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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. Information on EU Member State specific requirements can be found in the FAIRS reports prepared by the Offices of Agricultural Affairs in the individual EU Member States:

<http://www.fas.usda.gov/posthome/useu/fairs.html>.

**DISCLAIMER:** This report was prepared by the Office of Agricultural Affairs of the USDA/Foreign Agricultural Service in Rome, Italy 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 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**

**SECTION II: LABELING REQUIREMENTS**

**SECTION III: PACKAGING & CONTAINER REQUIREMENTS**

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## **Section I. Food Laws**

Greece's food laws and regulations follow European Union (EU) rules to the extent that EU food laws have been harmonized. However, in cases in which the EU law may be incomplete or absent, the law of each Member State applies. One main principle of the single market concept is to ensure that all food products, whether produced in the EU or imported from a third country, can move freely throughout the EU if they comply with uniform requirements. In reality, certain directives allow Member States to make exceptions (i.e., in cases where a country can identify unique concerns about a product intended for import). Free movement can only be guaranteed when all aspects are covered by harmonized legislation (e.g., a foodstuff may comply with the general labeling directive but may carry a health claim for which harmonized rules do not yet exist).

Imported products must meet existing Member State requirements in cases where EU regulatory harmonization is not yet complete. Greek authorities implement EU rules (directives and regulations) for food and agriculture through country specific laws and decrees. Current information on EU food import rules as well as general information on EU import duties and quotas can be found on the USEU website at <http://useu.usmission.gov/agri/usda.html>.

In Greece, food safety is the primary responsibility of the Greek Ministry of Rural Development and Food in cooperation with the National Chemical Laboratory and the Ministry of Public Order. Occasionally, the Greek Ministry for Development and Commerce may play a role.

Please note that imports 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 originate only from EU approved U.S. establishments.

## **Section II. Labeling Requirements**

### **A. General Requirements**

Food labeling and ingredient regulations for the most part have been harmonized within the EU. General provisions on the labeling, presentation and advertising of foodstuffs marketed in the EU are laid down in [European Parliament and Council Directive No 2000/13/EC](#). It applies not only to foodstuffs intended for sale to the ultimate consumer but also for supply to restaurants, hospitals and other mass caterers.

Nevertheless, Greece maintains specific labeling and ingredient rules for some food products that 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 GSCL. 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 Greek Ministry of Agriculture Port Authorities. 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.

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 Hellenic 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.

Note that the standard U.S. label does not comply with EU labeling requirements (<http://useu.usmission.gov/agri/label.html>). U.S. food products can generally be uniformly packaged for sale in all EU Member States based on the condition that they conform to the national law set forth in at least one member state.

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 Greek 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 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.

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.

### **All food products imported into Greece 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. 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 (excluding food products transited through Greek soil) must provide the following information:**

- a. Name of the product as commonly used in the trade.  
The name established by law or, if this is lacking, a brief description of the product.
- b. List of ingredients and food additives in descending order by weight.  
The following ingredients require a specific statement on the label: GMOs, packaging gases, sweeteners, aspartame, poly oils, quinine, caffeine, phytosterols, phyostanols, and licorice.
- c. Food allergen labeling rules were introduced by Directive 2003/89/EC that became effective on November 25, 2005. The following potential allergenic ingredients must be indicated on food labels: cereals containing gluten, crustaceans, eggs, fish, peanuts, soybeans, milk and dairy products (including lactose), nuts and nut products, sesame seeds, lupine and products thereof, mollusks and products thereof and sulphite at concentrations of at least 10 mg per kg or 10 mg/l, celery, and mustard. Allergen labeling also applies to alcoholic beverages.

Guidelines for the implementation of the allergen labeling rules are available on the Commission's website: [http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/guidelines\\_6\\_10.pdf](http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/guidelines_6_10.pdf).

- d. Quantitative ingredient declaration (QUID).  
The quantity of certain ingredients or categories of ingredients is mandatory in the following cases:

- Where the ingredient or category of ingredients appears in the name under which the foodstuff is sold;
- Where the ingredients or category of ingredients is usually associated with that name by the consumer;
- Where the ingredient or category of ingredients is emphasized on the labeling in words, pictures or graphics;
- Where the ingredient or category of ingredients is essential to characterize a foodstuff and to distinguish it from similar products.

The QUID declaration must be indicated in or immediately next to the name under which the product is sold, unless a list of ingredients is voluntarily indicated on the label in which case the quantity may appear in the list. The quantity of the ingredient, expressed as a percentage, must correspond to the quantity of the ingredient(s) actually used in the preparation of the product.

e. Metric units for all measurements.

The nominal net content or weight expressed in metric units: (weight in grams, liters, kilograms, centiliters, etc.). A small “e” on the label may be used to guarantee that the actual content corresponds to the quantity indicated.

f. Expiration date.

Every package must have listed the minimum shelf-life period. Preferred language is: “Best before end of DD/MM/YY”. It is also possible to state the time limit of consumption if the food is stored and prepared properly.

g. Storage and usage conditions.

Any special storage conditions or conditions of use should be stated. Instructions for use should be given as necessary.

h. Alcoholic content.

This is required for drinks with alcoholic content equal or greater than 1.2 percent alcohol in volume.

i. Name or business name and address of manufacturer, packager, vendor, and importer established within the European Union.

j. Country of origin. Particulars of the place of origin or provenance in case absence of such information might mislead the consumer.

k. Lot Marking.

Council Directive 89/396/EEC requires that foodstuffs carry a mark identifying the lot to which a foodstuff belongs.

l. Instructions for intended use.

m. Treatments undergone, with specific indications for irradiate or deep-frozen foods.

n. The actual alcoholic strength for beverages containing more than 1.2 percent alcohol by volume.

## **Additives**

- Annex II to the labeling directive lists the categories of additives, which must be designated by the name of their category followed by their specific name or EEC number. The categories are the following: color, preservative, anti-oxidant, emulsifier, thickener, gelling agent, stabilizer, flavor enhancer, acid, acidity regulator, anti-caking agent, modified starch, sweetener, raising agent, anti-

foaming agent, glazing agent, emulsifying salts, flour treatment agent, firming agent, humectants, bulking agent, propellant gas.

- Flavorings: Annex III to the labeling directive describes the way of designating flavorings in the list of ingredients.

### **Quinine and Caffeine**

Commission Directive 2002/67/EC requires the compulsory labeling of quinine and caffeine used in the production or preparation of foodstuffs (usually tonic waters and energy drinks). Quinine and caffeine must be mentioned in the ingredients list, preceded by the term "flavoring". Beverages containing more than 150 mg of caffeine per liter will have to be labeled with "high caffeine content" followed by the caffeine content expressed in mg/100 ml.

### **Phytosterols & Phytosterols**

Commission Regulation 608/2004 lays down labeling requirements for foods and food ingredients with added phytosterols, phytosterol esters, phytosterols and phytosterol esters (used to reduce cholesterol levels). For labeling purposes, they must be designated respectively by the terms "plant sterols", "plant sterol esters", "plant stanols" and "plant stanol esters".

### **Warnings on Labels**

Commission Directive 2008/5/EC establishes a list of foodstuffs that require a warning on the label:

- foodstuffs whose durability has been extended by means of packaging gases;
- foodstuffs containing (a) sweetener(s);
- foodstuffs containing added sugar(s) and sweetener(s);
- foodstuffs containing aspartame;
- foodstuffs containing more than 10% added polyols;
- confectionery or beverages containing liquorices.

As of July 20, 2010, Regulation 1333/2008 requires foodstuffs containing the food colors sunset yellow (E110), quinoline yellow (E104), carmoisine (E122), allura red (E129) and ponceau 4R (E124) to be labeled "may have an adverse effect on activity and attention in children". Food placed on the market or labeled before July 20, 2010, which do not comply with this provision may be marketed until their date of minimum durability or use-by-date.

Any non-edible parts of a packaging system that consumers could mistake for food must be labeled with the words "DO NOT EAT" and where technically possible carry the warning symbol established by Annex I of Regulation 450/2009.

### **Language Requirements**

As a general rule, labeling has to be in a language easily understood by consumers. However, as an exception to the general rule, it also is allowed to use:

- Another language, provided it can easily be understood by consumers.

- Other means depicting the content (e.g. pictures).

Multi-language labeling is allowed throughout the EU. For Greece, the language requirement requires that the label also be in Greek.

## **Labeling of Genetically Modified Foods**

Section VII of this report is entirely dedicated to the regulatory review and commercialization of genetically modified foods in the EU and provides information on EU labeling requirements for genetically modified foods and their derivatives. All foods and ingredients that are produced in whole or in part from genetically modified organisms should indicate this on their labels. The same rules apply to flavors and additives. For detailed information see Section VII.

## **B. Medical / Health / Nutrition Claims**

Medical claims that expressly or implicitly affirm or suggest that a food product has a healing (curative) or preventive effect are prohibited in the EU/Greek labeling directive. Only rather bland references that the product has general beneficial effects are allowed as long as these are not misleading to consumers. U.S. exporters of “health” foods, weight loss/diet foods, baby foods and vitamins should work closely with a Greek importer, since Greek labeling laws regarding health claims can be particularly stringent. Greek legislation sets forth orders, obligations and criminal sanctions for violations.

On July 1, 2007, a new EU regulation on nutrition and health claims entered into force. Regulation 1924/2006 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 that is marketed in the EU. Once the nutrient profiles, based on scientific evaluations by the European Food Safety Authority (EFSA) have been set, there will be another two-year period before the nutrient profiles begin to apply to allow food operators time to comply with the new rules.

Nutrition claims can fail one criterion (i.e., if only one nutrient (salt, sugar or fat) exceeds the limit of the profile) still be made provided the high level of that particular nutrient is clearly marked on the label. For example, a yogurt can make a low-fat claim even if it has high sugar content but only if the label clearly states “high sugar content”. Health claims cannot fail any criteria.

Regulation 353/2008 as amended by Commission Regulation 1169/2009 sets out implementing rules for applications for the authorization of health claims as provided for in Article 15 of Regulation 1924/2006.

A guidance document on how companies can apply for health claim authorizations can be downloaded from EFSA’s website at:

[http://www.efsa.europa.eu/EFSA/ScientificPanels/NDA/efsa\\_locale1178620753812\\_1178684448831.htm](http://www.efsa.europa.eu/EFSA/ScientificPanels/NDA/efsa_locale1178620753812_1178684448831.htm).

Trademarks and brand names that suggest health and/or nutritional benefits but do not comply with the new rules must be entirely removed from the EU market by January 19, 2022.

### C. Nutritional Value Labeling Ordinance

Nutrition labeling is not mandatory in the EU unless a nutrition claim is made on the label or in advertising messages. Nutrition labeling rules are laid down in Council Directive 90/496/EEC. The presence of a U.S. nutritional label (Nutrition Facts) may be considered to be equivalent to a nutritional claim and consequently its presence on the label requires drawing up the nutritional table according to European (and thus, Greek) standards as well. To avoid this problem, many U.S. products place their Greek language label over the portion of the U.S. label containing nutritional information.

The energy value and the proportion of nutrients must be declared in specific units per 100 grams or per 100 milliliters. Information on vitamins and minerals must be expressed as a percentage of the recommended daily allowance (RDA). The information on the label must be presented in tabular form with the numbers aligned or if space does not permit, in linear form in a language easily understood by the purchaser.

Commission Directive 2008/100/EC update the list of vitamins and minerals and their Recommended Daily Allowances (RDAs) and provide an EU definition of “fiber”. The conditions for the use of nutrition claims such as “source of fiber” or “high fiber” are laid down in Regulation 1924/2006 (see nutrition and health claims).

Nutrition labeling is usually optional in Greece and other EU countries, but it is compulsory if the label, advertising, or any other presentation contains a nutritional claim (see "Related Acts" in: [http://europa.eu/legislation\\_summaries/consumers/product\\_labelling\\_and\\_packaging/121092en.htm](http://europa.eu/legislation_summaries/consumers/product_labelling_and_packaging/121092en.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.

Greek 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. The European Food Information Council (EUFIC) 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	Energy value
Amount of proteins	Amount of proteins
Carbohydrates	Carbohydrates
Fats	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;
- 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.

When nutritional labeling is required, it 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 percent. A product may be labeled as “reduced calorie” if the calories are reduced by at least 30 percent 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.

## **D. Product-Specific Labeling**

For a number of products, specific labeling requirements have been established in addition to the general requirements described above. These include:

- genetically modified foods
- novel foods
- fortified foods
- foodstuffs for particular nutritional uses including dietetic and baby/infant foods
- beef
- wine
- spirit drinks
- olive oil
- organic foods
- cocoa and chocolate products, sugars, honey, fruit juices and similar products, preserved milk
- coffee extracts and chicory extracts, fruit jam, jellies, marmalades and chestnut puree
- fresh fruits and vegetables
- meat, poultry, eggs, dairy products, spreadable fats
- seafood
- pet food

## **E. Country of Origin Labeling**

In the EU, country of origin labeling is mandatory for beef and veal, fruit and vegetables, eggs, poultry meat, wine, honey, olive oil, aquaculture products and for organic products carrying the EU logo. For other products, the indication of the place of origin or provenance is mandatory only if the omission of such information might mislead the consumer.

## **F. 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.

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 N.107/2008 and 109/2008 of the 1924/2006 contain other relevant provisions

(See: <http://eurlex.europa.eu/JOHtml.do?uri=OJ:L:2008:039:SOM:EN:HTML>).

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 and laws in effect.

The competent authority for health claims in Greece is the National Pharmaceuticals Organization (EOF) operating under the 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 sets rules for applications to authorize health claims as provided in Article 15 of Regulation 1924/2006 (see also USEU Report No E48055, page 2).

### **Section III. Packaging and Container Requirements**

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

Council Directive 76/211/EEC (amended by Commission Directive 78/891/EEC) specifies the maximum tolerable error between the actual content and the quantity indicated on the label of prepackaged products.

Directive 2007/45/EC abolishes regulations on mandatory pack sizes at both EU and national levels. The Directive frees sizes for all prepackaged products except wine and spirits, coffee and white sugar. Member States in which mandatory nominal quantities are prescribed for milk, butter, dried pasta and coffee may maintain their restrictive rules until October 2012. The rules for white sugar may be maintained until October 2013. Mandatory nominal quantities for wines and spirits are set out in the Annex to Directive 2007/45/EC.

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

European Parliament and Council Regulation 1935/2004 specifies the main requirements for materials that come into contact with foodstuffs. It also sets out labeling and traceability requirements and the procedure for the authorization of substances through the European Food Safety Authority. Additional requirements will be proposed in specific measures and will include positive lists of authorized substances and materials. Annex I to regulation 1935/2004 lists the group of materials for which specific measures may be adopted. To date, specific directives have been developed for plastic materials (Commission Regulation 10/2011), recycled plastic materials (Commission Regulation 282/2008), regenerated cellulose film (Commission Directive 2007/42/EC) and ceramics (Council Directive 84/500/EC). In the case of ceramics, migration limits have been established for lead and cadmium. Materials must bear an indication "for food contact" or the symbol reproduced in Annex II to Regulation 1935/2004.

DG Sanco's webpage on food contact materials also provides guidance documents and contact

information with regard to the submission of applications for authorization:  
[http://ec.europa.eu/food/food/chemicalsafety/foodcontact/documents\\_en.htm](http://ec.europa.eu/food/food/chemicalsafety/foodcontact/documents_en.htm)

### C. Packaging Disposal Regulations

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 (HSCC decision No. 358/95 & 1028/96, Greek Food Code, Art. 26a);
- coatings (HSCC decision No. 446/98, Greek Food Code, Article 28);
- paper and board (HSCC decision No. 478/2004, Greek Food Code, Article 24);
- metals and alloys (HSCC decision No. 232/98, Greek Food Code, Article 22);
- cans (HSCC decision No. 232/98, Greek Food Code, Article 22).

The table below provides an overview of the EU legislation on food contact materials and implementation in Greece.

Materials/Substances	EU legislation	Greek implementation
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>

### D. 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 APHIS (Animal and Plant Health Inspection Service) inspector.

- **Presidential Decree No. 42** which entered into force on January 1, 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 Rural Development and Food (for specific info visit IPP website at:

<https://www.ippc.int/servlet/CDSServlet?status=ND1ucHBvZ3ImNj1lbiYzMz0qJjM3PWtvcw~~>)

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

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

Food additive use is fully harmonized within the EU (see [www.useu.be/agri/additive.html](http://www.useu.be/agri/additive.html)). The Greek food additive sector is governed by Council Directive 89/107/EEC that provides for the establishment of EU harmonized positive lists —lists of what is permitted— of a wide range of food additives.

Most food additives may be used only in limited quantities in certain foodstuffs. Food additives for which no quantitative limits have been established (maximum level established at “quantum satis”) must be used according to good manufacturing practice. This means using only as much as necessary to achieve the desired technological effect. Processing aids and flavorings fall outside of the scope of this directive. An important difference from U.S. legislation is the use of flour bleaching agents: chlorine, bromides, and peroxides that are not allowed in the EU.

European Parliament and Council Regulation 1333/2008 setting out the rules for the use of food additives has been in effect since January 20, 2010. This regulation provided for a revision of the food additives approved under the old directives in order to establish an EU positive list of food additives including colors and sweeteners.

Commission Regulation 1129/2011 establishes a list of all authorized food additives in foodstuffs as well as the conditions of use and amends Annex II to Regulation 1333/2008. Only additives placed in Annex II will be authorized for use in food products sold on the EU market. Regulation 1129/2011 will apply as of June 2013 in order to allow the Union's food industry to adapt to the new rules. Commission

Regulation 1130/2011 establishes a second list of food additives and amends Annex III to Regulation 1333/2008. This list concerns additives approved for the use in food ingredients such as other food additives, food enzymes, food flavorings and nutrients. Regulation 1130/2011 applies since December 2, 2011 but a transitional period of 24 months applies to preparations not complying with Parts 2, 3 and/or Section A of Part 5 of Annex III and until May 31, 2013 for preparations not complying with Parts 1 and 4 of Annex III. Until Annexes II and III become fully applicable, food additives approved under the old directives will continue to be permitted. The authorized uses of additives are from now on listed according to the category of food to which they may be added. The new legislation also provides for clear conditions under which additives may be added to food.

Commission Regulation 1131/2011 approves the sweetener steviol glycosides, commonly known as stevia, which is extracted from the leaves of the *Stevia Rebaudiana* Bertoni plant. Stevia's approval for its use in several food categories will allow industry to innovate and to develop new products. Annex II to Regulation 1333/2008 is amended accordingly.

Additionally, Regulation 1333/2008 also provides for an evaluation program set up by Commission Regulation 257/2010 for food additives permitted before January 2009. Those food additives shall be subject to a new risk assessment carried out by EFSA and the re-evaluation of approved food additives shall be completed by the end of:

- 2015 for food colors (currently listed in Directive 94/36/EC)
- 2018 for all additives other than colors and sweeteners (currently in Directive 95/2/EC)
- 2020 for all sweeteners (currently listed Directive 94/35/EC)

Annex I of Regulation 1333/2008 lists the approved food additives for which the re-evaluation by EFSA was already completed at the time of adoption of Regulation 257/2010. Foods containing any of the six food colors Quinoline Yellow (E104), Sunset Yellow (E110), Ponceau 4R (E124), Tartrazine (E102), Azorubine/Carmoisine (E122) and Allura Red AC (E129), will have to be labeled with the phrase, may have an adverse effect on activity and attention in children (Annex V to Regulation 1333/200). For an overview of the rules in force until the new regulation becomes applicable see the 2008 FAIRS report (GAIN report E48078). An important difference from U.S. legislation is the use of flour bleaching agents: chlorine, bromates, and peroxides are not allowed in the EU.

See also the Commission's food additives database that contains all necessary information on the different food additives allowed in the EU: <http://useu.usmission.gov/agri/additive.html>.

Greece has implemented the EU legislation on additives and flavorings in food into its national legislation. Greek competent authorities are the National Chemical Laboratory (NCL) and accredited laboratories for testing (only in the public sector and state universities); the Ministry of Public Health, the Ministry of Rural Development and Food, and the National Agency for Food Control (EFET).

## **B. Flavorings**

Regulation 1334/2008 on flavorings and certain food ingredients with flavoring properties sets specific rules for the use of the term "natural." The new rules went into force on January 20, 2011. The register

of all flavoring substances —as last amended by Commission Decision 2009/163/EC— authorized in the EU is being reviewed before inclusion in Annex I of the new Regulation as the community list of authorized substances. Regulation 2232/96, currently still in force, will be repealed when the new list is published. Substances that are subject to restrictive or prohibitive measures in certain member states have been marked.

A Community procedure for the safety assessment and the authorization of smoke flavorings intended for use in or on foods is established in Regulation 2065/2003.

### **C. Enzymes**

Regulation 1332/2008 on food enzymes introduces harmonized rules for their scientific evaluation and authorization in the EU and establishes labeling requirements. Until the adoption of an EU positive list of authorized enzymes, the existing national provisions on the marketing of food enzymes will continue to apply. Regulation EC 234/2011 regarding the implementation of the common authorization procedure sets out a deadline of two years starting from September 11, 2011, to submit applications on existing and new enzymes and for industry to provide the information for the risk assessment.

## **Section V. Pesticides and Contaminants**

Current EU pesticide legislation has not been fully harmonized within member states. Regulation 1107/2009 sets out new rules for the authorization of plant protection products (PPPs) and replaces Directive 91/414/EEC. It entered into force at the end of December 2009 and became fully applicable June 14, 2011. This Regulation establishes a list of approved active substances. Only PPPs containing active substances included in the list may be authorized for use in the EU. Member States can approve PPPs containing the active substances. According to the new Regulation, the EU is divided in three different zones. Once a Member State approves the PPP, it can be mutually recognized and thus authorized within the same EU zone as set out in Annex I of the Regulation. The Maximum Residue Levels (MRLs) for substances not on the list will be set at default level of 0.01 mg/kg. The legislation allows exporters to request an "import tolerance" for active substances not yet evaluated or in use in the EU.

### **MRLs: Regulation 396/2005**

Since September 2008, Regulation 396/2005 has harmonized all MRLs in the EU on food or feed of plant and animal origin. Pesticide MRLs for processed or composite products are based on the MRLs of the raw agricultural ingredients.

Commission Directive 2002/63 /EC establishes harmonized sampling methods for the official control of residues in and on products of plant and animal origin. Commission Regulation 915/2010 requires Member States to take and analyze samples for product and pesticide residue combinations in food of plant and animal origin. Annex I to the Regulation sets out the pesticide and product combinations to be monitored. Annex II sets out the number of samples that need to be taken for each combination. The

Member States must submit results of the sample tests to the EU by 31 August 2013, 2014 and 2015 for samples tested in 2012, 2013 and 2014 respectively.

The competent authority on controls and tests for MRLs (maximum residue levels) in Greece is the Ministry of Rural Development and Food through its laboratories and regional control centers (known as KEPYELS).

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

### **Maximum Levels**

EU wide harmonized maximum levels for contaminants are set in the Annex of Commission Regulation 1881/2006. The Annex to Regulation 1881/2006 includes maximum levels for:

- nitrates in lettuce, spinach and infant food (section 1);
- mycotoxins (section 2);
- aflatoxins in nuts, dried fruit, cereals, maize, spices, milk and infant food;
- ochratoxin A in cereals, cereal products, dried vine fruit, roasted coffee, soluble coffee, wine, grape juice, spices, infant; food and licorice;
- patulin in fruit juices, spirit drinks, solid apple products, apple juice and infant food;
- deoxynivalenol in cereals, cereal products, maize, pasta and infant food;
- zearelenone en cereals, cereal products, maize, refined maize oil, bread and small bakery wares and infant food;
- fumonisins in maize and maize based products;
- T-2 and HT-2 toxin in cereals and cereal products;
- heavy metals (section 3);
- lead in milk, infant food, meat, offal, seafood, vegetables, fruit, wine and food supplements;
- cadmium in meat, seafood, cereals, soybeans, vegetables, fruit, fungi and food supplements;
- mercury in seafood and food supplements;
- tin in canned foods, canned beverages and canned baby foods;
- 3-MCPD in vegetable protein and soy sauce (section 4);
- dioxin and PCBs in meat, liver, fishery products, milk, eggs and oils & fats (section 5);
- polycyclic aromatic hydrocarbons (PAH) in oils & fats, infant foods, (smoked) meat, fish and infant food (section 6).

### **Import Conditions for U.S. Almonds**

In September 2007, the EU implemented special import conditions which called for mandatory testing of U.S. almonds imported into the EU. USDA and the California almond industry have developed a “Voluntary Aflatoxin Sampling Plan (VASP)” comparable to the EU sampling procedures so that almonds can be uniformly tested before they are shipped to the EU. Per Commission Regulation 1152/2009, these procedures are considered to provide sufficient assurances, which means that almonds shipped under VASP are subject to random controls. Almonds not controlled under VASP continue to be subject to 100 percent border controls. The Regulation covers almonds in shell or shelled, roasted

almonds and mixtures of nuts or dried fruits containing almonds, and foodstuffs containing a significant amount of almonds (at least 20 percent).

Regulation 1152/2009 also introduces the use of a Common Entry Document (CED). Importers have to provide prior notification to the competent authorities at the designated port of entry for the goods covered by the regulation at least 1 working day prior to the arrival of the goods, using the CED. The CED was published as Annex II to Regulation 669/2009. Provisions for methods of sampling and analysis for the official control of mycotoxins including aflatoxins are laid down in Commission Regulation 401/2006.

### **Residues in Animals and Animal Product**

The monitoring of residues in animals and animal products is addressed separately in Council Directive 96/23/EC. This directive includes the monitoring of the pesticide residues as well as residues of veterinary drugs and a wide range of other contaminants and undesired substances such as residues of growth promotants. The prohibition of the use of hormones in meat production is addressed in Council Directive 96/22/EEC (amended by Directive 2008/97/EC).

## **Section VI. Other Regulations and Requirements**

### **A. Product Inspection and Registration**

Member States are responsible for carrying out inspections on a regular basis and in cases where non-compliance is suspected. Products can be checked at import or at all further stages of marketing. 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. The weekly reports of the notifications under the rapid alert are available on the European Commission's website ([http://ec.europa.eu/food/food/rapidalert/index\\_en.htm](http://ec.europa.eu/food/food/rapidalert/index_en.htm)). The information published on the website is limited to the notifying country, the reason for notifying and the country of origin. Repeated non-compliance may lead to suspension of imports or special import conditions for products from the third country concerned, applicable on the entire EU territory.

The criteria for laboratories conducting food controls have been EU harmonized but it is the responsibility of each Member State to designate laboratories authorized to perform analyses (Council Directives 89/397/EEC and 93/99/EEC).

Specific detailed inspection requirements exist for animal products (Directive 97/78/EC). Inspections are carried out under the supervision of a veterinarian at a limited list of ports and border inspection posts (BIP's – Border Inspection Post.)

In Greece, random checks are performed at import or at later stages of trading by 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).

**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 Greek Authorities to accompany nuts and specific dried fruit (i.e. prunes) issued by accredited laboratories in the country of origin. Greek 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 simplified export certificate or VII 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. That 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 (Greek Ministry of Agriculture, 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 that 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 Greek Ministry of Rural Development and Food - 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>.

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**

[http://www.fas.usda.gov/posthome/useu/Certification\\_Guide.html](http://www.fas.usda.gov/posthome/useu/Certification_Guide.html)

Detailed information on certification is also available on the website:

[http://www.fas.usda/posthome/useu/Certification\\_Guide.html](http://www.fas.usda/posthome/useu/Certification_Guide.html).

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.

- Food and agricultural products destined for the Greek market require an import license issued by the competent Greek authority (either Ministry of Rural Development and Food or Ministry 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. Please 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;
- 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.

### C. 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 EU. 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), under the Ministry of Rural Development and Food.

### D. 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 Greek authorities for all imported plants and plant products in compliance with EU's Plant Health Directive 2000/29/EC of 8 May 2000 (with the incorporated amendments to date). A USDA/APHIS phytosanitary certificate must accompany imports of fresh fruits, vegetables, and unprocessed nuts. The certificate is used to certify that the commodities have been inspected and that they comply with the importing country's phytosanitary regulations.

**Wheat of U.S. Origin:** Milling wheat, feed wheat, and wheat seed for planting are checked for Karnal bunt contamination by the Greek phytosanitary authorities, and must be 100 percent-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 - European Plant Protection Organization). 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 Greek. This fact has discouraged Greek grain importers from buying U.S. milling wheat for twelve years while similar Canadian wheat is still purchased. The competent authority for the adoption and implementation of EU legislation is the Phytosanitary Division of the Greek Ministry of Rural Development and Food. 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.

### E. 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. Actually, 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.

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 few years, numerous misunderstandings between Greek 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 Greek customs veterinarians, mislabeling of cartoon boxes, etc.

## **F. 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 related mainly 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 fully implements 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.

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

### **A. Genetically Modified Food and Feed**

EU Regulation 1829/2003 (articles 12-13) establishes labeling regulations for GM food products. These rules apply to products that have undergone varying degrees of processing. The regulation does not require labeling of food products that are not food ingredients, such as processing aids (i.e. rennet in cheese production, yeast in wine production). Meat, milk or eggs obtained from animals fed with GM feed or treated with GM medicinal products do not require GM labeling. The traceability rules require all business operators to transmit and retain information on GM products in order to identify both the supplier and the buyer of the GM product.

All food products containing or consisting of GMOs, produced from GMOs or containing ingredients produced from GMOs must be labeled even if they no longer contain detectable traces of GMOs. The allowable adventitious presence level for EU-approved varieties of GMOs is set at 0.9 percent. Above this level, all products must be labeled. For GM varieties that received a positive EU risk assessment but are not yet formally approved, the adventitious presence level is set at 0.5 percent. A list of these varieties is available at [http://ec.europa.eu/food/food/biotechnology/gmfood/events\\_en.pdf](http://ec.europa.eu/food/food/biotechnology/gmfood/events_en.pdf).

The wording to be used on GM food labels is as follows:

- Where the food consists of more than one ingredient, the words “genetically modified” or “produced from genetically modified [name of ingredient]” must follow in brackets immediately after the ingredient concerned. A compound ingredient with a GM component should be labeled “contains [name of ingredient] produced from genetically modified [name of organism]”.  
Example: a biscuit containing soy flour derived from GM-soy must be labeled “contains soy flour from genetically modified soy.”
- Where the ingredient is designated by the name of a category (e.g., vegetable oil), the words “contains genetically modified [name of organism]” or “contains [name of ingredient] produced from genetically modified [name of organism]” must be used. Example: for vegetable oils

containing rapeseed oil produced from genetically modified rapeseed, the reference “contains rapeseed oil from genetically modified rapeseed” must appear in the list of ingredients. The designations may appear in a footnote to the ingredients list, provided that they are printed in a font at least the same size as that of the list of ingredients or, where there is no list of ingredients, clearly on the labeling.

- Where there is no list of ingredients, the words “genetically modified” or “produced from genetically modified [name of ingredient]” must appear clearly in the labeling.

[Commission Regulation 619/2011](#) sets a tolerance of 0.1 percent - “Low Level Presence” (LLP) – for adventitious traces of non EU-authorized GMOs in feed imports. For more information, see the European Commission press release “Questions and Answers on the low level presence (LLP) of GMOs in feed imports”. The Commission may come forward with proposals dealing with LLP in food imports.

Greece incorporates EU regulations on GM foods and feed, but has yet to comply with EU decisions. A clear policy is also needed to fairly regulate, inspect, and label food imports.

**Seeds for planting:** In addition to the APHIS phytosanitary certificate, Greek authorities require laboratory certification (issued before shipment from the United States) for the non-presence of transgenic material in imported cottonseed for planting (zero tolerance required). For corn seed for planting the tolerance level is set at 0.5 percent 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.

## B. Novel Foods

<http://www.fas.usda.gov/posthome/useu/novelfood.html>

The Novel Food Regulation 258/97 lays down detailed rules for the authorization of novel foods and novel food ingredients, including foods derived from, containing, or consisting of GMOs. It defines novel foods as foods and food ingredients that were not used to a significant degree in the EU before May 15, 1997. The new regulations on GM food provide for a separate regime to deal with the authorization and traceability of novel foods and novel food ingredients that consist of, or contain, or are derived from GMOs. Pre-market approval of non-GM novel foods will continue under European Parliament and Council Regulation 258/97.

Non-GM categories of novel foods consist of food and food ingredients:

- with a new intentionally modified primary molecular structure, or
- consisting of, or isolated from, micro-organisms, fungi or algae, or
- consisting of, or isolated from plants or animals, except for foods and food ingredients obtained by traditional propagating or breeding practices with a history of safe use, or
- to which a production process not currently used has been applied, where that process changes the composition or structure of the food or food ingredient significantly.

The full list of novel food applications and authorizations/rejections/withdrawals is available from [http://ec.europa.eu/food/food/biotechnology/novelfood/app\\_list\\_en.pdf](http://ec.europa.eu/food/food/biotechnology/novelfood/app_list_en.pdf).

### **C. Fortified Foods**

Regulation 1925/2006 establishes an EU-wide regulatory framework for the addition of vitamins and mineral and of certain other substances such as herbal extracts to foods. It lists the vitamins and minerals that may be added to foods and sets criteria for setting maximum and minimum levels. Although originally scheduled for January 2009, the Commission is still working on a proposal to set maximum permitted levels of vitamins and minerals in foods and food supplements. Minimum amounts are linked to the notion of “significant amount” as defined in the Annex to Council Directive 90/496/EEC on nutrition labeling. The use of vitamins and minerals not included in the annexes to Regulation 1925/2006 is not allowed.

Member States may under certain conditions provide for a temporary derogation (until January 19, 2014) for vitamins and minerals not included in the annexes.

### **D. Dietetic or Special Use Foods**

New framework Directive 2009/39/EC consolidates Directive 89/398/EEC and all its amendments into a single text and lays down rules for foodstuffs intended for particular nutritional uses. These are foodstuffs, which due to their special composition or manufacturing process can clearly be distinguished from foodstuffs for normal consumption. Commission Regulation 953/2009 lists the substances (vitamins, minerals and aminoacids) that may be added for specific nutritional purposes in foodstuffs for particular nutritional uses.

Provisions regarding compositional and hygiene requirements, quality of raw materials, a list of additives/substances, specific labeling requirements, sampling procedures and analysis methods have been laid down in specific directives for four product categories:

- Commission Directive 2006/125/EC on processed cereal-based foods and baby foods for infants and young children;
- Commission Directive 96/8/EC on foods intended for use in energy-restricted diets for weight reduction;
- Commission Directive 2006/141/EC on infant formula and follow-on formula, amended by Commission Regulation 1243/2008 as regards compositional requirements for certain infant formulae;
- Commission Directive 1999/21/EC on dietary foods for special medical purposes;
- Commission Regulation 41/2009 lays down new EU harmonized rules for the composition and labeling of foodstuffs suitable for people who are intolerant to gluten. This regulation, applicable as of January 1, 2012, sets conditions for the use of the terms “very low gluten” and “gluten-free.” For more information see GAIN report E49009 “New EU labeling rules for “gluten free” foods.

## **E. Single Common Market Organization (CMO)**

Council Regulation 1234/2007 establishes a single common market organization (CMO) for all agricultural products and replaces the 21 existing specific CMOs for different agricultural sectors. The single CMO provides definitions and marketing rules for rice, sugar, beef and veal, milk and milk products, eggs and poultry meat, olive oil, fruit and vegetables, spreadable fats, and wine.

### **Animal Products - Veal**

Annex XIa to Council Regulation 1234/2007 classifies bovine animals aged less than 12 months in two categories: 1) “category V” - bovine animals aged 8 months or less and 2) “category Z” - bovine animals aged more than 8 months but less than 12 months. For both categories, Annex XIa lists the sales descriptions in the different Member States languages and the mandatory labeling requirements.

### **Fruit and Vegetables**

<http://www.fas.usda.gov/posthome/useu/Fruit-Veg.html>

Commission Regulation 543/2011 lays down detailed rules for the implementation of Article 113 of the single CMO. This regulation sets out specific marketing standards for 10 products: apples, citrus fruit, kiwi fruit, lettuces, peaches and nectarines, pears, strawberries, sweet peppers, table grapes and tomatoes. Fruits and vegetables not covered by a specific marketing standard must comply with the general marketing standard. The details of the general marketing standard are set out in Part A of Annex I to Regulation 543/2011. The following products are not required to conform to the general marketing standard: mushrooms (other than cultivated mushrooms), capers, bitter and shelled almonds, shelled hazelnuts, shelled walnuts, pine nuts, pistachios, macadamia, pecans and saffron. Products conforming to UNECE standards are considered as conforming to the general marketing standard. Marketing standards apply at all marketing stages including import. For more information see the European Commission’s “[Fruit and Vegetables Marketing Standards](#)” webpage.

Fruit and vegetables destined for the processing industry are not required to conform to the marketing standards provided they are clearly marked “intended for processing” or “for animal feed or other non-food use”.

Fresh fruits, vegetables and nuts are subject to phytosanitary controls and are checked for compliance with the quality standards and labeling requirements. A conformity certificate (Annex III to Regulation 543/2011) - to be obtained by the importer at the point of entry - is required for all shipments of fresh produce.

### **Wine, Beer and Other Alcoholic Beverages**

Council Regulation 479/2008 establishes general rules on oenological practices, designations of origin and labeling. The provisions of this regulation as well as the implementing rules have been incorporated into Council Regulation 1234/2007 (Single CMO). As the implementing rules were only published on July 24, 2009, a transitional period was provided in order to ease the transition to the new requirements. Wines placed on the market or labeled before December 31, 2010, that comply with the provisions applicable before August 1, 2009 (rules laid down in Council Regulation 1493/1999), may be

marketed until stocks are exhausted. Commission Regulation 607/2009 lays down detailed EU labeling rules.

Ingredients that may trigger an allergic reaction must be included on the label preceded by the word “contains.” Alcoholic beverages with sulphite concentrations of more than 10 mg/liter must use one of the following terms: “sulphites,” “sulfites,” “sulphur dioxide” or “sulfur dioxide.” The indication of sulphites may be accompanied by the pictogram included in Annex X to Regulation 607/2009. Replacing the word “sulphites” by “SO<sub>2</sub>” or the E-number (E220) is not allowed.

The indication of the wine grape variety on the label is optional. For third country wines, the wine grape variety must be included in at least one of the lists established by the “International Organization of Vine and Wine (OIV), the “Union for the Protection of Plant Varieties (UPOV)” or the “International Board for Plant Genetic Resources (IBPGR)”. Terms such as “barrel matured”, “barrel aged” (listed in Annex XVI to Regulation 607/2009) may not be used on wines produced with the aid of oak chips.

Specific rules for organic wines have not yet been adopted. Council Regulation 834/2007 establishes terms referring to the organic production of grapes.

### **U.S.-EU Wine Agreement**

In March 2006 was signed the “Agreement between the United States and the European Community on Trade in Wine.” This Agreement is the first phase and addresses a number of issues, such as labeling and certification. Other important issues such as geographical indications will be addressed in a second phase of the negotiations. The Agreement covers wine with an actual alcohol content of not less than 7 percent and not more than 22 percent. All U.S. wine imports must be accompanied by certification and analysis documentation using the format specified in Annex III (a) to the Agreement.

More information on the simplified EU import certificate form can be obtained from the Alcohol and Tobacco Tax and Trade Bureau at [http://www.ttb.gov/industry\\_circulars/archives/2007/07-02.html](http://www.ttb.gov/industry_circulars/archives/2007/07-02.html). The Agreement’s “Protocol on Wine Labeling” sets conditions for the use of optional particulars on wine labels. Commission Regulation 1416/2006, as amended by Commission Implementing Regulation 1212/2011, concerns the protection of U.S. names of origin in the EU. Information on the US-EU Wine Agreement can also be obtained from the U.S. Dept. of the Treasury - Alcohol and Tobacco Tax and Trade Bureau (<http://www.ttb.gov/itd/index.shtml>).

### **F. Organic Foods**

Council Regulation 834/2007 lays down a new legal framework for organic production and the labeling of organic products. This regulation covers living and unprocessed products including aquaculture, processed products, animal feed, seeds, and propagating material. Title IV lays down general rules for the labeling of organic products; Title VI covers trade with third countries. Processed food products can be labeled as organic only if at least 95 percent of the ingredients is organic. Food products containing less than 95 percent organic ingredients may refer to the organic production method in the ingredients list only. The Annex to Regulation 834/2007 lists the term “organic” in all the official EU languages. Derivatives or diminutives such as “bio” and “eco” may used only to label products that comply with

the EU organic production rules.

Commission Regulation 889/2008 lays down detailed rules for the implementation of Regulation 834/2007 with regard to production, labeling, and control. On July 1, 2010, the use of the new EU organic logo became mandatory for all pre-packaged organic products produced in the EU (with a 2-year transitional period) and optional for products from third countries complying with EU organic standards. The model logo is published in Annex XI-A of Regulation 889/2008. Annex XI-B sets out the format of the code number of the control body or authority. This code number together with an indication of the place of farming of the agricultural raw materials must be placed below the EU organic logo. More information on organic food labeling is available in GAIN report E48106.

Commission Regulation 1235/2008 lays down rules for the implementation of Regulation 834/2007 as regards the arrangements for imports of organic products from third countries. In order to export organic products to the EU, third countries must prove that their production standards are equivalent to the EU standards. For third countries currently not included in the EU's equivalency list, the Commission will compile a list of recognized control bodies and control authorities. To be included in the EU list, U.S. control bodies/authorities must submit a technical dossier. In December 2011 Implementing Regulation 1267/2011 amending regulation 1235/2008 was published in Official Journal L 324. This Regulation contains the first list of recognized certifiers, including seven U.S. certifiers; Washington State Department of Agriculture, Organic crop improvement association, Oregon Tilth, Quality Assurance International, International Certification Services Inc., Organic Certifiers and California Certified Organic Farmers. To avoid trade interruptions, Member States can —until January 1, 2013— continue to grant authorizations to importers of U.S. organic products on a case-by-case basis. The model certificate established by Regulation 1235/2008 must accompany shipments of organic products. The European Commission has published [guidelines on imports of organic products](#) into the EU on its website.

## G. Beef & Meat Labeling

### Beef

A compulsory beef-labeling scheme has been in place since September 2000. Full implementation of the beef-labeling scheme went into effect on January 1, 2002 (Regulations 1760/2000 and 1825/2000). Under this scheme, labels for all bovine meat must indicate the following information:

“Born in: name of third country”
“Reared in: name of third country or third countries”
For beef derived from animals born, raised and slaughtered in the same third country, the above indications may be combined as “Origin: name of third country”
A reference number ensuring the link between the meat and the animal or animals
“Slaughtered in: third country / approval number of slaughterhouse”
“Cutting in: third country / approval number of cutting plant”
A traceability code linking the meat to the animal or a group of animals representing the production of maximum one day

## **Meat**

Commission Directive 2001/101/EC, amending general labeling Directive 2000/13/EC, sets out the definition of “meat” for labeling purposes. This definition does not cover mechanically separated meat as it is still subject to Member State legislation. The Commission may propose legislation to harmonize the definition of mechanically separated meat.

## **H. Health & Identification Marks**

The EU’s “Food Hygiene Package” introduced new rules concerning the application of health and identification marks. Chapter III of the European Parliament and Council Regulation 854/2004 lays down rules for applying a health mark to fresh meat. More information on the EU health mark is available on FSIS’s website at

[http://www.fsis.usda.gov/regulations\\_&\\_policies/European\\_Union\\_Requirements/index.asp](http://www.fsis.usda.gov/regulations_&_policies/European_Union_Requirements/index.asp).

Annex II to the European Parliament and Council Regulation 853/2004 lays down rules for applying an identification mark to products of animal origin. Linear presentation of the required information is allowed only for imports from EU-approved establishment in third countries.

More information on the EU’s identification mark is available on AMS’s website at

<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5061042>.

## **I. Frozen Foodstuffs**

Council Directive 89/108/EEC sets rules for quick-frozen foodstuffs and for their packaging and labeling. Quick-frozen foodstuffs sold to the final consumer should carry the following additional labeling indications: the product name with the indication “quick-frozen”; the date of minimum shelf life; the period during which the purchaser may store the product; the storage temperature and/or type of storage equipment required; batch identification; a clear indication of the type “do not re-freeze after defrosting”.

## **J. Seafood**

Council Regulation 2406/96 lays down common marketing standards fishery products. Fishery and aquaculture products offered for retail sale in the EU must be properly labeled providing the following information:

- Commercial name of the species (each member state has established a list of commercial designations);
- Product method: “caught in...,” “caught in freshwater,” “farmed,” or “cultivated.”
- Catch area: for products caught at sea, a reference to one of the areas listed in the annex.
- For products caught in freshwater: a reference to the country of origin.
- For farmed products: a reference to the country in which the product undergoes the final development stage.

Operators may indicate a more precise catch area. To improve the traceability and control at all

marketing stages - from the ship to the shop - the information concerning the commercial designation, the production method, and the catch area for all fishery and aquaculture products must be provided either on the label, on the packaging or by means of a commercial document accompanying the goods (e.g. the invoice).

Detailed information on exporting U.S. seafood to the EU is available in the 2010 update of the “How to export seafood to the European Union” guide which can be downloaded from <http://www.fas.usda.gov/posthome/useu/NOAA-Export-to-the-EU-Guide.pdf>.

## **K. Pet Food**

European Parliament and Council Regulation 767/2009 sets out new rules for the labeling and marketing of feed and pet food. It covers feed materials, compound feed and medicated or dietetic feed for both food and non-food producing animals. Feed and pet food not complying with Regulation 767/2009 and with the provisions on feed additives laid down in Regulation 1831/2003 and Directive 90/167/EC will not be allowed on the EU market. New requirements relate to the indication in descending order of weight of feed materials in compound feed, claims, the establishment of a non-exhaustive “Catalog of Feed Materials” and “Codes of Good Labeling.” For more information see GAIN report E50060 “EU Feed and Pet Food Labeling Requirements.”

Commission Regulation 575/2011 establishes a new catalogue of feed materials. It enables operators to use more precise names and expressions for the feed they place on the market. The annex to the Catalogue contains three parts: A) general provision, B) glossary of processes and C) list of feed materials. The use of the Catalog is voluntary but where it is used all relevant provisions have to be complied with. Commission Recommendation 2011/25/EU establishes guidelines for the distinction between feed materials, feed additives, biocidal products, and veterinary medicinal products. A “Code of Good Labeling Practice for Pet Food” drafted by the European Pet Food Industry (FEDIAF) was published on October 20, 2011.

A health certificate signed by APHIS officials must accompany pet food imported for commercial sale that contains product of animal origin. APHIS veterinary services will endorse certificates after facilities have been officially approved as compliant with Regulation 1774/2002. A statement guaranteeing that SRMs (specified risk materials) have been removed needs to be added to the certificate. The APHIS website can be viewed at [www.aphis.usda.gov](http://www.aphis.usda.gov).

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

### **A. Trademarks**

Community trademark policy was created by Council Regulation 40/94 and implemented by Commission Regulation 2868/95. This regulation creates a single, unitary registration system covering the whole Community territory. In practice, a Community trademark must meet two conditions: it must be a sign that can be represented in graphic form, and it must make it possible to distinguish goods and services from those of another company. It is valid for a period of 10 years. On completion of the registration procedure, the trademark is registered in the Register of Community 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, interested parties 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 Greek Ministry of Development and Commerce. It is highly recommended that U.S. exporters to Greece pursue trademark registration.

Greece is a member of the Patent Cooperation Treaty (PCT). Patents are filed in Greece in Greek and English.

## **B. Protected Geographical Indications**

Geographical indications (GIs) are “indications which identify a good where a given quality, reputation or characteristic of the good is essentially attributable to its geographic origin”. Council Regulation 510/2006 on the protection of geographical indications/designations of origin for listed European agricultural products and foodstuffs repealed Regulation 2081/92 to bring its rules in line with a WTO ruling. The new regulation allows third country operators to submit registration applications directly to the Commission rather than through their governments and deletes reciprocity requirements. It also allows third countries to object directly to new registrations. Guidelines for the registration of GIs by third country producers have been published on the Commission’s website at [http://ec.europa.eu/agriculture/foodqual/protect/thirdcountries/proced\\_en.pdf](http://ec.europa.eu/agriculture/foodqual/protect/thirdcountries/proced_en.pdf).

The complete list of registered product names that receive protection in the EU can be found at [http://ec.europa.eu/agriculture/qual/en/1bbaa\\_en.htm](http://ec.europa.eu/agriculture/qual/en/1bbaa_en.htm).

The European Commission’s website provides guidance on how to register a PDO/PGI or how to object to a PDO/PGI proposed for registration. Lists of protected names by country, product type, registered name and name applied for are available through the Commission’s online “DOOR” (Database of Origin and Registration) database at <http://ec.europa.eu/agriculture/quality/door/list.html;jsessionid=pL0hLqqLXhNmFQyFl1b24mY3t9dJQPflg3xbL2YphGT4k6zdWn34!-370879141>

The EU has granted a Protected Geographical Indication (PGI) to a variety of Greek products including 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. 20 Greek locations have been recognized for the production of OPAP (Appellation of Origin of Superior Quality) wines in Greece and Wines of Appellation of Controlled Origin (OPE). Only sweet wines, produced in 8 recognized regions, can be designated OPE.

## Section IX. Import Procedures

Council Regulation 2913/92 establishes the Community Customs Code. The Code lists all the customs procedures applicable to the trade in goods with third countries. Import duties are determined by the tariff classification of goods and by the customs value. With the implementation of the Code, the Member States of the European Union form a customs union that means that all the Member States apply the same tariff on goods imported from outside the EU. Once an imported good is cleared in one Member State, it can move freely throughout the EU, and therefore also to Greece.

Products are examined when they enter Greece by border inspection posts (BIP's – Border Inspection Post). Health authorities or laboratories perform tests and relative analysis of samples. Import operations can be completed and the product may enter commerce within 48 hours from the time of arrival at port if no specific problems arise from the import document inspection or sample testing.

European Parliament and Council Regulation 648/2005, a “security amendment” to Regulation 2913/92, introduces a number of measures to tighten security for goods crossing international borders. The provisions to implement the security amendment to the Customs Code are established by Council Regulation 1875/2006. Starting January 1, 2011, all traders involved in customs transactions have to provide EU customs authorities with security data on goods before they are imported into the EU. The type of security data requested varies according to the means of transport and can include a description of the goods, information on the consignor or exporter, the route of the goods and any potential hazards. The time limits for submitting advance security data also vary according to the means of transport: 24 hours for maritime cargo to 1 hour for road traffic and air transport. The European Commission's DG for Taxation and Customs Union has created a “[European Customs Information Portal](#)” to communicate information for traders on the safety and security amendment to the Community Customs Code.

The EU uses the Combined Nomenclature (CN) for the customs classification of goods. The CN eight digit code numbers are based on the Harmonized System (HS) nomenclature: the first six digits refer to the HS headings; the two following digits represent the CN subheadings. The EU's on-line customs database can be consulted to look up commodity codes and relevant import duties:

[http://ec.europa.eu/taxation\\_customs/dds2/taric/taric\\_consultation.jsp?Lang=en&redirectionDate=20101215](http://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en&redirectionDate=20101215). The [EU's 2012 Tariff Schedule](#) was published on October 28, 2011 in Official Journal L 282.

It is also possible to obtain Binding Tariff Information (BTI) from a member state's customs authority to get the proper product classification. Through this system, traders know in advance the tariff classification of the goods they intend to import. BTI is legally binding in all the member states. Information on how to obtain a BTI can be downloaded from

[http://ec.europa.eu/taxation\\_customs/customs/customs\\_duties/tariff\\_aspects/classification\\_goods](http://ec.europa.eu/taxation_customs/customs/customs_duties/tariff_aspects/classification_goods)

[/index\\_en.htm](#).

Goods are only released after payment of the import duty and other taxes that may be due. Duties payable on goods imported into the EU may include:

- import duty (expressed as ad valorem tariffs or specific tariffs per unit weight/volume/number of pieces);
- additional duties on flour and sugar (processed products) entry price (fruit and vegetables);
- environmental taxes - not harmonized;
- inspection fees - not harmonized;
- Value Added Tax (VAT) - not harmonized;
- excise duties (alcohol and tobacco) - not harmonized.

A list of VAT rates applicable in the different Member States can be found at:

[http://ec.europa.eu/taxation\\_customs/taxation/vat/consumers/vat\\_rates/index\\_en.htm](http://ec.europa.eu/taxation_customs/taxation/vat/consumers/vat_rates/index_en.htm).

A list of excise duties applicable on alcoholic beverages and tobacco can be found at:

[http://ec.europa.eu/taxation\\_customs/taxation/excise\\_duties/alcoholic\\_beverages/rates/index\\_en.htm](http://ec.europa.eu/taxation_customs/taxation/excise_duties/alcoholic_beverages/rates/index_en.htm)  
and

[http://ec.europa.eu/comm/taxation\\_customs/taxation/excise\\_duties/tobacco\\_products/rates/index\\_en.htm](http://ec.europa.eu/comm/taxation_customs/taxation/excise_duties/tobacco_products/rates/index_en.htm)  
[m](#) respectively.

Greek 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).

Imported products must 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.

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)).

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.

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

### MAJOR GREEK AND EUROPEAN REGULATORY AGENCIES

#### **Ministry of Rural Development and Food**

Directorate of Plant Production

Phytosanitary and Plant Protection Division

150, Sygrou Avenue

17671 Athens-Kallithea

Greece

Phone: +30 210 9287232; +30 210 9287233

Fax: +30.210.9287234

E-mail: [syg059@minagric.gr](mailto:syg059@minagric.gr); [syg042@minagric.gr](mailto:syg042@minagric.gr)

#### **Greek Ministry of Economy and Finance**

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>

#### **Hellenic Food Safety Authority (EFET)**

Central Division

124, Avenue & 2 Iatridou

11526 Ambelokipi PC Athens

Greece

Tel: +30 210 6971 500

Fax: +30 210 6971 501

E-mail: [info@efet.gr](mailto:info@efet.gr)

Website: [www.efet.gr](http://www.efet.gr)

#### **General Chemical State Laboratory**

Directorate of Foods

16, A. Tsoha Str, GR 11521 Athens

Tel.: +30 210 6479 251

Fax: +30 210 6467 725

Email: [gxk-foodiv@ath.forthnet.gr](mailto:gxk-foodiv@ath.forthnet.gr)

Website: [http://www.gcsf.gr/index.asp?a\\_id=136](http://www.gcsf.gr/index.asp?a_id=136)

### **General Customs and Excise Department**

10, Kar. Serbias

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>

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

241, Acharnon

GR-10446 Athens

Greece

Tel: +30 210 212 49 03

Fax: +30 867 0503

Website: <http://www.opekepe.gr>

### **Hellenic Export Promotion Organization (HEPO)**

86-88, Marinou Antypa

163 46 Hellioupolis Athens

Greece

Tel.: +30 210 9982100

Fax: +30 210 9969100

Website: [www.hepo.gr](http://www.hepo.gr)

E-mail: [infocenter@hepo.gr](mailto:infocenter@hepo.gr)

### **European Commission**

200, Rue de la Loi

1049 Brussels

Belgium

Tel: +32 2 299 11 11

### **Permanent Representation of Greece to the EU**

25, Rue Montoyer

1000 Brussels

Tel: +32 2 551 56 11

Fax: +32 2 512 79 12; +32 2 551 56 51

E-mail: [mea.bruxelles\(at\)rp-grece.be](mailto:mea.bruxelles(at)rp-grece.be)

Website: [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.gva@mfa.gr](mailto:grdel.gva@mfa.gr)

**United States Mission to the European Union**

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

**Geek Embassy, Washington**

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

**Appendix II. Other Import Specialist Contacts**

American Embassy  
Foreign Agricultural Service  
Via Vittorio Veneto 119/A  
00187 Rome  
Italy

**Tel:** +011 39 06 4674 2307  
**Fax:** +011 39 06 4788 7008  
**E-mail:** [agathens@usda.gov](mailto:agathens@usda.gov)  
**Webpage:** <http://italy.usembassy.gov/agtrade.html>

**Counselor for Agricultural Affairs**

James Dever

**Agricultural Assistant**

Ornella Bettini

### **Appendix III. Website links & Guidance Documents**

#### **European Commission:**

- DG Health & Consumers: [http://ec.europa.eu/dgs/health\\_consumer/index\\_en.htm](http://ec.europa.eu/dgs/health_consumer/index_en.htm)
- DG Agriculture: [http://ec.europa.eu/agriculture/index\\_en.htm](http://ec.europa.eu/agriculture/index_en.htm)
- DG Taxation & Customs Union: [http://ec.europa.eu/taxation\\_customs/index\\_en.htm](http://ec.europa.eu/taxation_customs/index_en.htm)
- Other Directorates General: [http://ec.europa.eu/about/ds\\_en.htm](http://ec.europa.eu/about/ds_en.htm)

#### **ABC of European Union Law:**

- [http://eur-lex.europa.eu/en/editorial/abc\\_toc\\_r1.htm](http://eur-lex.europa.eu/en/editorial/abc_toc_r1.htm)
- European Food Safety Authority (EFSA): <http://www.efsa.europa.eu>

#### **U.S. Mission to the EU:**

- Foreign Agricultural Service: <http://www.fas.usda.gov/posthome/useu/index.html>
- Foreign Commercial Service: <http://www.buyusa.gov/europeanunion/>

#### **FAIRS Reports:**

- <http://gain.fas.usda.gov/Pages/Default.aspx>

#### **GUIDANCE DOCUMENTS:**

- EU general food law – implementation guidelines:  
[http://ec.europa.eu/food/food/foodlaw/guidance/guidance\\_rev\\_8\\_en.pdf](http://ec.europa.eu/food/food/foodlaw/guidance/guidance_rev_8_en.pdf)
- Food hygiene regulations: [http://ec.europa.eu/food/food/biosafety/hygienelegislation/guide\\_en.htm](http://ec.europa.eu/food/food/biosafety/hygienelegislation/guide_en.htm)
- Guidance document for competent authorities for the control of compliance with EU legislation on aflatoxins: <http://ec.europa.eu/food/food/chemicalsafety/contaminants/guidance-2010.pdf>
- Plant protection: [http://ec.europa.eu/food/plant/protection/resources/publications\\_en.htm#council](http://ec.europa.eu/food/plant/protection/resources/publications_en.htm#council)
- Pesticide residues: [http://ec.europa.eu/food/plant/protection/pesticides/publications\\_en.htm](http://ec.europa.eu/food/plant/protection/pesticides/publications_en.htm)
- Guidance documents on animal by-products:  
[http://ec.europa.eu/food/food/biosafety/animalbyproducts/faq\\_en.htm](http://ec.europa.eu/food/food/biosafety/animalbyproducts/faq_en.htm)
- How to read a food label:  
[http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/publications/leaflet\\_EN6\\_12112007\\_web.pdf](http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/publications/leaflet_EN6_12112007_web.pdf)
- Food traceability factsheet:  
[http://ec.europa.eu/food/food/foodlaw/traceability/factsheet\\_trace\\_2007\\_en.pdf](http://ec.europa.eu/food/food/foodlaw/traceability/factsheet_trace_2007_en.pdf)
- Guidelines on imports of organic products:  
[http://ec.europa.eu/agriculture/organic/files/news/download-material/guidelines\\_for\\_imports\\_en.pdf](http://ec.europa.eu/agriculture/organic/files/news/download-material/guidelines_for_imports_en.pdf)
- Food contact materials - a practical guide:

[http://ec.europa.eu/food/food/chemicalsafety/foodcontact/practical\\_guide\\_en.pdf](http://ec.europa.eu/food/food/chemicalsafety/foodcontact/practical_guide_en.pdf)

- Questions and answers on the regulation of GMOs in the EU:

[http://ec.europa.eu/food/food/biotechnology/gmfood/qanda\\_en.pdf](http://ec.europa.eu/food/food/biotechnology/gmfood/qanda_en.pdf)

- Vitamins & minerals – guidance on submissions for safety evaluations:

[http://ec.europa.eu/food/food/labellingnutrition/nutritional/adm\\_guidance\\_safety\\_substances\\_en.pdf](http://ec.europa.eu/food/food/labellingnutrition/nutritional/adm_guidance_safety_substances_en.pdf)

- Commission Communication on the future necessity and use of mechanically separated meat in the EU, including the information policy towards consumers:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0704:FIN:EN:PDF>.

- How to export seafood to the EU: <http://www.seafood.nmfs.noaa.gov/Howtoexportseafood2011.pdf>