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## Greece

### Food and Agricultural Import Regulations and Standards - Narrative

### FAIRS Country Report

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**Report Highlights:**

This report provides updated contact information for Greece and gives an overview of Greek food laws in the EU context. For more in-depth information at the general EU level, please refer to the EU-27 2009 FAIRS Report (E49058) and/or to USEU website (<http://useu.usmission.gov/agri>).

**Disclaimer**

This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service in Athens, Greece for U.S. exporters of domestic food and agricultural products. While every possible care was taken in the preparation of this report, information provided may not be completely accurate either because policies have changed since its preparation, or because clear and consistent information about these policies was not available. It is highly recommended that U.S. exporters verify the full set of import

requirements with their foreign customers, who are normally best equipped to research such matters with local authorities, before any goods are shipped.

FINAL IMPORT APPROVAL OF ANY PRODUCT IS SUBJECT TO THE IMPORTING COUNTRY'S RULES AND REGULATIONS AS INTERPRETED BY BORDER OFFICIALS AT THE TIME OF PRODUCT ENTRY.

## **Section I. Food Laws:**

As a member of the European Union (EU), Greece follows EU directives and regulations. Labeling and ingredient legislation for all food and agricultural products is based on EU rules and regulations. It is therefore recommended that U.S. importers read in conjunction with this report the Food and Agricultural Import Regulations and Standards (FAIRS) reports produced by the U.S. Mission in Brussels at [www.useu.be/agri/usda.html](http://www.useu.be/agri/usda.html). The University of Reading, UK provides a complete list of EU Food Laws, including a list of EU legal documents relevant to food, as published in the EU Official Journal (OJ) from the pre-1997 period until 2009 (<http://www.rdg.ac.uk/foodlaw/f-eu-law.htm> & <http://www.rdg.ac.uk/foodlaw/eu/news.htm>). Nevertheless, Greece maintains specific labeling and ingredient rules for some food products, which are described in detail in the Greek Food Code (hereafter referred to as the Food Code) published by the General State Chemical Laboratory (GSCL). There is no electronic version of the Food Code; a hard copy can be obtained in Greek from the General State Chemical Laboratory. The process of harmonizing Greece's existing legislation with EU laws and obligations, including numerous international treaties and agreements to which the EU is a party, has been difficult and remains on-going. (See also EU Regulation 764/2008 which sets out the procedural requirements for denying mutual recognition, and defines the rights and obligations of national authorities on the one hand and enterprises on the other.) Thus, it is essential for U.S. exporters to work with a Greek agent who has a suitable background and is able to fulfill customs procedures involving more than two authorities. GSCL is the Greek agency responsible for document inspection upon arrival, labeling and product ingredient regulations, and the performance of laboratory tests to grant importation approval to foodstuffs subject to approval in cooperation with GOG Ministry of Agriculture Port Authorities.

The current Food Code was published in 2003 and has been amended by a number of presidential decrees and ministerial decisions to incorporate new legislation. The Food Control Agency (EFET) is responsible for enforcing the regulations and collecting samples from selling points to check compliance with food legislation, both to ensure food safety and protect consumer health in accordance with EU Directive 89/397. Locally produced and imported food items are regularly checked by random sampling to ensure the absence of prohibited ingredients and adherence to fair trading practices and consumer expectations, as product labels should not mislead or confuse the consumer. Labeling must not make false claims nor should any product present a risk to public health.

Contact information for GSCL and EFET:

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Greek food regulations apply to both domestically produced and imported food products. Imported food and beverage products that comply with rules and regulations, as with any other product sold on the EU market, require no special permit nor are they subject to special rules or regulations regarding their commercialization in Greece. In special instances stricter controls may be required for a food product due to unique concerns (i.e. when certain food ingredients and/or supplements have to be approved).

With the exception of food supplements, U.S. food products that conform to any individual EU member state's rules and regulations may be transshipped and sold in any other EU member state. However, approval by the Hellenic Supreme Chemical Committee (HSCC) operating under the GOG General State Chemical Laboratory is needed when a food product does not correspond to Food Code specifications, in accordance with HSCC Decision 366/97, Official Journal of the Greek Republic 597/B/17.7.97, and in cases where preparation, processing, and packaging use one of the following:

- Additives such as antioxidants, colorants, emulsifiers, stabilizers, gelling agents and thickeners, flavorings, preservatives, sweeteners, and enzymes that are not listed in EU Regulations 94/34, 94/34, and 95/2;
- Materials and objects that will come into contact with foods, substances, or materials and are not included in the Food Code list of allowed materials;
- New techniques and technologies prohibited by the Food Code;
- Novel foods or new ingredients;
- Foods enriched with nutritional elements (vitamins, traces, aminoacids).

Gaining HSCC approval requires an application. The procedure takes approximately 3 months for products already circulated in other EU member states, and 5 months for new products entering the EU. In compliance with EU Regulations 1829/2004 and 1830/2004, Greece requires all foods and feeds containing GMO ingredients, either detectable or non-detectable, to be labeled accordingly.

Further reading on the role of the Hellenic Food Control Agency (EFET), Greece's Position and Policies on GM Food Acceptance and the Approaches in the Risk Assessment of GM Foods by EFET, is provided by Dr. T. Varzakas, et al., in various publications. Dr T. Varzakas is in charge of the Directorate of Nutritional Policy and Research in EFET and Professor in the School of Agriculture (See <http://cat.inist.fr/?aModele=afficheN&cpsidt=17912492>, <http://www.ncbi.nlm.nih.gov/pubmed/17457721>, and <http://cat.inist.fr/?aModele=afficheN&cpsidt=18626979>).

Exporters are advised to have an experienced agent or joint venture partner - with suitable background, demonstrated experience, and extensive sales/services network - who can offer full support to the end-user. The Greek importer holds responsibility for the marketability of any imported product in Greece. The importer is also responsible for any violations of the Food Code and is liable for prosecution in the event of failure to observe food laws.

In Greece, food safety is the primary responsibility of the GOG Ministry of Rural Development and Food (Ministry of Agriculture) in cooperation with the National Chemical Laboratory (Ministry of Finance including customs and duties) and the Ministry of Public Order. Occasionally, other ministries such as the GOG Ministry for Development and Commerce may play a role.

U.S. exports of red meat, meat products, pet food, farmed and wild game meat, all dairy products, seafood, bovine embryos and semen, porcine and equine semen, and animal byproducts to the EU from the United States may only originate from EU-approved U.S. establishments appearing on USDA updated lists of facilities that meet the requirements of the relevant EU regulations in effect. When updated, USDA lists of facilities must be presented to the GOG Ministry of Agriculture Veterinary Authorities. For contact:

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## **Section II. Labeling Requirements:**

### **B. General Requirements**

All imported food products must comply with the Greek Food Code. Products not labeled with all information required by the Food Code cannot be sold on the Greek market. Greece requires that labels be in the Greek language. Multi-language and stick-on labels are acceptable. Sample-size products should bear the "Not for Sale" indication.

Requirements for labeling, presenting, and advertising foodstuffs apply to retail sales as well as to hotels, restaurants, hospitals, and other institutional establishments. Labels, including attached pictures or symbols that refer to the product, must not deceive the consumer in regards to its characteristics. They should not attribute characteristics to the product which it does not have, present a common characteristic as unique, or attribute preventative or therapeutic properties to the product. Labels such as "No colorants" and "No preservatives" should only appear on products that do not contain such substances, either in raw form or included in the production process, manufacturing process, additions or residues.

Labels should not indicate that the foodstuff has the capacity to prevent, treat, or cure human diseases. This rule does not apply to dietetic foods or natural mineral water.

Food labeling and ingredient regulations have generally been harmonized within the EU, and Greek regulations are fully harmonized to-date. Harmonization is an ongoing process that differs in speed from member state to member state. EU regulations published in the Official EU Journal are immediately applicable. EU directives, on the other hand, take time to become national law through member-state parliaments, ministerial decisions, and/or presidential decrees.

The European Parliament and Council Directive No 2000/13/EC contains general provisions on the labeling, presentation, and advertising of foodstuffs marketed in the EU. It applies to foodstuffs sold directly to the consumer as well as for supply to restaurants, hospitals, and other mass caterers. Greece sets its own national requirements when EU standards have not yet been established. In cases where the standard U.S. label fails to comply with member-state rules and regulations, a sticker must be placed on the packaging that contains a translation of the U.S. label in Greek as well as all mandatory EU information listed below. Although many international companies provide multi-language labels to ensure the possibility of sale throughout the European Union, the Greek language is rarely present.

**All food and beverage products imported into Greece must provide the following information:**

**(Excluding food products transited through Greek soil)**

The following information is compulsory for all foodstuffs and must appear on the label:

**Product name:** This may be either a name or a description. The product name cannot be replaced by a commercial or industrial mark or by commercial nomenclature. The product name should contain or be accompanied by the nature of the product (i.e. powder, frozen) if the omission of this clarification could confuse the consumer. Irradiated foodstuffs should be marked accordingly.

**List of ingredients in descending order by weight:** The list must include additives used in production which exist in the end product. The list should start with the word "ingredient." In mixtures of vegetables and/or fruits containing equal quantities of vegetables and fruits, vegetables and/or fruits can be listed in random sequence. A list of ingredients is not necessary for fresh fruits and vegetables, carbonated beverages, vineyard products, cheese, butter, milk in ferment, and products consisting of a single ingredient provided that the product name is the same as the ingredient. Certain ingredients may be named as their category group rather than the specific name. These include refined vegetable oils excluding olive oil, refined fats, flour blends, starch, fish, cheese, spices, herbs, gum bases, crumbs, sugar, dextrose, glucose syrup, milk protein, cocoa butter, crystallized fruits (not exceeding 10% of the product's weight), vegetable mixes (not exceeding 10% of the product's weight), and wine. The following ingredients require a specific statement on the label: GMOs, packaging gases, sweeteners, aspartame, poly oils, quinine, caffeine, phytosterols and phytosterols, and licorice.

**Quantitative ingredient declaration:** The label must state the quantification of an ingredient or a group of ingredients used in production if the ingredient is present in the name of the product.

**Net quantity of prepackaged food:** The net quantity of prepackaged foods must be expressed in metric units (liter, centiliter, milliliter, kilogram, and gram). For pre-packed products sold by piece, the indication of the net quantity is not necessary if the items included in the package can be easily counted or if the label states the number of pieces.

**Shelf-life date – Expiration date:** This can either be written as "Best until ....." or "Best before ...." The date should be ordered as day, month, and year. Declaring the minimum shelf-life is not necessary for fresh fruits and vegetables (including potatoes), vins de liqueurs, alcoholic beverages of more than 10% alcohol, bakery products, vineyard products, salt, crystal sugar, chewing gum, portioned ice cream, and non-alcoholic beverages packaged in quantities greater than 5 liters and used by hotels, restaurants, or the institutional (HRI) sector.

**Storage and usage conditions:** When instructions are needed to ensure proper use of the product, they must be included.

**Alcohol content:** Alcoholic beverages under tariff codes 22.04 and 22.05 containing more than 1.2% alcohol need to be shown as "Alcohol (or alc.) ...% VOL". The alcohol content is measure at 20 degrees Celsius.

#### **Producer's, Packer's, or Importer's name and address in any EU member country**

**Country of Origin of the Product:** This can either be the product's country of production or of origin, according to EU regulations.

**Lot identification:** Lot here is used to identify products produced, processed, and packaged in similar conditions. The letter "L" precedes the lot number unless it is already clearly distinguishable from other parts of the label. The lot number should be evident and visible (color fast). The lot number is assigned by one of following people, who must be located within an EU country: The producer, the processor, the packer, or the initial vendor of the product.

#### **Medical/Health Claims**

##### **Nutritional Value Labeling Ordinance**

Nutrition labeling is usually optional in Greece and other EU countries, but it is compulsory if the label, advertising, or other any other presentation contains a nutritional claim (see "Related Acts" in: [http://europa.eu/legislation\\_summaries/consumers/product\\_labelling\\_and\\_packaging/l21092en.htm](http://europa.eu/legislation_summaries/consumers/product_labelling_and_packaging/l21092en.htm)). The

EU Nutritional Value Labeling Directive 90/496/EEC establishes rules for the separate labeling of the caloric and nutritional values of foods. This directive concerns nutrition labeling of foodstuffs for final consumers and for mass caterers (restaurants, hospitals, canteens, etc.). Though not mandatory for all foods, it requires additional information for products with labels that emphasize a particularly low caloric content or a particularly high nutritional value. The directive does not apply to food supplements, natural mineral water, or other waters intended for human consumption.

According to the Hellenic Nutritional Society and Consumer Organization reports in Greece, over 90% of Greek consumers say they read food labels (or wish to), but less than 15 percent of them pay attention to the "content's nutritional value." Researchers from the Agricultural University of Athens, Greece stated that "A possible explanation may be that consumers may buy from habit, experience and past behavior, [that they] do not tend to read labels and/or that they do not understand the information that they read." (For more information, see Health Claims: Consumers' matters, Journal of Functional Foods (2009), Authors: Pothoulaki, M., & Chrysoschoidis, G., doi:10.1016/j.jff.2009.01.012, also at: [linkinghub.elsevier.com/retrieve/pii/S1756464609000139](http://linkinghub.elsevier.com/retrieve/pii/S1756464609000139)).

Consumers and nutritional NGOs emphasize common problems with regulations, including their sometimes "optional nature," widespread lack of nutritional knowledge and healthy diet awareness, confusion created by misleading labels, multilingual label descriptions, lack of enforcement, and the widespread lack of nutritional information in the Greek language. EFET (GOG Min Ag Food Control Agency) is the authority responsible for enforcement. EFET does not currently offer enough specialized personnel or a sufficient budget to respond efficiently to all requirements. The European Food Information Council and EUFIC Greece provide additional information and reading on nutritional labeling developments in the EU (EUFIC Europe: <http://www.eufic.org/>; in the Greek language: <http://www.eufic.org/index/el/>). There is also helpful information in a recent study entitled, "Results of a Pan-European Consumer Research on In-Store Behavior, Understanding and Use of Nutrition Information on Food Labels, and Nutrition Knowledge" (<http://www.eufic.org/upl/1/en/doc/EUFIC%20pan-European%20results-full%20presentation.pdf>).

When nutritional labeling is required, nutritional values must be presented or advertised (according to EU Directive 90/496) in order to prevent misleading information on labels. Nutritional information, if cited, must provide information from Groups 1 or 2 in the following order:

<b>Group 1</b>	<b>Group 2</b>
Energy value Amount of proteins Carbohydrates Fats	Energy value Amount of proteins Carbohydrates Sugar Fat Saturates Fibre Sodium

Nutritional claims related to sugars, saturated fatty acids, fibre, or nitrates must include Group 2 information.

Nutritional labeling may include quantities of:

- Starch;
- Polyalcohol;
- Hydrocarbons;
- Fats;
- Cholesterol;
- Vitamins; and

- Inorganic acids.

Energy and nutrient content information is numerical and should be in specific units per 100 grams or 100 milliliters. Units used in the label are:

- Energy: Kj and Kcal;
- Proteins, hydrocarbons, fats, fibre, sodium: grams;
- Cholesterol: milligrams;

Vitamins and inorganic acids may also state the recommended daily intake.

Nutritional labeling must also be presented in Greek. Information should be in tabular form with properly aligned numbers, but a linear form is acceptable if space is insufficient for a table.

A product may be labeled as "low in hydrocarbons and/or sugars" if the absorbable carbohydrate content is less than 0.25%. A product may be labeled as "reduced calorie" if the calories are reduced by at least 30% compared with the original foodstuff. This category covers products such as "light," "line," or "slim." A product may be labeled as "low in calorie" if a single intake yields a maximum of 15 calories to the body and 30 calories per daily intake.

### Health Claims

The European Parliament and the Council on Nutrition and Health Claims Made on Foods re-published Regulation 1924/2006 in its corrected form on 18 January 2007 (OJ No. L12, 18.1.2007, p.3), and it entered into force on 1 July 2007. It sets EU-wide conditions for the use of nutrition claims such as "low fat" or "high in vitamin C" and health claims such as "helps lower cholesterol." The regulation applies to any food or drink product produced for human consumption and marketed in the EU. Only foods that fit a certain nutrient profile (below certain salt, sugar, and/or fat levels) are allowed to carry claims. Food labels can only contain nutrition and health claims if they are included in one of the EU positive lists. Food products carrying claims must comply with the provisions of the nutritional labeling directive 90/496/EC.

EU Regulation 1924/2006 is the first piece of specific legislation to deal with nutrition and health claims, and it aims to provide a higher level of consumer protection as well as harmonize legislation across the EU to facilitate intra-Community trade. Regulation 1924/2006, as all EU regulations, is directly applicable in Greece as in all member states. EFET has put in place the necessary enforcement provisions. EU Regulation 353/2008, "Implementation Measures of Reg 1924/2006," establishes current implementation rules for applications to authorize health claims as provided in article 15 of Reg 1924/2006. Amendments No 107/2008 and 109/2008 of the 1924/2006 contain other relevant provisions (See: <http://eur-lex.europa.eu/JOHtml.do?uri=OJ:L:2008:039:SOM:EN:HTML> ).

The NGO Hellenic Center for the Protection of the Consumer (KEPKA) recently published a study showing that 96 percent of Greek consumers pay attention to health claims in food labeling. Below are additional findings of the study:

<b>Health Claims: Greek Consumer Preferences &amp; Habits</b>	<b>%</b>
Consumers paying attention to health claims	96
Consumers reading health claims before purchase	94
Percent of consumers who trust health claims	86
Consumers considering health claims as an Incentive	85
Consumers who declare that they understand the meaning of "health claims" in food	94
Consumers who claim that they understand the ingredients cited on labels	67
Consumers who claim that they understand the nutritional values cited	77

Another study found that Greek consumers are very aware of a number of factors they believe pose serious health risks (see table below), coming from a traditional diet that is rich, delicious but mainly healthy. Greek consumers prefer to know more about their food content and claim not to be misled. Parents want their children to frequently eat home-cooked food, with plenty of fresh foods and vegetables. Obesity among preschool children is of great concern in Greece.

<b>Subject (Health risk from)</b>	<b>Awareness (% of Greek Population)</b>
Foods containing GMO ingredients	89
BSE	86
Agricultural chemicals & pesticides	82
Dioxins, mycotoxins, heavy metals in the food chain	81
Snack food consumption	73
Hormone content in Food	72
Food additives (E-number, etc), preservatives (nitrates, colorants, sweeteners, other), and flavorings	65
Food irradiation	60
Fast food (all chains)	58
Food contamination (listeria, salmonellas, etc)	57

Source: INKA Surveys (Consumers Institute of Greece)

U.S. firms exporting food items to Greece have the responsibility to:

- follow U.S. laws and regulations
- follow the EU Regulations in effect
- Work closely with Greek importers who are familiar with labeling regulations & laws in effect

Third-country exporters of food items to the EU, particularly of new products, must respect the regulations for using nutrition claims set out in detail in the Annex of Regulation 1924/2006. Products already labeled or on the market before January 2007 may remain on the market with the original labels until January 2010. From 2010, only nutrition claims included in the Annex will be allowed.

A list of well-established health claims such as "calcium is good for your bones" will be established by January 2010, based on member states' lists of health claims already approved at the national level. The national competent authority in Greece is the National Pharmaceuticals Organization (EOF) operating under the GOG Ministry of Health. Disease risk reduction claims and claims referring to the health and development of children will require authorization on a case-by-case basis, following the submission of a scientific dossier to EFSA. A simplified authorization procedure has been established for health claims based on new scientific data. Regulation 353/2008 establishes rules for applications to authorize health claims as provided in Article 15 of Regulation 1924/2006 (see also USEU Report No E48055, page 2).

### ***Dietetic Foods - Special Food Products***

Foodstuffs for infants and people with health problems fall under this category. These products have additional regulations and must specify the intended target group of consumers, caloric value, and nutrient content. Foodstuffs included in this category are:

- Baby foods;
- Milk for babies;
- Low calorie products to control weight;
- Food for diabetics;
- Low sodium foods including low/no sodium salt;
- Non-gluten foods;
- Special foods for athletes; and
- Other food products of special medical purposes.



Every declaration or advertisement for dietetic products must be explicit. The National Pharmaceutical Organization (EOF) is the regulatory agency that imposes and implements regulations on dietetic foods and food supplements.

### **Allergen Labeling & List of Allergenic Ingredients**

Requirements for labeling allergens and listing allergenic ingredients were introduced by EU Directives No 2003/89 and No 2006/142, in which came into effect on November 25, 2005 and December 2008 respectively. On November 25, 2005, including allergenic ingredients on food labels became mandatory throughout the EU. The new allergen labeling rules also apply to beverages containing more than 1.2% alcohol by volume. Alcoholic beverages containing sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/liter must be labeled "contains sulphites" or "contains sulphur dioxide." Replacing the word "sulphites" by "SO2" or "E220" is not allowed. For more information on the mandatory labeling of allergens, refer to the USDA/USWU's GAIN Report E36066, available at: <http://www.fas.usda.gov/gainfiles/200604/146187522.pdf>.

### **Quantitative ingredient declaration (QUID)**

A list of cases when quantitative ingredients must be labeled, per art. 7 of 2000/13/EU Directive, may be found at the USEU's page: <http://useu.usmission.gov/agri/label.html#QUID>. USEU's E46058 FAIRS 2009 Report describes the cases where a Quantitative Ingredients Declaration becomes compulsory (page six). Greece and local industry organizations fully implement EU regulations on QUID and its principles, according to relevant guidelines provided by the European Commission. A copy of these guidelines can be downloaded from the European Commission's website at [http://ec.europa.eu/food/fs/fl/fl02\\_en.pdf](http://ec.europa.eu/food/fs/fl/fl02_en.pdf).

## **Section III. Packaging and Container Regulations:**

### **C. Consumer Packaging Ordinance and Laws on Weight and Measures**

Foodstuff packaging must protect the product from all external influences. Pre-packing and packing is to be carried out under strict conditions of cleanliness, and only approved materials may be used. The composition of food packaging material must not affect or be affected by the foodstuff, change the smell, taste or the appearance of the foodstuff, or transmit harmful substances. Greece implements EU directives, Commission regulations, and related acts provided in the EU's website below, regarding both pre-packing and packing of food products. This includes entry-into-force dates, expiration dates, and deadlines for transposition in the member states:

[http://europa.eu/legislation\\_summaries/consumers/product\\_labelling\\_and\\_packaging/l32029\\_en.htm](http://europa.eu/legislation_summaries/consumers/product_labelling_and_packaging/l32029_en.htm)

New Directive 2007/45/EC of the European Parliament and of the Council on 5 September 2007 abolishes regulations on mandatory packaging sizes at both EU and national levels. It removes rules on nominal quantities for pre-packaged products that governed the package sizes in which prepackaged goods could be sold, thereby repealing Council Directives 75/106/EEC and 80/232/EEC, and amending Council Directive 76/211/EEC. Greece has adopted Directive 2007/45/EC and enforced most articles since April 2009. However, it allows member states to retain specified quantities for white sugar until October 2013 and for butter, milk, dried pasta, and coffee until October 2012.

### **B. Materials in Contact with Foodstuffs**

Regulations for materials in contact with food have been EU-harmonized and Greece complies with EU Reg 89/109 as replaced by Council Regulation 1935/2004. This includes common rules for materials that come

into contact with foodstuffs, including active and intelligent packaging . Materials must bear either the label "for food use," or a specific symbol designed in Council Directive 80/590/EEC replaced by EU Regulation 1935/2004.

Such EU legislation applies to all materials and articles intended to come into contact with foodstuffs including a range of items, including packaging materials, cutlery, dishes, domestic appliances, kitchen utensils, and ink for printing labels. The legislation can be divided into three types:

- Framework legislation (covers all food-contact materials);
- Specific directives (single groups of food-contact materials e.g. ceramics, plastics, etc.); and
- Directives on specific substances in food-contact materials (substances used in the manufacture of materials e.g. vinyl chloride monomer).

**Greek Implementation and Legislation**

Greece has accepted all EU directives on food-contact materials and articles into national law. Greek legislation has been consolidated in the Greek Food Code. Greek legislation is fully harmonized with existing EU legislation concerning food-contact materials and substances. In addition, Greece has implemented national provisions for the following materials:

- Dyes and pigments for plastics in contact with food;
- Coatings;
- Paper and board;
- Metals and alloys; and
- Cans.

The table below provides an overview of the EU legislation on food contact materials and implementation in Greece. It also lists additional Greek legislation concerning these materials.

TABLE: Implementation of EU legislation on food contact materials in Greece

<b>Materials/ substances</b>	<b>EU legislation</b>	<b>Greek implementation</b>
All food contact materials	Regulation (EC) 1935/2004	<i>Automatically applicable*</i>
Ceramics	Directive 84/500/EC	HSCC Decision No 159/86
Regenerated cellulose film	Directive 93/10/EC	HSCC Decision No 240/95
Plastics	Directive 2002/72/EC	HSCC Decision No 58/2002
Recycled plastic materials	Regulation (EC) 282/2008	<i>Automatically applicable*</i>
Plasticizers in gaskets & lids	Regulation (EC) 372/2007	<i>Automatically applicable*</i>
Vinyl Chloride monomer	Directive 78/142/EC	HSCC Decision No 1976/85
N-nitrosamines and N-nitrosatable	Directive 93/11/EC	HSCC Decision No 598/94
BADGE, NOGE, BFDGE	Regulation 1895/2005	<i>Automatically applicable*</i>

Additional Greek (national) legislation  
(Materials/ substances followed by Greek legislation) :

<p><b>Dyes and pigments plastics:</b>  HSCC decision No. 358/95 &amp; 1028/96, Greek Food Code, Art. 26a</p> <p><b>Coatings:</b>  HSCC decision No. 446/98, Greek Food Code, Article 28</p> <p><b>Metals and alloys:</b>  HSCC decision No. 232/98, Greek Food Code, Article 22</p>
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**Paper and board:**

HSCC decision No. 478/2004, Greek Food Code, Article 24

**Cans:**

HSCC decision No. 232/98, Greek Food Code, Article 22

Source: CBI Market Information Base (<http://www.cbi.eu>)

**D. Packaging Disposal Regulations**

The EPA provides a useful background on the recycling and reuse of packaging material, as well as a summary of relevant EU directives beginning with the 1994 Directive on Packaging and Packaging Waste (94/62/EC) (See: <http://www.epa.gov/oswer/international/factsheets/200610-packaging-directives.htm>).

The majority of member states had transposed Directive 94/62/EC by late 1998. In 1999 the Commission commenced infringement proceedings against Greece and the United Kingdom for their failure to provide notification of transposition measures. The Commission subsequently decided not to continue its case against the United Kingdom after it gave notification of its measures.

The European Court of Justice (ECJ) ruled against Greece in its judgment of 13 April 2000 on the grounds that Greece had failed to adopt implementation legislation by the deadline stipulated in the directive. Greek authorities indicated that new legislation was being prepared. GOG passed National Law No 2931/2001 and associated presidential decrees for the recycling of packaging waste, transposing Council Directive 94/62/EC on packaging waste and related directives on other wastes (used tires, end-of-life vehicles, waste oils, electrical and electronic waste and batteries). The principal objective of this Law is, in accordance with Article 1, "the establishment of measures that for the management of packaging are targeted at reuse or recovery of their waste".

Although Greece is still a long way from meeting the targets set by these regulations, it has improved and recorded an increase in the amount of waste recovered and recycled each year, in particular in relation to packaging waste. It reached the level of 30 % in 2008, short of the minimum target of 60% set by the EU. Denmark leads with over 90% among the EU-15. The following table provides the recycling targets set by Greek National Law 2939/2001 for January 1<sup>st</sup> 2012 in comparison to the minimum ones set by the EU.

Type of packaging wastes to be recycled in Greece	National Target (%)	EU Commission's Recycling Targets set for Y 2008 (min %)
% weight of total packaging wastes	55-80	55-80
% weight of glass wastes	60	60
% weight of paper and cardboard wastes	60	55
% weight of metal wastes	50	50
% weight of plastic wastes	22,5	20
% weight of wood wastes	15	NA

Source: Table was composed by FAS Athens based on EU documents and GOG presidential decrees associated with Law No 2939/2001

Law No 2939/2001 also obligates the economic actors (producers, importers) to organize or participate in collective or individual systems of alternative waste management (i.e. return, collection, transportation, and recovery systems) in order to achieve specific quantitative targets. Pursuant to Law 2939/2001, the Ministerial Decisions 106453/2003 (OJG 391B/2003) and 105857/2003 (OJG 391B/2003) approved the operation of two nationwide systems for collective alternative management of packaging wastes.

Most recently, the GOG Ministry of Environment (YPEHODE) issued JMD 22912/1117/2005 (OJG 759B/2005) which integrates the EU Directive 2000/76/EC on waste incineration into Greek legislation. Furthermore, the revision of national legislation on hazardous waste management is in its final stage. This includes three items, namely measures and conditions for the management of hazardous waste, technical guidance for the management of hazardous waste, and the national plan for the management of hazardous waste.

### **Phytosanitary Requirements Health Requirements for Plant Products**

Greece complies fully with the EC's plant health regime as established by Council Directive 2000/29/EC (as amended by Council Directive 2002/89/EC of 28 November 2002) on "Protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread within the Community." Detailed information on the EU's phytosanitary policies, certification, and controls are provided in: [http://ec.europa.eu/food/plant/organisms/index\\_en.htm](http://ec.europa.eu/food/plant/organisms/index_en.htm) .

Council Directives 2000/29/EC & 2002/89/EC were adopted by GOG with Presidential Decree No. 365/2002 and other associated presidential decrees, ministerial decisions and joint ministerial decisions (JMDs).

**Presidential Decree No. 84** harmonizes Greek national legislation with EU Commission Directive 2004/103/EC on identity and plant health, including inspection of plants, plant products, or other objects as listed in Part B of Annex V to Council Directive 2000/29/EC. Inspections may be carried out at a place other than the point of entry into the Community, and the legislation specifies conditions related to these checks.

All plant products must be accompanied by a U.S. Department of Agriculture phytosanitary certificate or PPQ577, issued by an official Animal and Plant Health Inspection Service (APHIS) inspector.

**Presidential Decree No. 42** which entered into force on January 1<sup>st</sup> 2005 determines the models of official phytosanitary certificates or phytosanitary certificates for re-export accompanying plants, plant products, or other objects from third countries. The decree, in compliance with European Community Directive No. 2004/105/EC, determines the models of official phytosanitary certificates or phytosanitary certificates for re-export accompanying plants, plant products, or other objects from third countries, listed in Presidential Order No. 365/2002 (which refers to Council Directive 2000/29/EC). The Hellenic authorities shall accept certificates issued in accordance with the models as specified in Annex I and II (Model Phytosanitary Certificate and Model Phytosanitary Certificate for Re-export) until 31 December 2009.

The competent authority for phytosanitary law enforcement is the GOG Ministry of Agricultural Development and Food (for specific info visit IPP website at: <https://www.ippc.int/servlet/CDSServlet?status=ND1uchBvZ3ImNj1lbiYzMz0qJmM3PWtvcw~>)

## **Section IV. Food Additives Regulations:**

### **A. Food Additives and Flavorings**

GOG strictly implements EU regulations and enforces thorough testing. Greece is fully harmonized with the EU's rules for authorization and conditions for the use of additives. In 1989, the European Community adopted Framework Directive 89/107/EC which set out the criteria by which additives would be assessed and provided for the adoption of three specific technical directives: Directives 94/35/EC and 95/31/EC on sweeteners; Directive 94/36/EC & 95/45/EC on colors and Directives 95/2/EC; 96/77/EC on remaining additives other than sweeteners and colors. These directives establish the list of additives which could be used (to the exclusion of others), the foods in which they could be used, and any maximum levels. The purity required for these additives is laid down in directives defining specific purity criteria.

The legislation on flavorings is not fully harmonized throughout the EU. The legislative requirements are laid down in Directive 88/388/EC, Regulation 2232/96/EC, Decision 1999/217 and Regulation 2065/2003/EC on smoke flavorings.

The USEU's and EU's websites provide detailed info on developments and the precise context of legislation in effect (See: [www.useu.be/agri/additive.html](http://www.useu.be/agri/additive.html) and [http://ec.europa.eu/food/food/chemicalsafety/additives/comm\\_legisl\\_en.htm](http://ec.europa.eu/food/food/chemicalsafety/additives/comm_legisl_en.htm)).

Only authorized food additives and flavorings can be used in the EU. New EU legislation is expected to replace the current system and provide a basis for controls on food additives, flavorings, and food enzymes. Greece has adopted all current EU Directives and incorporated them into national law.

Summary for Greece on:	Food additives and flavorings
Products:	Food
Requirements:	<ul style="list-style-type: none"> <li>•List of authorized food additives is established</li> <li>•Requirements on use, labeling, purity criteria, and quantity limits</li> </ul>
Status:	Greece has implemented the EU legislation on additives and flavorings in food into its national legislation. The Greek legislation imposes the same requirements as the EU legislation.
GOG competent authorities for control & enforcement	The National Chemical Laboratory (NCL) and accredited laboratories for testing (only in the public sector and state universities), Ministry of Public Health (GOG Min of Health), EOF, Ministry of Agricultural Development and Food (GOG Min Ag), and National Agency for Food Control (EFET)

## Section V. Pesticides and Other Contaminants:

### Pesticides

In GR4011 (<http://www.fas.usda.gov/gainfiles/200407/146106827.doc>) FAS Athens provides a series of answers on the status of the maximum residue levels of pesticides in foodstuffs, based on GOG's responses, interviews with agricultural chemical companies, and information from farmer organizations. No significant changes are reported since then, although Greek law is progressively harmonized with the new Regulation No 396/2005 which will replace Directives 86/362/EC, 86/363/EC, and 90/642/EC.

Parliament and Council Regulation No. 396/2005 of 23 February 2005 concerns the maximum residue levels of pesticides in or on food and feed of plant and animal origin, and it amends Council Directive 91/414/EC. Under this new regulation that overhauls EU rules on maximum residue levels (MRLs) of pesticides in food and animal feed, nationally set MRLs will be progressively harmonized with the EU. This is expected to reduce legal complexity and eliminate obstacles to trade. The European Food Safety Authority has a lead role in proposing EU-wide MRLs.

The competent authority on controls and tests for MRLs in Greece is the GOG Ministry of Agriculture through its laboratories and regional control centers (known as KEPYELS). According to contacts in the agricultural chemical industry, MRLs are in excess in less than 4% of collected samples to date.

Further reading on MRL developments in the EU is provided at: <http://useu.usmission.gov/agri/pesticides.html>

## Section VI. Other Regulations and Requirements:

## B. Product Inspection and Registration

Each EU member state is responsible for carrying out inspections on a regular basis. Random checks are performed at import or at later stages of trading by GOG Min Ag authorities at points of entry and EFET when they enter the distribution channel. Foodstuffs entering Greece for the first time are inspected to gain approval. The ingredient list that must accompany the product determines its clearance and what duties are imposed. The application for approval must include a statement indicating the name of the product, type of packaging, processing method, the exact composition of the product, and food safety control methods used. If all are in compliance with the Greek Food Code the product is granted clearance. The clearance procedure costs about €200 and is handled by a freelance customs agent hired by the importer.

Products using allowed additives not included in the catalogue, non-approved packaging material, new technologies during processing, novel foods in accordance with HSCC Decision 366/97, and foodstuffs enriched with nutritional elements must obtain approval from the HSCC in order to be commercialized in Greece. The cost of this procedure is about €450. The procedure takes 5 months for products new to EU countries and 3 months or less for products already commercialized in other EU member states.

Specific agricultural and food products which are subject to inspection and to Greek trade restrictions include:

- **Poultry, Meat, Fish, Dairy, and Egg:** Products of third country origin must originate from plants included in the EU approved plant list. Proper public health certificate models cited in relevant EU regulations for importation and/or transiting through Greek soil must accompany all meat products signed by FSIS inspectors. Specific detailed inspection requirements exist for all animal products (Directive 97/78/EC). Inspections are carried out under the supervision of customs veterinarians at Greek ports of entry and border inspection posts (BIPs). U.S. poultry meat and products have not been imported into Greece since 1997, due to a U.S.-EU trade dispute. Greece used to purchase 7,000-8,000 MT/annum of U.S. turkeys and products, and demand is estimated to be much higher today. French and Italian turkey meat imports have supplemented domestic demand (as a result of the EU's rejection of chlorine as an anti-microbial treatment in poultry slaughter, U.S. exports to the EU of poultry using this process have been banned).
- **Enriched/Bleached Flour:** Greek regulations prohibit the import of any products made or including enriched/bleached flour.
- **Nuts & Dried Fruit:** Imported nuts and dried fruit are subject to a random aflatoxin test at entry stage or at selling points. At port, usually one out of ten containers is sampled to be tested for aflatoxin. Aflatoxin content certificates are required by GOG Authorities to accompany nuts and specific dried fruit (i.e. prunes) issued by accredited laboratories in the country of origin. GOG port authorities are authorized to repeat sampling and testing upon arrival. Consignments found to contain aflatoxins in excess are rejected. If the shipment is not returned to the country of origin or sent to an EU-approved re-processing facility elsewhere in the EU within 60 days, it is confiscated and discarded.
- **Row Nuts:** APHIS phytosanitary certificates for row nuts imported into Greece are required in accordance with EU legislation in effect.
- **Wine-specific Import Requirements:** Third-country (i.e. U.S.) wines imported into the European Community member states must be accompanied by a VI1 document until such wine is put into free circulation. Further information on EU import regulations for wine can also be found in the wine section of the U.S. Mission to the European Union: <http://www.useu.be/agri/wine.html>

An import declaration is required for goods from third countries such as the U.S. When goods are imported into Greece, it is the responsibility of the importer or his authorized agent (on Greek soil) to declare them to customs. A **Single Administrative Document or SAD** is used for this purpose. This is the approved form for the import declaration process. Further information on the SAD can be found in: [http://ec.europa.eu/taxation\\_customs/customs/procedural\\_aspects/general/sad/index\\_en.htm](http://ec.europa.eu/taxation_customs/customs/procedural_aspects/general/sad/index_en.htm)

The importer, or his local representative, must also request a **health inspection** by submitting an application to the port authorities according to the product (GOG Min Ag agronomists, veterinarians, and National Chemical Laboratory staff when sampling and testing becomes necessary), together with the documents

related to the consignment. The release of goods from customs can only be carried out after a favorable result of the inspection is reflected in the corresponding certificate.

Goods are released from customs for "free circulation" or "transiting" when documents have been filed and payment of tariff duties has been completed if necessary. After paying the value added tax (VAT) and any other applicable excise duty, goods are also released for consumption and ready to be marketed.

All plant and food samples, organic products, novel foods, and functional food items must undergo all phyto, hygiene, or labeling requirements. U.S. firms are advised to contact the GOG Ministry of Agriculture Phytosanitary Division and/or National Chemical Laboratory (NCL) prior to any shipment of samples. Authorization must be obtained from the Greek Ministry of Agriculture.

For additional information please refer to: <http://www.useu.be/agri/usda.html>

Infringements of EU food and feed legislation are reported through the Rapid Alert System on Food and Feeds (RASFF). The rapid alert system is a network of member state authorities managed by the European Commission. On 16 July 2009, EU Commissioner for Health Androulla Vassiliou opened the RASFF Portal website: ([http://ec.europa.eu/food/food/rapidalert/index\\_en.htm](http://ec.europa.eu/food/food/rapidalert/index_en.htm)).

For detailed information on certification requirements to import into the EU, see USEU's guide at: [http://useu.usmission.gov/agri/Certification\\_Guide.html](http://useu.usmission.gov/agri/Certification_Guide.html)

## ***B. Certification and Documentation Requirements***

### ***General Procedures and Documentation***

Roughly, the following is a list of procedures and documents that are needed for importing into Greece. However, due to frequent changes in regulations, U.S. exporters are advised to cooperate closely with their importers and local customs agents for more detailed information.

- Import authorization or license where this is stipulated in EU or Greek national law: Food and agricultural products destined for the Greek market require an Import license issued by the competent Greek authority (either GOG Min Ag or GOG Min of Commerce according to the type of product). Expiration of licenses varies in validity;
- Bill of Lading and/or Airway Bill;
- Commercial invoice: It must include all agreed costs plus insurance and shipping. A harmonized number is recommended;
- Certificate of origin or invoice declaration where the application for a preferential tariff treatment is requested: It is important to note that under EU regulations, certificates of origin may be required for certain goods, including goods subject to surveillance and/or quota requirements. The local importer and/or trade representative should be contacted for further information prior to issuance;
- Packing list (not mandatory, but may facilitate clearance of goods);
- Pro-Forma invoice;
- Certificate of insurance;
- An authorization or certificate of authenticity where a favorable EU tariff treatment is requested;
- A certificate of authenticity for all alcoholic beverages; and
- APHIS phytosanitary certificate and/or FSIS public health certificate when applicable.

Importers and/or potential Greek importers must register with the local Chamber of Commerce in their town or prefecture.

### ***AGRIM Certificates***

CAP (Common Agricultural Policy) import licenses are required for wine imported from third-countries (U.S. included) into any member state in the E.U. Such import licenses, often referred to as AGRIM certificates, are issued in Greece by the OPEKEPE (GOG's Payment and Control Agency for Guidance and Guarantee Community Aid), part of the GOG Ministry of Agricultural Development and Food.

### ***Health Certificates for Plant Products***

[http://europa.eu/legislation\\_summaries/food\\_safety/plant\\_health\\_checks/f85001\\_en.htm](http://europa.eu/legislation_summaries/food_safety/plant_health_checks/f85001_en.htm)  
[http://ec.europa.eu/food/plant/index\\_en.htm](http://ec.europa.eu/food/plant/index_en.htm)  
<http://useu.usmission.gov/agri/plantcertif.html>  
[http://www.aphis.usda.gov/import\\_export/plants/plant\\_exports/export\\_certificates\\_forms.shtml](http://www.aphis.usda.gov/import_export/plants/plant_exports/export_certificates_forms.shtml)

Phytosanitary certificates are required by GOG authorities for all imported plants and plant produces in compliance with EU's Plant Health Directive 2000/29/EC of 8 May 2000 (with the incorporated amendments to date). As cited elsewhere in this report, imports of fresh fruits, vegetables, and unprocessed nuts must be accompanied by a USDA/APHIS phytosanitary certificate. The certificate is used to certify that the commodities have been inspected and that they comply with the importing country's phytosanitary regulations.

- **For Wheat of U.S. Origin:** Milling wheat, feed wheat, and wheat seed for planting are checked for Karnal bant contamination by the GOG phytosanitary authorities, and must be 100%-free (*Tilletia indica* Mitra, the fungus responsible for Karnal bunt disease of wheat, is currently recognized as a quarantine pest by both the EU and EPPO). The last U.S. wheat shipment to Greece took place in 1997. Imports stopped after a rejection of a shipment of 3,000 MT of U.S. wheat due to false-positive findings by Greek inspectors (Greek testing methods for Karnal bunt disease in U.S. wheat have served as a de facto ban on imports and transshipment of wheat for over a decade due to a high incidence of false-positive results). The case is still in Greek courts after the importer pressed charges against the GOG. This fact has discouraged Greek grain importers from buying U.S. milling wheat for twelve years while similar Canadian wheat is still purchased. (Further reading: <http://www.fas.usda.gov/gainfiles/200308/145985747.pdf> and Report No GR9008 - Export Guide Annual Report, FAS Athens, May 27 2009).

The competent authority for the adoption and implementation of EU legislation is the Phytosanitary Division of the GOG Ministry of Agriculture.

Information on specific subjects pertaining to phytosanitary regulations and controls for specific plants and plant products is also provided by EPPO, the European Plant Protection Organization (<http://www.eppo.org/>). EPPO is an intergovernmental organization responsible for European cooperation in plant health.

### **Health Certificates for Animal Products**

[http://ec.europa.eu/food/animal/animalproducts/index\\_en.htm](http://ec.europa.eu/food/animal/animalproducts/index_en.htm)  
<http://useu.usmission.gov/agri/certification.html>

Fresh meat must fulfill the animal health requirements laid down in Council Directive 2002/99/EC which superseded the former Directive 72/462/EC from the 1st of January 2005 and contains many of the same principles. All U.S. products imported into Greece and/or transited through Greece must be accompanied by the proper veterinary certificates (models of which are provided in relevant EU legislation document annexes). Greece fully implements EU-harmonized health certificates which are mandatory for meat, poultry, dairy, eggs, gelatin and seafood. Products destined for the Greek market must originate in EU-approved slaughtering and processing facilities in the United States. U.S. agencies, including FSIS, APHIS, AMS, and FDA, are involved in the establishment listing process. Establishments are subject to occasional EU audits after listing. Exporters should be aware that getting a plant listed can take several months. At present, the following food products must come from an EU-approved establishment: red meat, meat products, farmed and wild game meat, ratites, animal casings, milk and milk products, fish and fishery products, and gelatin. Updated lists of approved U.S. facilities are forwarded to GOG Min Ag Veterinary Division through FAS Athens.

Relevant EU regulations, document requirements, and guidance for imports of aquaculture products, game meat, meat products, dairy products, poultry meat, other products of animal origin, and personal imports into the EU are provided in the EU's website cited above.



Export Requirements for the European Union are provided by FSIS at: [http://www.fsis.usda.gov/regulations/European\\_Union\\_requirements/index.asp](http://www.fsis.usda.gov/regulations/European_Union_requirements/index.asp), with indications for the most recent revision to these requirements (see also: [http://www.fsis.usda.gov/regulations/European\\_Union\\_Requirements/index.asp#XVII](http://www.fsis.usda.gov/regulations/European_Union_Requirements/index.asp#XVII))

In the past four or five years, numerous misunderstandings between GOG veterinary authorities and U.S. meat importers in Greece and in neighboring Balkan countries were recorded, particularly for transiting products to these countries. Most problems had to do with wrong certificate models accompanying the products, use of old certificates instead of renewed EU certificate models, misinterpretations of current legislation by GOG customs veterinarians, mislabeling of cartoon boxes, etc. In most cases FAS Athens was asked to intervene and solve such problems in cooperation with GOG customs and the central public health VET authorities.

Recent controls by GOG veterinarians of BIPs in Greek ports or airports were performed in a very strict manner, particularly when inspection of transited consignments did not previously take place in another EU member state. GOG vets carry out inspections as imposed by EU Regulation No 97/78. Reportedly, in February 2009, EU auditors visited the Thessaloniki Port Authority and asked Greek VETs to apply strict controls. Greek VETs report to FAS Athens that they must comply with EU auditors' instructions for stricter controls, without exception.

### ***Health Certificates for Processed Foods***

(<http://useu.usmission.gov/agri/foodcertif.html>)

Greece imports a large amount of processed food products, trading with countries all over the world in an increasing diversity of food products. It strictly implements all EU food legislation in effect. In order to export products to the EU, third-countries and food processing companies must meet the requirements of the basic legal framework. The European Union's food legislation is built around high food safety standards, which serve to protect the health of consumers. For import of foods of animal origin, additional requirements are set out in specific legislation. The requirements are mainly related to food safety and consumer health in avoiding the transmission of diseases to the public. They apply to all stages of the production process. Greece implements fully EU Regulation No 852/2004 on hygiene of foodstuffs.

All animal products imported into the EU, and therefore also Greece, need animal or public health certification (see relevant sections above). For processed foods containing animal product, the situation is more complicated because there is no legislation specifying the percentage of dairy, egg, red meat, or poultry meat that a foodstuff must contain to necessitate certification.

As such, it is best to check the documentation requirements with the importer. In principle, products containing any amount of red meat or poultry meat must be certified. Certification of products containing egg products or dairy products depends on the composition of the product. Generally, any foodstuff containing more than 50 percent egg/dairy products will need the corresponding certificate.

Prior to importation of any new processed food items into Greece, importers must contact the Food Chemistry Division in the NCL where instructions are provided for necessary actions. Usually, more documentation, food samples, and additional information must be submitted. Occasionally (on a random basis and/or after a complaint is filed by individuals or Consumer NGOs), EFET proceeds with sample inspections checking for mislabeled food items or for those carrying hidden ingredients.

The general characteristics of composite food products intended for human consumption within the EU are well summarized in the UK's DFRA's document provided in: <http://www.defra.gov.uk/animalh/diseases/monitoring/pdf/composites290605.pdf>

## **Section VII. Other Specific Standards:**

## B. Genetically Modified Food and Feed

The EU has traceability, information, and labeling requirements for food and food products produced from GMOs. The labeling requirements do not apply to food products containing GMOs in a proportion no higher than 0,9% of each individual ingredient, provided its presence is adventitious or technically unavoidable. For further information on the regulations of GMOs in the EU, visit: [http://ec.europa.eu/food/food/biotechnology/gmfood/index\\_en.htm](http://ec.europa.eu/food/food/biotechnology/gmfood/index_en.htm), and for the EU Legislation in place see: [http://ec.europa.eu/food/food/biotechnology/gmfood/legisl\\_en.htm](http://ec.europa.eu/food/food/biotechnology/gmfood/legisl_en.htm).

Greece fully implements and enforces, to the extent it is technically and economically possible, the relevant EU legislation on GM foods and feed. Enforcement takes place by the GOG Min Ag food control agency, EFET. Greece's position on issues pertaining to biotechnology GMO products are reported in relevant FAS Athens post reports and in the context of EU-27 Biotechnology GAIN Reports.

- **For Seeds for planting:** In addition to an APHIS phytosanitary certificate, GOG authorities require laboratory certification (issued before shipment from the U.S.) for the non-presence of transgenic material in imported cotton seed for planting (zero tolerance required). For corn seed for planting the tolerance level is set at 0.5% for EU-approved GM corn varieties.
- **GMO field crop trials:** Greece has not been responsive to applications to introduce biotech seeds for field tests, despite support for field trials by interested farmers and academics.

## Section VIII. Copyright and/or Trademark Laws:

### Trademarks

In order to obtain trademark protection in Greece interested parties may register their trademarks in two ways. The first option is to request registration of the trademark in the European Union (Re: [Commission Regulation 2868/95](#)). The European Union treaty includes trademark protection in 27 countries of Europe. The second option is to register their trademark directly in Greece. In the latter case, they must follow the steps through a local agent in Greece and/or trademark attorney who will file and process their trademark application before the Greek Trademark Office. The responsible authority for patent and trademark registration in Greece is the General Secretariat of Commerce (<http://www.gge.gr/4/search.asp>) operating under the GOG Ministry of Development and Commerce. It is highly recommended that U.S. exporters to Greece pursue trademark registration.

To file a patent in Greece, it costs 3,000 -3,500 €. To file a trademark, it costs about 2,000 €. Greece is a member of the Patent Cooperation Treaty (PCT). Patents are filed in Greece in Greek and English.

### **Protected Geographical Indications**

<http://useu.usmission.gov/agri/GI.html>

For producers outside the EU, they can [fill in an online application using DOOR](#) or send it to the Commission via their national authority (see also: [http://ec.europa.eu/agriculture/quality/schemes/index\\_en.htm](http://ec.europa.eu/agriculture/quality/schemes/index_en.htm)). The new EU Regulation 510/2006 allows third country operators to submit registration applications directly to the Commission rather than through their governments and deletes reciprocity requirements. (See also: [http://www.tpe.gov.tr/dosyalar/ABCografı/510\\_2006\\_Sayılı\\_AB\\_Tuzugu.pdf](http://www.tpe.gov.tr/dosyalar/ABCografı/510_2006_Sayılı_AB_Tuzugu.pdf)).

For further reading evaluating the EU policy on protected geographical indications, see: <http://ecologic.eu/2432>.

The EU has granted a Protected Geographical Indication (PGI) to various Greek products including various olive oil types, table olives, saffron, Feta cheese, other cheeses, potatoes, Hios chewing gum, honey, elephant

beans or giant beans, dried figs, Aegina Island pistachios, black currants, and other food products (raw and/or processed), plus a number of local wines (these are divided into: Wines of Appellation of Origin of Superior Quality (OPAP). A total of 20 Greek locations have been recognized for the production of OPAP wines in Greece & Wines of Appellation of Controlled Origin (OPE). Only sweet wines, produced in 8 recognized regions, can be designated OPE).

More detailed information can be found in the EU's database of Origin and Registration (DOOR) by product type, registered name, and name applied for, and by:

- protected designations of origin (PDOs);
- protected geographical indications (PGIs); and
- traditional specialties guaranteed (TSGs).

See also: [http://ec.europa.eu/agriculture/quality/database/index\\_en.htm](http://ec.europa.eu/agriculture/quality/database/index_en.htm)

## **Section IX. Import Procedures:**

General import and inspection procedures are also provided in Greece's "Exporter Guide Annual Report" No GR9008 (25/7/2009).

GOG authorities in charge of import controls at customs are:

- GOG Min Ag Veterinary Service (public health certification controls);
- GOG Min Ag Phytosanitary Division (phytosanitary certificate controls); and
- National Chemical Laboratory (NCL at customs, Food Code compliance).

Customs implements EU certification regulations requiring imported products to be accompanied by the proper documents (EU certificate models in effect for either domestic use or transit). Specific agricultural and food products subject to inspection and Greek restrictions are cited in Sections VI and VII above. More information on procedures for importers can be provided by:

The GOG Veterinary Public Health Certification Authority, contact: [ka6u045@minagric.gr](mailto:ka6u045@minagric.gr)

For phytosanitary certification and inspection matters, the GOG Phytosanitary & Plant Protection Division can be contacted at: [syg053@minagric.gr](mailto:syg053@minagric.gr) and [ve46u030@minagric.gr](mailto:ve46u030@minagric.gr). For inspection matters and control procedures after clearance through customs, EFET can be contacted ([http://www.efet.gr/index\\_en.html](http://www.efet.gr/index_en.html)).

On customs, import taxes, levies, and tariffs, the database of TARIC-ECICS-EBTI is available at :

<http://www.europa.eu/int/comm.taxation-customs/ddw/el/home.htm>

National Chemical Laboratory of Greece (NCL): [http://www.gcsf.gr/index.asp?a\\_id=136](http://www.gcsf.gr/index.asp?a_id=136)

NCL Food Division: [http://www.gcsf.gr/index.asp?a\\_id=154](http://www.gcsf.gr/index.asp?a_id=154)

Hellenic Union of Food Industries: <http://www.sevt.gr/site/content.php>

U.S. exporters should work with experienced local agents and have the import agent work with Greek regulatory authorities to ensure acceptability of specific products. It is also advisable for the agent to contact phytosanitary and public health authorities at the port of entry when necessary, as interpretation of health directives may vary from port to port and poor harmonization with EU regulations may cause delays in custom clearance.

The EU uses the Combined Nomenclature (CN) for the customs classification of goods. The CN eight-digit codes are based on the Harmonized System (HS) nomenclature: the first six digits refer to the HS headings and the two following digits represent the CN subheadings. For more information on the Combined

Nomenclature, see:

[http://ec.europa.eu/taxation\\_customs/customs/customs\\_duties/tariff\\_aspects/combined\\_nomenclature/index\\_en.htm](http://ec.europa.eu/taxation_customs/customs/customs_duties/tariff_aspects/combined_nomenclature/index_en.htm)

## **Appendix I. Government Regulatory Agency Contacts:**

**European Commission**

Rue de la Loi 200  
1049 Brussels  
Belgium  
Tel: +32 2 299 11 11

**Permanent Representation of Greece to the EU**

Rue Montoyer 25  
1000 Brussels  
Tel: +32 2 551 56 11  
Fax: +32 2 512 79 12/ +32 2 551 56 51  
mea.bruxelles(at)rp-grece.be  
[www.greekembassy-press.be](http://www.greekembassy-press.be)

**Permanent Mission of Greece in the WTO, Geneva**

4, rue du Léman  
1201 Geneva, Switzerland,  
Tel: +41 22 909 8940  
Fax: +41 22 732 2150  
E-mail: [grdel.qva@mfa.gr](mailto:grdel.qva@mfa.gr)

**Greek Embassy, Washington**

2221 Massachusetts Ave. N.W.  
Washington, DC 20008  
Tel: (202) 939-1300  
Fax: (202) 939-1324  
Website: <http://www.greekembassy.org>

**United States Mission to the European Union**

Office of Agricultural Affairs  
27 Boulevard du Regent  
1000 Brussels  
Belgium  
Tel: +32 2 508-2760  
Fax: +32 2 511-0918  
e-mail: [AqUSEUBrussels@fas.usda.gov](mailto:AqUSEUBrussels@fas.usda.gov)

**General Customs and Excise Department**

Kar. Serbias 10  
GR-10184 Athens  
Greece  
Tel: (+30) 210 3375 000 / 210 3375 714 / 210 3375 715  
Fax: (+30) 210 3375 034  
E-mail: [gdcustom@otenet.gr](mailto:gdcustom@otenet.gr)  
Website: <http://www.e-oikonomia.gr>

**OPEKEPE****(Payment and Control Agency for Guidance and Guarantee Community Aid)**

Acharnon 241  
GR-10446 Athens  
Greece  
Tel: (+30) 210 212 49 03  
Fax: (+30) 867 0503  
Website: <http://www.opekepe.gr>

The Single Administrative Document (SAD) must be physically submitted to the Greek Customs Administration. An electronic declaration method is being put in place. For more information on the electronic declaration, contact:

**Greek Ministry of Economy and Finance**

GGPS  
(General Secretary of IT-Systems)  
Section of Customs  
1, Chandri Street  
GR-18346 Athens, Greece  
Tel: (+30) 210 480 2400  
Fax: (+30) 210 480 2400  
E-mail: [a.manta@gsis.gr](mailto:a.manta@gsis.gr), [info@gsis.gr](mailto:info@gsis.gr)  
Website: <http://www.gsis.gr>

**Ministry of Agricultural Development and Food Directorate of Plant Production**

Phytosanitary and Plant Protection Division  
150, Syggrou Avenue  
Phone: +30.210. 9287232 – 233  
Fax No: +30.210.9287234  
E-mail: [syg059@minagric.gr](mailto:syg059@minagric.gr), [syg042@minagric.gr](mailto:syg042@minagric.gr)

**Appendix II. Other Import Specialist Contacts:**

**ANNEX B - POST CONTACT INFORMATION FOR OFFICE OF AGRICULTURAL AFFAIRS, ATHENS, GREECE**

**Foreign Agricultural Service**

**U.S. Embassy, Athens**

Mailing Address:  
PSC 108; Box 7 (AGR)  
APO AE 09842  
Tel: (011-30-210) 643-1289  
Fax: (011-30-210) 721-5264  
Email: [agathens@usda.gov](mailto:agathens@usda.gov)