



Hellenic Republic
Ministry of Rural
Development and Food

EFET

HELLENIC FOOD AUTHORITY

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Food Enterprise Controls Directorate
Department for controls on businesses handling
food of animal origin**

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General Directorate of Veterinary Services
Veterinary Public Health Directorate
Section for meat, poultry and meat products
Section for slaughterhouses and other
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SUBJECT: Draft report of Community mission DG(SANCO)/2012-6334

REF: Your letter No 3663/99482 of 27 September 2012

We are sending you comments on the draft mission report DG(SANCO)/2012-6334 and replies to the recommendations concerning the matters falling within the EFET's area of competence. Please add this letter as an annex to the single final reply which our department expects to receive.

The President of EFET

Yannis Michas

[signed and stamped as true copy]

Internal distribution:

Laboratory Controls Directorate

RESPONSE TO DRAFT REPORT OF A MISSION

CARRIED OUT IN GREECE

FROM 23 APRIL TO 4 MAY 2012

IN ORDER TO EVALUATE OFFICIAL CONTROLS

RELATED TO SLAUGHTER AND PROCESSING OF FRESH MEAT, IN

PARTICULAR FRESH OVINE MEAT

5.1. COMPETENT AUTHORITIES

1.1.4 Audit findings

1st paragraph: The accreditation of EFET laboratories concerns the field of analyses, not sampling.

1.1.5 Audit findings:

We would also refer you to the following circulars issued by the EFET:

- 5128/14-4-2010. Issues relating to official checks on the frequency of sampling of minced meat and meat preparations, control of nitrites and nitrates.
- Circular 6345/7-5-2010. Information about legislative developments in the field of food additives
- Circular 3666/8-3-2011. Guidelines for issuing operating licences for businesses handling food of animal origin

1.2.2 Cutting plants – 5th paragraph The way in which findings are presented does not correspond, in some cases, to the actual situation of that specific establishment. For instance, reference is made to the presence of a cat which was in fact outside, within the fenced surroundings and not in the establishment, and to hand-operated hand wash facilities, whereas the facilities in the establishment are foot-operated.

1.2.3 Audit findings – Own checks The text says that the supplier carries out a test on water at least once per year, whereas actually the sampling frequency by which the supplier must abide is laid down in legislation (Directive 98/83/EC).

RECOMMENDATIONS

1. To continue the implementation of the documented official control system currently being put in place based on Article 8 of Regulation (EC) No 882/2004, paying particular attention to the effectiveness of official controls and to taking corrective actions.

To help improve the effectiveness of official controls, the EFET will continue to:

- put forward priorities when planning and shaping annual control actions for 2013;
- adapt at local level the periodicity and frequency of controls on the basis of risk analysis data;
- help in the adoption of legislative acts which will improve the framework governing official controls (single system of sanctions, rules on the marketing and sale of foodstuffs, amendments to the Food and Beverage Code);
- develop and implement training programmes for 2013 which will meet official control

needs;

- use the findings and conclusions of mission DG(SANCO)/2012-6334 by informing the competent authorities of issues relating to checks on requirements, inspection of water in establishments, method for recording and documenting findings, compliance measures;
- follow up, collect and assess information from official controls;
- adopt specific effectiveness indicators to enhance official controls.

5. To take appropriate action to implement the requirements of Article 3 of Regulation (EC) No 2073/2005, including the possibility of using the flexibility for slaughterhouses with low throughput provided for in Chapter 3.2 of Annex I to this Regulation.

As regards small cutting plants and establishments producing preparations in small quantities, the competent authorities have made use of the derogation relating to the sampling frequency for minced meat and meat preparations in accordance with the EFET's guidelines.

9. To improve supervision of staff performing official controls from central and regional levels to ensure effectiveness of official controls, as required by Article 8 of Regulation (EC) No 882/2004.

The EFET, through its system for collecting, recording and evaluating the controls carried out by services, may:

- have a clearer view on the range and scope of controls, their frequency, analysis of cases of non-compliance;
- draw conclusions which help formulate the MANCP report;
- highlight problems and take corrective measures;
- communicate with the local authorities about the conclusions and problems by any appropriate means (letters, meetings, visits);
- make use of the capabilities of the integrated IT system (OPS).

EFET will do its best to improve supervision and adaptation of the local authorities' audit work and measures to the priorities and support services of central planning.