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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

GREECE

FROM 02 TO 11 FEBRUARY 2011

IN ORDER TO EVALUATE THE IMPLEMENTATION OF CONTROLS FOR ANIMAL
WELFARE DURING TRANSPORT AND AT THE TIME OF SLAUGHTER

Executive Summary

This report describes the outcome of an audit carried out by the Food and Veterinary Office (FVO) in Greece, from 2 to 11 February 2011.

The main objective of the audit was to evaluate the measures taken subsequent to the Judgement in the European Court of Justice (hereafter “the Judgement of the ECJ”), in particular concerning measures to ensure that the competent authorities (CA) carry out obligatory checks of the journey log; that they provide for facilities in or in the immediate vicinity of ferry ports to enable animals to rest after unloading; that the inspections of the means of transport and the animals are actually carried out; that the rules on the stunning of animals at the time of slaughter are complied with, and that inspections and controls in slaughterhouses are carried out in an appropriate manner.

The report concludes that inspections on means of transport and animals are being carried out, but due to resource constraints these inspections still focus almost exclusively on controls at slaughterhouses which is not fully in accordance with the Central Competent Authority's (CCA) instructions.

CAs are not carrying out satisfactory checks of animal welfare during transport as the standard of the reporting at slaughterhouses was variable and does not provide confidence in the efficacy of these controls carried out by official veterinarians (OVs); no meaningful official controls on journey logs were carried out on transporters, the Control Post visited, or Intra-Union (IU) consignments arriving at non-slaughterhouse destinations (which make up the majority of consignments in the three Regional Units (RU) visited).

The CCA has actively attempted to promote the setting up of Control Posts since the previous inspection but with limited success resulting in the provision of one Control Post in the vicinity of Piraeus port. There are still no Control Post facilities for the main transit ports of Igoumenitsa and Patras.

The rules on the stunning of animals at the time of slaughter were mainly complied with in the slaughterhouses visited during this audit and satisfactory stunning and restraint equipment, in good condition and satisfactorily maintained, was seen in four out of the five slaughterhouses visited.

CCA audits carried out during 2006-2008 concluded that the system of official controls on animal welfare at the time of slaughter was ineffective due to inadequate enforcement of official controls by RUs. The evidence seen by the FVO team of variable reliability of reporting, the failure to detect any non-conformities or take any enforcement action in the three RUs visited during the period 2007-2010, coupled with the lack of enforcement action taken regarding animal welfare non-compliances in slaughterhouses detected throughout Greece and reported to the CCA during this period, leads to a similar conclusion.

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

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
CA	Competent Authority
CCA	Central Competent Authority
DAWMA	Department of Animal Welfare Medicaments and Applications
DG(SANCO)	Health and Consumers Directorate-General
DVIC	The CCA's Directorate of Veterinary Inspection and Control
EC	European Community
EU	European Union
FAQ	Frequently Asked Questions
FBO	Food Business Operator
FVO	Food and Veterinary Office
IU	Intra-Union
MRDF	Ministry of Rural Development and Food
MS	Member State
OV	Official Veterinarian
RU	Regional Unit
SNS	Satellite Navigation System
TRACES	Trade Control and Expert System of the European Commission

1 INTRODUCTION

The audit took place in Greece from 2 to 11 February as part of the FVO's planned programme. The FVO team comprised two inspectors and was accompanied throughout the audit by a representative of the Central Competent Authority; the Ministry of Rural Development and Food (MRDF; hereafter: CCA).

An opening meeting was held on 2 February 2011 with the CCA, where the FVO team confirmed the objectives of the audit as well as the itinerary, and information required for the successful completion of the audit was requested.

2 OBJECTIVE

The objectives of the audit were to evaluate the implementation of national measures, aimed at the control of animal welfare in accordance with the requirements of EU legislation for animal welfare during transport and at slaughter and killing. More specifically, the audit sought to evaluate the measures taken by the Greek authorities subsequent to the Judgement in the European Court of Justice¹ on Greece relating to the welfare of animals during transport and at slaughter and killing, in particular concerning measures to ensure that:

- CAs carry out obligatory checks of journey logs;
- They provide for facilities in or in the immediate vicinity of ferry ports to enable animals to rest after unloading;
- Inspections of the means of transport and the animals are actually carried out;
- The rules on the stunning of animals at the time of slaughter are complied with, and
- Inspections and controls in slaughterhouses are carried out in an appropriate manner.

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

Visits			Comments
Competent Authority	Central	3	Opening, clarification and final meetings
	Regional	3	RUs (formerly known as Prefectures) of Fthiotis, Larissa and Thessaloniki
	District	1	Atalanti
Slaughterhouses		5	Five for red meat species. Each slaughterhouse was selected by the FVO team from a list provided by the CCA.
Transporters/dealers		2	One transporter/dealer in Fthiotis and one in Larissa
Control Post		1	One Control Post

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation, in particular Article 28 of

¹<http://curia.europa.eu/jurisp/cgi-bin/form.pl?lang=EN&Submit=Submit&numaff=C-416/07>

Regulation (EC) No 1/2005, Article 14 of Directive 93/119/EC and Article 45 of Regulation (EC) 882/2004.

A full list of the EU legal instruments referred to in this report is provided in the Annex and refers, where applicable, to the last amended version.

4 BACKGROUND

Previous FVO inspections with the same subject were carried out in 2000, twice in 2003, in 2004 and in 2006 (hereafter: inspections 1060/2000, 9002/2003, 9211/2003, 7273/2004 and 8042/2006).

The reports of these inspections concluded, in general, that progress in implementing the commitments given by the CCA in response to previous recommendations had been slow and not fully adequate.

The last report, (DG (SANCO)/8042/2006-MR) concluded that regarding animal welfare during transport the situation had remained largely unchanged, with official controls seldom sufficient to ensure that requirements were respected. Regarding welfare at slaughter, although there was some, albeit belated, progress with implementation of commitments, serious problems persisted.

A later FVO report (DG (SANCO)/2009-8237-MR) on food safety also examined animal welfare during slaughter and concluded that non-compliances with animal welfare requirements were identified during stunning and regarding the construction of lairages in slaughterhouses. These animal welfare problems had not been identified during official inspections. As a result the situation as regards animal welfare at slaughter was found to be largely unsatisfactory.

The European Court of Justice found Greece guilty in its Judgement of 10 September 2009 (Case C-416/07) for failing to fulfil its obligations on the protection of animals during transport and at the time of slaughter or killing which are laid down in Directives 91/628/EEC (superseded by Regulation (EC) No 1/2005) and 93/119/EC.

The reports of the above inspections are available under their reference number on the FVO internet site: http://ec.europa.eu/food/fvo/index_en.cfm

5 FINDINGS AND CONCLUSIONS

5.1 COMPETENT AUTHORITY

5.1.1 Designation of Competent Authorities

Legal Requirements

Article 4(1) of Regulation (EC) No 882/2004 requires Member States to designate the competent authorities responsible for official controls.

Findings

The organisation of the Competent Authorities (hereafter: CA) is described in the country profile of Greece on food and feed safety, animal health, animal welfare and plant health (FVO report (DG

(SANCO)/ 2010/8368-MR Final), which is available at:

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

It was noted that:

➤ As a result of a recent administrative reform in 2010 termed *Kallikratis*, Prefectures no longer exist as administrative entities and have been replaced with the term Regional Units (RUs). RUs veterinary sections are no longer subdivided into departments of Animal Health, Public Health and Animal Welfare Medicaments and Applications. The 55 RUs will now be coordinated and supervised by 13 new Regional Veterinary Directors of the Regional Veterinary Directorates. Although these posts have been put in place, the tasks and responsibilities of the new staff have not been described and the impact on official controls for animal welfare is not yet known. Elected officials remain administratively responsible for the RUs and the Regions.

Conclusions on Designation of Competent Authorities

Though there have been changes in terminology applied to the former Prefectures and certain staff have been appointed to new posts in the revised regional structures, there has been no concrete effect in the organisation or discharge of official controls on animal welfare at the former Prefectural or field station level.

5.1.2 Coordination between Competent Authorities

Legal Requirements

Article 4(3) of Regulation (EC) No 882/2004 provides for efficient and effective coordination and cooperation between competent authorities.

Findings

➤ The CCA showed clear communication of information on animal welfare non-compliances during transport between the RUs and the CCA and to and from other Member States (MS) over the period 2007 to present. However, many requests for information or dossiers of evidence have been ignored by other MS' contact points with potential implications for future animal welfare problems in Greece. Efforts were made by the CCA on one occasion to coordinate actions to try and prevent recurrence of non-compliances by a known offender (a targeted control at a port was organised but the transporter used a different port to evade the controls);

➤ The CCA has been subject to a recurrent lack of cooperation from certain RUs in their reporting of the results of official controls on animal welfare during transport and slaughter during 2007-2009 (See section 5.2.3 for further details). Similarly it was noted that there has been a distinct lack of cooperation on enforcement action in Greece despite repeated clear instructions over the last three years from the CCA including specific direct orders from the Secretary General of the MRDF on September 2010 addressed to the RU veterinary heads of department making them personally responsible for ensuring that enforcement action is taken and reported;

➤ The CCA and RUs reported that they had started to carry out roadside checks (in 2007) as part of teams operating under the authority of the transport department. These checks were not successful as the veterinary teams were not able to levy any fines due to the legal constraints of this arrangement. A new Joint Ministerial Decision 314754/2009 now lays down the responsibilities for roadside checks and gives veterinary staff the authority to impose fines when conducting such checks with traffic police.

Conclusions on Coordination between Competent Authorities

There has been effective communication between CAs through the Greek transport contact point since the previous FVO inspection. However, coordination and cooperation between the CCA and the RUs throughout this period has been less effective with the CCA obtaining incomplete information on official controls and very little enforcement action being taken by the RUs despite clear instructions from the CCA.

5.1.3 Coordination within Competent Authorities

Legal Requirements

Articles 4(3) and (5) of Regulation (EC) No 882/2004 require efficient and effective coordination and cooperation to be ensured between the different units carrying out official controls. Coordination required by Council Directive 89/608/EEC is also applicable (as indicated in Article 24 of Regulation (EC) No 1/2005).

Findings

- Information on non-compliances detected during official controls at Serres (2 March 2010; 17 March 2010; 22 April 2010;) on three transporters registered in Larissa was entered and communicated by TRACES (Trade Control and Expert System of the European Commission) but was not extracted by the Larissa staff, or transmitted in any other way to the Larissa RU from Serres;
- Staff carrying out animal welfare controls do not have easy access to animal health information that would be of benefit to carrying out these controls, such as TRACES information or information on registration of dealers etc. Staff visiting premises such as dealers for animal welfare reasons, are not tasked to inspect for animal health reasons and vice versa;
- The Directorate of Veterinary Inspection and Control (DVIC) audit of 2008 on the CCA's animal welfare department noted good coordination and cooperation with a number of departments, regions and external contacts but that cooperation and coordination could be improved between the public health department of the CCA (responsible for the approval of slaughterhouses) and the animal welfare department responsible for controls on animal welfare during slaughter and killing.

Conclusions on Coordination within Competent Authorities

There is an apparent lack of synergy between different departments at RUs in the organisation of official controls at places of destination and the effective use of staff resources.

5.1.4 Staffing provision and facilities

Legal Requirements

Article 4 of Regulation (EC) No 882/2004 requires the competent authority to ensure that they have access to a sufficient number of suitably qualified and experienced staff; that appropriate and properly maintained facilities and equipment are available; and that staff performing controls are free of any conflict of interest.

Findings

➤ There is now one official responsible at central level for the implementation of EU animal welfare legislation rather than two: one of the two previous jobholders is now in charge of the Department of Animal Welfare, Medicaments and Applications (DAWMA);

Staffing details for permanent veterinary staff in the three RUs visited were as follows:

➤ Fiothis RU currently has 11 veterinary staff, a decrease of three since the previous FVO inspection in 2007; Larissa has 19 (including one on maternity and two on sick leave) a decrease of 20 since 2007; Thessaloniki has 51, two less than 2007. The numbers of support and administrative staff were said to have decreased considerably during this period but no clear figures were readily available;

➤ The Directors of the RUs met could not provide any overview of how job responsibilities and therefore tasks are allocated. No recent review of staffing requirements has been carried out nationally or in the three RUs visited and reference was always made to organigrammes dating back 20 or 30 years for the total number of posts required in each RU;

➤ The RUs staff repeatedly stated that they do not have enough staff to perform their duties correctly, but during the visit there were two OVs present for five pigs and five sheep in one slaughterhouse and one OV for one bovine in another. Whilst this is a legal requirement for *ante* and *post-mortem* inspection, it did seem to represent poor use or scheduling of CA resources;

➤ Official vehicles are provided in some RUs but not in others. Vehicle usage is limited to 84 litres of fuel/month. In other RUs staff must use their own vehicles for official controls. Reimbursement of fuel costs has been reduced and limited to journeys over 40km for only 60 days per year;

➤ Field station staff in RUs do not have IT equipment in their offices to enable them to check whether journey logs are realistic even though they are tasked with the responsibility of carrying out checks on arrival and departure of consignments;

➤ The situation regarding controls on animal welfare during transport at ports or upon arrival of consignments at farms outside normal working hours has not changed since the previous FVO inspection. The CA is not in a position to pay for overtime to perform these controls outside normal working hours. The Head of the DAWMA has written to the Secretary General of the MRDF and the Chief Veterinary Officer on a number of occasions between 2006 and 2010 requesting funding to cover such controls but none has been forthcoming;

➤ The CCA wrote to all the RUs and BIPs on 26 October 2006 requiring them to ask dealers and long distance animal transporters if they would be interested in setting up control posts in the vicinity of the three main livestock ports (Igoumenitsa, Patras and Piraeus) and close to the Northern border of the country. As a result of this the MRDF was involved in discussions with a potential operator for a control post in Igoumenitsa between 2006 and 2008. However, an ownership dispute between the Ministries of Finance and the MRDF ultimately prevented the land being leased to this private company and there have been no further developments since;

➤ The facilities of the former BIP of Promachonas at the border with Bulgaria have been leased to a private party and a control post was set up on 16 April 2008. A second control post was set up in Oinofyta on 1 March 2010 in Viotia RU, approximately 53 km from Piraeus Port.

Conclusions on Staffing Provisions and Facilities

The constraints on carrying out official controls have worsened since the last inspection, with fewer staff, additional restrictions on reimbursement for the use of vehicles, and no lifting of the overtime ban despite repeated requests from the CCA for additional funding. The CCA has actively attempted to promote the setting up of control posts since the previous inspection, with some limited success, though there are still no facilities in place for the main transit ports of Igoumenitsa and Patras and as a result these ports do still not have the facilities required in Annex 1, Chapter V, point 1 (7)b of Regulation (EC) No 1/2005.

5.1.5 Staff training

Legal Requirements

Article 6 of Regulation (EC) No 882/2004 requires competent authorities to ensure that staff receive appropriate training, and are kept up-to-date in their competencies.

Findings

- There has been no change in the way training is planned or carried out since the previous inspection. However, there has been a marked increase in the provision of training. Since the previous inspection in 2006 the CCA has provided training on animal welfare during transport on six occasions with approximately 229 OV's attending. Training on animal welfare during slaughter has been given on two occasions since 2006 with 97 OV's and there were two joint training sessions on both subjects in 2010 with 92 OV's;
- One out of five of the veterinarians in charge of the *ante* and *post-mortem* checks at the slaughterhouses visited in three RUs had attended animal welfare training since the previous inspection in 2006. All of these OV's were aware of the minimum standards in relation to stunning and bleeding of animals but most were unsure or inaccurate regarding the electrical stunning parameters of the equipment used and two OV's had taken no action to rectify deficiencies in the maintenance and safety of lairages. One OV in Larissa had received training on animal welfare but accepted animals with broken legs into the slaughterhouse as a normal routine procedure contrary to the training information and the provisions of Chapter 1 of Annex 1 to Regulation (EC) No 1/2005;
- One OV in Fiothis had attended two training sessions on animal welfare during transport but had not correctly approved a vehicle used for long distance transport seen by the FVO team. The training material provided adequately covered the approval requirements for long distance means of transport;
- Thessaloniki RU provided training to all slaughterhouse operators and staff on animal welfare during transport and slaughter between 2008 and 2010. Thessaloniki and Larissa RUs indicated that they had provided informal training sessions in field stations to local farmers which had included animal welfare during transport but there were no records of these;
- Two OV's in different field stations had been requested to carry out checks of journey logs (one for a Control Post and one for transporter's records) but had received no training on this.

Conclusions on Training

The CCA has made a strong effort to provide regular training sessions on animal welfare during transport and at slaughter since the previous inspection and most veterinarians were conversant with

the main requirements on slaughter, while less so for transport. OVs that were not familiar with transport requirements had not received the relevant training and were therefore unable to perform tasks such as checking journey logs effectively, whereas in another case the OV had received training but did not implement the requirements effectively.

5.1.6 Audit

Legal requirements

Article 4(6) of Regulation (EC) No 882/2004 requires the competent authorities to carry out audits to ensure they are achieving the objectives of this Regulation.

Findings

➤ Since 2006 the DVIC has carried out three audits in 2006, six in 2007, three in 2008 (including an animal welfare audit of DAWMA) and three in 2009 on the implementation of RU controls of animal welfare during transport and at slaughter. Four audits on food safety in 2010 also included findings on animal welfare during slaughter and killing. Audits on fur farms have been scheduled for 2011. A five year audit plan will be introduced in 2012;

➤ Results of the six audits in 2007 indicated an initial compliance rate of 48%, rising to 85% upon completion of corrective action. The major non-conformities related to RUs inability to meet the targets of 30% checks performed on animal transports, lack of enforcement on non-compliant transporters, and shortcomings of controls on animal welfare during slaughter;

➤ Results of the three audits in 2008 indicated an initial compliance rate of 68%. The major non-compliances related to ineffective enforcement action taken on non-compliances for transport and slaughter, inability to comply with the 30% target of official controls on transport, ineffective official controls at slaughterhouses, poor facilities and equipment in slaughterhouses and the time interval between stunning and slaughter;

➤ Overall DVIC concluded that the system of official controls for transport and slaughter was ineffective due to inadequate enforcement by the RUs. Two of the three RUs visited during this FVO audit had previously been the subject of DVIC audits;

➤ Fiothis region was audited in December 2007 and negative findings were noted in relation to: lack of staff and equipment; inadequate training; only one out of five slaughterhouses operating were approved by the CCA, the remaining four operated under a decision of the Prefect and some had not implemented a corrective action programme to rectify non-conformities; reports on transport controls were not forwarded to the CCA; maintenance records for stunning equipment were unsatisfactory. A follow up audit was carried out by correspondence and the audit was closed in December 2008 with satisfactory action taken for four out of six recommendations and the responses to the two remaining recommendations were judged unsatisfactory on the slaughterhouse modernisation programme;

Subsequently two of the non-approved slaughterhouses have been closed, two have been approved by the CCA and the slaughterhouse visited by the FVO team is finalising its modernisation programme prior to approval;

➤ Larissa region was audited in May 2009 and negative findings were noted in relation to: a severe lack of staff; inadequate training; lack of political decision to impose sanctions; poor communication between CCA and region and region and field stations; poor planning of official controls; no controls on transport carried out, no evidence to support transport reports submitted to

CCA in 2008, slaughterhouse inspection forms without deadlines to rectify deficiencies, were poorly completed and not forwarded to the CCA; transporter authorisations issued without the relevant forms; poorly completed or no vehicle inspection protocols and poor and missing records (journey logs) kept at dealers' premises;

A follow up audit was carried out by correspondence and the audit was closed in January 2010 with satisfactory action taken for four out of 13 recommendations and the response to nine recommendations unsatisfactory relating to the implementation of controls on transport and slaughter and the completion and return of the relevant reports to the CCA;

Subsequently, slaughterhouse inspection protocols were completed but were not forwarded to the CCA and transporter authorisations seen by the FVO team were satisfactory. A plan for transport controls has been put in place but not implemented.

Conclusions on Audits

DVIC has given controls on welfare and slaughter a high priority since the last FVO inspection by carrying out 15 audits on these sectors throughout Greece. It has produced clear targeted reports to the Regions, issued recommendations to rectify non-compliances and carried out follow up by documentary verification. The effectiveness of the audit programme is reflected in the actions taken at Regional level on ensuring satisfactory equipment for stunning and slaughter and reporting of slaughterhouse inspections where there have been some improvements since the DVIC audit in two of the regions visited by the FVO team. However, remedial action for the implementation of official controls on transport and enforcement action has been limited to improvements in the documentation of the authorisation process for transporters and approvals of vehicles.

5.2 TRANSPORT

5.2.1 Authorisation of Transporters

Legal Requirements

Article 10 of Regulation (EC) No 1/2005 lays down the requirements for authorising transporters carrying out journeys up to eight hours. In particular, the applicants must demonstrate that they have sufficient and appropriate staff, equipment and operational procedures to comply with this Regulation and that they do not have records of serious infringements of EU legislation and/or national legislation on the protection of animals in the three years preceding the date of the application.

Article 11 of Regulation (EC) No 1/2005 laying down the provisions for authorising transporters carrying out long journeys, in addition to the documentation mentioned in Article 10, requires further documents, such as the certificates of approval of vehicles, procedures to trace and record the movements of road vehicles and to contact drivers, a contingency plan in the event of emergency, and the certificates of competence for drivers and attendants.

Article 13(3) of Regulation (EC) No 1/2005 requires the CA to record authorisation of transporters in a manner enabling them to be identified

Findings

➤ The CCA has issued a number of circulars since the previous FVO inspection and provided RUs with a transport guide. Joint Ministerial Decision 314754 (18 September 2009) delegates the

authorisation of transporters to RUs. It also gives them powers to suspend or revoke these authorisations in the event of non-compliance with Regulation (EC) No 1/2005;

➤ The CCA has established a database of authorised transporters based on information supplied by RUs. This database is available at:

<http://www.minagric.gr/greek/2.3.3.METAFOREIS.html>

➤ The FVO team reviewed a selection of the authorisation files of transporters in the three RUs visited. It was noted that:

➤ The transporter details held in the RUs were, with one exception, consistent with the CCA list;

➤ Transporter authorisation files all contained statements from transporters relating to their freedom from conviction for serious infringements of EU legislation and national legislation on the protection of animals in the three years preceding the date of the application. However, neither the CCA nor the RUs can verify if the information supplied is accurate as there is no record of convictions available to them. The CCA intends to add a module to the transport database to record all the information supplied to them on transporter convictions;

➤ The CCA has drawn up a template for contingency plans and asked RUs in July 2010 to circulate it to transporters to complete and return to RUs by November 2010. The CCA received confirmation from 37 out of 55 RUs of implementation of this request. Details of contingency plans submitted by transporters varied in their completeness from generic statements of intent with no details supplied to detailed lists of telephone contact points for most types of foreseen emergencies;

➤ The CCA has provided training in three sessions during 2008, 2009 and 2010 to 1900 drivers and attendants and issued successful applicants with certificates of competence. Valid certificates of competence were seen for all drivers interviewed during the audit and on files at the RUs. One driver in Thessaloniki had his certificate of competence withdrawn for two months in 2008 after being fined for improper transportation of bovine animals.

Conclusion on authorisation of transporters

The CCA has taken action to improve the system of transporter authorisations by delegating the authorisation of transporters to the RUs, issuing clear instructions and cross-checking the information in the transport database to ensure it is accurate. A central list of transporters is now available, the information was mainly up to date and authorisation files seen contained all the necessary information.

5.2.2 Approval of means of transport by road

Legal Requirements

Article 18 of Regulation (EC) No 1/2005 lays down the requirements for CAs to grant certificates of approval of means of transport by road for long journeys. Article 18(3) requires the CA to record certificates of approval of means of transport for long distance in an electronic database, and to make this information readily available to all Member States.

Findings

➤ The CCA issued in 2006 detailed guidelines (circular 261069) to the RUs concerning the inspection and approval of means of transport for long journeys. The CCA guidance for calculating

deck areas in multi-tier vehicles does not distinguish between movable decks that fit directly on top of each other or decks which fit inside one another;

➤ The CCA has established an electronic database of approved means of transport for long journeys based on information supplied by RUs. The information held in the central database was, with the exception of one case, consistent with that held at local level. The single case concerned a vehicle which was no longer considered compliant for long journeys but whose authorisation had not been withdrawn by the Fiothis RU. Information on approved means of long distance transport was not readily available to all MS;

During the inspection of three vehicles approved for long journeys at two transporter/dealers' premises it was noted that:

➤ Two of the vehicle approval certificates listed the total deck area and not the individual deck areas and one certificate did not provide any deck area though it had been recorded on the inspection approval checklist. This would cause difficulty with calculating accurate stocking densities on the different decks. One vehicle approved for bovines, pigs and sheep/goats had nipple drinkers but no suitable watering devices for calves or lambs and adult bovines. One vehicle did not have an external device to indicate the level of water in the vehicle's tanks. A different transporter stated that he had been fined €3000 in another MS for failing to have an external device to indicate the level of water in the vehicle's tanks. No information on contingency planning was available on site for two out of three vehicles seen. One vehicle did not have a temperature alarm which was visible or audible in the driver's cab;

➤ A vehicle for short distance transportation unloaded animals during the inspection at a slaughterhouse in Fiothis. There was no lateral protection on the unloading ramp of the vehicle or on the receiving ramp in the slaughterhouse resulting in a large gap between them.

Conclusion on approval of means of transport by road

The CCA has improved the system of approvals for means of transport for long distances and recorded their details in a central database available to RUs but not readily available all Member States as required by Article 18(3) of Regulation (EC) No 1/2005. The three vehicles seen which had been approved all had some deficiencies not detected in the approval process despite the relatively recent training of those inspecting and approving the vehicles and the clear CCA guidelines and checklists which would indicate that either the training was not very effective, or was not well absorbed, or that vehicle approval was not given a high priority. There are consequences for subsequent checks of vehicles as officials will depend on aspects checked at approval when subsequently carrying out controls on how vehicles are operated.

5.2.3 Checks during transport

Legal Requirements

Article 27(1) of Regulation (EC) No 1/2005 requires that the CA shall carry out non-discriminatory inspections of animals, means of transport and accompanying documents. Such inspections must be carried out on an adequate proportion of the animals transported each year within each MS.

Article 15(1) of Regulation (EC) No 1/2005 requires the competent authority to carry out appropriate checks at any stage of long journeys on a random or targeted basis to verify that declared journey times are realistic and that the journey complies with this Regulation and in

particular that travel times and resting period have complied with the limits set out in Chapter V of Annex I.

Point 8 of Annex II to Regulation (EC) No 1/2005 requires a copy of the completed journey log to be returned to the CA of the place of departure within one month of completion of the journey, unless the systems referred to in Article 6(9) of the Regulation were used, which allows the CA to check if the journey times described in point 1 Chapter V of Annex I of the same Regulation are respected.

Regulation (EC) No 854/2004, Annex I, Section I, Chapter II C requires the official veterinarian at slaughterhouses to verify compliance with EU rules on animal welfare during transport.

Article 8(3)(a) of Regulation (EC) No 882/2004 requires the CA to have procedures in place to verify the effectiveness of official controls.

Findings

➤ The CCA introduced a transport guide that was used for training in 2006, issued to all RUs in 2008 and then re-issued in September 2010. It provides clear instructions on the requirements of Regulation (EC) No 1/2005 including a FAQ section and has been supplemented by a number of additional instructions dealing with, amongst other issues, the targeting and frequency of checks on transport, the necessity to take enforcement action when non-compliances were noted and revised inspection forms;

➤ There has been no change since the previous FVO report in the target frequency of inspections of 30% of animals transported. The CCA stated that this target has never been met and may soon be changed;

➤ The CCA has not drafted any procedures to verify the effectiveness of official controls on transport.

It was noted that:

➤ In all the RUs visited, it was stated that it was not possible to fulfil the CCA's target of 30% checks on transported animals, especially checks on consignments arriving from other MS due to the shortages of staff and the lack of overtime payments and reasonable fuel allowances to implement controls outside normal working hours. As a result of this it was stated that checks on transport concentrated almost exclusively on controls at slaughterhouses;

➤ OVs stated that only minor infringements are being detected and these are being followed up with oral warnings and no details are recorded or reported to the RU and therefore the CCA;

➤ Enforcement actions (four fines and one tribunal) were taken for five out of eight offences committed by Greek drivers and reported to the Greek contact point between 2007-2010, but no enforcement action, except notification to the respective MS contact points, was taken in a further seven cases with foreign drivers;

➤ Two of the RUs visited, Larissa and Thessaloniki, had drafted annual plans since 2009 for carrying out controls on transport. There was a plan drafted in Fiothis in 2007 but it has not been updated and is not implemented;

➤ Larissa's plan foresees 30% checks at destination on animals arriving from other MS; from short distance transport, at departures and through roadside checks. There is no specific mechanism stated on how this figure is to be achieved and the plan is not being implemented as described;

There was no information available on checks on transport for 2007. In 2009 the DVIC audit noted

that the 450 checks reportedly carried out at slaughterhouse destinations in 2008 were not substantiated by documentation. The OV's at two of the slaughterhouses visited admitted that controls for animal welfare were in essence a paper ticking exercise to meet targets. In 2010 the CA carried out 18 controls on transport outside slaughterhouses, eleven of which related to intra-Union (IU) trade. The reports of these checks were very poorly documented with no mention of the type of checks carried out and some sections not completed;

Inspection reports on transport were available in one slaughterhouse from July 2010. Before this date controls on transport were said to have been carried out in this premises but were not documented. Controls on the arrival of animals at a second slaughterhouse were reviewed from January to November 2011 with no non-compliances noted during this period. The FVO team reviewed the reports of 118 controls on transport in a third slaughterhouse which were in general poorly completed with check boxes left blank, missing dates, and partly illegible text. The OV stated that the controls were just numbers performed to meet the CCA's target of 30% controls;

To put the level and targeting of controls into perspective: information from TRACES for the period 2008, 2009 and 2010 shows that there were 393, 466 and 419 consignments arriving in Larissa from IU transportation and 97,421, 102,090 and 91,587 animals in these consignments respectively. Of these 1278 consignments, nine had slaughterhouses as their destination. During this period there were no non-compliances detected in Larissa relating to official controls on animal welfare during transport though action had been taken for five offences relating to the use of TRACES. Substantial fines (~€20-30,000) had been imposed or were pending for these offences.

➤ Thessaloniki's plan foresees 30% of the number of animals transported to be subject to checks. The plan prioritises consignments of animals arriving at slaughterhouses (mainly from abroad), then from a different RU and lastly from within Thessaloniki. It then lists further control priorities in order of decreasing importance: holdings receiving consignments which have travelled for more than eight hours, holdings receiving consignments from within Greece. 266 checks were reported to have been carried out at slaughterhouses in 2009. Reports of official controls on transport inspections were available and satisfactorily completed in the slaughterhouse visited.

Eight animals had been found dead in one consignment of 400 sheep from an MS which had arrived at a slaughterhouse in 2010. There was no other information available on the cause or time of death and no follow-up investigation had been carried out by the CA. Official controls on animal welfare in Thessaloniki are also recorded in the TRACES database and showed four welfare controls at destination during 2010. The documentary report of one of these inspections showed that no animal welfare controls had been carried out despite this having been indicated in TRACES;

To put the level and targeting of controls into perspective: information from TRACES for the period 2008, 2009 and 2010 shows that there were 298, 250 and 218 consignments arriving in Thessaloniki from IU transportation and 13 884, 10592 and 8457 animals in these consignments respectively. Of these 766 consignments 20 had slaughterhouses as their destination. During this period there were two non-compliances detected in Thessaloniki relating to official controls on animal welfare during transport. A fine of €1000 for non-return of a journey log was imposed and a second transporter was subjected to a tribunal for a similar offence but was cautioned and not fined.

➤ There is no updated plan for transport controls in Fiothis as it was stated there are not enough staff to implement it. Controls are done at slaughterhouses, 85 reported in 2008, 19 in 2009 and regular reports from 2010 seen at one premises. Inspection reports on means of transport for 2008 to 2011 (8 for 2010 and 14 for 2009) were stated to have been carried out but were not available.

During this period there were no non-compliances detected in Fiothis relating to official controls on animal welfare during transport and no enforcement action or sanctions were taken with the

exception of one case reported to Fiothis from another MS where a driver had been prosecuted for having an inadequate supply of water on the vehicle. In this case, the Greek driver was prosecuted but the outcome of the case was not known to the CA and no action had been taken to rescind or suspend his certificate of competence;

To put the level and targeting of controls into perspective: information from TRACES for the period 2008, 2009 and 2010 shows that there were 107, 154 and 137 consignments arriving in Fiothis from IU transportation and 23,830, 41,821 and 28,701 animals in these consignments respectively. Of these 398 consignments, 21 had slaughterhouses as their destination.

Checks on Journey Logs

➤ The FVO team saw no evidence of documentary checks on animal welfare during transport such as: verification of journey logs, records of satellite navigation system printouts (SNS) or temperature and tachograph records, which could be requested from Greek transporters (in the absence of physical checks) on consignments arriving at the three offices visited and notified in TRACES and through consignee fax notifications;

➤ There were incomplete records of journey logs available at the two transporters' premises visited as they both stated they had returned the original journey logs to the points of departure, mainly Spain, and they did not keep any copies of these, and kept tachograph records no longer than 25 days. Journey logs covering consignments from other countries were reviewed and found to be compliant for the transporter in Fiothis;

➤ The OV at a Field Veterinary Station (FVS) stated that checks had been carried out on journey logs for consignments of animals from IU trade at their destination. However, all the section four parts of the journey log copies (39 available between March 2010 to November 2010) were completely blank. There were no requests for the missing information made to the transporter concerning the journey logs that had not been completed;

➤ The OV inspecting the control post visited by the FVO team had received no training in assessing journey logs and had no access to Internet applications to verify if journey times were realistic and therefore this had not been carried out. The OV had signed and stamped the journey logs but had not included a statement on the fitness of the animals to continue the journey. For the four journey logs available there were inaccuracies in section four relating to missing information on the last section of the journeys from Patras and Igoumenitsa to Oinofyta; it was therefore not possible to verify the exact duration of the journeys.

Roadside checks

➤ The CCA had requested RUs to instigate a series of roadside checks on animal transport in 2006 but this was found to be ineffective since the OVs had no powers to issue enforcement notices or levy fines whilst working under the authority of the transport department of the RU and these checks were abandoned;

➤ In 2008 the CCA requested a further round of roadside checks in the RUs of Serres, Kilkis, Thesprotia, Achaia and Imathia. The number of roadside checks reported by the CCA to have been carried out during the period 2007- 2010 is given below:

Region	2007	2008	2009	2010
Serres (borders Bulgaria)	46	0	19	12
Kilkis (borders FYROM)	0	0	1	0
Thesprotia (including Igoumenitsa port)	24	6	8	6

Achaia (including Patras port)	0	0	0	0
Imathia (largest destination region for IU trade: 817, 700 and 738 consignments received in 2008, 2009 and 2010 respectively)	0	0	0	0

➤ There were no enforcement actions reported to the CCA and no sanctions levied as a result of these controls. To put the level of roadside checks at the main Greek arrival ports for livestock of Igoumenitsa and Patras into context, information requested from the Italian authorities showed that there were 467 consignments of livestock (333 bovine, 80 sheep and goats and 54 pigs) leaving the ports of Bari and Brindisi for the main Greek ports in 2010;

➤ Fiothis and Thessaloniki RUs stated that they had carried out three and 17 roadside checks in 2010 and 2007 respectively with no non-compliances noted and with no records available.

Reporting the results of transport checks

➤ The CCA has sent reminder notes to the RUs on a number of occasions since the previous FVO inspection (most recent Circular 276832 in July 2010) urging the RUs to send the quarterly and annual reports of transport inspections to it and to ensure the data is accurate and verifiable. In 2007 45 out of 55 RUs sent annual reports to the CCA but 5 out of 45 did not include quarterly reports. In 2008 45 out of 55 sent annual reports but 14 out of 45 did not include quarterly reports. In 2009 44 out of 55 sent annual reports but 19 out of 45 did not include quarterly reports. The three RUs visited all sent quarterly and annual returns for 2007 and 2008. In 2009 they all sent annual reports but only Thessaloniki sent quarterly returns as requested. The CCA is further developing the transport module of the Veterinary Identification and Recording database for RUs to directly input the results of official controls on transport and it is expected to be in place by August 2011;

➤ The CCA's reports to the Commission for 2007 and 2008 gave no analysis of the major deficiencies and no action plans. The data requirements for the 2007 and 2008 reports are incomplete and at times totally lacking. The CCA's report for 2009 does give a very brief description of the non-compliances detected and sanctions levied but fails to provide an analysis of the data or an action plan.

Conclusions on checks during transport

In the two out of three Regional Units which did draw up a programme of inspections the checks did not meet the CCA target. Overall the CAs relied almost exclusively on checks at slaughterhouses with little emphasis given to checks at destination on consignments which had travelled for over eight hours.

The standard of the reporting at slaughterhouses was variable with many forms poorly completed and the activity considered by some OVs and local CAs to be a form filling exercise. Non-compliances were under-reported in the three regional units visited as, if detected, non-compliances are still being followed by oral warnings, as opposed to a written warning as stated in CCA procedures. The CCA is still not aware of the true level of compliance in the Regions.

No progress has been made since the previous FVO inspection in providing Control Post facilities at the main ports of Igoumenitsa and Patras, but the provision of two new Control Post facilities should, if used by transporters, reduce non-compliance with the requirements of Regulation EC No 1/2005 on certain other trade routes. Also as checks at ports are still not performed outside working hours, and levels of roadside checks remain extremely low, it remains easy for transporters to avoid being checked.

Controls on journey logs were inadequate as no meaningful official controls were carried out on transporters, the Control Post visited or IU consignments arriving at non-slaughterhouse destinations which make up the majority of these consignments in the three RUs visited. The two dealer/transporters visited did not retain the relevant records as required in Point 8 of Annex II to Regulation (EC) No 1/2005 and the CA had carried out no controls to detect this and subsequently enforce these requirements despite being in regular contact with them both for animal health inspections.

The Greek CCA is not in possession of sufficient reliable information from the RUs to provide a meaningful annual report on the inspections performed during the previous year nor are they able to provide any useful analytical trends in non-conformities or an action plan to address them due to the lack of deficiencies reported.

5.2.4 Checks at control posts

Legal requirements

Article 3 of Regulation (EC) No 1255/97 requires the CAs to approve and issue an approval number to each control post and describes the conditions for their approval. It requires control posts to be under control of an OV ensuring *inter alia* compliance with the provisions of this Regulation, and that regular inspections are carried out at least twice a year to ascertain that the requirements for approval continue to be fulfilled. Detailed requirements for the control posts are laid down in Annex I to Regulation (EC) No 1255/97.

The requirement regarding the provision of Control Post facilities in the vicinity of a port arises in Annex 1, Chapter V, point 1 (7)b of Regulation (EC) No 1/2005 in the case of transport by sea on a regular basis and direct link between two geographical points of the community by means of vehicle loaded onto vessels without the unloading of the animals, the latter must be rested for 12 hours after unloading at the port of destination or in its immediate vicinity unless the journey time at sea is such that the voyage can be included in the general scheme of points 1.2-1.4 of Annex 1.

Article 4(4) of Regulation (EC) No 1255/97 requires the competent authority of the place of departure to notify via TRACES (Decision 2004/292/EC) the movement of animals passing through control posts.

Findings

➤ The premises visited was new and in very good structural condition. The premises has been authorised for cattle, sheep and pigs by the CCA despite comments from the local CA during the approval inspection visit that it was not suitable for pigs during the summer months as there were no sprinklers. The premises has had few consignments, despite being frequently cited on journey logs and in TRACES by transporters from other MS as a resting place. The CCA has written to the MS concerned on a number of occasions but has received no response. The local OV had attended the premises as required whenever consignments had used the facility but had received no training to effectively carry out her tasks (see section 5.2.3 checks on journey logs);

➤ The livestock pens had not been satisfactorily cleansed and disinfected since the last consignment as the original disinfection machinery had been stolen and only a knapsack sprayer was available, but this was inadequate for the purpose.

Conclusion on Checks at Control Posts

The Control Post visited has been approved according to the provisions of Article 3 of Regulation (EC) No 1255/97. Some discrepancies with the approval conditions and with operational issues were noted but in general the premises was compliant. Official controls are being regularly carried out when animals are present as required but the OV was insufficiently trained to carry out these tasks effectively.

5.3 ANIMAL WELFARE AT SLAUGHTER AND KILLING

Legal requirements

Article 3 of Directive 93/119/EC stipulates that animals shall be spared any avoidable excitement, pain or suffering during movement, lairaging, restraint, stunning, slaughter or killing. In particular, Article 4 of Directive 93/119/EC sets out that the construction, facilities and equipment of slaughterhouses, and their operation, shall be such as to spare animals any avoidable excitement, pain or suffering. To this end, specific requirements apply to the restraining and stunning of animals brought into slaughterhouses.

Among these requirements, animals must be restrained in an appropriate manner in such a way as to spare them avoidable pain, suffering, agitation, injury or contusions (Article 5(1)(b) and Annex B of Directive 93/119/EC). Animals must be stunned before slaughter or killed instantaneously in accordance with the provisions of Annex C (Article 5(1)(c) of Directive 93/119/EC). Stunning is defined as any process which, when applied to an animal, causes immediate loss of consciousness which lasts until death (Article 2(5) Directive 93/119/EC).

Instruments, restraint and other equipment and installations used for stunning or killing must be designed, constructed, maintained and used in such a way as to achieve rapid and effective stunning or killing (Article 6(1) of Directive 93/119/EC). In this regard, the CA has the obligation to check the compliance of the instruments, restraint and other equipment used for stunning or killing (Article 6(1) of Directive 93/119/EC). Suitable spare equipment and instruments must be kept at the place of slaughter for emergency use. They shall be properly maintained and inspected regularly (Article 6(2) of Directive 93/119/EC).

Findings

- Since the previous FVO inspection the CCA has issued a number of circulars to the RUs requesting them to report on inspections in slaughterhouses and to inform the CCA of progress in upgrading facilities to meet the requirements of Directive 93/119/EC. The CCA has also issued guidelines for red meat species which give stunning parameters including amperage for sheep and pigs. The most recent circular (134099) sent on 18 January 2011 reiterated the request for completion of slaughterhouse inspection forms S1 and S2 (with a yearly frequency and six monthly follow up of non-compliances if required). It also requested further reporting using an additional reporting protocol at a rate of 5% of OV attendance days;
- These CCA requests have not been fully complied with between 2007 and 2009 by the 51 RUs which have slaughterhouses. For these 51 RUs, the CCA received six returns in 2007; 15 in 2008; 18 in 2009 and 25 in 2010;
- The CCA listed 17 regions during 2007 and 2008 with slaughterhouses which had deficiencies relating to animal welfare during slaughter. For 2009-2010 the CCA stated that for these 17 regions with non-compliances, the CCA had no information on the situation for 11; four were now compliant and two remained non-compliant. On the basis of the 2011 reports available at

the time of this audit, the CCA indicated that six reports from 25 regions show non-compliances with animal welfare requirements. There were no details of any enforcement action taken regarding animal welfare at slaughter over the period 2007-2011.

- The public health department of the CCA together with the DVIC has been involved in managing and reporting on the upgrading of slaughterhouses throughout the country during 2007-2011. The upgrading of slaughterhouses includes the requirement that animal welfare requirements are fully met. The CCA stated that the number of slaughterhouses which are fully compliant and have been issued with an MRDF approval number was 123 for mammals and 44 for poultry. There were 15 slaughterhouses operating without an approval number compared to 48 at the end of 2009;
- DVIC concluded from a series of audits in 2006, 2007 and 2008 that the system of official controls for slaughter was ineffective due to inadequate enforcement by the RUs.

At the RUs visited the following was noted:

- Slaughtermen had not received any recent documented training in two of the three RUs visited. However, stunning and slaughter of animals were carried out in a satisfactory manner in four out of five slaughterhouses seen in operation. The condition of equipment for stunning and restraint, the maintenance of the equipment and the provision of spare equipment and records of maintenance were satisfactory in four of the five slaughterhouses visited and action was in train to replace a faulty pair of electrical tongs in the fifth one;
- There were no non-compliances noted nor any enforcement action nor sanctions imposed by the RUs from 2007 to the time of this FVO audit in any of the slaughterhouses visited. Infrastructure such as lairages had been modernised in two of the premises visited but in two other slaughterhouses non action had been taken for unsatisfactory lairages. OVs reported that minor non-compliances had been detected but only verbal admonitions had been given to transporters and food business operators' (FBO) staff and no written reports of these actions had been made;
- S1 and S2 reports for 2009 and 2010 had been completed for all the slaughterhouses visited by the FVO team and forwarded to the CCA by Fiothis and Thessaloniki RUs. These reports had not been sent by Larissa RU to the CCA.

In Fiothis it was noted that:

- In one slaughterhouse lambs were inadequately stunned and the acoustic alarm was not audible during the application of the tongs. However, sheep were adequately stunned and the alarm was fully audible. Neither the OV nor the slaughtermen were fully aware of the electrical stunning parameters. The lairage has been recently rebuilt to a large extent but there were still areas (in particular races) with protruding sharp edges and some feeding and water troughs broken in the isolation pen;

The second slaughterhouse was not in operation during the visit. There was no lairage available for bovines. The remaining lairage areas for pigs and sheep was satisfactory. The RU stated that the lack of lairage for bovines was due to be addressed but there was no documentary evidence of this provided. The OV was not fully aware of the stunning parameters used for sheep and pigs. Records of transport checks were available and filled in on a regular basis.

In Larissa it was noted that:

- The stunning observed in one red meat slaughterhouse was satisfactory. There was an electrical fault in the fuse board supplying the electrical tongs used to stun pigs and the company electrician was required to intervene. The stunning parameters were stated to be 1.3A for pigs but far higher levels were used during the inspection (in the region of 2A). Similarly for sheep, the OV stated that the stunning parameters for adult sheep were 1 A and 150 V (at least) but during the visit

the FVO team observed 1,5 A and 250 V being used;

The OV in the same slaughterhouse was not able to find records concerning the slaughter of a cow with a broken leg that she had mentioned. The transport of such animal was considered normal by the OV even though she had participated in seminars on animal welfare where this had been indicated as non-permissible, though she had not received the CCA instructions on fitness of animals for transport;

The second slaughterhouse demonstrated satisfactory stunning and restraint of bovines and sheep though the OV was again uncertain of the specific voltage utilised by the stunning equipment. There was no alarm in place to warn if the concentration of carbon dioxide in the pig stunning chamber dropped below 70% but the doors of the chamber would not open below this concentration. Certain areas of the lairage were in poor condition with no covers on drains, sharp edges, and unsealed, non-cleanable floors. There were no records of enforcement action by the OV in relation to the conditions in the lairage;

The third slaughterhouse demonstrated satisfactory restraint, stunning and slaughter of animals. The slaughterhouse had been closed in 2007 due to the lack of suitable lairage capacity and once this had been provided it had reopened in May 2008. As for the other slaughterhouses, there had been no non-compliances noted, in reports and no enforcement action taken for controls on transport and slaughter.

In Thessaloniki it was noted that:

- The small capacity slaughterhouse visited was well maintained and satisfactory restraint, stunning and slaughter of one bovine animal were demonstrated. The tongs for head only stunning of sheep and pigs had no acoustic or visual device indicating the length of time of the application on the animal. This was the only slaughterhouse visited that had very good, clear record keeping of *ante* and *post-mortem* inspection results;
- Training on animal welfare at slaughter and killing had been provided to the slaughterhouse staff in 2008 and certificates of training issued to staff.

Conclusions on Animal Welfare at Slaughter

The CCA do not have full information for the whole of Greece on the level of compliance with animal welfare requirements at slaughter and killing due to the lack of reports sent to them from RUs during 2007-2010.

DVIC audits carried out during 2006-2008 concluded that the system of official controls on animal welfare at the time of slaughter was ineffective due to inadequate enforcement of official controls by RU. The evidence seen by the FVO team of variable reliability of reporting, the failure to detect any non-conformities or take any enforcement action in the three RUs visited during the period 2007-2010, coupled with the lack of enforcement action taken regarding animal welfare non-compliances in slaughterhouses detected throughout Greece and reported to the CCA during this period, leads to a similar conclusion.

However, a positive effort and result has been obtained on the stunning and slaughter of animals observed and in the provision of satisfactory stunning and restraint equipment which was in good condition and satisfactorily maintained in four out of the five slaughterhouses visited.

5.4 MISCELLANEOUS ISSUES

Although outside the main scope of this audit, the FVO team noted a number of additional issues which were communicated to the regional CAs and the CCA at the closing meeting.

5.4.1 Public Health

- Very poor maintenance and generally poor cleanliness of walls, ceilings and other structures was noted with totally unsuitable flooring and poor personal hygiene habits seen in three out of the five slaughterhouses visited. The CCA indicated that remedial action would be taken to rectify these deficiencies;
- Generally poor records of *ante* and *post-mortem* controls were noted in four of the five slaughterhouses visited as it was difficult to distinguish between FBO records and any controls performed by OV's as the latter were not easy to assess and were not positively indicated i.e. the absence of any comment was taken as an implicit recognition of fitness for human consumption. The only clearly recorded events related to carcass grading and interventions and condemnations.

5.4.2 Animal Health

- There is no published list of dealers contrary to the requirement of Article 13(5) of Council Directive 64/432/EEC. The CCA uses TRACES to extract a list of dealers but using TRACES for entering the details of dealers is not suitable as details can also be entered by non CCA staff and there are already listings of assembly centres in TRACES that do not exist in Greece. The list of dealers given to the FVO team in Thessaloniki did not match the existing list provided by the CCA;
- Two dealers premises were visited, one in Fiothis and one in Larissa. Both were totally unacceptable in terms of structural approval as they were impossible to adequately cleanse and disinfect (earth floors); no separation from owners' stock and no suitable records kept of animals on or off the premises in either location i.e. in Fiothis it was not possible to match dates of entry on and off the farm, in Larissa it was possible to match dates of batches on and off the farm but no individual identification was given.

Conclusion on Animal Health

The authorisation, listing and supervision of dealers' premises is not in accordance with the requirements of Article 13 of Directive 64/432/EEC.

5.4.3 Cooperation of the Greek Authorities with the Commission

Full cooperation was received from the CCA in relation to the conduct of the audit. However, cooperation with RUs was less than fully transparent during the audit:

- Despite the FVO team's request to observe the CA controls in normal operating conditions, it was presented in Larissa with five sheep and five pigs for slaughter during one visit to a slaughterhouse with two OV's in attendance. Records of the same day the previous week indicated that seven bovines, 33 sheep, 29 goats, 10 pigs and about 120 lambs had been killed;
- The FVO team took copies of the first and third pages of slaughterhouse inspection reports (S1 and S2 reports) from one slaughterhouse in Fiothis and requested the full reports to be sent. The full reports had been amended when received by the FVO team and contained different stunning parameters to the original copy versions received in the slaughterhouse.

6 OVERALL CONCLUSIONS

Inspections on means of transport and animals are being carried out, but due to resource constraints these inspections still focus almost exclusively on controls at slaughterhouses which is not fully in accordance with the CCA's instructions.

CAs are not carrying out satisfactory checks of animal welfare during transport as the standard of the reporting at slaughterhouses was variable and does not provide confidence in the efficacy of these controls carried out by OV's; no meaningful official controls on journey logs were carried out on transporters, the Control Post visited, or IU consignments arriving at non-slaughterhouse destinations (which make up the majority of consignments in the three RUs visited).

The CCA has actively attempted to promote the setting up of Control Posts since the previous inspection but with limited success resulting in the provision of one Control Post in the vicinity of Piraeus port. There are still no Control Post facilities for the main transit ports of Igoumenitsa and Patras.

The rules on the stunning of animals at the time of slaughter were mainly complied with in the slaughterhouses visited during this audit and satisfactory stunning and restraint equipment, in good condition and satisfactorily maintained, was seen in four out of the five slaughterhouses visited.

CCA audits carried out during 2006-2008 concluded that the system of official controls on animal welfare at the time of slaughter was ineffective due to inadequate enforcement of official controls by RU. The evidence seen by the FVO team of variable reliability of reporting, the failure to detect any non-conformities or take any enforcement action in the three RUs visited during the period 2007-2010, coupled with the lack of enforcement action taken regarding animal welfare non-compliances in slaughterhouses detected throughout Greece and reported to the CCA during this period, leads to a similar conclusion.

7 CLOSING MEETING

A closing meeting was held on 11 February 2011 with representatives of the CCA. At this meeting, the main findings and conclusions of the audit were presented by the FVO team. The representative of the CCA acknowledged the findings and conclusions presented and provided clarifications on some of the issues discussed.

8 RECOMMENDATIONS

The competent authorities are invited to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), aimed at addressing the recommendations set out below, within twenty five working days of receipt of this specific audit report.

N°.	Recommendation
1.	The CCA should take action to ensure that the level of official controls on transport can be realistically planned and effectively implemented as required in Article 3 of Regulation (EC) No 882/2004 where it requires that official controls are carried out regularly, on a risk basis and with appropriate frequency. In this regard, the CCA should consider collecting and utilising best practice from Regional Units and

N°.	Recommendation
	involving them in any future proposals.
2.	In conjunction with planned actions to address recommendation No.1, the CCA should ensure that when controls on journey logs are carried out, as required in Article 15(1) of Regulation (EC) No 1/2005, they are carried out by trained staff. The CCA should consider the targeting of such controls using information available in the TRACES database in each Regional Unit to perform an initial screening of the type and volume of trade entering and leaving the regional unit using a desk based exercise and then targeting different types of transport according to the local risk criteria set. For this purpose, consideration could be given to the verification of transporters' compliance with requirements in Chapter V of Annex 1 of Regulation (EC) No 1/2005 by requesting satellite navigation system records, tachograph records, temperature printouts, and copies of journey logs.
3.	The CCA should take the necessary action to provide for facilities in or in the immediate vicinity of the two main ferry ports of Igoumenitsa and Patras to enable animals to rest after unloading if required, as laid down in Annex 1, Chapter V, point 1 (7)b of Regulation (EC) No 1/2005. The CCA should notify other Member States' Transport Contact Points to ensure that local veterinary units involved in the verification of the planning sections of journey logs and the issue of TRACES certificates for consignments destined for Greece are fully aware that facilities are not presently in place for transporters using these ports. Similarly the CCA should notify all Greek transporters authorised for long distance transport of the implications for journey times relating to the lack of these facilities.
4.	The CCA should ensure that in conjunction with actions taken to address recommendations No 1 and 2, physical inspections of the means of transport and the animals are actually carried out as required in Article 27(1) of Regulation (EC) No 1/2005. The CA should consider collecting and utilising best practice from Regional Units and involving them in any future proposals to ensure that the best use of available resources is made e.g. combining animal health and animal welfare inspections at transporters/dealers' premises; ensuring staff trained on animal welfare and approval of vehicles are present at slaughterhouses on days intra-Union consignments are expected.
5.	The CCA should ensure that verification of the effectiveness of official controls on animal welfare during transport and at slaughter as required in Article 4 of Regulation (EC) No 882/2004 is included in actions taken to address recommendations No.1,2,4, 6 and 7.
6.	The CCA should ensure that inspections and controls in slaughterhouses are carried out in an appropriate manner to ensure the requirements of Articles 3, 4, 5 and 6 of Directive 93/119/EC are effectively implemented.
7.	The CCA should ensure that official controls on animal welfare during transport and

N°.	Recommendation
	<p>slaughter are effectively enforced according to the requirements of Articles 54 and 55 of Regulation (EC) No 882/2004. In this regard, the CCA should ensure that efficient and effective coordination and cooperation is put in place between different units carrying out official controls. To this end, improvements should be sought in the complimentary work of the public health department and the animal welfare section of the CCA and in the Regional Units regarding animal welfare at slaughter and killing. Consideration should be given to improving the sharing of information and developing synergies to enhance the enforcement of official controls e.g. at CCA level, by actively liaising with RUs in those cases where enforcement action has not been taken by the regions in slaughterhouses where animal welfare non-compliances have been identified. Consideration should be given to developing new strategies in consultation with the Regional Units to overcome the persistent lack of enforcement action.</p>
8.	<p>The CCA should ensure that the implementation of the provisions of Articles 4(3) and (5) of Regulation (EC) No 882/2004 requiring efficient and effective coordination and cooperation between different units carrying out official controls is improved regarding the persistent under-reporting by Regional Units to the CCA of the results of official controls on animal welfare during transport and at slaughter and killing. In this regard the CCA should intensify efforts to develop a comprehensive IT reporting system for the practical input of data from the Regional Units, whilst also addressing the infrastructural problems associated with the smaller field offices' lack of equipment.</p>
9.	<p>The CCA should ensure that prompt action is taken to address the deficiencies identified in the authorisation and operational surveillance of dealers' premises throughout Greece in order to comply with the requirements of Article 13 of Directive 64/432/EEC.</p>

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

http://ec.europa.eu/food/fvo/ap/ap_gr_2011-6212.pdf

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 64/432/EEC	OJ 121, 29.7.1964, p. 1977-2012	Council Directive 64/432/EEC of 26 June 1964 on animal health problems affecting intra-Community trade in bovine animals and swine
Dir. 91/628/EEC	OJ L 340, 11.12.1991, p. 17-27	Council Directive 91/628/EEC of 19 November 1991 on the protection of animals during transport and amending Directives 90/425/EEC and 91/496/EEC (repealed and replaced by Regulation (EC) No 1/2005)
Dir. 93/119/EC	OJ L 340, 31.12.1993, p. 21-34	Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing
Reg. 1255/97	OJ L 174, 2.7.1997, p. 1-6	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 to Directive 91/628/EEC
Dec. 2004/292/EC	OJ L 94, 31.3.2004, p. 63-64	2004/292/EC: Commission Decision of 30 March 2004 on the introduction of the Traces system and amending Decision 92/486/EEC
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
Reg. 1/2005	OJ L 3, 5.1.2005, p. 1-44	Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97

