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

DG(SANCO)/1060/2000 – MR final

FINAL REPORT OF A MISSION
CARRIED OUT IN GREECE
FROM 20 TO 24 NOVEMBER 2000
CONCERNING ANIMAL WELFARE DURING TRANSPORT AND AT THE
TIME OF SLAUGHTER OR KILLING

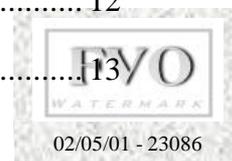
Please note that certain written comments, made by the Greek authorities on 23 March 2001 in response to the draft report, have been included in the text of this final report in bold, italic type or as a footnote.



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TABLE OF CONTENTS

1. INTRODUCTION.....	5
2. OBJECTIVES OF THE MISSION.....	5
3. LEGAL BASIS FOR THE MISSION.....	5
4. SUMMARY OF PREVIOUS MISSION RESULTS AND BACKGROUND TO THE CURRENT MISSION	6
5. MAIN FINDINGS.....	6
5.1. Applicable legislation	6
5.2. Competent Authority.....	6
5.3. Operational procedures	7
5.3.1. Inspections	8
5.3.2. Transport checks.....	8
5.3.3. Controls in Slaughterhouses.....	8
5.3.4. Sanctions.....	8
5.4. Control of transport.....	9
5.4.1. Fitness of animals	9
5.4.2. Controls at ports	9
5.4.3. Controls in slaughterhouses	10
5.5. Means of transport	11
5.5.1. Authorisation of transporters	11
5.5.2. Control of vehicle standards.....	11
5.6. Control of route plans and journey times.....	11
5.7. Control of stunning and slaughtering.....	12
6. CONCLUSIONS.....	12
6.1. Supervision and reporting	12
6.2. Instructions and training.....	13
6.3. Animal welfare controls	13



7. CLOSING MEETING..... 13

8. OVERALL ASSESSMENT OF THE COMPETENT AUTHORITY 13

9. RECOMMENDATIONS..... 14

 9.1. To the competent authorities of Greece 14

 9.2. To the Commission services..... 15

10. ADDENDUM 16



ABBREVIATIONS & SPECIAL TERMS USED IN THE REPORT

AHD	Animal Health Directorate
CA	Competent Authority
CCA	Central Competent Authority
DG SANCO	Directorate General of the European Commission for Health and Consumer Protection
DVS	Directorates of Veterinary Services
GDV	General Veterinary Directorate
EEC	European Economic Community
EC	European Community
EU	European Union
FVO	Food and Veterinary Office
VCPD	Veterinary Care, Drugs and Practice Directorate
VPHD	Veterinary Public Health Directorate



1. INTRODUCTION

The mission took place in Greece from 20 November to 24 November 2000. The mission team comprised two inspectors from the Food and Veterinary Office (FVO), and one Member State expert.

The mission was undertaken as part of the FVO's planned mission programme. The inspection team was accompanied during the mission by a representative from the central competent authority, the Ministry of Agriculture.

An opening meeting was held on 20 November 2000 with the central competent authority. At this meeting the objectives of, and itinerary for, the mission were confirmed by the inspection team, and additional information required for the satisfactory completion of the mission was requested.

2. OBJECTIVES OF THE MISSION

The first objective of the mission was to evaluate progress since the last mission concerning animal welfare during transport and at the time of slaughter (reference DGXXIV/1470/98). The second objective was to evaluate animal welfare controls, as part of a wider series of missions in the Member States on welfare during transport.

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

COMPETENT AUTHORITY VISITS			Comments
Competent authority	Central	2	Opening and closing meetings
	Prefecture	2	
LIVE ANIMAL CONTROL SITES			
Slaughterhouses		3	
Ports		2	

3. LEGAL BASIS FOR THE MISSION

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

Commission Decision 98/139/EC of 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.

Council Directive 91/628/EEC of 19 November 1991 on the protection of animals during transport, as amended by the Council Directive 95/29/EC and Council Regulation (EC) No. 411/98 of 16 February 1998 on additional animal protection standards for the carriage of livestock on journeys exceeding eight hours.

Council Regulation (EC) No.1255/97 of 25 June 1997 concerning Community criteria for staging points and amending the route plan referred to in the Annex of Directive 91/628/EEC.



Council Directive 93/119/EC of 22 December on the protection of animals at the time of slaughter or killing.

4. SUMMARY OF PREVIOUS MISSION RESULTS AND BACKGROUND TO THE CURRENT MISSION

There was a series of missions to Greece concerning animal welfare during transport and at the time of slaughter, of which the last was undertaken from October 12th to October 16th 1998.

The report of this mission (reference number DGXXIV/1470/98) is available at:

http://europa.eu.int/comm/food/fs/inspections/vi/reports/greece/index_en.html

Major deficiencies in the field of animal welfare during transport and at the time of slaughter were observed during this mission, in 1998, in particular in the fields of stunning and long-distance transport. The level of veterinary supervision in Greece was also not considered to be of the necessary standard to enforce the requirements. When comparing the results of this mission with the results of the previous animal welfare missions carried out in Greece in 1995 and in 1996, no progress could be noted.

An infringement procedure was opened against Greece by letter of formal notice, dated 19-11-1999, with ref. A 99 / 2195.

5. MAIN FINDINGS

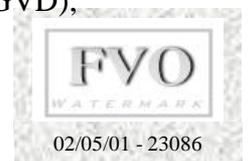
5.1. Applicable legislation

The following legislation was relevant to the controls carried out at the various locations visited:

- Council Directive 91/628/EEC (as amended by 95/29/EC) on the welfare of animals during transport has been transposed into Greek legislation by the Presidential Decree n°.344/1997 of 11.11.1997;
- Council Directive 93/119/EEC concerning the protection of animals at the time of slaughter or killing has been transposed into Greek legislation by the Presidential Decree n°.327/1996 of 3.9.1996;
- A general animal welfare law 1197/81 on the protection of animals contains general provisions on the protection of animals during transport, on the stunning of mammals before killing at slaughterhouses and makes provision for penalties.

5.2. Competent Authority

The competent authority in Greece is the General Veterinary Directorate (GVD), within the Greek Ministry of Agriculture.



The GVD is subdivided into:

- Animal Health Directorate (AHD), subdivided into four sections;
- Veterinary Public Health Directorate (VPHD), subdivided into four sections;
- Veterinary Care, Drugs and Practice Directorate (VCPD), subdivided into three sections including the Animal Welfare section.

11 Border Inspection Posts are under the control of the GVD.

Following the abolition of the veterinary inspectorates, there are no longer any regional veterinary services.

At the prefectural level veterinary activities are carried out by the Prefecture (*Nomos*). There are 54 Directorates of Veterinary Services (DVS), one in each *Nomos*. Following a policy of decentralisation, these Directorates are under the budgetary control of the *Nomos* and in that way controlled by the Ministry of Interior and not by the Ministry of Agriculture. Law 2240/94 (153, I) and Law 2218/94 (90, I) define the Prefect as the political supervisor and empower him to hold the veterinary service of his Prefecture to account. However the DVS receive orders from the Ministry of Agriculture and have to implement the relevant legislation.

It was reported that at the local level there are 347 Rural Veterinary Offices under the supervision and co-ordination of the DVS but only 250 of these Rural Veterinary Offices are operating at present.

Information was given that the Ministry of Agriculture (GVD) is responsible for transposing EC legislation into Greek national legislation and notifies prefectural veterinary services of relevant legislation and their obligations concerning veterinary supervision in the *Nomi* by sending out circulars, letters etc. The overall responsibility for implementation of the provisions on the protection of animals during transport rests at the central level. Responsibility for on the spot implementation e.g. inspections relating to the protection of animals during transport, for the issue of licences to transporters, the control of route plans and animal welfare at slaughterhouses rests at the prefecture and at local levels with the DVS and the Rural Veterinary Offices.

5.3. Operational procedures

The DGV sends the texts of legislation and related circulars to the DVS in the prefectures to keep them informed about the legal requirements relating to the protection of animals during transport and at the time of slaughter. Further detailed instructions, guidelines or checklists related to inspections or other tasks associated with animal welfare from the CCA to the DVS were not presented.

The mission team was informed that transporters are provided with information related to animal welfare by the prefectural DVS and the Rural Veterinary Offices and that the DVS keep a register of transporters, issue licences and control route plans and other necessary documents. Information is mainly provided at meetings arranged by the veterinary directorates responsible for the



geographical areas in which transporters are established and by sending out relevant written instructions stating the transporters' obligations. The verification of the above was not possible due to lack of appropriate documentation or any other written evidence being made available to the mission team.

5.3.1. Inspections

The inspectors carrying out the controls provided for by Directive 91/628/EEC and Directive 93/119/EEC are official veterinarians of the prefectural and local authorities.

A report of inspection for 1999 (required by article 8 of Council Directive 91/628/EEC, as amended) has in January 2001 been sent to the Commission service. There were no reporting systems in place at central, prefectural and local level or between the services. However in one prefectural DVS office visited, a reporting system concerning inspections of animal transports at the port has been developed on the individual initiative of the CA in charge.

5.3.2. Transport checks

The CCA indicated that the inspections to verify compliance with the requirements are carried out by the veterinary services of the prefectures and by the Rural Veterinary Offices in accordance with Article 8 of Directive 91/628/EEC, and that the authorities carry out inspections, if seen necessary, as part of their normal work and also whenever a complaint is received. However there was written evidence of such checks having been done only in one prefectural office responsible for inspection at one port visited during the mission (see 5.3.1).

The CCA could not present any documentation or figures concerning transport checks in Greece.

5.3.3. Controls in Slaughterhouses

Controls of animal welfare at slaughterhouses are carried out by the DVS and the Rural Veterinary Offices. No appropriate practical or written evidence of controls concerning animal welfare at slaughterhouses was seen during the mission (see 5.4.3 and 5.7.). Furthermore in the slaughterhouses visited no registers of incidents involving unfit animals were available.

5.3.4. Sanctions

The Directorate General for Veterinary Services has delegated the imposition of sanctions for possible infringements of the legislation to the competent prefectural and local veterinary services. The services take appropriate action in accordance with Article 8 of Law 1197/81, Article 13 of Presidential Decree 344/97 and Article 23 of Law 2538/97.

If, in the course of a check, an inspector discovers an infringement of the legislation relating to the protection of animals during transport or at the



time of slaughter, the inspector has the legislative power to impose the sanctions stated below depending on the seriousness of the infringement, on whether the culpable party has committed the infringement previously and on the degree of maltreatment engaged in:

- an oral or written formal warning
- an administrative fine (e.g. money penalties)
- suspension or withdrawal of the transport licence
- Referral to the public prosecutor.

The CCA was aware of two cases of sanctions for infringements relating to transporters. No further cases concerning infringements against animal transportation and animal welfare during slaughter were presented. However during the mission, the CA in one *Nomos* visited stated that they intend to open an infringement procedure against two transporters due to the findings made during inspections of long distance transports in the presence of the mission team.

5.4. Control of transport

5.4.1. Fitness of animals

In all DVS visited, evidence that unfit animals had been excluded from further transportation was not presented.

5.4.2. Controls at ports

Two important ports for intra-community long distance transports were visited during the mission. The inspection of the animals is carried out while the animals remain on the trucks.

In one port the local competent authority reported that one official is present two times per week (2 h) in the port area to check animal transporters coming from Italy, however there is no reporting system in place related to the number of animal transports and veterinary inspections and findings.

During the inspection of three cattle transports, coming from Italy, the official veterinarian did not point out any particular deficiencies in the transport and licence documents. Changes of transport routes had been explained in the route plans, but for the resting time and feeding of the animals there was no official stamp of the staging point in Italy. The check of animals and means of transport did not give the official veterinarian any reason for further action.

Since there was no documentation e.g. checklists for inspections by the local competent authority, the inspection itself was undertaken in a non-informed and disorganised way. Furthermore, the lack of information on



numbers of inspections and the types of findings demonstrated that there is no evidence for routine inspections of animal transports.

In the other port visited, the local competent veterinary authority has two veterinarians present (and if necessary the director of the veterinary authority as well) at arrivals of animal transports in the port. Animals arrive there three days per week. The inspection reports of animal transports have been documented. An inspection checklist, elaborated on their own initiative, includes the identification of animals, licences of transporters, status of fitness of animals, problems during transport (information from the driver), vehicle standards (e.g. bedding, stock density, compartments or group sizes, water supply, and ventilation system). The inspection of three animal transports (in the presence of the mission team) on the basis of the above mentioned checklist was not satisfactory, because a number of deficiencies were not detected by the responsible veterinarian, e.g.:

- dead animals,
- moribund animal, (unfit for further transport)
- injured animal, (unfit for further transport)
- overcrowding of animals,
- unsatisfactory checks on water tanks
- Incomplete route plans.

Although there is a good organisation of routine checks of animal transport in the port and a reporting system established, the veterinary checks of the vehicles and the animals were shown not to be sufficient to cover the requirements related to animal welfare during transport.

5.4.3. *Controls in slaughterhouses*

Veterinary officials representing the competent authorities in the field of animal welfare at the three visited slaughterhouses were not taking the necessary measures to enforce the respective legislation, e.g. by allowing unfit animals (e.g. a moribund sheep, new-born lamb with a not completely healed navel) for transport to the slaughterhouse.

The veterinarians in charge did not take any action or notice of various deficiencies seen, e.g.:

- inadequate unloading facilities (no appropriate lateral protection, gaps between lorry and ramp, angle of slope over 45 degrees),
- overloading of animals,
- insufficient route plan controls in the case of long distance transport



- lairages in one of three slaughterhouses insufficient due to general poor condition of the buildings and broken watering facilities.

The control of requirements concerning animal welfare at slaughterhouses was insufficient particularly as no records on inspections and/or actions could be presented.

5.5. Means of transport

5.5.1. Authorisation of transporters

The CCA reported that in order to obtain a licence from a DVS a transport operator must submit an application together with the requisite supporting documents and a solemn declaration stating a willingness to comply with the requirements. The DVS carry out checks to verify that the transporter will be able to comply with all of the undertakings given in the solemn declaration. The licence is issued following a positive recommendation by the veterinary service to the prefect. However, neither Greek transporters seen during the mission, both having vehicles for long distance transports, could present a valid licence.*¹

5.5.2. Control of vehicle standards

The level of control of vehicle standards and the conditions they provided for the animals varied at the different sites visited (see 5.4.2. and 5.4.3.). No records were available to prove that infringements related to hauliers have been noted.

5.6. Control of route plans and journey time.

The mission team was informed that the veterinary services and the rural veterinary offices should control route plans when carrying out veterinary inspections during transport and at the place of destination.

No instructions concerning legislative requirements for route plans and their effective monitoring were presented during the mission.

One transporter visited presented three route plans. However, these route plans were incomplete and there was no evidence presented that the transporter returns the route plans, as required, after completion of the journey.

Transporters seen at the ports also presented many incomplete route plans. Although requested by the mission team, route plans were not presented in one *Nomos* visited.

¹ * according to the Greek comments these cases are absolutely unique.



5.7. Control of stunning and slaughtering

Three slaughterhouses in two different Nomi were visited during the mission. In these slaughterhouses the stunning of pigs, lambs and sheep was carried out in such a way that several animals were not completely unconscious after being stunned by using electronarcosis before bleeding.

All slaughterhouses visited used electronarcosis to stun individual sheep, lambs and pigs. However only one slaughterhouse out of three had an apparatus incorporating a device which measures the impedance of the load and prevents operation of the apparatus if the minimum required current cannot be passed, an audible and visible device indicating the length of time of its application to an animal and a connected device indicating the voltage and the current under load; positioned so as to be clearly visible to the operator.

Further deficiencies seen during the mission included:

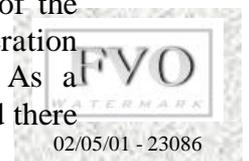
- wrong positioning of electrical stunning tongs;
- animals receiving several electrical pre-stun shocks;
- operators responsible for stunning not showing the necessary knowledge and skill for correctly judging the result of their activity;
- no control of effective stunning done by the official veterinarians in charge;
- a moribund sheep being killed without any attempt to stun it before bleeding;
- lack of adequate means of restraining animals before stunning;
- no back-up stunning equipment at the place of slaughter;
- No documented or visual evidence of the supervision of the welfare requirements;
- All three captive bolt pistols seen in the slaughterhouses were not maintained and they were in a poor condition, which can have a negative effect on proper functioning.

Only in one slaughterhouse visited was a register kept of the maintenance of the stunning equipment.

6. CONCLUSIONS

6.1. Supervision and reporting

There is no evidence that the DGV supervises and monitors the work of the prefectural services. Furthermore there was not evidence of good co-operation regarding issues of animal welfare between the services concerned. As a consequence there is a remarkable weakness of any supervisory system and there



was no documentation supporting or demonstrating supervision. Some evidence of individual initiative has been taken for reporting.

6.2. Instructions and training

Due to lack of detailed instructions and guidelines from the CCA the veterinary officials in the *Nomi* were not aware of their responsibilities, therefore the responsible CA was not carrying out the necessary checks to assure compliance with the animal welfare legislation at the time of slaughter. Even very obvious shortcomings noticed during the mission were not dealt with (e.g. unsuccessful stunning).

There is still evidence that no detailed instructions from the CCA are given to the veterinary personnel on the ground and that no reliable reporting system has been established in order to monitor the Animal Welfare situation at ports and slaughterhouses. Therefore no detailed figures could be obtained on inspections related to transports through the ports visited during the mission.

The monitoring of checks by official veterinarians undertaking inspections demonstrated a substantial lack of skill due to insufficient training and guidance. Unsuccessful stunning was also seen due to the fact that there was a lack of knowledge, skill, guidance, instructions, training, appropriate equipment and adequate supervision.

6.3. Animal welfare controls

The veterinary officials representing the competent authorities in the field of animal welfare during transport were considered not to have taken the necessary measures to enforce the respective legislation, e.g. by allowing animals unfit for transport to be transported, by accepting inadequate route plans.

7. CLOSING MEETING

A closing meeting was held on 24 November 2000 with the central competent authority. At this meeting, the mission team acknowledged the co-operation given by the CA during the mission and in particular, for adapting the itinerary to ensure that almost all sites were visited at times when they were operational with animals present. The mission team presented the main findings and conclusions of the mission and the representatives of the CA responded by indicating their willingness to address the failures highlighted.

8. OVERALL ASSESSMENT OF THE COMPETENT AUTHORITY

The results of this mission when compared with deficiencies identified in previous FVO missions indicate that no progress has been made up to now. The findings expressed in report XXIV/1470/98/MR Final related to Animal Welfare in particular to supervision and monitoring the situation of transportation, resting and stunning of animals remained - for the most part - unchanged. An effective level of enforcement of the provisions of Council Directive 91/628/EEC (as



amended) and Council Directive 93/119/EC has not yet been achieved. There was a widespread failure to impose meaningful sanctions where infringements were detected. The level of control carried out by the CA is therefore inadequate and in contravention of its obligations under article 18 of Council Directive 91/628/EEC (as amended).

As there is no evidence of major improvements relating to the findings of November 1998, and the actual deficiencies related to Animal Welfare on transport and slaughter continued to be encountered during the mission, it is recommended therefore to continue the execution of the infringement procedure A 99 / 2195.

9. RECOMMENDATIONS

9.1. To the competent authorities of Greece

- The competent authorities are requested to inform the Commission Services of the actions taken and planned to address the following recommendations and to provide a timetable for the completion of these actions. This should be done within 1 month of receipt of the final mission report.
- In order to fulfil the requirements laid down in the legislation on Animal Welfare and to comply with the recommendations expressed already in the report XXIV/1470/98 of 19 November 1998 particularly, the following requirements shall be ensured:
 - Enforcement of national legislation related to Animal Welfare during transport and at slaughterhouses as well as establishment of an effective control system in order to monitor the status of transported animals, their accompanying administrative papers, and the conditions of resting or staging as well as monitoring of the unloading, resting and stunning requirements at slaughterhouses.
 - Establishment of a reliable reporting system through all levels of veterinary administration in order to assure the appropriate flow of information for the supervision of Animal Welfare.
 - Appropriate training and information related to Animal Welfare is provided for all relevant veterinary personnel so that the official veterinary staff are informed about their duties and rights and in order to check the application of Animal Welfare legislation professionally.
 - Improvement of the approval system for transporters to ensure that the hauliers used for live animal transport fulfil the requirements of the EC-legislation and that the relevant personnel is capable of handling animals during transport.
 - Improvement of the approval system for slaughterhouses in order to fulfil the legal requirements for stocking, stunning and slaughtering of animals.



- Enforcement of national legislation in order to ensure the effective implementation of appropriate sanctions, including efficacious prosecution of penalty fines.

9.2. To the Commission services

- The Commission services are requested to continue the infringement procedure filed under No. A 99 / 2195 because there has been no improvement in the Animal Welfare surveillance system in Greece since the publication of report DG XXIV/1470/98.
- The commission services are requested to monitor the corrective actions to be taken by the Greek competent authority.



10. ADDENDUM

In the reply to the draft report DG (SANCO)/1060/2000 dated 26.03.2001 related to recommendations on the animal welfare reporting system, the Greek Competent Authority stated that:

- the veterinary service intends to put in place systems to demonstrate that the required checks are carried out and to ensure systematic recording of their results and/ or related activities,
- in order to achieve that goal all veterinary services are using now a single model for the recording of results as demonstrated in the yearly report on Animal Welfare of 1999 transmitted to the Commission.

With regard to the control at ports, it is stated that the competent prefectural authority took measures in the form of written warnings to the transporters using trucks not appropriate for the long distance transportation of live animals.

Related to slaughterhouse surveillance the CCA stated that the technical deficiencies have been rectified and the slaughterhouse management concerned has been placed under continuous strict surveillance

According to the Greek CCA the reasons for the weakness of the supervisory system and the lack of documentation are demonstrating severe understaffing, a lack of administrative/political support and associated excessive bureaucracy.

