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Directorate F - Food and Veterinary Office

DG(SANCO) 2009-8237 - MR FINAL

FINAL REPORT OF A SPECIFIC AUDIT

CARRIED OUT IN

GREECE

FROM 22 JUNE TO 03 JULY 2009

IN ORDER TO EVALUATE THE FOLLOW-UP ACTION TAKEN BY THE COMPETENT  
AUTHORITIES WITH REGARD TO OFFICIAL CONTROLS RELATED TO THE SAFETY OF  
FOOD OF ANIMAL ORIGIN, IN PARTICULAR MEAT, MILK AND THEIR PRODUCTS

IN THE CONTEXT OF A GENERAL AUDIT

*In response to information provided by the Competent Authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of an endnote.*

## *Executive Summary*

The main objective of the specific audit was to verify that official controls are carried out in accordance with the Greek multi-annual national control plan (MANCP) and in compliance with Community law. The audit also evaluated the follow-up action taken by the Central Competent Authorities (CCA) in response to the recommendations made in the report DG (SANCO)/2008-7813. Particular attention was paid to non-approved slaughterhouses. According to the list received from the Directorate General of Veterinary Service (DGVS) there had been 86 non-approved slaughterhouses in Greece of which 38 are now closed and 48 are still in operation.

The CCAs sent an action plan to the Food and Veterinary Office (FVO) addressing the 15 recommendations of the previous report and the response was considered to be satisfactory for 2 out of the 15 recommendations.

During the current audit 6 non-approved slaughterhouses, 3 approved slaughterhouses, 3 cutting plants, 1 distribution centre, 1 meat processing establishment, 3 milk processing establishments and the Rentis market were visited.

Although none of the 6 non-approved slaughterhouses was in compliance with the general and specific hygiene requirements, 3 slaughterhouses are considered to be relatively easy to upgrade and 1 can, with some effort, reach an acceptable level. Two of the non-approved slaughterhouses would be very difficult to upgrade to an acceptable level.

The approved slaughterhouses visited generally complied with the general and specific hygiene requirements.

Official controls over the red meat sector and in particular over the non-approved slaughterhouses were unsatisfactory. The control over the approved slaughterhouses and other establishments was in general satisfactory except for the Food Business Operators' (FBO) non-compliance with microbiological criteria for foodstuffs, sampling and analyses.

Procedures based on Hazard Analysis Critical Control Points (HACCP) principles were not in place in 5 of the 6 non-approved and in 1 of the 3 approved slaughterhouses visited.

Several cases of non-compliance with the identification marking and labelling requirements were seen during the audit.

Post-mortem inspection was not carried out fully in accordance with the general and specific requirements. The recommendations made in the previous report regarding the post-mortem inspection and Trichinella testing have not been satisfactorily addressed.

Non-compliances with the animal welfare requirements were identified and the previous report's recommendation to respect animal welfare conditions at the time of slaughter or killing has not been satisfactorily addressed.

The official controls in the dairy processing plants were generally satisfactory, but did not take all the production stages into account in case the raw milk does not meet the criteria.

Until shortly before the start of the audit, raw milk not meeting the criteria for plate count and somatic cell count (SCC) was used for the manufacturing of cheese without having any national rules in place.

The situation regarding Rentis Market has improved since the previous mission, but 7 establishments were still in operation in one of the old buildings under hygiene conditions which were unacceptable for fresh meat.

A number of recommendations have been made to the Competent Authority (CA) with a view to addressing the deficiencies identified during this mission.

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**ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT**

<b>Abbreviation</b>	<b>Explanation</b>
ABP	Animal By-Product
CA(s)	Competent Authority(ies)
CCA(s)	Central Competent Authority(ies)
CCP(s)	Critical Control Point(s)
DGVS	Directorate General of Veterinary Service
EC	European Commission
EFET	Hellenic Food Authority
ELOGAK	The Greek Milk Organisation
EU	European Union
FBO(s)	Food Business Operator(s)
FCI	Food Chain Information
FVO	Food and Veterinary Office
HACCP	Hazard Analysis of Critical Control Points
Hygiene Package	Regulations (EC) No 852/2004, No 853/2004, No 854/2004 and No 882/2004
MANCP	Multi-Annual National Control Plan ( <i>Plano Nacional de controlo Plurianual Integrado, PNCIP</i> )
MRDF	Ministry of Rural Development and Food
MSM	Mechanically Separated Meat
OV	Official Veterinarian
PVD	Prefectural Veterinary Directorate
SCC	Somatic Cell Count
TBC	Total Bacterial Count (Plate count at 30 °C)

## 1 INTRODUCTION

The Specific Audit formed part of the FVO's planned mission programme and was carried out as a component of a General Audit, as prescribed in Article 45 of 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.

This report focuses on the sector specific issues identified during the audit. It does not necessarily include aspects relating to Regulation (EC) No 882/2004; these aspects will be addressed in the subsequent General Audit report.

## 2 OBJECTIVES OF THE MISSION

The main objective of the specific audit was to verify that official controls are carried out in accordance with the MANCP referred to in Article 41 of Regulation (EC) No 882/2004 and in compliance with Community law.

The more specific objectives of the mission were:

- The MANCP.
- The evaluation of the follow-up action taken by the competent authorities in response to the recommendations made in report DG(SANCO)/2008-7813 with regard to:
  - CA organisation and operation,
  - official controls over FBOs' compliance with general and specific rules on the hygiene of food of animal origin,
  - the implementation of these rules by FBOs,
  - the correct implementation of the chain of certification.

In particular, controls over meat of domestic ungulates, farmed game, wild game, minced meat, meat preparations, mechanically separated meat, meat products, raw milk and dairy products in the framework of Regulations (EC) No 178/2002, No 852/2004, No 853/2004, No 854/2004 and No 882/2004 were subject to the evaluation.

In pursuit of these objectives, the mission itinerary included the following:

Competent authorities			Comments
Competent authorities	Central	1	Opening and closing meeting
	Regional	4	In regional offices and/or in establishments in Central Greece, West Greece, West Macedonia and Crete
<b>Food production / processing / distribution - Activities</b>			
Slaughterhouses non-approved		6	
Slaughterhouses approved		3	
Cutting plant / Meat products / Minced meat		4	
Milk processing plants		3	
Distribution centre		1	

### **3 LEGAL BASIS FOR THE MISSION**

The mission was carried out under the general provisions of Community legislation and, in particular Article 45 of Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

Full legal references are provided in Annex I. Legal acts quoted in this report refer, where applicable, to the last amended version.

### **4 BACKGROUND**

The previous mission concerning the safety of food of animal origin in Greece was carried out from 31 March to 9 April 2008, the results of which are described in report DG(SANCO)/2008-7813 – MR Final (hereafter referred to as report 2008-7813). This report is accessible at:

[http://ec.europa.eu/food/fvo/index\\_en.cfm](http://ec.europa.eu/food/fvo/index_en.cfm)

A detailed description of the CAs can be found in the country profile for Greece which is accessible at:

[http://ec.europa.eu/food/fvo/country\\_profiles\\_en.cfm](http://ec.europa.eu/food/fvo/country_profiles_en.cfm)

This specific audit is part of the General Audit to Greece to verify that official controls are carried out in accordance with the MANCP referred to in Article 41 of Regulation (EC) No 882/2004. As mentioned in the Introduction all parts of the official controls related specifically to Regulation (EC) No 882/2004 will be reported separately at the end of the full audit series.

### **5 FINDINGS AND CONCLUSIONS**

#### **5.1 NATIONAL MEASURES AND DEROGATIONS**

##### **Legal requirements**

According to Article 10 of Regulation (EC) No 853/2004 Member States may, without compromising the achievement of the objectives of Regulation (EC) No 853/2004 adopt national measures adapting the requirements laid down in Annex III. The national measures refer to continued use of traditional methods and regions subject to geographical constraints and are subject to notification to the Commission and other Member States. National rules may be maintained or established for placing on the market of raw milk or raw cream for direct human consumption and to permit the use of raw milk not meeting the criteria for plate count and somatic cell count. Article 7 of Regulation (EC) No 2074/2005 allows Member States to grant establishments manufacturing foods with traditional characteristics derogations from certain requirements set out in Regulation (EC) No 852/2004.

##### **Audit findings**

- The CCA informed the audit team that no national measures adapting the requirements laid down in Annex III of Regulation (EC) No 853/2004 have been adopted.
- The CCA informed the audit team that national rules are established by means of Circular 302591 of 19 May 2009, issued by the Ministry of Rural Development and Food (MRDF) permitting the use of raw milk not meeting the criteria for plate count and SCC of the

- manufacture of cheeses with an ageing or ripening period of at least 60 days.
- The audit team noted during the audit that feta cheese undergoes ripening in wooden barrels, but derogations from certain requirements set out in Regulation (EC) No 852/2004 were not established. The Hellenic Food Authority (EFET) informed the audit team at the final meeting that derogations will be established for dairy processing plants for the manufacturing of foods with traditional characteristics. Shortly after the audit, the EFET forwarded a copy of the Circular to the FVO (reference number 10470 dated 16 July 2009).
  - There are no derogations in place for establishments other than for dairy processing plants

## **Conclusions**

Until shortly before the start of the audit, raw milk not meeting the criteria for plate count and SCC was used for the manufacture of cheeses without national rules being in place.

Only shortly after the completion of the audit did the Greek authorities establish national measures for derogations from certain requirements set out in Regulation (EC) No 852/2004 for dairy establishments, producing foods with traditional characteristics.

## **5.2 OFFICIAL CERTIFICATION**

### **Legal requirements**

Article 30 of Regulation (EC) No 882/2004 requires that a link exists between the certificate and the consignment and that the information in the certificate is accurate and authentic. Council Directive 96/93/EC lays down the rules to be observed in issuing the certificates required by veterinary legislation.

### **Audit findings**

- Within the scope of this mission none of the establishments visited exported products of animal origin.
- The audit team received information related to RASFF notification 2008.1396 of 6 November 2008 regarding fraudulent certification for fresh meat from Greece to Cyprus. Despite repeated requests the audit team did not receive copies of the certificate issued, the FBO's request for certification and control reports if available. The DGVS did not provide clarification as to why a certificate was issued from Greece to Cyprus.

## **Conclusions**

No proper evaluation of the certification procedure could be made as certificates had not been issued in the establishments visited and the audit team received limited cooperation from the DGVS in relation to the RASFF notification.

## **5.3 FOOD BUSINESS OPERATORS' OBLIGATIONS AND OFFICIAL CONTROLS**

### *5.3.1 General hygiene requirements*

### **Legal requirements**

The FBO shall comply with general hygiene requirements as set out in Annex II of Regulation (EC) No 852/2004. These provisions relate to cleaning and maintenance, layout, design, construction, sitting and size of food premises. Article 4(4) of Regulation (EC) No 854/2004 specifies that the CA shall carry out official controls in respect of products of animal origin to verify FBO compliance with these requirements.

### **Audit findings in the non-approved slaughterhouses visited**

- In 1 slaughterhouse visited significant deficiencies regarding general hygiene requirements

were identified by the audit team in relation to cleaning, maintenance and construction. These included flaking paint on ceilings and walls in the slaughter area and chillers, moulded surfaces, many overhead structures with corrosion, some equipment - including containers for transporting foodstuffs and offal were no longer suitable for their purpose, corrosive equipment, drainage was inadequate in several areas and filters were absent. There was inadequate protection against insects and pests (fresh rat droppings) and inadequate ventilation in some areas. The lairage facilities in this slaughterhouse were at an acceptable level, with the exception of the loading ramp and the pens dedicated for sick or suspect animals. These pens had no separate draining and were not sited in such a way so as to avoid contamination of other animals. The management decided to stop slaughter activities after the FVO audit visit and to upgrade the slaughterhouse to an acceptable level. Although the FBO informed the audit team that the slaughterhouse is in the process of upgrading, no upgrading plan with deadlines was present at the time of the on-the-spot visit. An upgrading plan has been established since and was given to the audit team at the final meeting.

- In 2 slaughterhouses visited significant deficiencies were identified in most areas related to cleaning, maintenance and construction. Equipment with corrosion was present, and the protection against insects and pests (presence of a rat in one chiller) was inadequate. Both slaughterhouses did not have adequate and hygienic lairage facilities in place or easy to clean and disinfect. The FBOs could not provide the audit team with an upgrading plan with deadlines for completion for both slaughterhouses. The audit team concluded that upgrading to an acceptable level will be difficult.
- In the 3 other slaughterhouses visited deficiencies were identified regarding general hygiene requirements in certain areas related to cleaning, maintenance and lay-out and construction and the audit team concluded that upgrading to an acceptable level could easily be done.
- In 1 of these 3 slaughterhouses visited, however, the FVO audit team requested slaughtering be stopped as the pre-operational conditions were not acceptable: the changing facilities for personnel were inadequate, lavatories were not properly equipped, for example the absence of toilet paper, washbasins with cold running water only and an absence of materials for cleaning and hygienic drying of hands. The lay-out and design of the slaughterhouse was acceptable and reconstruction works within the slaughterhouse were, apart from the bovine slaughter area, nearly completed. An upgrading plan with deadlines for completion was not present. However some issues remain to be solved regarding the general hygiene requirements, for example gaps at doors, potential air-borne contamination (opening in wall to outside for hides and skins) and drainage at bleeding place was not adequate. In addition the lairage facilities were of an unacceptable level, for example inadequate loading ramp, damaged fences, walls, ramps and floors. This slaughterhouse was not equipped for watering animals, for example there was an absence of water troughs and no water supply.
- Although the second of these 3 slaughterhouses visited was in the process of finishing reconstruction works, which include a change of lay-out and flows, no upgrading plan with deadlines for completion was present. Some deficiencies remain to be solved, for example the loading area for carcasses, moulded surfaces (doors, curtains), drainage filters with a maze of more than 6 mm, inadequate protection against insects and pests in certain areas (a gecko was present in the refuse store for animal by-products (ABP)), some of the equipment was corroded and ventilation was inadequate in the slaughter area. Certain areas were not clean and dirt had accumulated, including on some overhead equipment. In addition the lairage facilities were of an unacceptable level, for example inadequate loading ramp, damaged fences, walls, ramps and floors with pooled water. Although the operational licence authorises the slaughtering of cattle, the room was not appropriate for this operation (no entry). The CA stated that currently no cattle are slaughtered in this slaughterhouse.
- The third slaughterhouse was kept clean, but was not in good repair, for example flaking

painting on some walls, doors with gaps and the slaughter area for bovine animals was inadequate. Protection against insects and pests was inadequate, for example doors with gaps). The lairage was not easy to clean and no pens were dedicated for sick animals. Some of the hand wash basins had cold water only. Although the deficiencies in this slaughterhouse would be possible to solve the upgrading process had not yet started, despite the statement by the CA that an upgrading plan was in place.

### **Audit findings in approved establishments visited**

Of the 10 establishments visited (excluding Rentis Market), in general 6 met these requirements even though some minor deficiencies were identified and 4 did not meet some of the general hygiene requirements in 1 or more areas. The 3 approved slaughterhouses visited had recently been built and approved.

- Deficiencies were identified regarding the maintenance of some establishments (some doors with gaps or doors where the protective layer was only partly removed) and the protection against pests and insects was inadequate; the location of changing facilities in one slaughterhouse and in another establishment the changing facilities were inadequate.
- In all establishments examples were seen of articles, fittings and equipment, including containers for transporting foodstuffs that food comes into contact with which were not effectively cleaned. Some establishments were not adequately cleaned in certain areas.
- The surfaces of equipment in contact with food, in particular in the cutting areas, were not maintained in good condition in some areas. This was also the case at the place where carcasses were split in 1 approved slaughterhouse visited.
- In 1 meat product establishment some of the equipment was not corrosion resistant. The FBO could demonstrate that part of the equipment to be replaced was already present but needed to be installed. The FBO stated that 1 packing machine was no longer in use.
- In the cold store rooms of 2 establishments visited, raw materials were not kept in appropriate conditions so as to protect them from contamination.

### **Audit findings regarding official controls**

- The reports of official controls, in particular in the non-approved slaughterhouses did not reflect the findings of the audit team. One of the non-approved slaughterhouses with severe deficiencies identified by the audit team and which discontinued its activities after the audit visit, was evaluated by the CA as being in compliance with the requirements of the hygiene regulations.
- The enforcement was weak and no action plans were made available to the official veterinarian (OV) outlining a strategy for upgrading and deadlines for completion. Some upgrading plans however were in place at municipality level, but without guarantees for funding at present and no upgrading plans could be provided to the audit team for 2 slaughterhouses visited.
- The official controls regarding general hygiene requirements in the approved establishments reflected in general the findings of the audit team. However enforcement was weak and deadlines for completion of actions were often prolonged.

### **Conclusions**

Although none of the 6 non-approved slaughterhouses was in compliance with the general hygiene requirements, 3 slaughterhouses are considered to be relatively easy to upgrade to an acceptable level with more effort needed as regards the lairage facilities. One slaughterhouse ceased its activities for upgrading but could with some effort reach an acceptable level subject to continuous maintenance. Two of the non-approved slaughterhouses would be very difficult to upgrade to an

acceptable standard.

Official controls over the red meat sector, in particular over the non-approved slaughterhouses were unsatisfactory and did not identify most of the FBO's non-compliances with the general hygiene requirements as set out in Annex II of Regulation (EC) No 852/2004 and identified by the audit team. The control over 1 non-approved slaughterhouse in particular, was inadequate. The control over the approved establishments was in general satisfactory, but enforcement was weak.

### 5.3.2 *Specific requirements*

#### **Legal requirements**

Article 3 of Regulation (EC) No 853/2004 sets out that the FBO shall comply with the specific requirements of Annexes II and III of this Regulation. Article 4(3) of Regulation (EC) No 852/2004 states that the FBOs shall adopt specific hygiene measures regarding compliance with microbiological criteria for foodstuffs, compliance with temperature control requirements, and sampling and analyses. Details on microbiological criteria foodstuffs shall comply with are set out in Regulation (EC) No 2073/2005 and Article 4(4) of Regulation (EC) No 854/2004 specifies that the CA shall carry out official controls in respect of products of animal origin to verify FBO compliance with these requirements. These cover a range of items with regard to requirements for slaughterhouses, cutting plants, emergency slaughter, game handling, raw milk and dairy products and other products of animal origin.

#### **Audit findings in non-approved slaughterhouses visited**

Despite requests from the audit team only 2 out of 6 non-approved slaughterhouses visited could be seen in operation. Two non-approved slaughterhouses visited decided not to slaughter on the day of the audit visits. A third non-approved slaughterhouse visited finished slaughtering before the arrival of the audit team. In a fourth slaughterhouse the audit team requested the OV to stop slaughtering because of poor pre-operational hygiene reasons.

- Facilities for disinfecting tools with hot water supplied at not less than 82 degrees were inadequate in 3 non-approved slaughterhouses. In 1 slaughterhouse in operation, the temperature of the water in the sterilisers was below 82 degrees Celsius.
- During the chilling operations, ventilation was inadequate in 3 slaughterhouses to prevent potential condensation on the surface of the meat.
- Transport of meat carcasses takes place at a temperature higher than 7 degrees Celsius without the authorisation of the CA and no specific requirements were laid down for the transport of “*hot meat*”.
- In 1 slaughterhouse visited which was in operation, sheep, which were not clean, were slaughtered.
- In both slaughterhouses visited which were in operation, stunning, bleeding, skinning and evisceration of sheep were carried out in such a manner that there was potential contamination of meat:
  - the trachea and oesophagus did not remain intact during the bleeding of sheep (one case was seen of visible stomach content contamination),
  - in 1 slaughterhouse, 1 operator whose hands came into contact with the outer surface of the fleece continued working and touched the exposed meat without washing his hands in between,
  - insufficient measures were taken to prevent the spillage of digestive tract content during and after evisceration (examples were seen of contamination on the hind quarters of sheep).
- The various parts of a slaughtered animal subject to post-mortem inspection did not remain identifiable as belonging to a given carcass and sometimes came into contact with other

- offal or viscera before the post-mortem inspection had taken place.
- Some carcasses of sheep present in 3 of the non-approved slaughterhouses visited contained visible faecal contamination and the contamination was not removed after post mortem inspection.
  - Kidneys of ovine and caprine animals were systemically not removed from their fatty covering. Some kidneys of pigs were seen which were not removed from their fatty covering and renal capsule.
  - Microbiological sampling of carcasses did not take place in all non-approved slaughterhouses visited, with the exception of one. In this latter case, the sampling frequency laid down in the FBO's procedures was not followed and a trend analysis was not made. Results of carcass sampling seen exceeded the limits laid down in Regulation (EC) No 2073/2005 and no action was undertaken by the FBO.

### **Audit findings in approved establishments visited**

- In the approved slaughterhouses, only minor non-compliances were identified relating to specific hygiene requirements regarding structure and facilities. One slaughterhouse was not in operation due to an electric power cut. In the 2 other slaughterhouses some carcasses were identified with faecal contamination, hair and skin. Renal fat is systemically not removed by the FBO. None of the 3 approved slaughterhouses visited carried out microbiological carcass sampling.
- Transport of meat carcasses took place at a temperature higher than 7 degrees Celsius without the authorisation of the competent authority and no specific requirements were laid down by the CA for transport of “ *hot meat* ”.
- The specific requirements for cutting fresh meat, production of meat preparations and meat products, processing raw milk and dairy products were generally met in the approved establishments.
- One establishment, however, did not have facilities for disinfecting tools with hot water supplied at not less than 82 degrees Celsius did not have an alternative system with an equivalent effect in the area where the cutting of poultry takes place. This is not in line with point 2(b) of Chapter III of Section II to Annex III of Regulation (EC) No 853/2004.
- In another establishment visited which produced mechanically separated meat (MSM) for the production of their heat-treated meat products, the FBO could not provide evidence that the specific requirements were met, for example that neck skin was not used and that the poultry carcasses were not more than 3 days old. In addition MSM, which was not immediately used after being obtained, was not frozen to an internal temperature of no more than minus 18 degrees Celsius.
- In 4 other approved establishments visited samples were taken to check the microbiological criteria for foodstuffs regarding food safety criteria and/or process hygiene criteria. None of the FBOs however, was in compliance with the frequency and/or parameters to be tested.

### **Audit findings regarding official controls**

- The results of official controls did not reflect the findings of the audit team, in particular in the slaughterhouses. The CA failed to take measures against the absence of microbiological carcass sampling in the slaughterhouses visited. In 1 slaughterhouse where sampling took place, the CA failed to identify the non-compliance and absence of measures by the FBO.
- Official controls in the approved establishments did not include all control activities, in particular the FBO's own control systems, including microbiological sampling procedures were not verified in a satisfactory way. Deficiencies identified by the FVO audit team in the 4 approved establishments visited were not identified during official controls. In 1 establishment, the official control report authorised the FBO on the one hand to reduce the

sample frequency for final products, but recommended that the FBO at the same time be equipped with an in-house laboratory for the microbiological sampling.

## **Conclusions**

None of the non-approved slaughterhouses visited was in compliance with the specific requirements for food premises laid down in Chapter II of Section I of Annex II to Regulation (EC) No 853/2004.

Official controls over the red meat sector, in particular over the non-approved slaughterhouses were unsatisfactory and did not identify most of the FBO's non-compliances with the specific hygiene requirements as set out in Annex II of Regulation (EC) No 852/2004 identified by the audit team.

The approved slaughterhouses visited generally complied with the specific hygiene requirements, but the FBOs failed to adopt measures regarding compliance with microbiological criteria for foodstuffs, sampling and analyses. Results of official controls did not identify these deficiencies.

The control over the other approved establishments was apart from the FBO's non-compliance with microbiological criteria for foodstuffs, sampling and analyses generally satisfactory. Although deficiencies were identified enforcement by the CA was generally weak.

### *5.3.3 HACCP-based systems*

## **Legal requirements**

On the basis of Article 5 of Regulation (EC) No 852/2004 the FBO shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles. In Section II of Annex II to Regulation (EC) No 853/2004 the specific requirements for HACCP-based procedures in slaughterhouses are specified. Official controls in respect of all products of animal origin in the scope of Regulation (EC) No 854/2004 shall include audits of HACCP-based procedures (Article 4(5) of Regulation (EC) No 854/2004).

## **Audit findings**

- None of the non-approved slaughterhouses visited with the exception of 1 had procedures in place based on the HACCP principles. The procedures in this 1 slaughterhouse did not include that each animal or each group of animals accepted onto the slaughter premises meet the requirements of point 2 of Section II of Annex II to Regulation (EC) No 853/2004, for example the food chain information (FCI).
- All approved establishments visited with the exception of one slaughterhouse had procedures in place based on the HACCP principles. One cutting plant visited had procedures in place, but these did not include most of the principles of Article 5.2 of Regulation (EC) No 852/2004 i.e. hazards were not identified and verification procedures were not applied. The procedures in 2 slaughterhouses visited did not include that each animal or each group of animals accepted onto the slaughter premises meet the requirements of point 2 of Section II of Annex II to Regulation (EC) No 853/2004, for example the FCI.
- For 6 of the 10 approved establishments visited, shortcomings were identified regarding the principles applied, for example critical control points (CCPs) were identified, which were control points; set limits were inaccurate; and non-compliances were found regarding the implementation of the monitoring procedure. In the 2 slaughterhouses, ante- and post-mortem inspection were identified as CCPs.
- The CCA has not developed national guides for the application of HACCP principles and has not defined the period during which these FBOs shall retain documents and records.
- In the establishments visited the procedures were established and maintained by consultants with the exception of 1 establishment visited. In this establishment, the responsible person

for the maintenance of the procedures based on HACCP principles had insufficient knowledge of the principles.

- The checklists used during official controls in establishments were related to control of the presence of certain HACCP principles rather than to the assessment of the FBO's procedures based on HACCP principles and the official controls did not identify the deficiencies found by the audit team.
- During official controls before granting approval, assessment of procedures based on HACCP principles was not carried out in 2 slaughterhouses visited and despite this full approvals were granted.
- In several establishments visited, corrective actions had been requested by the CA in order to review the HACCP-based procedures, but the deadlines were not always met and had been extended by the CA without clear justification.
- The audit team noted that most of the staff met during the audit carrying out official controls had little knowledge of HACCP principles.

## **Conclusions**

Procedures based on HACCP principles were not in place in the non-approved slaughterhouses visited with the exception of one. In all approved establishments visited with the exception of 1, the FBOs had permanent procedures in place or procedures based on HACCP principles. In 7 out of 10 establishments where procedures were established, all principles had not been applied correctly.

Official controls failed to assess the FBO's procedures and consequently to identify the deficiencies identified by the audit team. Where corrective action was requested, this had not been adequately followed up.

### *5.3.4 Identification marking and labelling*

## **Legal requirements**

Provisions for the identification marking of a product of animal origin are made in Article 5 and Annex II, Section I to Regulation (EC) No 853/2004 and verification of compliance with these requirements is foreseen by Article 4(6) of Regulation (EC) No 854/2004.

Article 3 of Directive 2000/13/EC sets out the particulars on the labelling of foodstuffs to be delivered as such to the ultimate consumer. Regulations (EC) No 1760/2000 and 1825/2000 set out specific labelling requirements for beef meat.

## **Audit findings**

- All FBOs visited have procedures in place for identification marking and labelling. Most products seen were foreseen with identification marks and were correctly labelled.
- In 1 dairy processing establishment visited identification marks were used containing a different approval number than the approval number that had been granted to the plant. According to the FBO's explanation this was an old approval number which is no longer in use. The audit team identified that this number is related to another approved dairy processing establishment. The audit team requested the CA to take immediate action which they did by immediately suspending the use of these labels.
- In another dairy processing establishment visited, identification marks were present in the storage room with an incorrectly printed number.
- In 1 meat product establishment visited, carton boxes were used for the packaging of meat with the identification number of a revoked approval number for the production of composite products at the same site.

- Consignments with products of animal origin with packaging damaged or already open were seen in the cold stores of 2 establishments and consequently the origin of the products was no longer guaranteed. In both storage rooms, the audit team also noticed consignments without any identification marks or labelling.
- In one of these 2 establishments casings were present in a chiller without an identification mark. In addition the origin was a non approved establishment. The CA took immediate action and seized the consignment.
- This establishment also had beef in storage, which had all the mandatory labelling requirements regarding the indication of the country of cutting. Additionally, some beef quarters were not identified and those ready for dispatch did not contain most of the mandatory labelling requirements for beef. In addition, a consignment of veal was seen, where the label contained incomplete compulsory information.
- In another establishment some beef quarters were not labelled but were kept with the quarters containing the mandatory beef labelling requirements.
- In 1 non-approved slaughterhouse buckets were reused for packaging of offal. The buckets were not labelled and did not contain identification marks. In addition old labels were not removed and the products were no longer fit for human consumption. The CA took immediate action and seized the consignments.
- The audit team did not find evidence that the deficiencies regarding identification marking and labelling found during the audit were identified during official controls.

## **Conclusions**

Several cases of non-compliance with the identification marking and labelling requirements, including mandatory labelling requirements for beef were seen during the audit. The CA had not identified these deficiencies during official controls.

### *5.3.5 Traceability*

## **Legal requirements**

According to Article 18 of Regulation (EC) No 178/2002 the traceability of food and food-producing animals and any other substance intended to be incorporated into a food shall be established at all stages of production, processing and distribution. The FBO shall have in place systems and procedures to identify from whom they have been supplied and the other businesses to which their products have been supplied. Article 4(6) of Regulation (EC) No 854/2004 requires that verification of compliance with traceability requirements shall take place in all approved establishments.

## **Audit findings**

- Traceability systems were in place in the establishments visited, including in the non-approved slaughterhouses.
- Traceability systems for certain food were evaluated in 7 establishments. In these establishments, the FBO could demonstrate the tracing back or forward of the selected consignments.
- The post-mortem inspection results did not refer to consignments of animals and their origin in order to establish a link with the FCI (for more details, see point 5.4).
- For the official controls, Circular 322851 of 11 September 2007, provides traceability guidelines, which concentrate on the supplier and the next destination of products, but not on the identification marking and labelling.

## **Conclusions**

In the establishments visited, traceability systems were in place. However, the deficiencies identified regarding identification marking and labelling might jeopardise the effectiveness of the systems in place.

#### **5.4 OFFICIAL INSPECTION TASKS IN ESTABLISHMENTS FOR VERIFICATION OF THE FOOD BUSINESS OPERATORS' COMPLIANCE**

##### *5.4.1 Food chain information*

#### **Legal requirements**

According to Article 3 of Regulation (EC) No 853/2004, the FBO shall comply with the relevant provisions of Annex II and III to this Regulation. In particular the FBOs operating slaughterhouses must as appropriate, request, receive, check and act upon food chain information in respect of all animals, other than wild game, sent or intended to be sent to the slaughterhouses. According to Article 5(1) of Regulation (EC) No 854/2004 the OV shall carry out inspection tasks in slaughterhouses also as regards food chain information.

#### **Audit findings**

- In most cases there was no link from the post-mortem inspection results back to the FCI.
- The FCI as required by Article 3 of Regulation (EC) No 853/2004 was not requested by the FBOs and consequently was not checked. The CA stated that the movement documents accompanying animals for slaughter contain all the required FCI. The movement documents however, do not provide information on the use of veterinary drugs and the private practitioner. None of the FBOs had a standing agreement or a quality assurance scheme in place.
- All movement documents are controlled by the OV at the time of arrival of the animals and returned after completion to the veterinary stations where issued. No examples were seen where animals had been declared unfit for human consumption due to the absence of FCI.
- The movement documents accompanying sheep and goats for slaughter did not contain information on transport as required in point C of the Annex to Regulation (EC) No 21/2004.
- The official controls did not identify the absence of the FBO's controls as part of their procedures based on HACCP principles (for details see point 5.3).

#### **Conclusions**

The FBOs in the slaughterhouses visited did not request, check and act upon the relevant FCI as set out in Annex II and III to Regulation (EC) No 853/2004. In general the OVs took over the responsibilities of the FBO and carried out the checks. The CA failed to identify the absence of certain mandatory FCI and to force the FBOs to implement controls on FCI as part of the procedures based on HACPP principles.

##### *5.4.2 Ante-mortem inspection*

#### **Legal requirements**

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including ante-mortem inspection of all animals before slaughter in accordance with the general requirements of Section I, Chapter II of Annex I to Regulation (EC) No 854/2004.

The previous report recommended that in all the PVDs the ante- and post-mortem inspection in slaughterhouses has to comply with Article 5(1)(d) and Annex I, Section IV, Chapters I, II and IV of

Regulation (EC) No 854/2004 and their registration is consistent and documents required to be kept on the spot are available as is required in Article 4.1 of Regulation (EC) No 854/2004. The DGVS responded that 2 Memorandas were sent out and the existing procedures and documentation are expected to be improved upon by issuing manuals once the new draft Law has been approved by the Greek Parliament and the relevant powers have been redistributed by the CA.

### **Audit findings**

- Records of ante-mortem inspections were available in all slaughterhouses visited with the exception of one non-approved/approved slaughterhouse.
- The audit team did not see any records of animals which were rejected for slaughter.
- In 1 non-approved slaughterhouse, sheep which were not clean passed the ante-mortem inspection.

### **Conclusions**

The ante-mortem inspection was in general carried out in line with the requirements of Article 5(1) of Regulation (EC) No 854/2004 with one exception in a non-approved /approved slaughterhouse where no evidence of ante-mortem inspection could be provided.

The requirement of Regulation (EC) No 853/2004, Annex III, Section I, Chapter IV, paragraph 4 that animals must be clean was not enforced by the CA in 1 slaughterhouse visited.

#### *5.4.3 Post-mortem inspection*

### **Legal requirements**

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including post-mortem inspection in accordance with the general requirements of Section I, Chapter II of Annex I and the specific requirements of Section IV of Regulation (EC) No 854/2004.

### **Audit findings**

- For the recommendation made in the previous report regarding post-mortem inspection see point 5.4.2.
- The previous report recommended that *Trichinella* testing has to be carried out with one of the methods of detection as described in Articles 2 and 6 of Regulation (EC) No 2075/2005. The DGVS responded that the Directorate for Veterinary Public Health keeps a record of the slaughterhouses applying the method and those that do not. On-the-spot checks will be conducted at the latter and the political leadership of the MRDF will be informed thereof.
- Records of post-mortem inspection were available in all slaughterhouses visited. These records could not make a link to the FCI received for the animals slaughtered and consequently for the feedback to the holding of provenance.
- Post-mortem inspection was carried out by the OVs and some necessary examinations were not performed. For example incisions of pig hearts were not made in 1 slaughterhouse visited and green offal was not inspected in 2 slaughterhouses visited.
- Capsules of pig kidneys in 1 approved slaughterhouse visited and renal fat of kidneys of small ruminants in 1 non-approved slaughterhouse visited were systematically not removed and consequently not inspected post-mortem.
- In 1 approved slaughterhouse some bovine hearts were incised but the inter-ventricular septum was not cut to allow a proper visual inspection.
- In some slaughterhouses several carcasses were seen in the chillers after post-mortem inspection containing visible faecal contamination and hair.
- Generally there were no records available as regards the testing of samples of pig meat for

- the presence of *Trichinella* .
- The audit team received information from the DGVS that at the end of 2008 32 slaughterhouses located in 15 prefectures applied the digestive method for *Trichinella* testing but did not receive updated information. The DGVS did not provide information regarding the planned on-the-spot checks and the results of these checks.
  - Of the 8 slaughterhouses visited which were slaughtering pigs only 1 used the digestion method. In 4 slaughterhouses visited, the OV used the trichinoscopic method of which 1 OV did not follow the testing procedure laid down in Regulation (EC) No 2075/2005. Two out of the remaining 3 slaughterhouses visited have not analysed samples of slaughtered pigs for *Trichinella* since January 2009 and the third one at least for 1 month.
  - In some slaughterhouses visited slaughtering more than 75 pigs a week the trichinoscopic method was applied. The DGVS does not have an overview for which slaughterhouses the transitional provisions laid down in Article 16 of Regulation (EC) No 2075/2005 are applicable.
  - On 15 June 2009 the DGVS sent a circular to the PVDs informing the PVDs that slaughterhouses which do not apply a digestion method for the analysis of samples for *Trichinella* are no longer allowed to slaughter pigs as from 1 July 2009. One example was seen by the audit team of how a Prefect had suspended pig slaughtering in a non-approved slaughterhouse until the necessary equipment had been procured.
  - The above-mentioned Circular also requested the investigation of whether there was a need for the training of OVs in the use of the digestive method.

## **Conclusions**

Post-mortem inspection was not carried out fully in accordance with the general requirements of Section I, Chapter II and the specific requirements of Section IV of Annex I to Regulation (EC) No 854/2004. The recommendations regarding the post mortem inspection and *Trichinella* testing have not been satisfactorily addressed.

### *5.4.4 Health marking*

## **Legal requirements**

Article 5(2) of Regulation (EC) No 854/2004 requires that health marking of carcasses of domestic ungulates, farmed game mammals other than lagomorphs and large wild game as well as half-carcasses, quarters and wholesale cuts shall be carried out in slaughterhouses and game-handling establishments by, or under the responsibility of, the OV when official controls have not identified any deficiencies that would make the meat unfit for human consumption.

## **Audit findings**

- The health marks were in general correctly applied and there is a national health mark in place for carcasses in non-approved slaughterhouses.
- Occasionally carcasses were seen in cutting plants and meat processing plants with illegible health marks.

## **Conclusions**

Health marking was generally in accordance with Article 5(2) of Regulation (EC) No 854/2004.

#### 5.4.5 *Animal welfare at the time of slaughter or killing*

##### **Legal requirements**

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including animal welfare. Council Directive 93/119/EC sets out Community rules with regard to the protection of animals at the time of slaughter or killing.

##### **Audit findings**

- The previous report recommended that the animal welfare conditions at the time of slaughter or killing had to be in accordance with Article 5 Points (1)(b and c), Annex C Points II/1 and III/1, and Article 7 of Directive 93/119/EC. The DGVS responded that training, which included existing Circulars had been provided for 98 OVs from all PVDs in 2007. Another Circular No 264148 had been issued on 26 January 2009 concerning the updating of the findings of inspections in compliance with the requirements of Directive 93/119/EC.
- In 1 approved / non-approved slaughterhouse visited the operator did not wait until the audio device had given a signal before releasing the animal.
- In 1 approved slaughterhouse there was a visual alarm to indicate the time for stunning but the operator did not check this.
- In the same slaughterhouse caprine animals were not sufficiently restrained and the electrical stunning equipment was used to restrain them.
- In another approved slaughterhouse the restraining equipment for bovine animals was not adapted to the size of the animal which could move its head and hide behind the bars. The spare stunning equipment was not maintained properly. Stunning, however, was satisfactorily carried out.
- In 2 non-approved slaughterhouses visited, parts of the lairage facilities were not adequate to sufficiently protect animals against unnecessary injuries. In one of these 2 slaughterhouses, no facilities were available for watering the animals.
- In the slaughterhouses visited no evidence could be provided concerning specific training for staff carrying out the stunning of animals.
- The checklist used for inspection of slaughterhouses includes controls regarding the procedures of animal welfare at the time of the slaughter but these provisions were not detailed enough to detect the non-compliances found by the audit team.

##### **Conclusions**

Non-compliances with the animal welfare requirements of Chapter II of Directive 93/119/EC were identified during the stunning and regarding the construction of the lairage in slaughterhouses. These animal welfare problems had not been identified during official inspections. The recommendation to respect animal welfare conditions at the time of slaughter or killing has not been satisfactorily addressed and the situation as regards animal welfare at slaughter was found to be largely unsatisfactory.

#### 5.4.6 *Criteria for raw milk*

##### **Legal requirements**

Article 8 of Regulation (EC) No 854/2004 requires that Member States shall ensure that official controls with respect to raw milk and dairy products take place in accordance with Annex IV to Regulation (EC) 854/2004 and the CA carries out official controls to verify that health and hygiene requirements for raw milk and colostrum are compliant with Chapter I, Section IX of Annex III to Regulation (EC) No 853/2004 and monitors the check carried out for total plate count (TPC), SCC

and residues of antibiotic substances.

### **Audit findings**

- The previous report recommended that the criteria for raw milk and colostrum had to meet the requirements in Annex III, Section IX, Chapter I, Point 3 (a) and (b) of Regulation (EC) No 853/2004 and that the CA has to take appropriate action as required in Annex IV, Chapter II, Points 1 and 2 of Regulation (EC) No 854/2004. The DGVS indicated that they had sent out 2 Circulars to the PVDs in 2007. One Circular related to the official inspection of milk collection centres testing of TPC and SCC. The second Circular concerns the traceability and frequency of official controls on a risk basis.
- In 2 out of the 3 milk processing establishments visited the criteria regarding TPC and/or SCC, the frequency of testing for this was generally met. The establishments' in-house laboratories were well equipped and the rolling geometrical average was calculated. One FBO however, did not include all test results in the calculation of the geometrical average. In the second plant, the FBO's results of the calculation of geometrical average were not correct.
- The third dairy processing establishment, producing dairy products which undergo a ripening of at least 60 days as well as other dairy products did not meet the criteria for raw milk since March 2008 but the rolling geometrical average for TPC was not calculated.
- In the 3 dairy processing establishments visited, the FBO had procedures in case inhibitors are detected and the FBOs' control on inhibitors was satisfactory.
- The ELOGAK, which is a governmental body with a network of 8 laboratories is the main laboratory involved in controls on criteria for raw milk. Two of the laboratories are accredited and the others are in the process of accreditation. Apart from these 8 laboratories there are 50 dairy processing establishments with in-house laboratories and another 36 private laboratories carrying out analyses on behalf of the FBO. These 86 laboratories are subject to an annual inspection by the ELOGAK. The audit team was provided with some reports of these inspections. One report mentioned that the laboratory inspected did not send non-compliant test results on the criteria for TPC to the responsible PVD. All own-check laboratories are required to send the results of their analyses to the ELOGAK's head office. These data are then entered in the specially formatted ELOGAK database. Access to this database is limited to the ELOGAK laboratories and each laboratory has access to its own results
- One ELOGAK laboratory was visited. In this laboratory the audit team identified that a relatively high number of samples to be tested for TPC were found to be unsuitable for analysis.
- The laboratory visited sends all results concerning off-specification geometric averages for TPC every 2 months and in the case of cow's milk for SCC every 3 months to the PVDs for the farms located in their prefecture.
- In 1 PVD visited problems occurred when receiving test results from the laboratory visited, as sometimes it was found to be impossible to identify the farm of origin and hence no follow-up was carried out. The PVD requested corrective action from the laboratory.
- In May 2009 a Circular was sent from the MRDF to the PVDs reminding them about the 2 earlier memorandums from 2007 mentioned above. This Circular also indicated action to be taken by the CA when raw milk fails to comply with the criteria for TPC and SCC.
- Official controls in milk processing establishments included controls on raw milk criteria were in 2 out of 3 establishments satisfactory. In the third establishment the CA had identified that raw milk did not meet the quality criteria already in March 2008 but gave a 1 year deadline for corrective action to the FBO. Corrective actions have not been taken, the problem was again identified in a report by the CA in May 2009 and was still not solved

during the FVO audit.

- In 1 PVD visited, the CA stated that official controls at dairy farms did not take place in order to verify the health requirements for raw milk and the hygiene requirements for milking.

## **Conclusions**

The official controls in the dairy processing establishments were generally satisfactory, but did not take into account all the production stages in case raw milk did not meet the criteria for raw milk. The enforcement measures taken by the CA in 1 particular case was inadequate.

A system is in place for reporting test results for raw milk criteria, but due to a lack of sufficient information, non-compliant test results were not adequate in a particular case.

### *5.4.7 Animal by-products*

## **Legal requirements**

Article 5(1) of Regulation (EC) No 854/2004 requires that the OV carries out inspection tasks, including ABP. Annex II to Regulation (EC) No 1774/2002 sets out the requirements for the collection and transport of ABP, including requirements for identification, records and the use of commercial documents.

## **Audit findings**

- In 1 non-approved slaughterhouse visited the dispatch of stomach contents to a landfill site was not accompanied by commercial documents required by Regulation (EC) No 1774/2002. At the same slaughterhouse, the audit team identified the disposal of ABP on site.
- The requirements for the separate storage of ABPs were not met in one meat processing establishment and one cutting plant visited. In both establishments the ABP were stored in cold store rooms without identification and proper separation from other products of animal origin fit for human consumption.
- Despite the requirements that the identification of ABP containers are covered by the checklist used for inspections, correct labelling of ABP was found to be missing in 3 establishments visited (in 1 case they were labelled during the visit).

## **Conclusions**

The requirements as regards ABP were in general met but in some cases non-compliances were found in relation to Article 5(1) of Regulation (EC) No 854/2004 and to Annex II to Regulation (EC) No 1774/2002. The CA had failed to identify these non-compliances.

## **5.5 RENTIS MARKET**

## **Legal requirements**

The legal requirements are mentioned in point 5.3 of this report

## **Audit findings**

- The previous report recommended that necessary action be taken in the Rentis Market in order to correct deficiencies in the structure, layout, maintenance and hygiene requirements under the responsibility of the CA. The CCA replied in their response that 25 establishments in the new part had been approved on 18 June 2008 and the situation for the remaining 6 cold stores in the old part is still under examination but will be completed within a

reasonable time period.

### **Current state of play regarding construction and approval**

- Twenty-five establishments were in operation in the 2 new buildings. The 25 establishments were approved on 18 June 2008.
- On 16 February 2009 the CCA provided information in relation to the 6 remaining cold stores in the old building in their response to the recommendations of the previous mission report. The records of a meeting held with the Board of Directors of the Rentis Market (OKAA) on 28 May 2009 report on the transfer of 8 cold stores. The audit team confirmed on-the-spot that 7 cold stores were still in operation in 1 of the old buildings under hygiene conditions which were unacceptable for fresh meat.
- The other old buildings were being demolished.
- The management of Rentis Market informed the audit team that the construction of a third building is planned but no time table for its completion could be provided. The management further informed the audit team that due to the economic crisis it is likely that places in the new buildings might become vacant, which might facilitate the move of the remaining 7 establishments.

### **General and specific hygiene conditions in Rentis market**

- Three out of the 7 establishments in the old building were visited. The audit team did not see cutting activity during the visit to the old building. As reported in previous mission reports, the conditions of the establishments in the old building were not in compliance with the general and specific hygiene requirements. Mould, condensation and dirty carcasses in the chillers were found again.
- Four establishments were visited in the 2 new buildings. All had a similar structure and layout and were generally found acceptable from a hygienic point of view. Cleanliness and tidiness was acceptable except in 1 case. However, as already reported in the previous mission report the problem regarding working and street clothes not being kept separate remains. In addition, the problem regarding packing of meat in the first new building as mentioned in the previous report is also not solved. In addition the audit team identified some carcasses contaminated with dirt in cold stores.

### **Official control**

- Official controls were carried out on a regular basis and inspection reports were available. In addition it was shown that each establishment receives a bimonthly visit. Procedures based on HACCP principles were established. The CA explained that the 7 establishments in the old part are not approved or registered individually; therefore no reports on official controls were prepared in 2009. Nevertheless the PVD stated that these establishments are supervised at least 2-3 times/week and non-compliances are recorded in a logbook.

### **Conclusions**

The situation regarding Rentis Market has improved since the previous mission, but 7 establishments are still in operation in 1 of the old buildings under hygiene conditions which were unacceptable for fresh meat.

#### **5.6 MISCELLANEOUS**

On the site of 1 non-approved slaughterhouse visited, the audit team noted ear tags had been cast aside by the FBO. It concerned ear tags from animals slaughtered in the slaughterhouse visited as well as of animals slaughtered in another Region. The audit team requested specific corrective measures at local and national level.

The DGVS provided information on the action taken at PVD level and at national level. However, no guarantee has been provided that the ear tags will be collected and disposed of.

## **6 OVERALL CONCLUSIONS**

The performance of the competent authorities remains largely the same as in the previous mission. The audit team noticed little improvement in the supervision over the red meat sector, in particular over slaughterhouses by the DGVS and the PVDs.

The CCA did not address the recommendation of the previous report to impede further activities in establishments which have no operational licence, registration or approval and still 48 out of 86 slaughterhouses operate although in a number of cases alternative slaughter capacity is available.

The CCA did not oppose the decision of the prefecture to issue operational licences to non-approved slaughterhouses.

The situation in the dairy establishments and red meat establishments other than the slaughterhouses is rather satisfactory regarding general hygiene requirements. Further improvements on controls over the FBO's obligations regarding specific hygiene requirements, including microbiological sampling and controls over procedures based on HACCP principles and microbiological testing are required.

## **7 CLOSING MEETING**

A closing meeting was held on 3 July 2009 with the CCA. At this meeting the FVO team presented the findings and preliminary conclusions of the mission and advised the CCA of the relevant time limits for production of the report and their response.

The representatives of the CCA acknowledged the findings and preliminary conclusions presented by the FVO team. In addition, information on action already taken and planned in order to address particular findings in 2 establishments visited was provided.

The EFET informed the audit team at the final meeting that derogations will be established for dairy processing plants that are manufacturing foods with traditional characteristics and to inform the audit team once the Circular has been approved.

The DGVS informed the audit team at the final meeting that they would provide a copy of the Circular sent to the DGVS regarding the disposal of ear tags.

## **8 RECOMMENDATIONS**

An action plan describing the action taken or planned in response to the recommendations of this report and setting out a time table, and a description of the actions taken to correct the deficiencies found should be presented to the Commission within 25 working days of receipt of the report.

<b>N°.</b>	<b>Recommendation</b>
1.	To ensure that national measures and derogations are implemented in accordance with Article 10 of Regulation (EC) No 853/2004 and Article 7 of Regulation (EC) No 2074/2005.
2.	To improve the official controls at establishment level in order to ensure that deficiencies related to general hygiene requirements as laid down in Annex II of Regulation (EC) No 852/2004, in particular in red meat establishments are identified and addressed.
3.	To ensure that deficiencies relating to specific hygiene requirements as laid down in Annexes II and III of Regulation (EC) No 853/2004 are identified and addressed, in particular with regard to raw milk criteria and operations in red meat establishments.
4.	To ensure urgently that products of animal origin can only be placed on the market if they have been prepared and handled exclusively in establishments meeting the requirements of Regulations (EC) No 852/2004 and No 853/2004 and that been approved by the Competent Authority as required by Article 4 of Regulation (EC) No 853/2004.
5.	To ensure that identification markings are applied in accordance with Article 5 and Annex II, Section I of Regulations (EC) No 853/2004.
6.	To ensure that in all the PVDs the ante- and post-mortem examination in slaughterhouses complies with Article 5, (1) (d) and Annex I, Section IV, Chapters I, II and IV of Regulation (EC) No 854/2004 and their registration is consistent and documents required to be kept on the spot are available as is required in Article 4, Point 1 of Regulation (EC) No854/2004.
7.	To ensure that Trichinella testing is carried out with one of the methods of detection as described in Articles 2 and 6 of Regulation (EC) No 2075/2005.
8.	To ensure that FBOs shall put in place, implement and maintain a procedure or procedures based on the HACCP principles as is required by Article 5, of Regulation (EC) No852/2004.
9.	To ensure that official controls in respect of all products of animal origin in the scope of Regulation (EC) No 854/2004 shall include audits of HACCP-based procedures in line with Article 4(5) of Regulation (EC) No 854/2004.
10.	To ensure that the criteria for raw milk and colostrum are met as required in Annex III, Section IX, Chapter I, Point 3 (a) and (b) of Regulation (EC) No 853/2004 and the CA take appropriate action as required in Annex IV, Chapter II, Point 1 and 2 of Regulation (EC) No 854/2004.

<b>Nº.</b>	<b>Recommendation</b>
11.	To ensure that the animal welfare conditions at the time of slaughter or killing are in accordance with Article 5 points (1)(b and c), Annex III, C(3.A) and Article 7 of Council Directive 93/119/EC.
12.	To take the necessary action in Rentis Market in order to correct deficiencies in the structure, layout, maintenance and hygiene requirements under the responsibility of the CA.

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

[http://ec.europa.eu/food/fvo/ap/ap\\_gr\\_2009-8237.pdf](http://ec.europa.eu/food/fvo/ap/ap_gr_2009-8237.pdf)

## ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dir. 96/93/EC	OJ L 13, 16.1.1997, p. 28-30	Council Directive 96/93/EC of 17 December 1996 on the certification of animals and animal products
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
Dir. 2000/13/EC	OJ L 109, 6.5.2000, p. 29-42	Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs
Reg. 1760/2000	OJ L 204, 11.8.2000, p. 1-10	Regulation (EC) No 1760/2000 of the European Parliament and of the Council of 17 July 2000 establishing a system for the identification and registration of bovine animals and regarding the labelling of beef and beef products and repealing Council Regulation (EC) No 820/97
Reg. 178/2002	OJ L 31, 1.2.2002, p. 1-24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
Reg. 1774/2002	OJ L 273, 10.10.2002, p. 1-95	Regulation (EC) No 1774/2002 of the European Parliament and of the Council of 3 October 2002 laying down health rules concerning animal by-products not intended for human consumption
Reg. 21/2004	OJ L 5, 9.1.2004, p. 8-17	Council Regulation (EC) No 21/2004 of 17 December 2003 establishing a system for the identification and registration of ovine and caprine animals and amending Regulation (EC) No 1782/2003 and Directives 92/102/EEC and 64/432/EEC
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and	Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on

<b>Legal Reference</b>	<b>Official Journal</b>	<b>Title</b>
	re-published in OJ L 191, 28.5.2004, p. 1	official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
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. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Reg. 2075/2005	OJ L 338, 22.12.2005, p. 60-82	Commission Regulation (EC) No 2075/2005 of 5 December 2005 laying down specific rules on official controls for Trichinella in meat
Reg. 2076/2005	OJ L 338, 22.12.2005,	Commission Regulation (EC) No 2076/2005 of 5 December 2005 laying down transitional

<b>Legal Reference</b>	<b>Official Journal</b>	<b>Title</b>
	p. 83-88	arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004