



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

DG(SANCO)/9211/2003 – MR Final

FINAL REPORT OF A MISSION  
CARRIED OUT IN GREECE  
FROM 15 TO 19 SEPTEMBER 2003  
IN ORDER TO EVALUATE CONTROLS OF ANIMAL WELFARE  
DURING TRANSPORT AND AT THE TIME OF SLAUGHTER

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



## TABLE OF CONTENTS

1. INTRODUCTION .....	3
2. OBJECTIVES AND PROCEDURES OF THE MISSION .....	3
3. LEGAL BASIS FOR THE MISSION.....	4
4. BACKGROUND.....	4
5. FOLLOW-UP OF RECOMMENDATIONS .....	5
5.1. Competent authority .....	5
5.2. Implementation of transport checks .....	6
5.2.1. Official transport checks.....	6
5.2.2. Journey times.....	8
5.3. Implementation of slaughter checks.....	10
5.4. Sanctioning.....	10
6. CONCLUSIONS .....	11
6.1. Competent Authority .....	11
6.2. Implementation of transport checks .....	12
6.3. Sanctioning.....	12
6.4. Overall conclusion.....	13
7. CLOSING MEETING.....	13
8. RECOMMENDATIONS .....	13
8.1. To the competent authorities of Greece.....	13
9. ADDENDUM TO MISSION REPORT DG(SANCO)/9211/2003 .....	14

## 1. INTRODUCTION

The mission took place in Greece from 15/09/03 to 19/09/03. The inspection team comprised 2 inspectors from the Food and Veterinary Office (FVO) and a legal adviser from other Commission Services.

One working day before the beginning of the mission, a letter from the Director of the Central Veterinary Services of Greece announced that Official Veterinarians (OV) would be abstaining from their duties, starting from the second day of the mission, as an official action to obtain better pay and conditions. The inspection team was accompanied during the visits to the offices of the CA by a representative from the central competent authority (CCA), the Greek Ministry of Agriculture – Directorate General of Veterinary Services – Directorate for Veterinary Prevention, Pharmaceutical and other applications (Directorate *K.A.F.E.*). Due to the official dispute, the inspection team carried out the other visits without the presence of a representative of the CA.

## 2. OBJECTIVES AND PROCEDURES OF THE MISSION

The objective of the mission was to evaluate the implementation of EU legislation concerning animal welfare during transport (Council Directive 91/628/EEC - as amended<sup>1</sup>) and at slaughter (Council Directive 93/119/EC<sup>2</sup>). This mission was a follow-up to the one carried out in January 2003 (ref: DG (SANCO)/9002/2003) and aimed to complete the evaluation of actions and commitments given following report DG (SANCO)/1060/2000.

In order to achieve the objectives of the mission, meetings were held and the following sites visited:

VISITS			Comments
Competent authority	Central	1	Discussions normally held at an opening meeting with the CCA were incorporated with the prefectural meetings. A final meeting was held at the end of the mission with representatives of the CCA.
	Prefectural	2	Prefectural Veterinary Directorates of Karditsa and Larissa. In addition, discussions with officials from Kozani and Grevena regarding the organisation of the CA in these prefectures, took place in the context of visits to slaughterhouses.
Livestock importers premises		2	A cattle importer and a sheep importer, both place of arrival for animals after long distance transports.

---

<sup>1</sup> Council Directive 91/628/EEC, OJ L 340 of 11.12.1991 p.17 (as amended)

<sup>2</sup> Council Directive 93/119/EC, OJ L 340 of 31.12.1993 p.21

VISITS		Comments
Slaughterhouses	4	No animals were present at any of the slaughterhouses. One slaughterhouse had been the subject of a complaint to the Commission and had been definitively closed by a prefectural Order. Two others were not operational on the day of the visit due to the OV's' abstention from duties.

The objective relating to slaughter could not be achieved since the OV's were abstaining from duties. No slaughterhouse visited was operational after the first day of the mission and according to the Greek authorities this was the situation throughout Greece. On the first day of the mission, a representative of the CCA explained that there would be no animal movements in the country. However the Director of the Central Veterinary Services subsequently issued an instruction which retained the officials at border inspection posts (BIPs) to carry out their duties during this week. This was in anticipation of problems with consignments already in transit. A reminder was also sent to the prefectural veterinary services regards the responsibilities of various operators to ensure animal welfare was respected in such circumstances. Airlines were also notified of possible disruption to checks on import of animals.

### 3. LEGAL BASIS FOR THE MISSION

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

- Council Directive 91/628/EEC of 19 November 1991 (as amended) on the protection of animals during transport and amending Council Directives 90/425/EEC and 91/496/EEC, in particular Article 10 which enables Commission experts to carry out on-the-spot checks.
- Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing, in particular Article 14 which enables Commission experts to carry out on-the-spot checks.
- 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<sup>3</sup>.

### 4. BACKGROUND

The report of the two previous missions on this topic are available on the DG (Health and Consumer Protection) Internet site, <http://europa.eu.int/comm/dg24/> under reference DG(SANCO)/1060/2000-MR-Final and DG(SANCO)/9002/2003-MR-Final (hereafter: reports 1060/2000 and 9002/2003).

---

<sup>3</sup> Commission Decision 98/139/EC, OJ L 38 of 12.2.1998, p.10

In their comments on report 1060/2000, the Greek CCA explained that the reasons for the weakness of the supervisory system and the lack of documentation are due to severe understaffing, a lack of administrative/political support and associated excessive bureaucracy. Regarding the recommendations in report 1060/2000, the CCA subsequently informed all prefectural veterinary services of their duties, established a system for recording and reporting the results of checks and indicated training of personnel would take place. Further details of the commitments given are in report 9002/2003.

In its overall conclusion, report 9002/2003 stated that although efforts to improve the level of compliance with the EU requirements for animal welfare during transport and at slaughter had been made, the very low number of infringements detected and limited sanctions imposed, indicated insufficient progress with surveillance and enforcement. The lack of representative activity at locations visited did not assist in producing conclusive evidence that real progress has been achieved and was one of the reasons for this follow-up mission.

Further recommendations were made in report 9002/2003. The CCA action plan in response to these recommendations was to inform the prefectural services to take the necessary action. The result of these actions was not yet available.

## **5. FOLLOW-UP OF RECOMMENDATIONS**

### **5.1. Competent authority**

Report 9002/2003 recommended that “*adequate resources are employed at all levels for effective inspections*”.

In May 2003 the Greek CCA informed the Commission Services about their plans to remedy a certain number of outstanding issues. Regarding staff recruitment, the CCA stated that the prefectural Administrations had requested the Ministry of Domestic Affairs, Public Administration and Decentralisation to approve the recruitment of additional permanent staff.

In response to the specific recommendation in report 9002/2003, the CCA had requested the prefectural administrations – Veterinary Directorate and Border Inspection Posts (BIPs), to inform them of their needs in terms of staff and staff training by the end of September 2003. The Director of the prefectural veterinary services of Karditsa stated that he had not received this request.

In the prefectures visited, the actual situation regarding recruitment of OVs in 2003 is summarised in the following table<sup>4</sup>:

---

<sup>4</sup> *In their response to the draft report, the Greek central authorities indicated that Grevena currently need five veterinarians but the Prefecture had not indicated how this shortfall would be corrected. In relation to the other Prefectures, Kozani lacked five veterinarians and are recruiting four. Karditsa lack one and Larissa two, but neither have initiated recruitment. The CCA also indicated that during 2004 a total of 380 veterinarians and veterinary assistants will be hired on an 8-month contract to cover the needs arising in the veterinary departments at prefectural level.*

Prefecture	Number requested	Number recruited
Kozani	2	1
Karditsa	9	0
Grevena	3	0
Larissa	4	0

Aside from difficulties in obtaining the necessary approval for this recruitment, a representative of the CA indicated that even if posts were available, the monthly salary for a recently qualified veterinarian recruited to the official services is not attractive in comparison with earnings in private practice.

The training, which some OVs from the prefectures visited had attended and which was prior to 2003, was often incorporated into seminars on a wide range of veterinary topics, which did not allow adequate time for transfer of information on animal welfare. Even where suitable training was previously provided, the uptake varied between prefectures as they are not obliged to follow CCA proposals in this regard. The CCA did not provide training on animal welfare during transport and slaughter during 2003<sup>5</sup>.

A representative of the CCA indicated that at central level, a considerable amount of time was currently being devoted to deal with the issue of stray dogs, leaving staff with less time to deal with implementation of EU requirements. The number of staff at central level dedicated to animal welfare is currently unchanged (two persons) from that during mission 9002/2003. There are no plans for further recruitment.

## **5.2. Implementation of transport checks**

### *5.2.1. Official transport checks*

Report 9002/2003 recommended that:

“Inspections are carried out on an adequate sample of the animals transported each year in Greece (Article 8 of Council Directive 91/628/EEC as amended)”.

“Thorough checks are performed in order to ensure that deficiencies are detected and recorded and appropriate actions are taken”.

In response, the CCA requested the prefectures to:

- Set the following targets for checks: 10% of consignments for the second half of 2003 and 30% from 2005 onwards.

---

<sup>5</sup> *In their response to the draft report, the Greek authorities indicated that in November and December 2003 they held a training seminar on animal health and welfare.*

- Ensure the regular transmission of quarterly reports regarding inspections at the slaughterhouses and during transport.
- Transmit a weekly report of the inspections carried out at ports.

The inspection team noted that:

The CA of Larissa had not responded to a similar previous request from the CCA on 17.9.2002 to intensify checks.

OVs in the prefectures visited are available from 7.00 am to 2.30 pm, without the possibility of over-time. This prevents checks being organised outside these hours when many consignments arrive.

Several official veterinarians, transporters and slaughterhouse operators met during the mission were unable to confirm the occurrence of any animal welfare problems within their areas of responsibility. This was due either to a general reluctance to acknowledge that such problems exist or to insufficient communication. The Director of the prefectural veterinary service in Karditsa for example was not aware of any incidents in the last year, whereas later in the same meeting one of his staff outlined some incidents.

Controls during transport are carried out at ports and at BIPs. No other checks of consignments during transport are carried out and no arrangements have been made with the Police services to facilitate such checks. Such road checks are required by Article 8 of Council Directive 91/628/EEC, as amended<sup>6</sup>.

Animals with certificates for slaughter from other Member States are often first delivered to the premises of the importer rather than directly to slaughterhouses, with health certificates and ANIMO messages<sup>7</sup> indicating erroneous consignees and places of destinations. In one prefecture, a consignment of slaughter cattle from Spain, which had been certified to a slaughterhouse in Greece, had instead gone to a farm, where they had remained for up to one month after the date they should have been slaughtered. In any case, Article 7 of Council Directive 64/432/EEC (as amended)<sup>8</sup> requires that such animals must be slaughtered within 72 hours of their arrival. In another prefecture, one consignment of sheep randomly selected by the mission had been delivered to another prefecture and health certificates for two other consignments could not be retrieved. There are responsibilities for those designated as receiving animals to ensure pre-notification to the relevant CA of the arrival of the consignments, according to Article 5 of Council Directive 90/425/EEC<sup>9</sup>, as amended.

---

<sup>6</sup> *In their response to the draft report, the Greek authorities indicated that they are seeking co-operation with the police authorities in this regard.*

<sup>7</sup> Animal Movement System, Commission Decision 91/398/EEC of 19 July 1991, OJ L 221 9.8.1991 p. 30

<sup>8</sup> Council Directive 64/432/EEC of 26 June 1964, OJ L 121 of 29.07.1964, p. 1977 (as amended)

<sup>9</sup> Council Directive 90/425/EEC of 29 June 1990, OJ L 224 of 18.08.1990, p. 29

CA and CCA officials confirmed that movements of animals as described above were illegal and that this represented a serious and continuing problem, which, at the moment, could not effectively be prevented. They also confirmed that it was not possible to control the welfare of animals involved in such large-scale illegal movements. Following an initiative adopted by other prefectures, further cases in Larissa were being examined with the intention of referring them to the body for the prosecution of financial crimes (*S.D.O.E. - Soma Dioxix Ikonomikou Eglimatos*).

A major transporter / dealer did not keep any register of movements in and out of his flock as required by Article 4 of Council Directive 92/102/EEC<sup>10</sup>. Records of mortalities, which would be used in conjunction with the movement register to get a crude indication of the state of animal welfare at destination were also not kept (Paragraphs 5 and 6 of the Annex to Council Directive 98/58/EC<sup>11</sup>).

### 5.2.2. *Journey times*

Recommendations in report 9002/2003 in relation to journey times, were:

“Documents accompanying animals during transport enable the CA to check the time of departure, as foreseen in Article 4 of Council Directive 91/628/EEC, as amended”

and

“There should be a system in place to verify that journey times indicated on route plans are in fact feasible”.

The action plan provided by the CCA indicated that a system for improving route plan compliance had been set up. It was noted that:

Several Greek transporters had taken part in an exercise, which was part of the actions undertaken following the above recommendations. The transporters had been asked to submit a more detailed itinerary for their usual trade routes to the CA. The plans provided by the transporters had been sent several months previously to the CCA. This had not been analysed by the OV's in the prefecture prior to sending to the CCA. The CCA had not yet analysed this data. The inspection team identified that several of the transporters plans did not comply with EU journey time requirements.

In response to report 9002/2003 the CCA stated that there are no special facilities at ports for resting animals which are transported by sea, because such journeys can be incorporated into the allowed travel schedules. However, not all journey times could be incorporated as the CCA had foreseen. Certain consignments boarded the ferry and the maximum journey time expired during the ferry crossing from Southern Italy to Greece. In such cases, animals should have 12 hours rest in the vicinity of the port of arrival

---

<sup>10</sup> Council Directive 92/102/EEC of 25 November 1992, OJ L355 of 05.12.1992, p. 32

<sup>11</sup> Council Directive 98/58/EC of 20 July 1998, OJ L221 of 8.8.1998, p. 23

rather than continuing to their final destination seven or eight hours from the port (point 7 (b) of Chapter VII of the Annex to Council Directive 91/628/EEC, as amended).

The OV at one BIP, which is a major point of transit for consignments of live animals, had approved a route plan in such a way that the BIP itself was indicated as place of final destination, although the transporter had clearly indicated a location within Greece. The route plan also indicated that the consignment of 690 sheep had spent an hour at the BIP which is insufficient time to carry out all the necessary checks, including compliance with animal welfare requirements (Article 4 of Commission Decision 97/794/EC<sup>12</sup> and Article 11 of Council Directive 91/628/EEC, as amended).

A transporter did not keep copies of any route plans, including from other Member States as required by Art. 5 (A)(2)(e) of Council Directive 91/628/EEC, as amended. In relation to imports from third countries, he stated that route plans were held at the BIP instead of accompanying animals to their destination (Article 5(A)(2)(d)(i) of Council Directive 91/628/EEC, as amended).

Formal training of transporters, which the CCA had previously proposed would be made a legal requirement, had been postponed until the CCA considered the Commission's proposal for a regulation on animal welfare during transport which would replace the requirements of Council Directive 91/628/EEC (as amended). One transporter interviewed by the inspection team indicated that he saw nothing wrong in transporting lambs with a broken leg from France in the "belly box" under the chassis of his vehicle, although this is contrary to Council Directive 91/628/EEC, as amended.

In relation to animal welfare problems where consignments originated in other Member States, a representative of the CCA indicated that information and a request for feedback had been sent by the CVO to his counterparts in Spain, The Netherlands and France on several occasions without ever receiving a reply.

Report 9002/2003 recommended that

"Ruminants and pigs for slaughter from other Member States are accepted only if all requirements of Commission Decision 2001/327/EC are respected".

Commission Decision 2001/327/EC<sup>13</sup> (as amended) restricted the movement of animals susceptible to foot-and-mouth disease through staging points. In February 2003, the Greek CCA informed the prefectural services and the CCAs of Member States of departure on the obligation to comply with Commission Decision 2001/327/EC. Subsequently this Decision has been

---

<sup>12</sup> Commission Decision 97/794/EC, OJ L 323 of 26.11.1997, p. 31

<sup>13</sup> Commission Decision 2001/327/EC, OJ L 115 of 25.4.2001, p. 12

replaced by Commission Decision 2003/483/EC<sup>14</sup>, which applies from 1/7/2003 and allows animals susceptible to FMD to rest in staging points provided certain conditions are met.

An analysis by the inspection team of ANIMO data for the prefectures visited, indicated a reduction in the number of consignments of sheep for slaughter from other Member States transported via road after January 2003. However, a small number of consignments of sheep for slaughter and a greater number of cattle continued to be transported after this date. These consignments were either not respecting the above Decision or were transported in excess of the journey times laid down in Chapter VII of the Annex of Council Directive 91/628/EEC (as amended). In addition many of the consignments were not delivered directly to the slaughterhouses indicated on the health certificates.

### **5.3. Implementation of slaughter checks**

Report 9002/2003 recommended that:

- “facilities and equipment in slaughterhouses are in compliance with requirements laid down in Council Directive 93/119/EC, in particular:
  - (1) fasting of animals before slaughtering is in accordance with the requirements of Annex A(II)(9) of Council Directive 93/119/EC
  - (2) the use of electrical stunning equipment is in compliance with the provisions of Articles 3 and 6(1) and Annex C(II)(3) of Council Directive 93/119/EC
  - (3) bleeding of animals starts as soon as possible after stunning, in compliance with the provisions of Annex D(1) of Council Directive 93/119/EC”

Due to the abstention of OV's from their duties, the mission team could not visit any slaughterhouses in operation. In addition, the CCA's reply to the recommendation in report 9002/2003 indicated that they would not have a complete overview of the results of re-inspections of slaughterhouses until the end of February 2004.

### **5.4. Sanctioning**

Report 9002/2003 recommended that

“the level of sanctions is proportionate to the offence”.

The CCA's report to the Commission regarding controls throughout the whole of Greece on animal welfare during transport in 2002 (Art. 8 of Council Directive 91/628/EEC, as amended) was not available at the time of mission 9002/2003. This has subsequently been sent to the Commission and the results are summarised in the following table:

---

<sup>14</sup> Commission Decision 2003/483/EC, OJ L 162 of 1.7.2003, p. 72

No. infringements	Oral warnings	Written warnings	Administrative fines
26	9 mostly related to incidents of overloading	16 (7 in 2001)	1 (1 also in 2001)

There were neither suspensions nor withdrawal of authorisations nor criminal prosecutions in either 2001 or 2002.

In reply to the above recommendation, the CCA reminded the prefectural CAs to apply the foreseen penalties and to include all infringements detected and actions taken in their quarterly report to the CCA. Previous instructions from the CCA had similarly indicated that the prefectural services should take necessary measures where infringements were detected.

During the mission, the CCA clarified that the steps for sanctioning as described in report 9002/2003, are not mandatory and the OV could decide which penalty to propose. They also clarified that the prefect's office is responsible for imposing sanctions and this cannot be carried out directly by the veterinary service. In relation to the above, in the prefectures visited, it was noted that:

- In one prefecture, four dossiers proposing administrative fines of c. €3000 for illegal movement of animals had been submitted to the Prefect in 2002, but no action was subsequently taken.
- A transporter, who had been responsible for repeated infringements of rules on animal welfare during transport and had been penalised prior to 2003 for infringements in other Member States and in Greece, remained as a driver on an authorisation recently issued to a transport company. This individual had been the authorised transporter but had requested not to renew it in his own name. This would not fulfil the requirements of Article 18 of Council Directive 91/628/EEC, as amended.
- Information from the CCA indicated that an official at a BIP had given a written notice to a Romanian transporter for overloading and insufficient headspace on a consignment of sheep. There was no indication that this situation had been resolved before the consignment was allowed to leave the BIP.

## 6. CONCLUSIONS

### 6.1. Competent Authority

- (1) There are still insufficient staff available to carry out checks of animal welfare during transport.
- (2) The level of training for the OVs in the prefectures visited had been minimal and the system whereby those trained pass on information to other colleagues was not effective.

## **6.2. Implementation of transport checks**

- (1) Despite an increase in the number of checks during the last year, the quality of controls has not improved. In particular as movement control is weak, checks are not always focused on the correct place to verify conditions after long distance transport.
- (2) OV's did not ensure that transporters, dealers and keepers of animals were meeting their requirements for transport and movement of animals.
- (3) Organisation of checks of animal transport is difficult due to the large number of illegal animal movements, which the CA has not been able to control. There has been a high degree of toleration of transporters providing incorrect destinations in Greece when purchasing animals for slaughter in other Member States and so the requirement for animal welfare checks at destination is not adequately fulfilled (Article 8 of Council Directive 91/628/EEC).
- (4) There are no checks during transport, apart from controls performed at BIPs and ports, and in the case of BIPs, some of these checks were found to be unsatisfactory. Regarding consignments via ports, the CCA had mistakenly come to the conclusion that all consignments could complete their journey within the framework of Chapter VII of the Annex to Council Directive 91/628/EEC (as amended). The requirement regarding the presence and use of facilities in the vicinity of ports for unloading and resting certain consignments of animals has therefore not been ensured.
- (5) The targets, which the CCA have asked the prefectures to follow, are unrealistic given the lack of staff.
- (6) The CCA's communication with other Member States in February 2003 resulted in a reduction in the number of consignments of sheep in breach of Commission Decision 2001/327/EC. However, a greater number of consignments of cattle for slaughter continued not to comply with this Decision or with the resting times required by points 4 and 7 of Chapter VII of the Annex of Council Directive 91/628/EEC, as amended.

## **6.3. Sanctioning**

Given the serious difficulties in performing adequate checks on the animals transported to and within Greece, it is likely that many infringements may be undetected. Nevertheless, regarding the small number of infringements detected:

- (1) The CA did not take appropriate action against transporters involved in repeated breaches of animal welfare requirements during the period under review.
- (2) Although the CA had prepared some files regarding illegal movements, the system of referring this to the Prefect did not result in effective action.

#### **6.4. Overall conclusion**

The commitments given by the CCA following mission 9002/2003 are unlikely to be achieved, because of a lack of resources and subsequent difficulties in implementation at prefectural level. There has been a failure to deliver on commitments given to recommendations from report 1060/2000, regarding the establishment of an effective control system, improvement of the system of authorisation of transporters and appropriate enforcement. There is a lack of consistency in the uptake of training between prefectures. The reporting system developed provides the CCA with certain information on the activities performed by the provincial services. It is not possible to give an overall conclusion on checks of welfare at slaughter, as the slaughterhouses visited were not operating during the mission.

#### **7. CLOSING MEETING**

A closing meeting was held on 19 September 2003 with the CCA, the Greek Ministry of Agriculture – Directorate General of Veterinary Services – (*K.A.F.E.*), and representatives of Public Health and Import Controls divisions. At this meeting, the main findings and conclusions of the mission were presented by the inspection team.

The representatives of the CCA accepted the findings and conclusions presented and acknowledged that serious difficulties with implementation existed. A representative of the CCA indicated that they would make contact with the Ministry of Public Order to discuss the possibility of involving the Police in combating the widespread illegal movement of animals. Regarding the staffing problem, the CCA were more optimistic that a solution could be found through adopting a system of authorised veterinary inspectors, which would incorporate private practitioners into official surveillance, rather than directly recruiting official veterinarians.

#### **8. RECOMMENDATIONS**

##### **8.1. To the competent authorities of Greece**

Within one month of the receipt of the translated final mission report, the CCA is requested to inform the Commission Services of the overall result of the actions taken by the prefectural services in response to the action plan proposed following mission 9002/2003 (letter from Dr Stylos of 27 August 2003 ref. 246191). In addition, the actions taken and planned to address the following recommendations and to provide a timetable for the completion of these actions:

- (1) Elaborate a training programme to ensure that all the veterinary personnel involved in animal welfare controls receive adequate practical knowledge to enable them to carry out thorough inspections.
- (2) Take measures to improve the quality of checks carried out on an adequate and achievable sample of the animals transported each year within Greece (Article 8 of Council Directive 91/628/EEC).
- (3) Take steps as a matter of priority in order to secure the co-operation of other enforcement bodies:

- (a) in checks during transport, in particular the co-operation of the Police to effect road controls to prevent illegal movements of animals and breaches of Council Directive 91/628/EEC (as amended);
- (b) in checks carried out at actual destinations (Article 8 of Council Directive 91/628/EEC), which may be at the same time as measures such as to counteract the illegal movement of animals;
- (c) in achieving the effective imposition of appropriate sanctions when serious infringements are detected (Article 18 of Council Directive 91/628/EEC).

## **9. ADDENDUM TO MISSION REPORT DG(SANCO)/9211/2003**

In their comments on a draft version of this report, the central competent authority provided the following initial reaction to the recommendations:

- (1) Regarding recommendation 1, further training has taken place.
- (2) Regarding recommendation 3(a), they are seeking the support of the Police in this regard.