

USDA Foreign Agricultural Service

GAIN Report

Global Agricultural Information Network

THIS REPORT CONTAINS ASSESSMENTS OF COMMODITY AND TRADE ISSUES MADE BY
USDA STAFF AND NOT NECESSARILY STATEMENTS OF OFFICIAL U.S. GOVERNMENT
POLICY

Voluntary _ Public

Date: 12/29/2015

GAIN Report Number: IT1586

Greece

Post: Rome

FAIRS Country Report

Report Categories:

Food and Agricultural Import Regulations and
Standards - Narrative

Approved By:

Christine Sloop

Prepared By:

Dimosthenis Faniadis

Report Highlights:

This report provides updated contact information for Greece and gives an overview of Greek food laws in the EU context. Information on the EU 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/data/eu-28-fairs-country-report>.

General Information:

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 interested in the Greek market. 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 regarding 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 CUSTOMS CLEARANCE 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. Food Additives Regulations

Section III. Pesticides and Other Contaminants

Section IV. Packaging and Container Regulations

Section V. Labeling Requirements

Section VI. Other Specific Standards

Section VII. Facility and Product Registration Requirements

Section VIII. Other Certification and Testing Requirements

Section IX. Import Procedures

Section X. Copyright and/or Trademark Laws

Appendix I. Government Regulatory Key Agency Contacts

Appendix II. Other Import Specialist Technical Contacts

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 (i.e. a foodstuff may comply with the general labeling directive but may carry a health claim for which harmonized rules do not yet exist).

This report outlines the applicable legislation regarding the export of U.S. food products to Greece, particularly those rules that differ from EU legislation or regulation. Exporters should be aware that when EU-wide legislation is incomplete, absent or there is room for interpretation, Greek laws apply

and imported product must meet existing Greek requirements.

For current information on EU food import rules as well as general information on EU import duties and quotas please see the reports produced by the U.S. Mission to the EU in Brussels, Belgium at <http://www.usda-eu.org/>.

In Greece, food safety is the primary responsibility of the Greek Ministry of Rural Development and Food in cooperation with the General Chemical State Laboratory of Greece and the Ministry of Citizen Protection. Occasionally, the Greek Ministry for Development and Commerce may play a role. 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. EFET is the principal Food Control Body in Greece, it is a public entity supervised by the Ministry of Rural Development and Food.

Greek Food Law

At the EU level, [Regulation \(EC\) 178/2002](#) sets out general principles and objectives in food law. In Greece, the EU Regulations (EC) [852/2004](#) and [853/2004](#) are being applied through the National Law [KYA 15523/2006](#) published in August 2006, which outlines the basic Greek food and feed regulations based in the Regulation (EC) 178/2002. This law sets out each organization's responsibility for applying the EU Regulations and the coordination mechanisms between the different public administrations with responsibilities in official food control.

Please note that imports of red meat, meat products, pet food, farmed and wild game meat, minced meat, all dairy products, seafood, bovine embryos and semen, porcine and equine semen, gelatin and animal casings, and animal byproducts to the EU from the United States may originate only from [EU approved U.S. establishments](#).

For more information about the EU food law see the FAS USEU website <http://www.usda.-eu.org>.

Section II. Food Additives Regulations

Greece applies EU-harmonized legislation regarding food additives. For detailed information on the EU-harmonized legislation on food additive regulations, please consult the [EU-28 FAIRS Report](#) as well as the section on additives on the USEU [website](#).

Greece has some specific labeling and ingredient rules for select food products (i.e. re-frozen vegetables, prepared fishery products, and glazed foods) which are described in detail in the Greek Food Code (hereafter referred to as the Food Code) published by the General Chemical State Laboratory (GCSL). There is no electronic version of the Food Code. However, a hard copy can be obtained in Greek from the GCSL (see Appendix I for contact information). GCSL is the Greek agency responsible for the documentary inspection upon arrival, labeling and product ingredient review, and the analysis of laboratory tests to grant import approvals for foodstuffs in cooperation with the Greek Ministry of Rural Development and the individual Port Authorities. It is essential for U.S. exporters to work with a Greek agent who has a suitable background and is able to manage customs procedures involving more than

two authorities.

With the exception of food supplements, U.S. food products that already conform to another individual EU member state's rules and regulations may be transshipped and sold in Greece. However, approval by the Hellenic Supreme Chemical Committee (HSCC) operating under the Greek General Chemical State 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, amino acids).

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. Although EU Regulations 1829/2003 and 1830/2003, requires all foods and feeds containing GMO ingredients, either detectable or non-detectable, to be labeled accordingly, Greece has an open policy restricting the use of GMO foods and feeds.

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

Section III. Pesticides and Other Contaminants

Current EU pesticide legislation has not been fully harmonized amongst the member states. Regulation 1107/2009 sets out the rules for the authorization of plant protection products (PPPs) and replaced 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. Greece is included in Zone C (South) along with Bulgaria, Cyprus, France, Spain, Italy, Malta and Portugal. Once a Member State approves a PPP and it is listed in Annex I of the Regulation, it can be mutually recognized and thus authorized for use anywhere within the specified EU zone. However, there is a procedure that can take several months for the product to be specifically approved for use in Greece. Regulation 1107/2009 was transposed to national law by [Law 4036/2012](#).

Since September 2008, in accordance with EU Regulation 396/2005, all Maximum Residue Levels (MRLs) have been harmonized for 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.

The default MRL for substances not on the list is 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. The complete list of MRLs, and commodity combinations allowed in the EU can be obtained from the [EU Pesticides Database](#). Member States are responsible for risk assessments.

Commission Directive 2002/63 /EC establish 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 2014, 2015 and 2016 for samples tested in 2013, 2014 and 2015 respectively.

The competent authority for controls and tests of MRLs (maximum residue levels) in Greece is the Ministry of Rural Development and Food (previously named the Ministry of Agriculture) through its laboratories and regional control centers (known as KEPYELS). Greece strictly adheres to the EU-harmonized MRL levels in its import requirements. Legislation regarding sampling can be found on the Ministry's [website](#).

For detailed information on EU-harmonized legislation on pesticide and contaminant regulations, please consult the [EU-28 FAIRS Report](#) as well as the [USEU website pesticides section](#).

Aflatoxin Levels in Tree Nuts

[Commission Regulation \(EU\) 165/2010](#) amended the maximum aflatoxin levels for almonds and pistachios, as well as apricot kernels, hazelnuts and Brazil nuts (15 µg per kg), to bring them in line with the Codex Alimentarius levels for tree nuts adopted in July 2008.

Imported nuts and dried fruits may be subject to a random aflatoxin test at the point of entry or at point of sale. At the port, usually one out of ten containers is sampled to be tested for aflatoxin. Aflatoxin certificates issued by accredited laboratories in the country of origin must accompany nuts and specific dried fruits (i.e. prunes, blueberries, raisins, and cranberries). Greek port authorities may randomly sample and test again upon arrival. Consignments found to contain aflatoxins in excess of the EU tolerance 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 destroyed. APHIS phytosanitary certificates also are required for ground nuts imported into Greece in accordance with the current EU legislation in effect.

In September 2007, the EU implemented special import conditions requiring mandatory testing of U.S. almonds imported into the EU. USDA and the California almond industry developed a "Voluntary Aflatoxin Sampling Plan (VASP)" comparable to the EU sampling procedures so that U.S. almonds

could be uniformly tested before they were shipped to the EU. On September 2, 2014, based on favorable control results and favorable EU Food and Veterinary Office audits, [Regulation \(EU\) 884/2014](#) eliminated the special conditions for imports of almonds from the United States. As a result, a VASP certificate is no longer a pre-condition for importing almonds into the EU. The Pre-Export Checks (PEC) voluntary program went into effect on April 1, 2015, to replace VASP. The PEC program for aflatoxins means that shipments of almonds accompanied by this certificate should only be subjected to a less than 1 percent testing regime at the border. For more information please see: <http://www.ams.usda.gov/services/lab-testing/aflatoxin>.

Residues in Animals and Animal Products

The monitoring of residues in animals and animal products is addressed separately in Council Directive 96/23/EC. This directive includes the monitoring of pesticide residues as well as residues of veterinary drugs and a wide range of other contaminants and 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 IV. Packaging and Container Regulations

Consumer Packaging Ordinance and Laws on Weight and Measures

Greece applies EU-harmonized legislation relating to packaging and containers. 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, Greece adopted EU's Directive in 2008, after publishing at the Official Journal of the Greek Republic [1657/B/14.8.2008](#).

Materials in Contact with Foodstuffs

European Parliament and Council [Regulation 1935/2004](#) specify 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

Packaging waste management

[Law 2939/2001](#) transposes [Directive 94/62/EC](#) into national Law. The latest amendment to [Directive 2015/720/EC](#) relates to reducing the consumption of lightweight plastic bags.

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 paperboard (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
Plastics	Directive 10/2011/EC	<i>Automatically applicable</i>
All food contact materials	Regulation (EC) 1935/2004	<i>Automatically applicable</i>
Ceramics	Directive 2005/31/EC	HSCC Decision No 159/86
Regenerated cellulose film	Directive 2004/14/EC	HSCC Decision No 147/2009
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
Epoxy derivatives (BADGE, NOGE, BFDGE)	Regulation (EC)	<i>Automatically</i>

	1895/2005	<i>applicable</i>
Active and Intelligent materials intended to come into contact with food	Regulation (EC) 450/2009	<i>Automatically applicable</i>

Section V. Labeling Requirements

The U.S. standard label does not comply with EU labeling requirements. Food labeling and ingredient regulations have been harmonized within the EU, and Greek regulations are fully harmonized to-date with these. General provisions on the labeling, presentation and advertising of foodstuffs marketed in the EU are laid down in [Regulation \(EC\) 1169/2011](#). They apply not only to foodstuffs intended for sale to the ultimate consumer, but also for supply to restaurants, hospitals and other mass caterers.

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. For detailed information on the EU-harmonized labeling legislation, please consult the [EU-28 FAIRS Report](#) as well as the [USEU website section on labeling](#). Detailed information on labeling requirements that are applied from December 13, 2014 can be found in the [USEU report on New EU food labeling rules](#), supplemented by [GAIN report “How to Comply with the EU’s New Food Labeling Rules.”](#)

Greece applies EU-harmonized legislation through the Greek Food Code. The current Food Code was published in 2009 and has been amended by a number of Presidential Decrees and Ministerial Decisions to incorporate new legislation.

Locally produced and imported food items are regularly checked thru 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.

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.

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 even after processing.

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. However, the strict EU rules on the use of claims in labeling do apply.

The European Parliament and Council Directive No 2000/13/EC (replaced by Council Directive 2006/142/EC and Regulation (EC) 596/2009) 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 supplies for restaurants, hospitals, and other mass caterers. Greece sets its own national requirements when EU standards have not yet been established. In cases where the standard U.S. label fails to comply with Member-State rules and regulations, a sticker must be placed on the packaging that contains a translation of the U.S. label in Greek as well as all mandatory EU information listed below. Although many international companies provide multi-language labels to ensure the possibility of sale throughout the European Union, the Greek language is rarely present.

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

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 in the Commission's [Regulation \(EC\) 1169/2011](#)

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. Commission [Regulation \(EU\) No 1337/2013](#) sets out the modalities (with some exceptions) regarding how the place of rearing and the place of slaughter for pre packed fresh, chilled and frozen meat of swine, sheep, goats and poultry should be shown. The new rules became effective as of April, 1, 2015.

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 establish 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".

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, multi-language labeling is permitted; however, one of the languages must be Greek.

Other Specific Labeling Requirements

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) and 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/en/nda/ndaguidelines>.

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.

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. 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/>).

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:

Group 1	Group 2
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, fiber, 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, fiber, 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,” “fitness,” or “slim.” A product may be labeled as “low in calorie” if a single intake yields a maximum of 15 calories to the body and 30 calories per daily intake.

Health Claims

The European Parliament and the Council on Nutrition and Health Claims Made on Foods re-published Regulation 1924/2006 in its corrected form on January 18, 2007 (OJ No. L12, 18.1.2007, p.3), and it entered into force on July 1, 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 Regulation 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 are responsible for:

- following U.S. laws and regulations;
- following the EU Regulations in effect;
- working 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 Organization for Medicines (EOF) operating under the Ministry of Health. Disease risk reduction claims and claims referring to the health and development of children 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](#).

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.

Section VI. Other Specific Standards

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

- genetically modified foods and feeds
- novel foods
- fortified foods
- foodstuffs for particular nutritional uses including dietetic and baby/infant foods
- organic foods
- fruit juices and similar products, cocoa and chocolate products, sugars, honey, preserved milk
- frozen foodstuff
- seafood
- pet food

Genetically Modified Foods and Feeds

The general attitude towards GE crops and products in Greece remains unfavorable. The uncertainty surrounding Greece's national biotech policy and negative media reports have sharply affected supermarket chain marketing strategies.

For more information, please see [EU's Biotech Annual Report](#) or visit FAS USEU website section on [Biotechnology](#).

Novel Foods

The Novel Food [Regulation \(EC\) 258/1997](#) lays down detailed rules for the authorization of novel foods and novel food ingredients. 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 EU catalogue on Novel Foods can be consulted in the [EU Commission's website](#). This catalogue provides information on whether or not a product would require authorization under the Novel Food Regulation. The list of novel food applications, authorizations, rejections and withdrawals can be also found in the [Commission's website](#).

The Novel Foods proposal follows the ordinary legislative procedure and is expected to be adopted at the end of 2015. For additional information, visit FAS USEU website section on [novel foods](#).

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. 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.

For additional information, visit FAS USEU website section on [fortified foods](#).

Dietetic or Special Use Foods

In June 2013, the EU adopted European Parliament and Council [Regulation 609/2013](#) on dietetic foods. This new regulation will apply as of July 20, 2016, and repeal the current rules on Foodstuffs for Particular Nutritional Uses. The scope of this regulation is limited to infant formula and follow-on formula, processed cereal-based food and baby food, food for special medical purposes and total diet replacement for weight control.

Foods that no longer fall within the scope of the current dietetic food rules will be regarded as "normal foods" and regulated under the Food Information of Consumers [Regulation 1169/2011](#). For additional information, visit FAS USEU website section on [dietetic foods](#).

Organic Foods

The recognition of certified organic products through the agreement between the European Union and the United States brings all products traded through a common organic export certificate. More information about this partnership can be found on the [USDA Organics Website](#).

Information on the EU-28 Organic Market can be found in the [Report “Plenty of opportunities for U.S. organics in the EU market”](#).

Fruit juices and certain similar products

[Directive 2012/12/EU](#) regulates to fruit juices and certain similar products intended for human consumption. Key amendments which affect to the fruit juice labeling rules include orange juice, nutrition claims, mixed juices and sugars and sweeteners. Directive 2012/12/EC was transposed to national law by Decision 67/2013. Detailed information on key changes introduced by the new directive can be found in [GAIN report “New EU Fruit Juice Labeling Rules”](#).

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”.

Seafood

[Council Regulation 2406/96](#) lays down common marketing standards for certain fishery products.

NOAA (National Marine Fisheries Service) of the U.S. Department of Commerce is the unique competent authority for the certification of fishery and aquaculture products intended for the EU. More detailed information can be found in the Guide: [“How to export Seafood to the European Union”](#).

As of December 13, 2014, all seafood sold at Retail must have nutritional information on the package. [Regulation 1169/2011](#) describes the minimum information to mention of labels intended for retail or mass caterers. Exporters should pay specific attention to Article 9 and following articles as well as all annexes of the Regulation.

Information on labeling can also be found in the European Commission’s [Guide](#), published in December 2014.

Pet Food

European Parliament and Council [Regulation 767/2009](#) sets out the 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. Information on requirements to export pet food to the EU can be found in the FAS USEU website section on [Pet food](#).

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.

Section VII. Facility and Product Registration Requirements

Facility Registration

The EU approves establishments to ship products of animal origin based on submissions from U.S. government agencies. Only products processed in approved establishments may enter the EU. Detailed information on approved U.S. establishments is available on the [USEU Mission website](#).

Product Registration

Generally, there is no EU requirement to register imported foods except for the introduction of novel foods. The company introducing a novel food must submit a request to the authorities in the Member States where the product will be marketed and a copy of this request has to be sent to the EU Commission's Health and Food Safety Directorate.

The introduction of foodstuffs with particular nutritional uses needs to be notified to the competent authorities where the food is sold need to be notified. Exporters of milk infant formula or nutritional supplements are mandated to notify competent authorities.

Section VIII. Other Certification and Testing Requirements

Inspection Requirements

Member State authorities are responsible for carrying out inspections in the food and feed chain. Products can be checked at import or at all further stages of marketing. 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.

Member States have the responsibility to designate laboratories that are allowed to perform food control analyses. In Greece, KEPPYEL performs seeds and biotech testing, while the Phytosanitary Division of the Ministry of Rural Development and Food (YPAAT) conducts the tests for aflatoxins in food and feed. Organic products, to be labeled as such, must be certified by an accredited Greek Certification Organization and the importer must alert both the Organic Certification Organization and YPAAT (ELGO-Dimitra Division) when they are bringing in a product.

Certification to Accompany Shipments

Greece applies EU-harmonized legislation for other related regulations and requirements including product inspection, registration and certification.

For detailed information on certification, please see the [USEU certification site](#).

[Council Directive 2000/29/EC](#), harmonizes the importation requirements of plants and plant products into the EU. Phytosanitary certificates, issued by an APHIS inspector, are required to accompany all plant and plant products entering the EU. Your nearest APHIS Export Certification Specialist can be found in this [link](#).

Some examples of non-fully harmonized products include collagen casings, lanolin and gelatin and composite products.

Section IX. Import Procedures

As a member of the European Union (EU), Greece follows all EU directives, regulations, and obligations where available. Once imported goods are cleared in one Member State, they can move freely throughout the EU territory, and therefore also to Greece.

[Council Regulation \(EEC\) 2913/92](#) establishes the Community Customs Code. As of June 1, 2016, this will be repealed by [Council Regulation \(EU\) 952/2013](#). Commission Regulation 2454/93 as amended by [Regulation \(EU\) 1099/2013](#) lays down the provisions for the implementation of the Customs Code. Information on the EU's applicable duties can be found in the [on-line customs data base](#).

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. 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 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. 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 found here:

http://ec.europa.eu/taxation_customs/customs/customs_duties/tariff_aspects/classification_goods/

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/resources/documents/taxation/vat/how_vat_works/rates/vat_rates_en.pdf

The Greek authorities in charge of import controls at customs are:

- GOG Ministry of Rural Development and Food (Veterinary Service - public health certification controls);
- GOG Ministry of Rural Development and Food (Phytosanitary Division - phytosanitary certificate controls); and
- General Chemical State Laboratory (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.

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

The following documents are required for ocean or air cargo shipments of food products into Greece:

- Bill of Lading and/or Airway Bill
- Commercial Invoice
- Phytosanitary Certificate and/or Health Certificate when applicable
- Import Certificate

Most food products require an Import Certificate issued by the competent Greek authorities (please see Section II for more details). This certificate must be obtained by a registered importer as it is intended for tariff classification purposes.

Product samples have to comply with the food regulations applicable in the EU. Exemptions exist for meat and meat products, for which a waiver may be obtained from the listing requirement described on

the FAS USEU website section on [certification](#).

Section X. Copyright and/or Trademark Laws

Trademarks

The regulations and standards covered under this section have been harmonized with the European Union requirements. However, the EU-harmonized trademark regulation did not replace the existing laws at the Member State level. Both systems coexist.

Community trademark policy was created by Council Regulation 40/94 and implemented by Commission [Regulation 2868/95](#). This regulation, amended by [Council Regulation 207/2009](#), created a single, unitary trademark registration system for the entire European Community. 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. The European Union treaty includes trademark protection in 28 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](#) operating under the Greek Ministry of Economy, Development, and Tourism. 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 in English.

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”. In November 2012, [Regulation 1151/2012](#) on quality schemes for agricultural products and foodstuffs repealing [Council Regulation 510/2006](#), was published and came into force on January 3, 2013.

Regulation 1151/2012 sets out the mechanisms to protect PDOs and PGIs in third countries. In any case, some regulations additional regulations need to be adopted for it to be fully functional. The complete list of registered product names that receive protection in the EU can be found at http://ec.europa.eu/agriculture/quality/schemes/index_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.

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, Chios chewing gum, honey, beans, dried figs, Aegina Island pistachios, black currants, and other food products (raw and/or processed), plus a number of local wines.

Appendix I. Government Regulatory Key Agency Contacts

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; syg042@minagric.gr

Greek Ministry of Economy and Finance

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

Hellenic Food Safety Authority (EFET)

Central Division
124, Kifissia's Avenue & 2, Iatridou Street
11526 Ambelokipi, Athens
Greece
Tel: +30 210 6971 500
Fax: +30 210 6971 501
E-mail: gramm1@efet.gr
Website: www.efet.gr

General Chemical State Laboratory

Directorate of Foods
16, A. Tsoha Str,
11521, Ambelokipi, Athens
Greece
Tel.: +30 210 6479 221
Fax: +30 210 6468 272

Email: alcohol_food@gcsf.gr

Website: 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

Website: <http://www.e-oikonomia.gr>

Enterprise Greece S.A.

The Official Investment and Trade Promotion Agency of Greece

109 Vasilisis Sophia's Avenue

115 21, Athens

Greece

Tel.: +30 210 3355700

Fax: +30 210 3242079

Website: <http://www.enterprisegreece.gov.gr/>

E-mail: info@enterprisegreece.gov.gr

American-Hellenic Chamber of Commerce

109-111 Messoghion Avenue,

Politia Business Center,

GR-115 26 Athens, Greece

Phone: +30 210 699 3559

Fax: +30 210 698 5686, 210 698 5687, 210 699 5033

Email: info@amcham.gr

Website: www.amcham.gr

European Commission

200, Rue de la Loi

1049 Brussels

Belgium

Tel: +32 2 299 11 11

Permanent Representation of Greece to the EU

19-21, Rue Jacques de Lalaing

1040 Brussels

Belgium

Tel: +32 2 5515 611

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

E-mail: mea.bruxelles@rp-grece.be

Website: <http://www.mfa.gr/brussels/en/>

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

United States Mission to the European Union

Office of Agricultural Affairs
24, Boulevard du Regent
1000 Brussels
Belgium
Tel: +32 2 811 4154
Fax: +32 2 811 5560
E-mail: AgUSEUBrussels@fas.usda.gov
Website: <http://www.usda-eu.org/>

Greek Embassy, Washington

2217, Massachusetts Ave. N.W.
Washington, DC 20008
Tel: (202) 939 1300
Fax: (202) 939 1324
E-mail: gremb.was@mfa.gr
Website: <http://www.greekembassy.org>

Appendix II. Other Import Specialist Technical Contacts

FAS Rome, Italy Offers Regional Coverage of Greece

Office of Agricultural Affairs, American Embassy
Via Veneto 119a, Rome, 00187, Italy
Tel: +39 06 4674 2396
E-mail: AgRome@fas.usda.gov
Web: <http://athens.usembassy.gov/fas.html>

Counselor for Agricultural Affairs

Christine Sloop