as a positive case.

5.2.1. Identification and registration of bovine animals

Regarding identification and registration of bovine animals, for a recent description, please see report of mission DG(SANCO)/9191/2003 carried out in Greece from 10 to 14 November 2003, concerning the bovine tuberculosis eradication programme.

Since January 2003, the bovine IR database has been operational. Also details of free ranging animals, stolen animals and missing animals are recorded in the bovine IR database.

The first seven digits in the identity code for a given animal provide details of the holding where a bovine animal was born.

No changes in the use of veterinary certificates for permitting movements of animals have been made since the last mission. Farmers are obliged to notify deaths of bovine animals to local veterinarians who in turn requested the PA to update the bovine IR database.

The mission team noted that:

- In one of the PA visited, the staff utilised the bovine IR database for the purpose of seeking details of offspring, sex and dam for a given animal which originated from a different PA. However, in another PA visited, they did not use the bovine IR database for that purpose, and they would have phoned to the relevant PA to trace such animals. The KAFE explained that temporary staff, used for entering data in the bovine IR database, can not always obtain the same level of experience than permanent staff in its use.
- The KAFE explained that the identity code of a dam is a precondition to trace progeny in the bovine IR database. For animals born in 2002 or earlier, it was not compulsory to record details of their dams on the passport or in the bovine

IR database before September 2002. Thus the availability of dam's details for such animals depends on the accuracy of farmer's records.

- According to the CA, free ranging animals are put out to graze in different mountain areas, usually from April to October. The veterinarians met explained that for the practical reasons, farmers do not usually declare deaths of such animals on time.
- In 2005, according to the data provided by the KAFE, 13,818 free ranging animals were notified as dead to the bovine IR database (i.e. 48 % of all adult bovines notified as dead in the bovine IR database) (see table 1). If the veterinarian has established the cause of the death of the animal, it is recorded in the bovine IR database and in the passports accompanying dead animals. This goes beyond the requirements of Regulation (EC) No 1760/2000.
- However, these data (passports and IR database) are not used by the AHD for supervisory purposes and are not cross-checked with information from other sources.

5.2.2. Passive surveillance

The relevant recommendation of report 8635/2002 concerned awareness of clinical symptoms by all involved in epidemio-surveillance and the detection and notification of clinical suspects.

In response to the above recommendation, the CA undertook to provide training to official veterinarians and to issue a Contingency Plan for TSEs in order to increase awareness.

Since the last mission, no clinical suspect for BSE was declared.

The national implementing rules on TSE monitoring require the laboratories for microbiological analyses to submit samples to the National Reference Laboratory (NRL) for rapid testing in cases when their analyses do not allow an alternative diagnosis to BSE.

The mission team noted that:

- The most recent leaflet on clinical symptoms for TSEs was sent from the AHD to farmers and veterinarians in October 2002.
- The veterinarians met were aware of some classical symptoms for BSE and some differential diagnoses for BSE. The veterinarians met explained that no suspect bovine animals had been reported as an alternative diagnosis had always been established.
- The NRL visited had not received any samples for the purposes of ruling out BSE from any of the 15 laboratories for microbiological analyses.

5.2.3. Active surveillance

The relevant recommendation of report 8635/2002 concerned under-notification, sampling and traceability of fallen stock.

In response to the above recommendation, the CA stated that existing notification procedures and compensation provisions combined with the relatively small number of animals and their breeding practices made it highly unlikely that a significant proportion of dead animals eludes sampling. Once the bovine IR database became operational and updated the verification by cross-checking would be possible.

The Greek implementing rules on TSE monitoring allow that 14 PA are exempted from the obligation to sample fallen stock because of their geographical locations and the relatively small quantity of livestock. The bovine population in the 14 exempted PA is below 10 % of the total bovine population, as allowed by Annex III, Chapter A, point 3.2 to the Regulation (EC) No 999/2001.

Since the last mission, an incentive of 100€ was established to encourage testing of fallen stock for BSE. Another incentive (50€), was introduced in case of contagious diseases, regardless of the age of the bovine animals, provided that the veterinarian had established the cause of the death of the animal and that the animal had also been identified and registered in the bovine IR database.

Since the last mission, a separate database for BSE-testing run by the AHD was also developed.

Table 1 below shows the notified dead adult bovines in the bovine IR database, dead adult free ranging animals notified in the bovine IR database and tested dead adult bovines broken down in exempted PA (from compulsory testing) and in non-exempted PA in 2005 (Source: the KAFE and the AHD).

Table 1.

	Total	In exempted PA (from compulsory testing)	In non-exempted PA
Notified dead adult bovines in the bovine IR database	28,681	3,670	25,011
Of which dead adult free ranging animals	13,818	1,548	12,270
Proportion of dead adult free ranging animals out of the total dead adult bovines notified in the bovine IR database	48%	5%	42%
Tested dead adult bovines	3,946	761	3,185
Proportion of tested dead adult bovines out of the total dead adult bovines notified in the bovine IR database	14%	3%	11%

The mission team noted that:

- The number of fallen animals tested has increased since 2003 (i.e. 1,798 samples tested in 2003 vis-à vis 2,533 samples tested in 2004). However, in 2005, the proportion of fallen adult bovine animals tested out of all bovines notified as dead in the bovine IR database was 14 % (see table 1).
- In all of the PA visited (which were non-exempted PA from the compulsory testing), discrepancies between bovines notified as dead in the bovine IR database and those tested for BSE were noted:
  a) In all the PA visited, the veterinarians explained it was due to common practice to keep free-ranging animals. As regards dead adult free ranging animals notified in the bovine IR database, see section 5.2.1.
  b) In three of the PA visited, the veterinarians met explained that discrepancies were also due to farmers' reluctance to notify fallen stock to the veterinarians.

c) Also, according to the veterinarians met, there was no need to take samples from fallen stock in cases where the veterinarian had established the cause of death of the animal. This is contrary to Annex III, Chapter A, section I, point 3 to Regulation (EC) No 999/2001 which requires that all bovines over 24 months of age which have been died or been killed shall be tested for BSE.

d) In another three PA visited, the veterinarians met explained that discrepancies were due to the decomposition of samples from fallen stock and the fact that fallen animals were not sampled at weekends.

- In 2005, the average mortality rate in the adult bovine population was 6%, but it varied between 1.2% and 5.7% in 19 non-exempted PA (out of total 54 PA).
- In 2005, in 14 exempted PA, 761 fallen animals were tested for BSE (i.e. 19% of the total testing of fallen stock) even though they were exempted from the compulsory testing (see table 1).
- In one of the PA visited, in 2005, 49 samples taken from fallen stock (out of 429) were not sent for BSE testing as they were regarded as unsuitable for testing. See also section 5.5.1.
- According to the CA, there is no nationwide collection and disposal system for dead animals. Thus burial of fallen stock (without removing SRM and without having available results of laboratory analyses for BSE testing) was still a common practice nationwide.
- The national implementing rules on the TSE monitoring programme set out *inter alia* measures following testing for BSE. However, in the two slaughterhouses visited, the official veterinarians gave different interpretations of which carcases, including hides, should have been disposed of in case of a positive rapid test result.
- The implementing rules on the TSE monitoring programme set out *inter alia* guidance on the categorisation of bovine animals into different sub-populations. However, the veterinarians met classified bovine animals being eradicated for certain animal diseases without showing clinical signs of the disease as animals found sick at ante mortem, not as healthy slaughtered, as required by Annex III, Chapter A, section I, point 2 to Regulation (EC) No 999/2001.
- In 2005, no bovines found sick at ante mortem were tested for BSE. The AHD stated that no animals are found in that category because the national rules banned slaughter such animals for human consumption. However, in one of the slaughterhouses visited, such animals were killed and sampled for BSE, but they were categorised as emergency slaughtered bovines.

5.2.4. Supervision

The relevant recommendations of report 8635/2002 concerned:

- to use the bovine IR database to assist in the monitoring of the effective testing and the uniform implementation of the surveillance programme;
- supervision of the BSE epidemiosurveillance programme facilitating the co-ordination in prefectures and locally.

In response to the above recommendations, the CA undertook to:

- operate from 2003 a new bovine IR database. According to the CA, however, this database was not accessible at sampling points for BSE epidemio-surveillance, and that this hindered the daily verification of the correct sampling

and the prefectural and central supervision. Consultation was in progress to solve this shortcoming;

– send a circular letter to the prefectures which were falling behind schedule in the collection of samples prompting them to increase sampling. Shortcomings found were acted upon: tracing back animals, updating recorded files, and following-up rapid test results. Training was also provided to involved services in December 2002.

After the last mission, all the PA were provided with read-only access to the bovine IR database (they can only edit data pertaining to their own PA). Around 120 field veterinarian services (within PA) are also connected to the bovine IR database.

The mission team noted that:

- Some informal meetings related to testing for BSE were held centrally upon requests made by the PA. Every three months, the AHD invites laboratory veterinarians to meetings to coordinate and help implement the TSE monitoring programme.
- The AHD has not carried out cross-checks between the number of fallen animals notified as dead in the bovine IR database and those tested for BSE (see table 1) and as a consequence, had not identified discrepancies between numbers of those animals. Shortly after the mission, however, the AHD announced the following corrective actions:
  a) establishing an interface between the bovine IR database and a database for BSE-testing;
  b) seeking an alternative solution to encourage farmers to notify dead free ranging bovines; and
  c) sending a reminder concerning the compulsory testing of all eligible bovines to all of the PA.

5.3. MEASURES FOLLOWING SUSPICION/CONFIRMATION OF BSE

The Greek implementing rules on the TSE monitoring provide *inter alia* detailed provisions on measures in the event of suspected BSE (in the holdings and in the slaughterhouses) and measures on confirmation of BSE. These include nationwide forms for movement restrictions, for epidemiological inquiry, and for submission of samples (see also report 7699/2005).

The mission team noted that:

- Since the last mission, movement restrictions and epidemiological enquiry were not applied as there were no clinical suspects.
- As regards tracing of a dam and progenies, see section 5.2.1.

5.4. TOTAL FEED BAN

5.4.1. Legal and administrative provisions

The relevant recommendation of report 7252/2004 concerned full implementation of feed ban rules in accordance with Regulation (EC) No 999/2001.

In response to the above recommendation, the CA undertook to publish a Joint Ministerial Decision in August 2004 and to issue an implementing circular letter in September 2004.

The mission team noted that

- The previous EU rules (stricter than current rules) on the total feed ban are still applicable in Greece, because national implementing provisions for Regulation (EC) No 1292/2005[7] have not been issued. The DAPI intends to complete new national provisions by the end of September 2006.
- No guidance was issued on how to target samples on batches or events where cross-contamination is most likely to occur.

5.4.2. Implementation of official controls and supervision

The relevant recommendations of report 7252/2004 concerned:

- appropriate checks in establishments including home compounders using certain animal proteins to verify compliance with the authorisation requirements;
- the completion and implementation of a control programme for inspections and sampling.

In response to the above recommendations, the CA undertook to:

- continue to carry out checks on approved establishments and on home compounders using animal proteins;
- send the official control programme to the competent services in September 2004.

The subsequent national control programmes for inspections and sampling in 2005 and in 2006 followed the basic provisions laid down in the first national programme established in September 2004. In addition, the DAPI amended the programme as necessary in order to reflect the requirements laid down in the Commission Recommendations on the annual coordinated inspection programme in the field of animal nutrition [8, 9].

As regards inspections, national rules require at least one annual visit to feed establishments and home compounders to ascertain compliance with provisions. Risk based criteria have been established to determine the percentage of samples to be collected in establishments. These criteria include units with a history of non-compliance or having two production lines, livestock farms (using fish meal or keeping ruminants) and intermediaries stocking feedingstuffs for ruminants and non-ruminants, including imported feedingstuffs.

In total, it was planned to take 300 samples each year. The DAPI is compiling the data related to the numbers of samples taken and analysed in 2005. However,

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(7) Commission Regulation (EC) No 1292/2005 of 5 August 2005 amending Annex IV to Regulation (EC) No 999/2001 of the European Parliament and of the Council as regards animal nutrition; OJ L 205. 6.8.2005. p. 3.

(8) Commission Recommendation of 12 March 2005 on the coordinated inspection programme in the field of animal nutrition for the year 2005 in accordance with Council Directive 95/53/EC; OJ L 62, 9.3.2005, p.22.

(9) Commission Recommendation of 14 December 2005 on the coordinated inspection programme in the field of animal nutrition for the year 2006 in accordance with Council Directive 95/53/EC; OJ L 337, 22.12.2005, p. 51.

according to the initial data provided by the DAPI, the target of sampling appears not have been reached because 2005 was the first complete year of implementation of the sampling programme and extra staff member was not recruited in the laboratory until 2006. In 2006 (up to May), 126 samples out of 136 samples received were analysed, and the remaining 10 samples were awaiting analysis. Prohibited animal proteins were not detected in any of those samples analysed. The last time a breach of the feed ban was detected, was in 2004.

The mission team noted that:

- Despite the availability of sample allocation criteria, the local feed committees could not explain to the mission team how samples and inspections are allocated in their PA.
- In all of the PA visited, no inspection records were available apart from sampling protocols and laboratory results. The local members of the feed committee met explained that the reports were produced only if non-compliance was found. However, in the feed establishment visited, the mission team found a shortcoming related to labelling of feedingstuffs (for the purpose of avoiding cross-feeding). In this case the local members of the feed committee explained that they had identified the deficiency and had already requested orally the operator to take corrective actions.
- In all of the PA visited, after granting the approvals for the use of animal proteins, feed establishments were inspected at least once a year, but none of the home compounders was inspected.
- In all of the PA visited, the main criteria in use for inspections at home compounders was the size of the farm, even though the national rules require that no distinction should be made regarding the size of the manufacturing establishments or the destination of products.
- In one of the PA visited, none of the fish farms were inspected to check compliance with feed ban rules. As regards competencies related to the feed ban controls at fish farms, see section 5.1.
- In one of the PA visited, 19 home compounders and two feed establishments using straight fishmeal (crude protein over 70 %) were not authorised although the authorisation is a requirement of Annex IV to Regulation EC (No) 999/2001. Also 14 home compounders using feedingstuffs containing fishmeal (crude protein less than 50 %) were not registered although the registration is a requirement of Annex IV to Regulation EC (No) 999/2001.
- In most of the PA visited, local members of the feed committees explained that non-authorisation of home compounders was due to the lack of applications received from operators. Also one local feed committee stated that they did not consider it a priority to authorise home compounders using straight fishmeal even though such operators exist in that PA. In contrast, in another PA visited, the local feed committee had taken a proactive approach to authorising home compounders, and as a result, ca 50 % of all the approved home compounders in Greece were based in that PA.
- In all of the PA visited, feedingstuffs in means of transport were not sampled, even though the national control programme and Commission Recommendations on the annual coordinated inspection programme in the field of animal nutrition required this to be done.

- In one of the PA visited, all samples allocated in that PA were taken in July. The official met explained that it was due to an easier workload at that period, and also because in his view it was better to take all the samples at one time.
- In all of the PA visited, the local members of the feed committees took feed samples from finished products for ruminants, mainly from feed establishments and occasionally from farms. However, no samples were taken to check for cross-contamination from batches of feed.
- The DAPI has not carried out any audits for feed ban controls for supervisory purposes although it is a requirement of Regulation EC (No) 882/2004. However, they are drafting national implementing rules on audits.

5.5. LABORATORY NETWORK

5.5.1. BSE diagnosis

Four authorised laboratories were involved in rapid testing of which one acts as the NRL (for rapid testing). For a description of the laboratory network, see report 7699/2005.

Apart from the designation of a different laboratory to function as the NRL for the confirmatory examinations for BSE, no other changes in the laboratory network was made. Also the tasks and duties of the NRL for rapid testing remain as noted in report 7699/2005.

In 2006, an extra employee was recruited to the NRL for rapid testing.

The mission team noted that:

- Individual samples from dead animals were usually not tested immediately in order to use test kits economically, as the priority was first to test bovines slaughtered for human consumption and then dead animals if there were unused wells left in the test kits. A similar finding was also made in report 7699/2005.
- In one of the PA visited, records of fallen stock sampled and tested for BSE in 2005 revealed that there was up to five months delay between dispatching samples and obtaining laboratory test results due to the shortage of test reagents because of the delay in the call for tender for laboratory consumables. A similar finding was made in the report 7699/2005. In 2006, the delay between dispatching samples and obtaining laboratory test results was between one week and seven weeks. According to the laboratory staff in the NRL for rapid testing, since 2006, there was no shortage of reagents for TSE tests.
- Since March 2006, the Diagnostic, Pathology and Anatomy Laboratory of the Athens Veterinary Institute of the MRDF was responsible for the confirmatory examinations for BSE (i.e. histopathological and immunohistochemical methods). However, this change in the competencies had not been communicated to the Commission. The AHD took immediate corrective actions.

5.5.2. Analyses for control of the total feed ban

Since the previous mission, no changes other than an increase in staffing in the single feed control laboratory for MAT have occurred. It has participated, with satisfactory results, in ring tests in 2005 and in 2006.

The mission team noted that in case of unsatisfactory performance in the ring tests, the laboratory staff considered re-training of staff as the minimal corrective measure.

5.6. SPECIFIED RISK MATERIAL

The relevant recommendations of report 8635/2002 concerned:

- verification of the removal of the vertebral column and other SRM by frequent official inspections;
- harvesting of bovine cheek meat in approved cutting plants.

In response to the above recommendations, the CA undertook to:

- provide training to veterinarians concerning the removal of vertebral column, the correct recording of the weight of SRM and the verification of its destruction;
- issue a circular letter concerning approved cutting plants in which the harvesting of head meat is permitted.

Since the last mission, the Veterinary Public Health Directorate has issued several circular letters on the removal of SRM, including changes in the age-limits for the removal of bovine tonsils and vertebral column and the rules set out in Annex XI, Chapter A, point 7 to Regulation (EC) No 999/2001 related to the control system for the harvesting head meat of bovine animals. The exemptions concerning the alternative control system for the harvesting of bovine head meat and the removal of vertebral column in butcher's shops specifically authorised for this purpose were not availed of.

The form used for recording produced SRM dispatched for disposal has not been changed since the last mission.

The mission team noted that:

- Since the last mission, according to the CA, no changes in provisions related to the harvesting of bovine head and tongue in cutting plants were made, as the authorisation to operate as a cutting plant included also the right to harvest head meat without any special authorisation for this purpose.
- In all of the slaughterhouses visited, veterinarians met did not regard tonsils from bovines younger than 12 months of age as SRM on the basis of previous rules on age-limits although it is a requirement of Annex XI to Regulation (EC) No 999/2001. The veterinarians explained that those tonsils were removed during post mortem inspections on the basis of meat hygiene rules and disposed of like SRM.
- Some of the veterinarians met did not regard the rostral part of the heads of bovine animals over 12 months of age (i.e. bones of the front part of the head including upper jaw) as SRM although it is a requirement of Annex XI to Regulation (EC) No 999/2001. The veterinarians met stated that the remaining parietal part of the head, including brain and eyes (i.e. bones surrounding brain) was regarded as SRM. The AHD explained that the Greek word for skull, 'cranium,' can be interpreted either to mean only the parietal part of the head (in standard language) or the entire skull (in the scientific language). A similar finding was also made in report 7516/2005 (which concerned a mission carried out in Greece from 13 to 23 September 2005 concerning animal-by-products).
- In one of the slaughterhouses visited, remnants of spinal cord were found in two carcases of bovine animals aged older than 12 months but younger than 24 months and which have passed post-mortem inspections (i.e. carcases were stamped with health marks).

- The method of removal of vertebral column from eligible animals could not be checked during on the spot visits in any of the slaughterhouses visited or in a cutting plant visited, as they had either been already removed or the removal was not necessary because of the age-limit.
- In two of the slaughterhouses visited, on the basis of previous rules, bovines slaughtered younger than 12 months of age were labelled with blue stripes indicating there was no need to remove vertebral columns. Even though current EU provisions do not require the removal of vertebral columns from bovines aged between 12 and 24 months the blue stripe was not in use for those. Also only bovine animals of Greek origin were labelled with blue stripes.
- The mission team was only able to observe demonstrations of the harvesting of cheek meat in two slaughterhouses visited. A variety of methods were used to perform this operation, including two which involved removing the head from the hooks or conveyor. In these cases, it was not apparent that the precautions to minimise risks of contamination of cheek meat with central nervous tissue given in Art. 7 of Regulation (EC) No 999/2001 were followed and in particular, no samples were taken to verify the effectiveness of any measures to reduce contamination. Also no guidance for the sampling plan for the detection of cross-contamination of head with central nervous tissue was issued, and no laboratory tests for such analyses were available.
- In the slaughterhouses visited, SRM from sampled bovine animals (i.e. heads) were recorded as being incinerated on the day of slaughter, whereas in fact those heads were retained, while waiting for the BSE test results. In other cases, records of slaughtered animals aged over 24 months and records of disposal of vertebral columns did not correspond.

6. CONCLUSIONS

6.1. COMPETENT AUTHORITIES

1. The CA has addressed a previous recommendation on sufficiency of staffing for controls locally and in the feed control laboratory. A recommendation on the collaboration between the different services involved in feed ban controls and the sharing of information has been partially addressed only.
2. Deficiencies in defining competencies at fish farms and in sharing information on import controls of fishmeal compromise feed ban controls intended to verify compliance with the provisions laid down in Annex IV, Chapter III, point F to Regulation (EC) No 999/2001 throughout the production and distribution chain. This is not in line with requirements laid down in Art. 4 of Regulation (EC) No 882/2004.

6.2. BSE EPIDEMIO-SURVEILLANCE

1. The CA has addressed partially all the previous recommendations.
2. The lack of notifications of clinical suspects raises doubts about the efficacy of passive surveillance, and is not in accordance with the requirements laid down in Art. 11 of Regulation (EC) No 999/2001.
3. Even though guidance was issued, misunderstandings exist on ground level in respect of the categorisation of bovines slaughtered in the context of a disease eradication campaign and of measures to be taken following rapid testing. This is not in line with provisions laid down in Annex III, Chapter A, section I, points 2

and 6 to Regulation (EC) No 999/2001, and it distorts the uniform application of the monitoring programme.

4. The level of sampling and testing of fallen stock is very low, therefore it compromises the reliability and accuracy of BSE epidemio-surveillance data, and impairs the effective detection of BSE. This is not in line with the requirement for compulsory testing as laid down in Annex III, Chapter, A, section I, point 3 to Regulation (EC) No 999/2001. The AHD announced corrective actions to address this issue shortly after the mission.

5. Even though tools for cross-checking of data from various sources were available they were not used for supervisory purposes to verify the efficacy of the monitoring programme, notably regarding testing of fallen stock. This is not in line with requirements laid down in Art. 10 of Regulation (EC) No 882/2004. Nevertheless, the CA stated that they intend to rectify this shortcoming.

6.3. MEASURES FOLLOWING SUSPICION/CONFIRMATION OF BSE

1. It was not possible to assess the practical implementation of measures to be taken following suspicion and confirmation of BSE as no such cases have occurred. However, measures following suspicion and confirmation of BSE appeared to meet requirements laid down in Artt. 12 and 13 of Regulation (EC) No 999/2001. Even though data on cohort animals and progenies were recorded in the bovine and identification database, these were not utilised for tracing in some PA. Effective tracing of animals is also hampered by the lack of some data, pre 2002. This does not facilitate the identification of bovine animals at risk required by Art. 13 of Regulation (EC) No 999/2001.

6.4. TOTAL FEED BAN

1. The CA has addressed a previous recommendation on the implementation of the total feed ban. The recommendations on appropriate checks in establishments using certain animal proteins and on the implementation of a control programme for inspections and sampling are partially addressed only.

2. A lack of system to keep records of the outcome of inspections and the absence of supervision hamper a uniform and effective enforcement of the total feed ban. This is not in line with requirements laid down in Artt. 9 and 10 of Regulation EC (No) 882/2004.

3. A significant number of the feed establishments and home compounders using animal proteins were neither authorised nor registered, which is not in line with provisions laid down in Annex IV, Chapter II to Regulation (EC) No 999/2001. This jeopardises the controls on the total feed ban.

4. The design of the national control programme for sampling followed some criteria laid down in the Commission recommendation on the annual coordinated inspection programme in the field of animal nutrition. Sampling, however, was not targeted on batches or events where cross-contamination with prohibited animal proteins is most likely to occur, which is not in line with requirements laid down in Art. 3 of Regulation (EC) No 882/2004.

5. The national control programme for inspections was not risk-based and did not include all stages of production and all types of premises where feed is produced, handled and administered. This is not in line with requirements laid down in Art. 3 of Regulation (EC) No 882/2004. This approach undermines the ability to verify compliance with the provisions laid down in Annex IV to Regulation (EC) No 999/2001.

6.5. LABORATORY NETWORK

1. The laboratory network for rapid testing is satisfactory. Nevertheless, delays in analysing samples from fallen animals do not facilitate actions required by Annex X, Chapter A, point 3.(b) to and Art. 13 of Regulation (EC) No 999/2001 following positive rapid test results in a timely manner.
2. The laboratory network for analyses for feed ban controls is satisfactory.

6.6. SPECIFIED RISK MATERIAL

1. The CA has addressed partially both recommendations.
2. Misunderstandings on which bovine tissues should be regarded as SRM and unreliable records of SRM produced compromise the effectiveness of official inspections to verify the correct removal and handling of SRM in compliance with provisions laid down in Annex XI, Chapter A, point 12 to Regulation (EC) No 999/2001.
3. No control system to ensure the prevention of contamination of head meat of bovine animals with central nervous tissue, as required by Annex XI, Chapter A, point 7 to Regulation (EC) No 999/2001, has been put in place. Thus the CA can not demonstrate that bovine head meat is harvested in a safe manner avoiding a risk of cross-contamination with central nervous tissue.

6.7. OVERALL CONCLUSION

Previous recommendations were partially addressed and some progress has been made. However, controls in relation to BSE epidemio-surveillance, SRM and the total feed ban remained quite ineffective, given that numerous gaps were still present in these areas. In particular, the BSE epidemiological picture was unreliable given the low level of testing of fallen stock; corrective actions to address this were announced following the mission.

7. CLOSING MEETING

A closing meeting was held on 23 June 2006 with the representatives of the CCA. At this meeting, the main findings and preliminary conclusions of the mission were presented by the inspection team. The CCA did not indicate any major disagreement with these. During the meeting, additional information requested by the mission team was provided by the CCA. Immediately following of the completion of the mission, the CCA provided information on a range of planned corrective actions.

8. RECOMMENDATIONS

The CA are invited to provide details of the actions taken and planned, including deadline for their completion within 25 working days after the receipt of the report.

<u>With regard to the CA</u>

1. To clarify competencies related to feed ban controls at fish farms and to ensure that sufficient exchange of information between services involved in import controls of fishmeal takes place in line with Art. 4 of Regulation (EC) No 882/2004 in order to control compliance with the provisions laid down in Annex IV to Regulation (EC) No 999/2001.

<u>With regard to BSE epidemio-surveillance</u>

2. To ensure that suspect bovine animals are notified to the relevant CA, as required by Art. 11 of Regulation (EC) No 999/2001.

3. To ensure that bovines slaughtered in the context of a disease eradication campaign, but showing no clinical signs, are classified in accordance with Annex III, Chapter A, section I, point 2 to Regulation (EC) No 999/2001.
4. To ensure that measures following rapid testing are followed in line with provisions laid down in Annex III, Chapter A, section I, point 6 to Regulation (EC) No 999/2001.
5. To increase sampling and testing of fallen stock in order to comply with the requirements laid down in Annex III, Chapter, A, section I, point 3 to Regulation (EC) No 999/2001.
6. To make better use of tools available for the supervision of the efficacy of the monitoring programme in accordance with requirements laid down in Art. 10 of Regulation (EC) No 882/2004. In particular, to perform cross-checks between data from different sources in order to ensure the validity of the data and to assist in the monitoring of controls.

With regard to measures taken following suspicion/confirmation of BSE

7. To ensure that animals at risk, notably cohort animals and progenies, are traced and identified, as required by Art. 13 of Regulation (EC) No 999/2001.

With regard to the total feed ban

8. To take measures which allow a uniform and effective enforcement of feed ban rules, including supervision in accordance with requirements laid down in Artt. 9 and 10 of Regulation EC (No) 882/2004.
9. To ensure that all feed establishments and home compounders using animal proteins are authorised or registered in line with provisions laid down in Annex IV, Chapter II to Regulation (EC) No 999/2001 and that they comply with the relevant requirements.
10. To target sampling on batches or events, where cross-contamination with prohibited animal proteins is most likely to occur, in line with requirements laid down in Art. 3 of Regulation (EC) No 882/2004.
11. To design a national control programme for inspections in such a way that it takes into account a risk-based strategy as laid down in Art. 3 of Regulation (EC) No 882/2004 in order to verify compliance with the provisions laid down in Annex IV to Regulation (EC) No 999/2001.

With regard to laboratory network

12. To avoid delays in testing fallen stock in case of positive rapid test results in order to allow actions required by Annex X, Chapter A, point 3.(b) to and Art. 13 of Regulation (EC) No 999/2001 in a timely manner.

With regard to SRM

13. To increase official inspections to verify the correct removal and handling of all bovine SRM in compliance with provisions laid down in Annex XI, Chapter A, point 12 to Regulation (EC) No 999/2001.
14. To put in place a control system which ensures the prevention of contamination of head meat of bovine animals with central nervous tissue in compliance with provisions laid down in Annex XI, Chapter A, point 7 to Regulation (EC) No 999/2001.

COMPETENT AUTHORITIES RESPONSE TO RECOMMENDATIONS

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

http://ec.europa.eu/comm/food/fvo/ap/ap_greece_8076_2006.pdf