FINAL REPORT OF A MISSION
CARRIED OUT IN
GREECE
FROM 25 NOVEMBER TO 27 NOVEMBER 2008
IN ORDER TO
EVALUATE A PROPOSED BORDER INSPECTION POST
Executive Summary

This report describes the outcome of a mission carried out by the Food and Veterinary Office (FVO) in Greece from 24 to 27 November 2008.

Its objective was to evaluate a proposed BIP against the relevant requirements of EU legislation with a view to its listing in Commission Decision 2001/881/EC.

The main conclusions are as follows:

As regards the infrastructure and equipment at the proposed BIP of Astakos, a number of shortcomings were identified which would require corrective action before its listing could be considered. These were discussed with, and accepted by the CCA. The CCA indicated that the shortcomings would be corrected without delay.

As regards the staffing, supervision and operation of the proposed BIP, many deficiencies relating to systemic problems identified in previous missions were also noted here. In particular the staff has received insufficient instructions or guidance on how to implement procedures, nor have they received sufficient training; no procedures have been put in place to in order to agree with Customs the entry of consignments of veterinary interest to the Free Zone; there is little formal co-operation with Customs; there is no system in place at central level for the ongoing supervision by the CCA of the correct application of procedures at BIPs.

In the closing meeting the CCA recognised and accepted the findings, and indicated that they could not be solved at service level alone but needed action at a higher level. They did commit however, to put in place a manual of procedures by March 2008.

While the infrastructure and equipment deficiencies can be remedied in the short term, the staffing, supervision and operational deficiencies of the proposed BIP are of a more systemic nature. In view of these shortcomings and until the resolution of all the deficiencies noted, the BIP of Astakos cannot be recommended for listing in Commission Decision 2001/881.

The report makes a number of recommendations addressed to the Greek competent authorities, aimed at rectifying the identified shortcomings and/or further enhancing the control measures in place.
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<td>Approval categories</td>
<td>Categories of live animals and animals products for the receipt of which BIPs are approved in accordance with Commission Decision 2001/881/EC, as follows:</td>
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<tr>
<td>HC</td>
<td>Products fit for human consumption</td>
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<td>NHC</td>
<td>Other products (Products not fit for human consumption)</td>
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<td>T(FR)</td>
<td>Frozen products</td>
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<td>NT</td>
<td>No temperature requirements</td>
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<td>BIP</td>
<td>Border Inspection Post as defined in Council Directives 97/78/EC</td>
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<td>CA</td>
<td>Competent Authority</td>
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<td>CCA</td>
<td>Central Competent Authority</td>
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<td>CN-code</td>
<td>The goods nomenclature code as laid down by Annex 1 to Council Regulation (EEC) No 2658/87 (i.e. the Combined Nomenclature)</td>
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<td>Decision on the consignment</td>
<td>The decision made by the OV at the BIP and entered on the CVED, as to the outcome of veterinary checks and the resulting fate of consignments.</td>
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<tr>
<td>DGVS</td>
<td>Directorate General of Veterinary Services of MRDF</td>
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<td>Directorate for Veterinary Inspection and Control of MRDF</td>
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<td>FVO</td>
<td>Food and Veterinary Office</td>
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<td>Manifest</td>
<td>A document specifying in detail the items carried by boat, rail or aeroplane arriving in ports/rails/airports of destination for a specific destination</td>
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<td>MRDF</td>
<td>Ministry of Rural Development and Fishery</td>
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<td>Products of Animal Origin</td>
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<td>Positive list</td>
<td>List of commodities of animal origin which are subject to veterinary checks in BIPs, as specified in Commission Decision 2007/275/EC</td>
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<td>RASFF messages</td>
<td>Messages used in the Rapid Alert System for Food and Feed of the European Commission</td>
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<td>TRAde Control and Expert System introduced by Commission Decision 2004/292/EC</td>
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1 INTRODUCTION

This mission to Greece took place from 24 to 27 November 2008. The mission team comprised two inspectors from the Food and Veterinary Office (FVO). The mission was undertaken at the request of the Central Competent Authority (CCA) in addition to the FVO’s planned mission programme. During the mission, the inspection team was accompanied by representative from the CCA, the Ministry of Rural Development and Fishery (MRDF) and partially by representatives from Customs and port representatives.

An opening meeting was held on 24 November 2008 with the representatives from the CCA. At this meeting, the inspection team confirmed the objectives of and itinerary for the mission. Additional information required for the satisfactory completion of the mission was requested by the CCA.

2 OBJECTIVES OF THE MISSION

The objective of the mission was to evaluate a proposed BIP against the relevant requirements of EU legislation with a view to its listing in Commission Decision 2001/881/EC.

The mission scope covered the planned implementation of import/transit control system at the proposed BIP Astakos port with respect to the requested approval category HC-T(FR)(2), HC-NT(2) and NHC-NT.

In terms of the criteria applied, the assessment was undertaken against the requirements set out in Council Directives 97/78/EC, the relevant implementing Regulations and Decisions, and Regulation (EC) No 882/2004 of the European Parliament and of the Council.

In pursuit of these objectives, the following were visited/meetings were held with:

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3 LEGAL BASIS FOR THE MISSION


Legal acts quoted in this report are provided in Annex 1 and refer, where applicable, to the last amended version.

4 BACKGROUND

The last mission concerning import controls was in March 2007. The results of which are described in DG(SANCO)/2007/7242-MR Final (hereafter: report 2007/7242) and are available on the Internet at:

http://ec.europa.eu/food/fvo/ir_search_en.cfm

The evaluation of the proposed BIP Astakos port was carried out at the request of the Greek CCA.

5 MAIN FINDINGS

5.1 COMPETENT AUTHORITIES

5.1.1 Allocation of competencies among CAs

Based on Art. 4 of Regulation (EC) No 882/2004 the MS shall designate the competent authorities responsible for the purposes and official controls set out in the Regulation, ensure the impartiality, quality and consistency of official controls at all levels and when, within a competent authority, more than one unit is competent to carry out official controls, efficient and effective coordination and cooperation shall be ensured between the different units.

• The structure and responsibilities of CAs are described in part 2 par. 3. of the report DG(SANCO)/7460/2007 (Country profile) available on the internet at:

http://ec.europa.eu/food/fvo/country_profiles_en.cfm

• Responsibilities related to approval, suspension and supervision of BIPs and providing the relevant instructions and information for efficient and uniform performance of the import/transit control are shared between three directorates of Ministry of Rural Development and Fishery (MRDF).

• Two directorates, Directorate of Animal Health (DAH) and Directorate of Veterinary Public Health (DVPH), within Directorate General of Veterinary Services of MRDF (DGVS) are directly responsible for submitting the legislation

- The BIPs are under direct supervision of DGVS and Prefectorates do not have any role in the BIPs supervision.
- The contact point for RASFF messages is the Greek Food and Safety Authority which informs the relevant directorates of MRDF about incoming messages. Each BIP receives all RASSF messages directly. In order to send a message, BIPs contact directly the DVPH, which delivers the information to the contact point.
- Problems were noted with coordination of the tasks between DAH and DVPH, notably regarding provision of legislation and instruction for performing the import/transit control.

5.1.2 Staff and training

Artt. 4 and 6 of Regulation (EC) No 882/2004 of the European Parliament and Council require competent authorities to ensure that they have a sufficient number of suitable staff who receive appropriate training, are kept up-to-date in their competencies, and have an aptitude for multidisciplinary cooperation. Resource and training requirements are also prescribed in the second indent of Annex II to Directive 97/78/EC and in point 2 of the Annex to Commission Decision 2001/812/EC.

- Two full time veterinarians and two auxiliary staff are planned for the proposed BIP. The recruitment of the staff depends on publication of a Presidential Decree which allocates staff resources and budget for the newly approved BIP.
- The adoption of a Presidential Decree is a lengthy process and no deadline could be provided as to when the required staff can be put in place.
- One official veterinarian intended for the proposed BIP participated at various training courses related to import controls organized by European Commission in 2008. No formal system is in place to disseminate the information received to other staff.
- No national system for initial and ongoing training is in place other than on-the-spot training, although some BIP staff have participated at Commission organised training. This is due to the difficulties caused by the fact that the veterinary service may not organize their own training due to lack of resources at central level and the fact that different bodies are involved in planning and organising the training.
- The CCA indicated that a number of identified problems are due to insufficient staff at central level. A request for an increase in the staff dating from 2006 has not been implemented yet.

5.2 Administrative provisions
5.2.1 Administrative provisions for implementation

Based on Art.4 of Regulation (EC) No 882/2004 the MS shall ensure that the CCA adopt measures to guarantee application of EU legislation and to ensure the impartiality, quality and consistency of official controls at all levels, including the import/transit control system.

Art. 8 of Regulation (EC) No 882/2004 of the European Parliament and of the Council requires documented procedures which contain information and instructions or a manual of procedures for personnel carrying out veterinary checks in order to allow correct and uniform implementation of the requirements. Several pieces of EU legislation require entry point lists or certain establishment lists linked to controls to be established (Artt. 8 (6) and 12 (4) of Directive 97/78/EC, Chapter XI of Annex VIII to Regulation (EC) No 1774/2002 of the European Parliament and of the Council).

• Commission Decisions and Regulations are directly applicable. However implementing national legislation may be needed, if there is a necessity to specify responsibilities of the authorities.

• According to the CCA a BIP may be delisted by amendment of the Presidential Decree. While this is a long process, the operation of BIP may be suspended by CVO decision.

• While some circulars have been issued accompanying the legislation sent to BIPs there is no comprehensive set of instructions sent to BIPs. Nor could the CCA provide any overview of which circulars and on what topics have been sent to the BIPs to date.

• No manual of procedures have been developed; in a number of key areas inspected by mission team no centrally developed procedures were in place. Limited information related to import/transit control is provided by issuing Circulars.

• Art. 24 (2) of Regulation (EC) No 882/2004 is not yet implemented with the consequence that products of animal origin can be unloaded in free zones without the agreement of the competent authority.

5.2.2 Implementation of TRACES, databases and distribution of documentation/information

Art. 3 (3) of Commission Decision 2004/292/EC requires to use the TRACES-system for all consignments received at BIPs. This system replaced the ANIMO-system which is foreseen by EU legislation as a means of communication in relation to specific consignments received at BIPs, e.g. channelled and rejected consignments, non-EU-complying consignments for transit, warehouse storage or ship supply.

The registers and records to be maintained in BIPs are laid down in points 4 and 5 of the Annex to Decision 2001/812/EC, whereas point 4 specifies the alternative records to be kept in electronic or paper form at the BIP, such as registers in accordance with Commission Decisions 97/394/EC and 97/152/EC and a register on the reduced frequency of checks (Commission Decision 94/360/EC) as well as one of all samples taken for laboratory tests, if the data are not entered into TRACES.
Records of checks made and anomalies found must be kept, where arrangements for the disposal of waste of POAO are under the responsibility of the BIP, as well as records to demonstrate that regular checks have been made at free zones, free/customs warehouses or ship suppliers within, or closely associated with, the BIP area.

- TRACES is used to register arriving consignments in the BIPs.
- The national database ANIO is used for recording the data as required in Decision 97/394/EC; however, the manual registration for rejected consignments did not include all data specified in Decision 97/152/EC, as described in the previous reports. The BIPs have not been required to maintain other registers as foreseen in the Annex to Regulation (EC) No136/2004.
- The CCA is responsible for providing the documentation to BIPs and each BIP has to develop its own system for maintaining and updating the documentation and information pertaining to import control requirements specified in point 3 of the Annex to Commission Decision 2001/812/EC.
- No guideline as how to maintain the documentation is in place and the CCA has no overview of documentation issued. This is especially important in relation to issued safeguard/protective measures. There is no system in place ensuring that all BIPs are aware of all such measures. At the BIP visited, the process of putting in place the required documentation is under development.

5.2.3 Application of legal powers available to official services

Art. 54 of Regulation (EC) No 882/2004 requires a competent authority which identifies non-compliance to take appropriate action to ensure that the operator remedies the situation. In deciding on the action, it must take account of the nature of the non-compliance and the past record of the operator involved. The article prescribes the nature of the measures which such action should include, where appropriate, inter alia the restriction or prohibition of the placing on the market, import of feed, food or animals. The operator concerned, or a representative, must be given written notification of the decision for action, the reasons involved, and the rights of and procedures for appealing that decision. The expense for the action is to be borne by the operator.

Art. 55 of Regulation (EC) No 882/2004 requests MS to lay down rules on sanctions applicable to infringements of feed and food law and other EC provisions relating to the protection of animal health and animal welfare and to take all measures necessary to ensure that they are implemented. The sanctions provided for must be effective, proportionate and dissuasive. Furthermore, MS shall notify the provisions applicable to infringements of feed and food law and any subsequent amendment to the Commission without delay.

- The duties of veterinary staff in relation to import controls are defined by national legislation in particular in presidential decrees 282/1997, 420/1993 and 178/2005.
- The BIP veterinarians can:
  - Reject or destroy the consignments which are not in compliance with EU
requirements,

- Take action in the cases of violation of Directive 2002/99/EC,

• The BIP veterinarians do not have power to apply sanctions, other than those described above, for example in order to compel notifications in advance of arrival of the consignments.

5.3 CONTROLS FOR IMPORT/TRANSIT CONSIGNMENTS AT ENTRY BIPs

5.3.1 Identification and selection of consignments

Art. 3 (1) of Directive 97/78/EC require that MS shall ensure that no consignment from a third country is introduced into EU territory without having been subjected to the veterinary checks at a BIP. Additionally, Art. 7 of Directive 2002/99/EC stipulates that POAO intended for human consumption are introduced only if they comply with the EU requirements for animal health.

Art. 2 (1) of Regulation (EC) No 136/2004 requires notification of consignments of POAO before their physical arrival on Community territory to the BIP staff. Member States shall in accordance with Article 3(3) of Directive 97/78/EC ensure that persons responsible for the load are obliged to forward information in advance by duly completing where applicable the certificate referred to in Article 5(1) of this directive, or provide a detailed description in writing or in computerised form of the consignment.

Art. 9 of Directive 97/78/EC specifies requirements for consignments in transhipment and Commission Decision 2000/25/EC clarifies the minimum and maximum time periods following arrival, which determine the type of veterinary checks to be carried out: either documentary or identity and physical checks depending on the time elapsed.

• The pre-notification of consignments is in most of cases done by persons responsible for load using the Part I of CVED in accordance with Article 2 (1) of Regulation (EC) No 136/2004. However no action is foreseen if this is not applied.

• The BIP staff now has access to database of port operator, but detailed information on arriving consignments is not available.

• Controls are limited only to submitted manifests what means that the checks carried out on manifests are not carried out in such a way as to verify that all relevant consignments have been pre-notified as is required by Art. 2 of Regulation EC No 136/2004.

• The Customs system ICIS does not identify those consignments which require veterinary checks, as specified in Commission Decision 2007/275/EC.

• The positive list of products in the above Decision was transmitted by CCA to the Customs service who provided it to local offices, however it could not be clarified why it had not been included in ICIS.

5.3.2 Veterinary checks
Procedures for veterinary checks on consignments of animal origin are laid down in Direc\-tive 97/78/EC, in Regulation (EC) No 136/2004 and in Commission Decisions such as 94/360/EC and 2001/812/EC.

• As the BIP was not in operation the mission team could not evaluate veterinary checks, however in many areas assessed no written procedures could be provided covering e.g. such areas as manifest checks and checks of arriving consignments, performance of veterinary checks, rejection, re-importation, detention, transit and channelling procedures.

• At the BIP visited the lack of a system to monitor transhipment is important as transhipment is expected to account for 60% of throughput of the port.

5.3.3 Monitoring plans for sampling imported consignments
Point 1 of Annex II to Regulation (EC) No 136/2004 requires Member States to submit consignments of POAO presented for importation to a monitoring plan to detect residues, pathogenic organisms or other substances dangerous to humans, animals or the environment.

• A monitoring plan for sampling imported consignments in BIPs as required in Annex II to Regulation (EC) No 136/2004 was not in place.

• Some sampling is carried out based on received RASFF messages or EU legislation.

5.3.4 Decision on the consignment
Procedures for the veterinary decision on consignments of products of animal origin and the follow up of such specific consignments are laid down in Directive 97/78/EC, in Regulation (EC) No 136/2004 and in Decision 2001/812/EC.

• During on-the-spot visit the mission team could not assess the performance of the import/transit checks as the proposed BIP is not in operation. However no written instruction on decision on the consignment have been issued.

5.3.5 Monitoring of non-EU complying consignments
Artt. 11 and 12 of Directive 97/78/EC lay down specific requirements in relation to consignments in transit. These consignments must enter and leave the EU via an approved BIP and detailed requirements are specified in Commission Decisions 2000/208/EC and 2000/571/EC. Since 01.01.2005 such consignments must fulfil the animal health requirements laid down in Art. 7 of Directive 2002/99/EC.

The first indent of Art. 11 (2) (b) of Directive 97/78/EC provides for the possibility that documentary checks will be confined to the examination of the on-board manifests in case of consignments which are destined for transit but not unloaded from ships/aircraft.

• The confirmation of exit of the transiting consignments are sent by BIPs of exit. However, there is no system in place to monitor if confirmations for transit consignments from the exit BIPs have been received within the 30-day-deadline in
accordance with Art. 2 of Decision 200/571/EC.

5.4 SUPERVISORY SYSTEMS

5.4.1 Supervision, inspections and reporting

Art. 4 of Regulation (EC) No 882/2004 requires MS to carry out internal audits, or have external audits carried out.

Art. 8 of Regulation (EC) No 882/2004 requires that competent authorities have procedures in place to verify effectiveness of official controls and that effectiveness of corrective action is ensured.

MS shall ensure that veterinary checks on POAO from third countries are carried out in accordance with Directive 97/78/EC. To monitor and verify compliance with EU legislation, MS have to put supervisory systems for the import/transit controls in place.

- An audit system in accordance with Art. 4 (6) of Regulation (EC) No 882/2004 has been put in place. The Directorate for Veterinary Inspection and Control (DVIC) carries out the audits of the BIPs according to a plan established for each year. All the BIPs were audited from 2005 to 2007 and recommendations to rectify the shortcomings noted were issued to the BIPs. No audit of a BIP was planned for nor performed in 2008.

- While these audits focused mostly on structures and equipment, they identified many deficiencies such as lack of staff, lack of training, unsatisfactory cooperation between directorates of MRDF related to providing the instructions and performing control and supervision of the BIPs. These audits could not have addressed the issue of veterinary procedures properly as written procedures are not in place.

- The CCA visited the BIP of Astakos in advance of FVO mission and produced a report where the corrections and measures to be taken were noted and addressed to the BIP. The CCA in report proposed the corrections regarding the facilities of the BIP, guidelines on the technical equipment and the archives and the connection to the database of the arriving containers. In the follow up report corrections of most of the identified deficiencies were reported.

- No ongoing supervision, as foreseen under Art. 8 of Regulation (EC) No 882/2004, is in place in order to verify effectiveness of official controls. The CCA indicated they plan to inspect each BIP twice per year but cannot due to lack of staff.

5.4.2 Communication and co-operation between services

Close co-operation between the various services involved in import controls is specifically required by paragraph 5 (1) of the Annex to Decision 2001/812/EC and is necessary in order to ensure that Art. 3 of Directive 97/78/EC are being implemented properly, i.e. that all consignments are being presented for checking at the BIP. Co-operation and co-ordination is also essential for the exchange of relevant information
between services and to ensure access to electronic systems in accordance with Artt. 6 and 7 of Commission Regulation (EC) No 136/2004.

- No arrangements for the access of BIP staff at the proposed BIP to custom database was in place.

- No formal agreement between Customs and Veterinary Services at central and BIP level dealing with such issues as positive list and sharing of information as required by Artt. 6 and 7 of Regulation (EC) No 136/2004 and by Art. 24(2) of Regulation (EC) No 882/2004 is in place as the written agreements between public services are not foreseen by national legislation.

- Problems were noted with coordination of the tasks between DAH and DVPH, notably regarding provision of legislation and instruction for performing the import/transit control.

5.4.3 Facilities outwith the BIPs

- Accredited laboratories, slaughter houses, incinerators and rendering plants (the latter approved in accordance with the provisions of Regulation (EC) No 1774/2002) were available for the BIP visited.

5.5 PROPOSED BIPs: FACILITIES, EQUIPMENT AND HYGIENE

The procedures for addition of new BIPs to and withdrawal of BIPs from the list of BIPs are laid down in Art. 6 of Directive 97/78/EC.

**BIP Astakos port**

- The BIP largely complies with the requirement for HC. However, the equipment is incomplete. Finishing works related to sealing up of existing gaps have to be done in the frozen storage. No equipment for handling the consignments between the unloading area and storage rooms was available at the time of visit.

- In the NHC part the layout of changing room is not satisfactory as it leads to a risk of cross contamination. Other problems were discussed concerning the unloading area which was not properly closed. The walls in the storage room were not easy to clean and disinfect. The equipment is not complete yet.

- The documentation required by Section 3 of Annex of Decision 2001/812/EC was not completed at the time of visit.

- No cleaning and disinfecting programme was in place.

6 CONCLUSIONS

6.1 ADMINISTRATIVE MEASURES
1. The lack of a manual of procedures or detailed and updated instructions presents a risk that these controls may not be done correctly. Areas where development is needed were identified: the most important of which relate to manifest checks and checks of arriving consignments, performance of veterinary checks, rejection, re-importation, detention, transit and channeling procedures. The lack of documented procedures is not in compliance with Art. 8 (1) of Regulation (EC) No 882/2004.

2. Although there is a system to provide updated documentation to the BIPs, the lack of instruction on keeping the documentation and records in the BIPs makes it difficult to ensure that all documents will be maintain as required by Art. 4 (3) of Council Directive 97/78/EC and section 3 of the Annex to Decision 2001/812/EC.

3. The lack of an annual sampling monitoring plan is not in accordance with the provisions of Annex II to Regulation (EC) No 136/2004 and therefore the obligations of Art. 29 (3) of Council Directive 96/23/EC are not fulfilled accordingly.

6.2 SUPERVISORY SYSTEMS

1. Some co-ordination of activities between the CCA, Customs and other authorities is in place. However, exchange of necessary information and data between all involved authorities as required by Artt. 6 and 7 of Regulation (EC) No 136/2004 is not in place.

2. As responsibilities are shared between three directorates of CCA, problems with coordination of the tasks between two directorates of MRDF, notably regarding provision of legislation and instruction for performing the import/transit control mean that it cannot be guaranteed that all relevant information is provide to BIPs.

3. An internal audit system of the BIPs to meet the requirements of Art. 4 (6) of Regulation (EC) No 882/2004, has been developed but does not fully address veterinary check procedures. However, no plan for ongoing verification of effectiveness of official controls at BIPs, as required by Art. 8 of Regulation (EC) No 882/2004, is in place to ensure correct implementation of import/transit controls.

4. Luck of staff at central level contributes to shortcomings in supervisory systems, issuing of instruction and in training programme.

5. The problems with providing relevant training to BIP staff as required by Art. 6 of Regulation (EC) No 882/2004 and Annex of Decision 2001/812/EC means it cannot be assured checks will be carried out correctly.

6. At the proposed BIP the deficiencies and shortcomings in the facilities, equipment and missing cleaning and disinfection programme were noted with respect to Artt. 4 and 5 and of the Annex to Decision 2001/812/EC. Most of these deficiencies had been identified by CCA in advance.
6.3 Import/Transit Controls

1. The proposed BIP was not in operation therefore the mission team could not evaluate veterinary checks performed at the spot. However, in many of assessed areas no written procedures could be provided covering such areas as manifest checks and checks of arriving consignments, performance of veterinary checks, rejection, re-importation, detention, transit and channeling procedures, therefore it can not be guaranteed that import/transit controls will be performed correctly.

2. As there is no procedure of giving the agreement of CCA before unloading the consignments from third countries in the free zone as laid down in Art. 24 (2) of Regulation (EC) No 882/2004 consignments which do not comply with EU rules may not be identified before unloading.

6.4 Overall Conclusion

As regards the infrastructure and equipment at the proposed BIP of Astakos, a number of shortcomings were identified which would require corrective action before its listing could be considered. These were discussed with, and accepted by the CCA. The CCA indicated that the shortcomings would be corrected without delay.

As regards the staffing, supervision and operation of the proposed BIP, many deficiencies relating to systemic problems identified in previous missions were also noted here. In particular the staff has received insufficient instructions or guidance on how to implement procedures, nor have they received sufficient training; no procedures have been put in place to in order to agree with Customs the entry of consignments of veterinary interest to the Free Zone; there is little formal co-operation with Customs; there is no system in place at central level for the ongoing supervision by the CCA of the correct application of procedures at BIPs.

In the closing meeting the CCA recognised and accepted the findings, and indicated that they could not be solved at service level alone but needed action at a higher level. They did commit however, to put in place a manual of procedures by March 2008.

While the infrastructure and equipment deficiencies can be remedied in the short term, the staffing, supervision and operational deficiencies of the proposed BIP are of a more systemic nature. In view of these shortcomings and until the resolution of all the deficiencies noted, the BIP of Astakos cannot be recommended for listing in Commission Decision 2001/881.

7 Closing Meeting

A closing meeting was held on 27 November 2008 with representatives from the CCA. At this meeting, the main findings and the preliminary conclusions of the mission were presented by the inspection team. The CCA recognised and accepted the findings, and stated that measures will be taken in order to rectify all shortcomings. The CCA indicated
that they are some measures which could not be solved at service level alone but they need action at a higher level. They did commit however, to put in place a manual of procedures by March 2008.

A number of clarifications were provided by the mission team in relation to certain findings presented.

## 8 Recommendations

The competent authorities are invited to provide, within one month of receipt of the report, a response including an action plan setting out the actions planned/undertaken to satisfactorily address the following recommendations, along with a timetable for completion of these actions, within the deadlines indicated.

<table>
<thead>
<tr>
<th>No.</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>To expedite the development of manuals or detailed guidance in relation to documented procedures including complete instructions to allow uniform implementation of veterinary checks and implementation of the monitoring sampling plan for all BIPs for residues, pathogens or other substances dangerous to humans, animals or the environment as laid down in Annex II to Regulation (EC) No 136/2004.</td>
</tr>
<tr>
<td>2</td>
<td>To take measures to ensure that documentation is maintained at the BIPs as required in section 3 of the Annex to Decision 2001/812/EC.</td>
</tr>
<tr>
<td>3</td>
<td>To further develop the system of supervision to ensure correction of identified shortcomings to achieve better overall compliance with EU requirements laid down in Directive 97/78/EC and implementing Regulations and Decisions and in Art. 4 (6) of Regulation (EC) No 882/2004.</td>
</tr>
<tr>
<td>4</td>
<td>To ensure that the number of staff at central level and at BIP is adequate to comply with Art. 3 of Decision 2001/812/EC and to draw the training programme planned for 2009 to ensure that all officials who are responsible for veterinary checks are provided with initial and ongoing training in import / transit controls particularly in the execution of veterinary checks and issuing of the decision on the consignment, in order to better implement Art. 6 of Regulation (EC) No 882/2004.</td>
</tr>
<tr>
<td>5</td>
<td>To rectify the deficiencies noted for facilities, equipment and operational hygiene in proposed BIP, in order to implement the provisions of Art. 6 of Directive 97/78/EC and the provisions of Decision 2001/812/EC.</td>
</tr>
<tr>
<td>6</td>
<td>To further develop the system for the identification and selection of the consignments subjected to veterinary checks, in co-operation with customs and port operator, especially regarding access to electronic systems, as laid down in Artt. 6 and 7 of Regulation (EC) No 136/2004 and to implement, with Customs, a procedure to apply Art. 24 (2) of Regulation (EC) No 882/2004.</td>
</tr>
<tr>
<td>7</td>
<td>To ensure that pre-notification is received in advance of physical arrival of the consignment as required by Art. 2 of Regulation (EC) No 136/2004, Art. 1 of Regulation (EC) No 282/2004 and Art. 3 of Directive 97/78/EC and to put in</td>
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<tr>
<td>No.</td>
<td>Recommendation</td>
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<td>place a system of cross checks of manifest in the port to verify that this is happening.</td>
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<tr>
<td>8</td>
<td>To ensure that veterinary checks including laboratory checks are carried out, and that veterinary decisions taken are in accordance with provisions of Directive 97/78/EC and the implementing Regulations and Decisions.</td>
</tr>
</tbody>
</table>

The deadline for completion of the corrective actions to all recommendations except of recommendation No 5., according to Art. 6 of Decision 2001/812/EC is three months.

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

<table>
<thead>
<tr>
<th>Reference</th>
<th>OJ Ref.</th>
<th>Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decision 2001/881/EC</td>
<td>OJ L 326, 11.12.2001, p. 44–62</td>
<td>2001/881/EC: Commission Decision of 7 December 2001 drawing up a list of border inspection posts agreed for veterinary checks on animals and animal products from third countries and updating the detailed rules concerning the checks to be carried out by the experts of the Commission</td>
</tr>
<tr>
<td>Reference</td>
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<tr>
<td>Decision 97/152/EC</td>
<td>OJ L 59, 28.2.1997, p. 50–52</td>
<td>97/152/EC: Commission Decision of 10 February 1997 concerning the information to be entered in the computerized file of consignments of animals or animal products from third countries which are re-dispatched</td>
</tr>
</tbody>
</table>