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DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and Food Audits and Analysis

DG(SANTE) CT-2025-0002

FINAL REPORT OF AN AUDIT
OF CYPRUS
CARRIED OUT
FROM 09 TO 23 SEPTEMBER 2025
IN ORDER TO
EVALUATE THE FOOD SAFETY CONTROL SYSTEMS IN PLACE GOVERNING THE
PRODUCTION AND PLACING ON THE MARKET OF FISHERY PRODUCTS

In response to information provided by the competent authority, any factual error noted in the draft report has been corrected; any clarification appears in the form of a footnote.

Executive Summary

This report describes the outcome of a Directorate-General for Health and Food Safety audit of Cyprus, from 09 to 23 September 2025, as part of its work programme of controls in Member States.

The objective of the audit was to assess whether the organisation and operation of the official control systems put in place by the competent authority meet the requirements of the relevant European Union law and to what extent the correct implementation of European Union rules relevant to fishery products is effectively enforced. An additional objective was to follow up on the actions taken in Cyprus in response to certain recommendations of the previous audit reports on this topic (DG(SANTE) 2019-6663 and 2020-6915).

The report concludes that the effectiveness of the Cypriot official control system is undermined by the absence of internal verification mechanisms, shortcomings identified in the approval procedures and their implementation and absence of controls over landing operations and primary production fishing vessels below 12 meters in length.

The measures implemented after previous Directorate-General for Health and Food Safety audits have not been effective as similar non-compliances were detected by the audit team (not detected and/or not recorded by the officials) in the areas checked - such as verification of operators' hazard analysis and critical control points plans including other important aspects such as maintenance, hygiene, cold chain, pest control, traceability and product labelling. Additionally, the official control system is negatively impacted by the reluctance of the competent authority to use enforcement measures.

The report contains recommendations to the competent authority to address the identified shortcomings.

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Annex 1 - Legal References

ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
AHWD	Animal Health and Welfare Division
CA(s)	Competent authority(ies)
CCP(s)	Critical control point(s)
DFMR	Department of Fisheries and Marine Research
DG Health and Food Safety	Directorate-General for Health and Food Safety of the European Commission
DVO(s)	District veterinary office(s)
EC	European Commission
EU	European Union
EUROSTAT	Statistical Office of the European Union
HACCP	Hazard analysis and critical control points
LCFAO	Laboratory for the Control of Food of Animal Origin of the VS
MANCP	Multi-annual national control plan
MARDE	Ministry of Agriculture, Rural Development and Environment
MH	Ministry of Health
PHS	Public Health Service
RASFF	Rapid alert system for food and feed
RV	Reefer vessel(s)
SGL	State General Laboratory of the MH
VPHD	Veterinary Public Health Division
VS	Veterinary Services

1 INTRODUCTION

The audit took place in Cyprus, from 9 to 23 September 2025 and was undertaken as part of the work programme of the Directorate-General for Health and Food Safety of the European Commission (DG Health and Food Safety). The audit was carried out by a) assessing the information and documentation provided in response to the pre-audit questionnaire, followed by (b) video-conference meetings that took place from 9 to 11 September, and (c) on the-spot assessment visits that took place from 15 to 19 September.

The audit team comprised two auditors from DG Health and Food Safety and was accompanied throughout the audit by representatives of the designated competent authority (CA): the Veterinary Services (VS) within the Ministry of Agriculture, Rural Development and Environment (MARDE).

The meetings were also attended by representatives of the Public Health Service (PHS) within the Department of Medical and Public Health Services of the Ministry of Health (MH), the Department of Fisheries and Marine Research (DFMR) of MARDE, the State General Laboratory (SGL) of the MH, and the Laboratory for the Control of Food of Animal Origin (LCFAO) of the VS.

2 OBJECTIVES AND SCOPE

The objective of the audit was to assess whether the organisation and operation of the official control systems put in place by the CAs meet the requirements of the relevant European Union (EU) law and to what extent the correct implementation of food law relevant to fishery products is effectively enforced. An additional objective was to follow up on the action taken by the CAs in response to certain recommendations of the previous audit reports on this topic.

In terms of scope, the audit focused on the organisation and performance of the CAs and the official control system in place covering the production, processing and distribution stages applicable to fishery products placed on the market.

Accordingly, relevant aspects of the EU legislation, referred to in the attached Annex ¹, were used as the technical basis for the audit.

In pursuit of this objective, the audit team covered the following:

COMPETENT AUTHORITY		
Central level	4	Opening and closing meeting and two technical meetings, representatives of district level attended the meetings and on-site visits

¹ EU legislation available at: <http://eur-lex.europa.eu/homepage.htm>. Full legal references to EU legal acts quoted in this report are provided in the attached Annex and refer, as appropriate, to the last amended version and applicable at the time of the audit.

PRIMARY PRODUCTION		
Aquaculture farms	1	On-land
Fishing vessels	3	One >12 meters in length and two <12 meters
Landing sites	2	
FACILITIES HANDLING FISHERY PRODUCTS		
Approved establishments	8	

3 LEGAL BASIS

The audit was carried out under the general provisions of EU legislation and, in particular, Articles 116, 117 and 119 of Regulation (EU) 2017/625 of the European Parliament and of the Council.

4 BACKGROUND

4.1 GENERAL BACKGROUND

The last DG Health and Food Safety audit on fishery products in Cyprus took place in 2019 and a remote follow-up audit in 2020. The reports of those audits ² identified several deficiencies for which the CAs presented their action plans aimed at addressing these deficiencies. These action plans were deemed at the time as satisfactory.

4.2 PRODUCTION AND TRADE INFORMATION

According to the information provided by the CAs, there are 45 primary production fishing vessels above 12 meters in length, 325 small fishing vessels below 12 meters and 16 landing sites. Based on the Green Line regulation ³, 145 vessels are allowed to supply fresh fish to Cyprus to be sold directly to the retail level and consumers. The total number of aquaculture farms is 18. Currently, there are 31 approved facilities producing fishery products and four approved reefer vessels (RVs).

According to Statistical Office of the European Union (EUROSTAT), in 2023 Cyprus produced approximately 5 700 tonnes of fin fish from aquaculture and 980 tonnes of fishery products were caught and landed by the Cypriot vessels. The CA reports that, in total, their fishery product sector handled 9 000 tonnes of aquaculture products and 1 550 tonnes of wild capture in 2024.

² Audit reference numbers DG(SANTE) 2019-6663 and 2020-6915, available at: <https://ec.europa.eu/food/audits-analysis/audit-report/details/4196> and <https://ec.europa.eu/food/audits-analysis/audit-report/details/4367>.

³ Article 1(1) of Council Regulation (EC) No 866/2004.

4.3 RAPID ALERT SYSTEM FOR FOOD AND FEED (RASFF) NOTIFICATIONS

Since 2021 to date, members of the RASFF network⁴ have not issued any notifications (iRASFF⁵ notifications) involving fishery products from Cyprus.

Section 5.4 below describes how the CAs handle RASFF notifications.

5 FINDINGS AND CONCLUSIONS

5.1 COMPETENT AUTHORITIES

Legal requirements

Articles 4, 5, 6, 8, 11, 12, 18(10), 28 to 33, and 139 of Regulation (EU) 2017/625.

Findings

1. The CAs designated for the official controls of fishery products and their production chain are identified in the multi-annual national control plan (MANCP) of Cyprus published on the website of the VS: [VETERINARY SERVICES - Multi Annual National Control Plan](#).
2. The Veterinary Public Health Division (VPHD) of the VS and the PHS have responsibilities for food safety of fishery products in Cyprus.
3. The VPHD is responsible for official controls over the production of fishery products (excluding the retail level), intra-community trade, primary production fishing vessels, transport, landing operations and RVs). To note, there are no approved factory or freezer vessels, auction halls or wholesale markets in Cyprus.
4. The Animal Health and Welfare Division (AHWD) of the VS is responsible for aquaculture farms covering both animal and public health aspects.
5. Five district veterinary offices (DVOs) implement official controls in line with instructions and guidelines of the central level for public health, animal health and animal welfare.
6. The PHS is responsible for official controls of food of non-animal origin throughout the whole chain and for food of animal origin at the retail level (excluding butcher shops), and for fishermen selling directly to the consumer, imports of breaded fish and food business operators that produce sushi/sashimi. Official controls are conducted by district and rural offices.

⁴ European Commission, EFSA, EFTA Surveillance Authority, EU Member States, Iceland, Liechtenstein, Norway and Switzerland.

⁵ 'iRASFF' means the electronic system implementing the RASFF and Administrative Assistance and Cooperation (AAC) procedures described in Article 50 of Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002, and in Articles 102 to 108 of Regulation (EU) 2017/625 respectively.

7. The DFMR provides fishing licenses to fishing vessels and carries out controls on the implementation of the fisheries control regulations, marketing standards and the provisions of the regulation on food information to consumers.
8. There are no delegations of specific tasks to control bodies.
9. Coordination and cooperation among the central office of the VS and the DVOs is done by written correspondences, such as letters, circulars, faxes and emails, by having conferences and phone calls. Regular meetings take place at the central level to address issues of mutual interest.
10. Communication and coordination between the CAs (the VS, PHS and DFMR) is established and carried out by phone calls, emails, letters and circulars. The DMRF and VS have signed a memorandum of cooperation, which involves sharing lists of fishing vessels on an annual basis. An agreement between the VS and the PHS requires the partners to share information about non-compliances and complaints which would trigger actions by the responsible service.
11. Official staff responsible for inspections have legal powers to carry out controls and take enforcement measures when needed.
12. The VS has in place measures to avoid conflict of interest and ensure independence of official control staff by signing of a statement of impartiality upon recruitment and when needed.
13. The VS has in total 143 officials of which 20 are involved in official controls of fishery products for approximately 25% of their work time. The VS stated that limited resources and long-standing vacant posts make it difficult to carry out controls on a regular basis and lead to delays in their completion. However, the VS is currently looking to recruit 16 officials.
14. The most recent training provided to staff consisted of fish diseases and aquaculture management, general hygiene (including the fishery sector) and ‘better training for safer food’ training on primary production of fish. Training focused on fishing vessels is planned to take place later in 2025. While the audit team noted that the staff met and involved in the control of fishery products was knowledgeable in most areas, some gaps were identified especially related to procedures based on hazard analysis and critical control points (HACCP) (more information in chapter 5.3).
15. The VS has issued several documented procedures to help its staff during official controls e.g. for approval of establishments, checklists for controls over general requirements, procedures based on HACCP, storing chilled and frozen fishery products, specific requirements for fishery products, reefer and fishing vessels, landing sites, aquaculture farms, official sampling and enforcement. These checklists are not supported with any guidelines to clarify and provide in-depth information for the points to be assessed by the officials, the consequences of which are covered in chapter 5.3.

16. The VS has a target for 2025-2029 to have an automated recording system for official controls. The other goal is to develop an integrated information system between the LCFAO and the SGL, which could automatically report analytical results related to zoonotic pathogens.
17. The VS has an internal audit system, and the fishery sector was covered in 2013. The VS monitors the implementation of the official control plans by receiving the completed checklists and the DVOs' reports every six and twelve months. When serious non-compliances at operators are detected, joint inspections can be carried out, but in these cases, evaluation of the performance of the individual officers is not included. The aforementioned tools are not adequate to allow the CA to have an overview of the effectiveness and appropriateness of the controls as set out in Article 5(1)(a) of Regulation (EU) 2017/625. Additionally, the VS does not have in place control verification procedures in line with Article 12(2) of Regulation (EU) 2017/625.

Conclusions on competent authorities

18. The CAs are clearly designated, and the official control systems cover the whole production chain of fishery products (except landing sites and primary production fishing vessels below 12 meters in length as explained in chapter 5.3). The VS's structure, organisation and legal powers provide for adequate implementation of controls to meet EU requirements, supported by documented procedures and training to a certain extent.
19. The lack of verification mechanism leaves the VS unaware of the real effectiveness and appropriateness of controls carried out and the compliance level of operators in the fishery sector as identified, among other things, during the previous DG SANTE audits on the same topic.

5.2 REGISTRATION/APPROVAL OF FOOD BUSINESS OPERATOR ESTABLISHMENTS

Legal requirements

Article 6 of Regulation (EC) No 852/2004 of the European Parliament and of the Council.

Article 4 of Regulation (EC) No 853/2004 of the European Parliament and of the Council.

Article 10(2), 138(2)(j) and 148 of Regulation (EU) 2017/625.

Article 69 of Commission Implementing Regulation (EU) 2019/627.

Article 45 of Commission Implementing Regulation (EU) 2019/1715.

Findings

20. The VPHD is responsible for providing a procedure for approval, preparing a list of approved establishments and updating the list every time a new establishment is approved and/or delisted. The list is available on the VS's website.

21. The approval of an establishment starts when a DVO receives an application accompanied by the required documents. The DVO official inspects the premises to check if the infrastructure requirements are fulfilled. Once this is confirmed, a joint inspection by the DVO and the VPHD staff is carried out. If the infrastructure requirements are fulfilled, the VPHD provides a conditional approval valid for a maximum of three months.
22. Within this three-month deadline, another joint inspection must be carried out to audit operator's procedures based on HACCP principles. If all the requirements are fulfilled, the VS proceeds to grant an approval. In cases where the CA is not satisfied with the results, a conditional approval can be extended for another three months, and after that the approval is either denied or granted based on the outcome of an inspection. If an establishment adds new activities, an approval process must be conducted for the new activities.
23. The audit team reviewed the approvals of several on-land establishments and noted that in general the procedure described above was followed. However, the timelines between conditional and final approvals were not always respected and exceeded a total of six months. This is not in line with Article 148(4) of Regulation (EU) 2017/625. The audit team noted that when new premises were built to replace the old one, in the same location with the same activity, there was not a new approval carried out. According to the CA, the current national approval procedure is not clear in this kind of case.
24. The approval procedure of RVs is different: an on-site inspection is carried out by one VS inspector and if infrastructure and equipment fulfil the legal requirements, conditional approval is granted up to 12 months. Within this deadline, the inspector carries out a desk-based HACCP procedures' assessment. If the result of this assessment is favourable, the final approval is granted. In parallel, the DFMR issues a fishing and trans-shipment licence for the vessel. A precondition for the VS and the DFMR to proceed with the application is a registration of the vessel by the Deputy Minister of Shipping.
25. The procedure described above is not in line with Article 148(4) of Regulation (EU) 2017/625, which requires that after three months, the CA must either extend the conditional approval (for a period not exceeding a total of six months) or issue a final approval. The exception (i.e. the possibility to extend conditional approval to a total of 12 months) applies only to factory and freezer vessels.
26. The audit team noted that even the current procedure is not always followed with regard to the deadlines set: one of the RVs was conditionally approved in 2020 and has not yet been granted with a final approval.
27. Primary production fishing vessels must be registered by the Deputy Minister of Shipping. The DFMR issues fishing licenses for these fishing vessels and sends updated lists annually to the VS. These vessels are categorised by their length and fishing activity: vessels over 12 meters and vessels below 12 meters (professionals (A and B) and amateurs (C)). When a new vessel above 12 meters starts to operate, the DVO official must carry

out an inspection and issue a certificate of compliance, which is valid for one year. No certificate is needed for vessels below 12 meters.

Conclusion on registration/approval of food business operator establishments

28. The procedures adopted to approve operators are broadly in line with the applicable EU legislation, except for RVs. Additionally, the timelines related to conditional approvals are not always respected and may be extended beyond the deadlines foreseen in EU rules allowing operators to carry out activities without not meeting all requirements.

5.3 OFFICIAL CONTROLS

5.3.1 Official controls on the production and placing on the market

Legal requirements

Article 4 and 5 of Regulation (EC) No 852/2004.

Article 3, Annex II, and Section VIII of Annex III to Regulation (EC) No 853/2004.

Commission Regulation (EC) No 2073/2005.

Section I of Annex II to Commission Regulation (EC) No 2074/2005.

Regulation (EC) No 1333/2008 of the European Parliament and of the Council.

Articles 9 (1) and (4-6), 10(1), 13, 14, 15, 18(1) and 18(8)(f), 137 and 138 of Regulation (EU) 2017/625.

Articles 67 and 68 of Implementing Regulation (EU) 2019/627.

Findings

29. The DVOs carry out risk assessments of each approved establishment every three years based on eight criteria providing a certain number of scores and these are calculated to provide an overall score. This risk-based procedure sets a frequency of inspections for land-based establishment from one to four inspections per year and for cold stores once every two years.
30. Inspection frequency for RVs is one on-the-spot inspection visit every four years. These vessels typically do not operate in the Mediterranean and inspections require advance planning and overseas travel.
31. The inspection frequency for fishing vessels above 12 meters in length is once per year for the purpose of checking hygiene conditions and the issuance of a certificate of compliance. As some of the vessels do not land in Cyprus, cooperation with neighbouring countries has been put in place. For example, the Greek authorities have checked vessels landing in Greece and provided the reports to VS.

32. Inspections are unannounced and carried out using specific checklists. Inspection reports must be provided for each inspection, the original remaining at the DVO, and copies to be given to the operator and to be sent to the VS. There are no electronic recording systems for control documents. The audit team was provided with the most recent inspection reports during the visits and noted that the completed checklists are regarded as a report.
33. Planned inspections cover among others general and specific hygiene requirements, HACCP based procedures' implementation, traceability, labelling, microbiological criteria, contaminants and water.
34. When non-compliances are detected, they must be recorded in the report with a set deadline for rectification. Follow-up must be carried out by the end of a deadline to verify if the corrective actions are implemented sufficiently by the operator. The audit team saw examples of reports, all related to approvals, which included orders to take actions to rectify non-compliances in set deadlines, as well as follow-up reports, which included the verification of the implementation of the actions taken by the operator.
35. All measures from improvement notices to suspension of activities are available to all officials. Establishment's approval can be withdrawn by the VS. The audit team saw examples of enforcement measures e.g. seizure and disposal of products when fishery products were found not to be in compliance with food safety criteria for microbiological parameters. However, no evidence of the use of any enforcement measures was available during the visits in the establishments although non-compliances were present (see paragraph 51).
36. All DVOs must report about the inspection and sampling results back to the VS every six months and yearly.

Primary production

37. Based on the data provided by the VS, from 22 to 30 primary production fishing vessels above 12 meters are inspected annually, while the current lists of vessels include 45 vessels. While not meeting the control frequency, the CA added that there are changes in their fishing activities, and therefore, not all vessels are inspected annually. The owners of active fishing vessels are encouraged to request an annual inspection by the DVO and make the initial contact.
38. The audit team saw examples of inspection reports and visited one vessel above 12 meters in length. The audit team noted that the hold had exposed wood, peeling paint and contained dirty water. As fishing trips may last more than 24 hours, operators require that their fishery products are maintained at temperature of melting ice. However, no temperature records were available at the time of the visit. The freshwater storage tank was in a location not possible to clean.
39. Vessels below 12 meters in length belonging to categories A and B are currently not included in the annual control plans. This is not in line with Article 67(b) of Implementing Regulation (EU) 2019/627. The VS informed the audit team that they have been excluded

from the controls mainly due to lack of resources, difficulty to reach the vessels and they do not need a certificate of compliance to operate. The VS added that they can be inspected on a random basis, if available and if an inspection to a landing site takes place (see paragraph 43). During an on-site visit to one landing site, two such vessels came back from a fishing trip. The DVO official inspected these vessels and detected the same non-compliances noted by the audit team (the reuse of polystyrene boxes, insufficient amount of ice, lack of cleanliness and absence of protection from the sun).

40. Aquaculture farms are inspected annually by the AHWD. The current checklist also contains the public health aspects as required for primary production by Regulation (EC) No 852/2004. Based on information provided, all inspections were carried out as planned.
41. The audit team visited one aquaculture farm, which had been inspected with a required frequency using the specific checklists. Public health points had been checked with a satisfactory outcome.

Landing operations, landing and first sales sites

42. The VS informed the audit team that there are no first sale facilities, auction halls and wholesale markets in Cyprus.
43. Based on information provided, controls of landing sites have not been planned and consequently not carried out since 2020. This is not in line with Article 67(a) of Implementing Regulation (EU) 2019/627.
44. The audit team visited a landing site and noted that many vessels are provided with polystyrene boxes and ice by an operator (fishmonger) who buys the wild catch from fishermen. The temperature of the fish was checked and found adequate.
45. The audit team visited another landing site and noted that landing of the bins with farmed fish was hygienic, and the temperature of the fish was checked and found adequate.

Facilities handling fishery products

46. The audit team carried out a desk-based assessment of the documented controls over RVs. The planned inspection frequency has not been respected and was consequently extended to six years instead of four years. The audit team noted that HACCP plans did not cover all relevant areas e.g. temperatures in the holds and fishery product traceability.
47. The audit team noted that the on-land processing establishments and cold stores visited were inspected as planned. Relevant checklists were used, and reports were available to the audit team. However, the reports observed typically contained the same remarks with little or no additional information provided on the points checked.
48. HACCP-based procedures are assessed by the central level at the time of approval. The DVO officials explained that they only check recordings and sampling by the operator related to HACCP and they do not review the HACCP plans themselves during inspections. Consequently, none of the reports included remarks of any non-compliances

in the operators' HACCP plans (see findings in paragraphs 49 and 50 on HACCP non-compliances).

49. The audit team noted that in many cases the operators had used external consultants to produce their HACCP plans. When reviewing the plans, the audit team noted discrepancies in relation to current processes and EU legislation. Furthermore, the HACCP plans were not always updated, when changes in activities and/or equipment occurred.
50. The audit team noted that in many cases HACCP hazard analysis did not include all possible hazards (no physical and chemical hazards included), critical control points had critical limits (temperatures) not in line with EU rules, monitoring of critical limits was not adequately determined, and in case of failures to comply with a critical limit (mainly related to temperatures of frozen fishery products), adequate corrective actions were not defined properly. When questioned, the operators did not have knowledge and ownership over their HACCP plans.
51. In addition to the findings related to HACCP-based procedures, the audit team noted non-compliances in many other areas, which were either not covered during official controls or, if checked, non-compliances were not detected and/or not recorded in the reports (see below paragraphs 52 - 59). The audit team did not find any evidence of enforcement measures used as defined in Articles 137 and 138 of Regulation (EU) 2017/625. When questioned, the officials explained that due to the good cooperation with the operators, and because the use of enforcement measures is too much workload and time consuming, there has not been willingness to take measures. Unfortunately, many of the findings in this report are a repetition of the findings made during the previous DG SANTE audits in Cyprus for fishery products showing that the official control system has systematically failed to adequately implement official controls contrary to requirements in Article 5(1)(a) and (b) of Regulation (EU) 2017/625.
52. Regarding non-compliances in the cold chain, the audit team noted the following during the visits: storage temperature records for chambers with frozen fishery products showed consistently temperatures above -18°C , temperature recording devices were not in place, not properly recording or not in a place where it can be easily read, locations of temperature sensors were unknown or not situated in the area of the highest temperature, temperatures measured from frozen fishery products were above the EU limits (starting from -12°C) and cold chambers with products stored up to the doors preventing access and proper air circulation. Those non compliances were not identified by the operators and the officials during inspections.
53. Freezing of fishery products was carried out for whole wrapped fish, such as tuna, in a cold store with no criteria for rapid freezing and/or controlling the freezing process. In another case, fishery products frozen two weeks ago were found to have a core temperature of -12°C , while the temperature recording display showed -23°C (at the time of the visit the blast freezer was used as a storage facility for polystyrene boxes).

54. Significant non-compliances in general hygiene were noted in areas where chilled fresh fish was processed as well as the excessive use of water resulting in spillage to floor instead of being directing to a drain. The audit team noted condensation above unprotected fishery products. In one case, bins used for the transport of farmed fish were dirty and had a bad odour as they were only flushed briefly after use and then stored outside at high ambient temperature waiting to be washed later before use. These bins (washed and filled with some ice), were still dirty. Officials were unaware of this situation.
55. Maintenance issues, some significant, were detected in several premises. In some cases, it was explained to the audit team that verbal orders have been given, and some corrective actions had been taken by the operators.
56. Deficiencies in pest control were noted due to the gaps around doors and fans. Live ants and flies were detected in some establishments.
57. Traceability was not ensured when fishery products were found in cold storage without any labels. During one traceability exercise, the operator was not able to show evidence of the origin of the raw material.
58. Hygiene of water was not ensured when seawater, added to bins with ice, was taken from the dock. In addition, the ice machine checked by the audit team was rusty, the room had dirty walls and ceiling and the process of loading ice into transport bins was unhygienic. In another case, the water treatment system with an ultraviolet lamp for river water had not been maintained since 2010. In addition, the analysis did not include all relevant chemical parameters.
59. The audit team identified non-compliances on the labelling of fishery products with regard to identification marking, mandatory information of origin, references to aquaculture/wild catch, latin names of species, storage temperatures, and when relevant, a warning on potential gastrointestinal effects of consuming oilfish (*Ruvettus pretiosus*).

Conclusions on official controls on the production and placing on the market

60. The official control system covers land-based establishments, aquaculture farms and to some extent, RVs and primary production fishing vessels above 12 meters in length. Official controls are performed using documented procedures covering the required aspects. However, landing sites and primary production fishing vessels below 12 meters in length are omitted from the official control planning and, thus a significant proportion of the production chain is not subject to official controls.
61. Official controls as implemented are not identifying and/or recording a range of readily apparent non-compliances in HACCP based plans, maintenance, hygiene, cold chain, pest control, traceability and labelling. Additionally, when non-compliances are detected, the CA is reluctant to use enforcement measures.
62. In the absence of on-the-spot verification of officials' performance when carrying out official controls, the VS is not aware of the situation described above, and that official

controls, as systematically inadequately implemented, cannot ensure the compliance of operators and processing of fishery products with food safety requirements as already noted during the previous DG SANTE audits on the same topic.

5.3.2 Official controls of fishery products

Legal requirements

Council Regulation (EC) No 2406/96.

Article 1 and Annex I to Regulation (EC) No 2073/2005.

Regulation (EC) No 1333/2008.

Commission Regulation (EU) 2023/915.

Article 18 of Regulation (EU) 2017/625.

Articles 70, 71 and Chapter I and II of Annex VI to Implementing Regulation (EU) 2019/627.

Findings

63. Official sampling is carried out by the VS at the primary production and processing establishment levels and by the PHS at the retail level. Samples are analysed in the two official laboratories (see chapter 5.5).
64. With regard to organoleptic testing and checks for parasites as well as for biotoxins in fish and poisonous species, it is mainly responsibility of the VS during the controls carried out at the primary production (excluded in primary production fishing vessels below 12 meters in length) and processing levels. When these controls are carried out, they are not necessarily recorded in the reports.
65. The PHS has taken samples in line with the annual sampling plans to be analysed for freshness indicators, histamine, mercury, lead, cadmium, microbiological checks, polycyclic aromatic hydrocarbons and additives. All analysis results have been satisfactory, except one sample out of 35 was non-compliant for cadmium in 2022 and three samples out of 25 for mercury in 2024.
66. In the VS, frequency of sampling is risk based, and the risk analysis is carried out every three years. Sampling procedure sent to the DVOs defines the matrix (product types including water and ice) and the parameters to be analysed.
67. The VS has taken samples to be tested for histamine, heavy metals, inorganic tin, dioxins and polychlorinated biphenyls, perfluoroalkyl substances, microbiological parameters and additives with satisfactory results since 2023.
68. Fish species associated with a high amount of histidine are analysed from the samples collected by the VS from processing establishments and by the PHS from retail level. The

VS has taken approximately 10 samples (nine sub samples) annually and the PHS six samples.

69. The audit team noted that official sampling includes annual water and ice samples from primary production and processing facilities for microbiological parameters. Results reviewed by the audit team were broadly in line with the requirements.
70. The VS informed that it requires absence of *Listeria monocytogenes* in 25 grammes of ready-to-eat fishery product (able to support the growth of *Listeria monocytogenes*) when placed on the market during its shelf-life. Therefore, the CA does not require the operators to carry out any other studies for shelf-life.

Conclusion on official controls of fishery products

71. Official controls of fishery products are carried out as planned and contain the required elements by the EU legislation.

5.4 FOLLOW UP OF iRASFF NOTIFICATIONS

Legal requirements

Articles 50(5) and 52 of Section 1 Chapter IV to Regulation (EC) No 178/2002 of the European Parliament and of the Council.

Articles 1(a), 2, 4, 12 to 22 and 25 of Implementing Regulation (EU) 2019/1715.

Findings

72. The PHS is the national contact point for iRASFF notifications. Its responsibility is to communicate information down- and upstream within its organisation, to/from the VS, the Department of Agriculture and the SGL in line with the standard operating procedures.
73. There have not been any notifications regarding Cypriot fishery products since 2020. Cyprus has issued a notification ten times since 2020 regarding various risks detected in fishery products originating from other Member States or imported to the EU.
74. The audit team assessed cases when the CA had taken samples of products not originating from Cyprus with non-compliant analysis results (e.g. high levels of histamine or mercury) and subsequently took actions. These actions were deemed adequate for identifying, seizing, recalling, and destroying the affected products.

Conclusion on follow up of iRASFF notifications

75. Arrangements are in place to follow-up of iRASFF notifications and ensure that corrective actions are implemented.

5.5 LABORATORIES

Legal requirements

Annex I to Regulation (EC) No 2073/2005

Commission Regulation (EC) No 333/2007.

Articles 34, 37, 39, 100 and 101 of Regulation (EU) 2017/625.

Commission Regulation (EU) 2017/644.

Chapter II of Annex VI to Implementing Regulation (EU) 2019/627.

Findings

76. Both the PHS and the VS take official samples to be analysed either in the SGL operating under the MH or in the LCFAO under the VS.
77. The SGL analyses official samples for chemical parameters including histamine. The LCFAO analyses microbiological parameters of fishery products, water and ice. Both laboratories are EN ISO/IEC 17025 accredited. Their analysis methods are under the scope of the accreditations. They participate regularly with satisfactory results in proficiency tests.
78. Since 2024, histamine analysis method used has been HPLC-UV based on ISO 19343:2017. Last proficiency test done in 2024 showed satisfactory Z-score (-0,8).
79. Microbiological analysis method used for *Listeria monocytogenes* in ready-to-eat food is ISO 11290-1:2017 for detection and ISO 11290-2:2017 for enumeration. Last proficiency test result from 2023 had satisfactory results for both methods.
80. *Salmonella* method used is ISO 6579-1:2017 for detection and the most recent proficiency test was in 2025 with good performance.
81. *Escherichia coli* analysis method used for water and ice is ISO 9308-1:2014 and for *Enterococci* ISO 7899-2:2000. Both methods had satisfactory results in the proficiency test carried out in 2024.
82. The analysis results reviewed showed that official sampling included correct matrixes, parameters and number and size of samples as well as analysis with required methods.
83. The VS has meetings with both laboratories in order to plan official sampling and the VS and the SGL have also organised campaigns e.g. SAFE2EAT.

Conclusion on laboratories

84. Cyprus has a network of designated laboratories that can guarantee the validity and reliability of the official sample analysis results, including histamine, by adherence to accreditation requirements and participation in proficiency tests with satisfactory results.

6 OVERALL CONCLUSION

The effectiveness of the Cypriot official control system is undermined by the absence of internal verification mechanisms, shortcomings identified in the approval procedures and their implementation and absence of controls over landing operations and primary production fishing vessels below 12 meters in length.

The measures implemented after previous DG SANTE audits have not been effective as similar non-compliances were detected by the audit team (not detected and/or not recorded by the officials) in the areas checked - such as verification of operators' HACCP plans including other important aspects such as maintenance, hygiene, cold chain, pest control, traceability and product labelling. Additionally, the official control system is negatively impacted by the reluctance of the CA to use enforcement measures.

7 CLOSING MEETING

During the closing meeting held on 23 September 2025, the audit team presented the main findings and preliminary conclusions of the audit to the CAs.

During this meeting, the VS acknowledged the findings and preliminary conclusions presented by the audit team.

8 RECOMMENDATIONS

The Commission invites the competent authorities to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), aimed at addressing the recommendations set out below. The Commission brings to your attention that this report also outlines non-compliances which have not resulted in a recommendation.

No.	Recommendation
1.	<p>The competent authority should ensure the effectiveness, appropriateness, quality and consistency of official controls when verifying operators and products compliance with applicable legal requirements in the fishery sector in line with Article 5(1)(a) and (b) of Regulation (EU) 2017/625.</p> <p>Recommendation based on conclusions Nos 19, 28, 61 and 62.</p> <p>Associated findings Nos 17, 23, 25, 26, 46, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58 and 59.</p>
2.	<p>The competent authority should ensure that landing sites and primary production fishing vessels below 12 meters in length are included in risk-based controls in line with Article 67(a) and (b) of Implementing Regulation (EU) 2019/627.</p> <p>Recommendation based on conclusion No 60.</p> <p>Associated finding Nos 39 and 43.</p>

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

http://ec.europa.eu/food/audits-analysis/rep_details_en.cfm?rep_inspection_ref=CT-2025-0002

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Regulation (EU) 2017/625	OJ L 95, 7.4.2017, p. 1–142	Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products, amending Regulations (EC) No 999/2001, (EC) No 396/2005, (EC) No 1069/2009, (EC) No 1107/2009, (EU) No 1151/2012, (EU) No 652/2014, (EU) 2016/429 and (EU) 2016/2031 of the European Parliament and of the Council, Council Regulations (EC) No 1/2005 and (EC) No 1099/2009 and Council Directives 98/58/EC, 1999/74/EC, 2007/43/EC, 2008/119/EC and 2008/120/EC, and repealing Regulations (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council, Council Directives 89/608/EEC, 89/662/EEC, 90/425/EEC, 91/496/EEC, 96/23/EC, 96/93/EC and 97/78/EC and Council Decision 92/438/EEC (Official Controls Regulation)
Regulation (EC) No 178/2002	OJ L 31, 1.2.2002, p. 1-24	Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
Regulation (EC) No 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Regulation (EC) No 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin

Legal Reference	Official Journal	Title
Regulation (EC) No 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004
Regulation (EU) No 931/2011	OJ L 242, 20.9.2011, p. 2-3	Commission Implementing Regulation (EU) No 931/2011 of 19 September 2011 on the traceability requirements set by Regulation (EC) No 178/2002 of the European Parliament and of the Council for food of animal origin
Regulation (EU) 2019/627	OJ L 131, 17.5.2019, p. 51–100	Commission Implementing Regulation (EU) 2019/627 of 15 March 2019 laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council and amending Commission Regulation (EC) No 2074/2005 as regards official controls
Regulation (EC) No 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs
Regulation (EC) No 333/2007	OJ L 88, 29.3.2007, p. 29-38	Commission Regulation (EC) No 333/2007 of 28 March 2007 laying down the methods of sampling and analysis for the control of the levels of trace elements and processing contaminants in foodstuffs

Legal Reference	Official Journal	Title
Regulation (EU) 2017/644	OJ L 92, 6.4.2017, p. 9–34	Commission Regulation (EU) 2017/644 of 5 April 2017 laying down methods of sampling and analysis for the control of levels of dioxins, dioxin-like PCBs and non-dioxin-like PCBs in certain foodstuffs and repealing Regulation (EU) No 589/2014
Regulation (EU) 2022/931	OJ L 162, 17.6.2022, p. 7–12	Commission Delegated Regulation (EU) 2022/931 of 23 March 2022 supplementing Regulation (EU) 2017/625 of the European Parliament and of the Council by laying down rules for the performance of official controls as regards contaminants in food
Regulation (EU) 2022/932	OJ L 162, 17.6.2022, p. 13–22	Commission Implementing Regulation (EU) 2022/932 of 9 June 2022 on uniform practical arrangements for the performance of official controls as regards contaminants in food, on specific additional content of multi-annual national control plans and specific additional arrangements for their preparation
Regulation (EU) 2023/915	OJ L 119, 5.5.2023, p. 103–157	Commission Regulation (EU) 2023/915 of 25 April 2023 on maximum levels for certain contaminants in food and repealing Regulation (EC) No 1881/2006
Directive (EU) 2020/2184	OJ L 435, 23.12.2020, p. 1–62	Directive (EU) 2020/2184 of the European Parliament and of the Council of 16 December 2020 on the quality of water intended for human consumption (recast)
Regulation (EC) No 2406/96	OJ L 334, 23.12.1996, p. 1-15	Council Regulation (EC) No 2406/96 of 26 November 1996 laying down common marketing standards for certain fishery products
Regulation (EC) No 1333/2008	OJ L 354, 31.12.2008, p. 16-33	Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives

Legal Reference	Official Journal	Title
Regulation (EU) No 1169/2011	OJ L 304, 22.11.2011, p. 18-63	Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004
Commission Implementing Regulation (EU) 2019/1715	OJ L 261, 14.10.2019, pp. 37– 96	Commission Implementing Regulation (EU) 2019/1715 of 30 September 2019 laying down rules for the functioning of the information management system for official controls and its system components (the IMSOC Regulation)