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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. It is recommended to read the EU-27 Food and Agricultural Import Regulations and Standards, to obtain a fuller understanding of EU laws as Greece is a member of the European Union and follows its directives and regulations.

**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.**

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## **Executive Summary**

All sections of the previous FAIRS report have been updated. The 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. EU requirements for food differ from the ones in the United States and the standard U.S. label fails to comply with EU labeling requirements. This report looks at general requirements for food and feed labels, food hygiene, contaminants, food packaging, food additives and flavorings and import procedures.

### **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).

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 Safety Authority (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. 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.

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 through 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 regard 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.

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, phytostanols, 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](#), fully harmonized through Greek [Law 20303/22-12-2014](#).

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. **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.

f. **Storage and usage conditions.**

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

g. **Alcoholic content.**

This is required for drinks with alcoholic content equal or greater than 1.2 percent alcohol in volume. Allergen labeling is compulsory on all alcoholic beverages.

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

i. **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.

On May 29, 2018, the European Commission published [Implementing Regulation 2018/775](#), which introduces mandatory dual origin labeling when a country of origin is given or visually implied on the label of a food product but the origin is not the same as that of its primary ingredient. Producers can simply state that the main ingredient does not originate from the country origin if the food or label is as “EU,” “non-EU”, the name of a third country or any other option listed in Article 2 of the Regulation.

j. **Instructions** for intended use.

k. **Nutrition Declaration.** Under Regulation 1169/2011, the nutrition declaration became mandatory on December 13, 2016. Annex V to the Regulation lists foodstuffs that are exempted from the mandatory nutrition declaration requirement. The nutrition declaration must be presented, if space

permits, in tabular format with the numbers aligned and where space does not permit, in linear format. All elements of the mandatory nutrition declaration should be in the same field of vision on the food label or package.

### Warnings on Labels

Annex III to Regulation 1169/2011 establishes a list of products that require a special warning on the label:

- foods whose durability has been extended by means of packaging gases
- foods containing sweeteners
- foods containing added sugar and sweeteners
- foods containing aspartame
- foods containing more than 10% added polyols
- confectionery and beverages containing liquorice (glycyrrhizinic acid or its ammonium salt)
- beverages containing more than 150mg/l of caffeine and foods with added caffeine
- foods or food ingredients with added phytosterols, phytosterol esters, phytosterols or phytosterol esters

[Food additives Regulation 1333/2008](#) requires foodstuffs containing the food colors sunset yellow (E110), quinoline yellow (E104), carmoisine (E122), allura red (E129), tartrazine (E102), 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 a warning symbol.

### 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.

## Minimum Font Size

Article 13 of Regulation 1169/2011 introduces a minimum font size for printing the mandatory information on food and drink labels. As a general rule, the information must be printed in characters using of minimum font size of 1.2 mm for the “x-height”. If the largest surface of a food package or container is less than 80 cm<sup>2</sup> the minimum font size is reduced to 0.9 mm. On packages with a printable surface smaller than 25 cm<sup>2</sup>, the nutrition declaration is not required. Packages which are smaller than 10 cm<sup>2</sup> do not need to bear a nutrition declaration nor a list of ingredients.

## **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.

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: <https://www.efsa.europa.eu/en/applications/nutrition>.

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.

### Gluten-Free

Harmonized compositional and labeling rules for foods for persons with gluten intolerance were previously set out in the EU’s directive on foods for particular nutritional uses (Regulation 41/2009). With the adoption of the [Dietetic Foods Regulation 609/2013](#), it was decided that gluten-free foods



would be regulated under the FIC regulation. Commission [Implementing Regulation 828/2014](#), applicable since July 20, 2016, sets out conditions for using “gluten-free” and “very low gluten” statements on food labels.

### Trans Fats

Rules to limit and label the content of trans fats in food products are not yet EU-harmonized. In April 2019, [Regulation 2019/649](#) amending Annex III to [Regulation 1925/2006](#) on trans-fat was published in the Official Journal. This new Regulation sets a maximum limit of trans fat, other than trans-fat naturally occurring in animal fat, in food, which is intended for the final consumer, of 2 grams of trans fat per 100 grams of fat.

### 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 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:

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

[Regulation 1924/2006](#), as all EU regulations, is directly applicable in Greece. 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, 109/2008, 116/2010, and 1047/2012 contain other relevant provisions (See: [Nutrition and health claims made on foods regulation](#)).

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

On October 12, 2017, the Parliament in Greece validated its country of origin labeling (COOL) requirements for milk, dairy and meat products. The [Law 4492/18-10-2017](#) mandates that dairy processors specify the country of origin on the label for the entire production chain: milking, processing, and packaging. Traceability is mandatory for all meat products, during production and distribution. Greece’s milk, dairy and meat products COOL laws entered into force in 2018. For more specific EU meat labeling requirements please see the FAS USEU website: <https://www.usda-eu.org/trade-with-the-eu/eu-import-rules/eu-labeling-requirements/beef-labeling/>

## Genetically Modified Foods and Feeds

<https://www.usda-eu.org/trade-with-the-eu/eu-import-rules/eu-labeling-requirements/labeling-of-genetically-modified-products/>

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](#).

## Organic Food

A new [EU Regulation on organic production and labelling of organic products](#) was adopted in May of 2018 and it will enter into force on January 1, 2022. The entry into force of the Regulation, initially scheduled for 2021, was postponed due to the COVID-19 crisis and to give economic operators more time to prepare for the new rules. For more information, please see GAIN report [New EU Organic Regulation Entering Into Force in 2021 - Regulatory Update](#).

## Plant-based Meat and Dairy Alternatives

To date, there is no EU-harmonized definition of the terms “vegetarian” and “vegan” and no specific requirements for the labeling of plant-based meat and dairy alternatives.

In July 2017, the European Court of Justice (ECJ) ruled that plant-based products cannot be labeled with dairy names such as “cheese,” “butter” or “milk”. A list of exceptions for non-dairy products that may be labeled with reserved dairy names was established by [Commission Decision 2010/791](#). For more information, please see GAIN Report [European Court Prohibits Use of Dairy Names for Non-Dairy Products](#). EFET is the official Greek authority to apply the ECJ rule in Greece.

## **Section III. 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. Detailed information on “Legal Metrology” is available on the [European Commission's website](#).

[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.

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](#).

## **Packaging Sustainability Measures**

[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. The Ministry of Environment and Energy announced that it will finally incorporate Directive 2015/720/EC into Greek law, preventing the use of plastic bags. As of July 2018, plastic bags cost up to 8 cents each in Greek supermarkets. The charge has reduced the use of such bags by 50 percent, previously estimated at an EU-leading 4.5 billion bags per year or 400 bags for each inhabitant every year. Two-thirds of all those bags come from supermarkets. On March 11, 2020, the Commission announced that it will propose new legislation on packaging, packaging waste, bioplastics and food contact materials. For more information about the upcoming legislative changes, please see GAIN Report [European Union Single Use Plastics Directive Enters into Force](#).

## 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)

## **Section IV. 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-27 FAIRS Report](#).

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 V. Pesticides and Other Contaminants**

Current EU pesticide legislation has not been fully harmonized amongst the member states. [European Parliament and Council Regulation 1107/2009](#) sets out the rules for the authorization of plant protection

products (PPPs) and replaced Directive 91/414/EEC. 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 [European Parliament and Council 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 2021, 2022 and 2023 for samples tested in 2020, 2021 and 2022 respectively.

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

### Aflatoxin Levels in Tree Nuts

In April 2015, the EU approved the pre-export checks (PEC) program for U.S. almonds. U.S. almonds were included in the Annex to [Commission Implementing Regulation \(EU\) 2015/949](#) which lists all EU-approved Pre-export Check programs. The acceptance of the U.S. program reflects the EU's recognition of aflatoxin controls performed at U.S. origin in line with Article 73 of [Regulation \(EU\) 2017/625 of the European Parliament and of the Council](#) (the Official Controls Regulation-OCR). This recognition is still sometimes referred to as "Article 24 recognition", which was the relevant article in Regulation

882/2004 that was superseded by the OCR. The USDA Agricultural Marketing Service began issuing PEC almond certificates on August 1, 2015.

Following the publication of [Commission Implementing Regulation \(EU\) 2017/1269](#) on July 14, 2017, the U.S. pre-export program for peanuts is no longer recognized by the EU. There is no restriction on the export of U.S. peanuts; however, shipments are no longer benefitting from the reduced testing level for aflatoxin upon entry in the EU.

On April 1, 2015, U.S. pistachios were included in the list of products/origins subject to increased import controls. On July 25, 2019, U.S. peanuts were also included in this EU list. The mandatory testing levels for U.S. pistachios and peanuts are laid out in [Commission Implementing Regulation \(EU\) 2019/1793](#). Member States must now test 10 percent of all incoming shipments for both products. The regulation does not impose any requirements on U.S. exporters.

For additional information on aflatoxin testing and certification performed in the United States prior to export to the EU, see:

- [PEC Program Manual](#)  
<http://www.peanutsusa.org.uk/eu-food-aflatoxin-legislation>  
[Pistachio Export Aflatoxin Reporting \(PEAR\) Program](#)  
<http://www.ams.usda.gov/services/lab-testing/aflatoxin>

### Residues in Animals and Animal Products

[Regulation \(EU\) 2017/625 of the European Parliament and of the Council](#) provides the currently applicable framework for official controls on foods, and includes transitional provisions applicable until December 14, 2022, continuing the application of [Directive 96/23/EC](#) regarding monitoring residues in animals and animal products. This directive states that any third country that exports to the EU must submit a plan setting out its guarantees on the monitoring of the groups of residues and substances referred to in Annex I to Council Directive 96/23/EC. Furthermore, a split system has to be in place guaranteeing that animals have not been treated with growth promotants if their products are to be exported to the EU. The prohibition of the use of hormones in meat production itself is addressed in [Council Directive 96/22/EC](#).

## **Section VI. Other Requirements, Regulations and Registration Measures**

An overview of all U.S. authorities that issue the legally required certificates for export to the EU is available on our website at <https://www.usda-eu.org/trade-with-the-eu/eu-import-rules/certification/u-s->



[agencies-providing-eu-certificates/](#). The websites of each of those authorities provide detailed and up-to-date information on the specific product certificates under their legal authority.

### 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.

[Council Directive 2000/29/EC](#), harmonizes the importation requirements of plants and plant products into the EU. An overview of legally required certificates in the EU and references to the U.S. authorities issuing these certificates is available on the website <http://www.usda-eu.org/trade-with-the-eu/eu-import-rules/certification/>.

### 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

U.S. exporters should be aware that certain products and ingredients may fall within the scope of the Novel Foods Regulation and need a pre-market authorization. The introduction of foodstuffs with particular nutritional uses needs to be notified directly to the Greek authority. Exporters of vitamin-enriched foods or nutritional supplements are especially advised to check for the existence of specific [Member State registration](#) or notification requirements. [National Organization of Medicines \(EOF\)](#) is the Greek authority responsible.

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

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

- novel foods
- fortified foods
- foodstuffs for particular nutritional uses including dietetic and baby/infant foods
- organic foods
- frozen foodstuff
- seafood

## Novel Foods

The [Regulation 2015/2283](#) on Novel Foods was adopted in November 2015 and published in Official Journal L 327 on December 11, 2015. Most provisions of the new Novel Foods Regulation are applicable on January 1, 2018. Novel Food can be a newly developed, innovative food resulting from new production techniques (e.g. nanotechnology) as well as a traditional - but unknown to EU consumers - food from a non-EU country. The Novel Food regulation does not apply to GMO's, additives, enzymes, flavorings and extraction solvents.

Detailed information on Novel Foods authorization process is available on the [USEU Mission website](#).

## 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 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 Foods

[Regulation 609/2013](#) sets out compositional and labeling rules for foods for specific nutritional uses. Its scope 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.

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

### Organic Foods

The European Commission published new EU rules for electronic certification of imported organic products, which became into effect on April 19, 2017. Following recommendations from the Court of Auditors and a request from Member State Ministers in 2011 to address concerns about monitoring the movements of organic products and the consistency of import checks, the new rules are aimed at improving the traceability of organic products and reducing potential fraud. The changes are expected to reduce the administrative burden for operators and authorities and provide much more comprehensive statistical data on organic imports. In practical terms, the changes will require the addition of these import certificates into the Trade Control & Expert System (TRACES), the existing EU electronic system for tracking movements of food products across the EU. Currently, Greek [Law 1973/138399](#) – 11/12/2013 harmonized the EU organic import requirements and applies the EC Regulations 834/2007, 889/2008, and 1235/2008 for import of organic products in Greece originated from third countries.

### Seafood

[Regulation 1169/2011](#) describes the minimum information required on labels intended for retail or mass caterers. The Greek Food Safety Authority, EFET, published [clarifications on the implementation of Regulation 1169/2011](#), where fishery products, prepared fishery products, and fishery and aquaculture products are distinguished and labelled accordingly.

## **Section VIII. Trademarks, Brand Names and Intellectual Property Rights**

### Trademarks

In the EU, trademarks can be registered at the national, regional or EU level. 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 Development and Economy. 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

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](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, pistachios, black currants, and other food products (raw and/or processed), plus a number of local wines.

### **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 \(EU\) 952/2013](#) establishes the Community Customs Code. [Commission Regulation 2015/2447](#) lays down detailed rules for the implementation of certain provisions of the new Union

Customs Code (UCC) including binding tariff information and origin of goods. Information on the EU's applicable duties can be found in the [on-line customs data base](#).

The European Commission's "Trade Helpdesk" provides a complete overview of documents needed for customs clearance: <http://trade.ec.europa.eu/tradehelp/>.

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. Greek customs authorities can be found at <https://portal.gsis.gr/portal/page/portal/ICISnet>

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)
- 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:

[https://ec.europa.eu/taxation\\_customs/taxation-1/value-added-tax-vat\\_en](https://ec.europa.eu/taxation_customs/taxation-1/value-added-tax-vat_en)

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.

## **Section X. Trade Facilitation**

### Advance Rulings

The customs duties that must be paid upon import of a product depend on the tariff classification applicable to the product. The Binding Tariff Information ([BTI](#)) system was introduced in the EU to ensure legal certainty for business operators when calculating import duties. A BTI decision is legally binding in all the Member States and is valid for three years.

U.S. exporters should be aware that the UCC makes the declaration of a BTI decision mandatory when completing customs formalities. As of October 1, 2019, business operators shall introduce all new applications electronically. Guidelines on the new BTI-system are published on DG Taxud's [website](#). Business operators can obtain a BTI decision from Greece's [Customs Authority](#) in order to get the proper product classification and relevant import duty. All BTI decisions issued by the customs authority are entered into the [EBTI-database](#). The customs value of a good is the CIF price at the European border derived from the product price found on the invoice and the transportation costs reflected in the airway bill or the bill of lading.

### Pre-Clearance Program

Greece applies the Official Controls Regulation (OCR - [Regulation 2017/625](#)), which provides the legal basis for the recognition of official controls in the country of origin of the goods. The OCR does not provide any legal basis for pre-clearance programs similar to the preclearance inspections conducted in foreign countries by APHIS personnel and funded by the exporters. Rather, Article 73 of the OCR provides for the approval of pre-export controls performed by third countries. Under this system, the EU approval specifies the competent authorities of the third country under the responsibility of which

pre-export controls must be performed, the certificates to be used for export of these goods and the maximum frequency of official controls to be performed by Greece's competent authorities at the entry of the consignments into the country.

### Electronic Certificates

OCR provides the legal basis for the general EU acceptance of electronic certificates using the EU's Integrated Management System for Official Controls (IMSOC). For plant products, Greece is able to receive U.S. e-Phytos sent via the Hub created by the International Plant Protection Convention (IPPC). For other commodities, currently no connection exists between IMSOC and the respective systems the U.S. Government Agencies use to issue electronic certificates. In absence of such a connection, paper certificates are required to satisfy Greece's requirement for an original certificate with an ink signature.

### Import Control Fees

Greece applies the OCR Regulation, providing the legal basis for the financing of import controls. Mandatory fees are charged to operators for certain official controls, including on import controls of animals, products of animal origin, germinal products, animal by-products, composite products, hay and straw, plants and plant products. Operators also have to pay for the border controls performed on food and feed of non-animal origin listed in [Commission Implementing Regulation \(EU\) 2019/1793](#). This regulation mandates specific frequencies of controls for certain hazards in products depending on their origin. Several products have to be tested for aflatoxin under this regulation. In addition, fees are also charged to operators for official controls that were not originally planned, because they are necessary to follow-up non-compliance

### Average Release Time for Products – Common Delays

Greece's ports of imports are organized in an efficient way to perform customs formalities as well as the necessary veterinary and plant inspections. Incomplete or incorrect certification generally leads to delays in the clearance of goods.

### Duplicative Inspections

Once goods have passed inspection and customs duties are paid, they can move freely throughout Greece and the EU. However, official controls remain possible at any stage of distribution in the EU.

## **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  
GR 17671, Athens-Kallithea, Greece  
Phone: +30 210 9287232; +30 210 9287233  
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, Moschato, Athens, Greece  
Tel: +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)**

124, Kifissia's Avenue & 2, Iatridou Street  
GR 11526 Ambelokipi, Athens, Greece  
Tel: +30 213 2145 800  
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, Ambelokipi, Athens, Greece  
Tel.: +30 210 6479 221  
Email: [alcohol\\_food@gcsl.gr](mailto:alcohol_food@gcsl.gr)  
Website: [http://www.gcsl.gr/index.asp?a\\_id=136](http://www.gcsl.gr/index.asp?a_id=136)

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

10, Kar. Serbias  
GR 10562, Athens, Greece  
Tel: +30 210 3375 714; 210 3375 715



E-mail: [gdcustom@otenet.gr](mailto:gdcustom@otenet.gr)  
Website: <http://www.minfin.gr>

**Enterprise Greece S.A.**

109, Vasilissis Sophia's Avenue  
GR 11521, Athens, Greece  
Tel.: +30 210 3355700  
Website: <http://www.enterprisegreece.gov.gr/>  
E-mail: [info@enterprisegreece.gov.gr](mailto:info@enterprisegreece.gov.gr)

**American-Hellenic Chamber of Commerce**

109-111 Messoghion Avenue,  
Politia Business Center,  
GR 11526 Athens, Greece  
Phone: +30 210 699 3559  
Email: [info@amcham.gr](mailto:info@amcham.gr)  
Website: [www.amcham.gr](http://www.amcham.gr)

**United States Mission to the European Union**

Office of Agricultural Affairs  
24, Boulevard du Regent  
1000 Brussels, Belgium  
Tel: +32 2 811 4154  
E-mail: [AgUSEUBrussels@fas.usda.gov](mailto: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  
E-mail: [gremb.was@mfa.gr](mailto:gremb.was@mfa.gr)  
Website: <http://www.mfa.gr/usa/en/the-embassy/>

## **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](mailto:AgRome@fas.usda.gov)

Web: <https://gr.usembassy.gov/business/foreign-agricultural-service/>

### **Counselor for Agricultural Affairs**

Charles Rush

### **Attachments:**

No Attachments.