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DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Health and Food Audits and Analysis

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**FINAL REPORT OF AN AUDIT
OF GREECE
CARRIED OUT
FROM 6 TO 21 MARCH 2025
IN ORDER TO
TO EVALUATE THE IMPLEMENTATION OF ANIMAL HEALTH CONTROLS IN
RELATION TO SHEEP AND GOAT POX AND PESTE DES PETITS RUMINANTS**

Executive Summary

This report outlines the outcome of an audit of Greece, carried out remotely on 6 March 2025 and on-the-spot from 10 to 21 March 2025 as part of the work programme for the Directorate-General for Health and Food Safety.

The objective of the audit was to evaluate the implementation of animal health controls in relation to sheep pox and goat pox, and infection with peste des petits ruminants virus in Greece.

The report concludes that despite the commendable efforts of the Hellenic veterinary services, a combination of multifactorial shortcomings hampered the early detection and rapid and effective containment of these diseases. This raised the risk of disease spread and increased the overall impact of the three consecutive, and at times overlapping epizootics, notably in the case of sheep pox and goat pox.

The ovine/caprine sector in Greece – one of the largest in the EU – faces persistent and significant structural weaknesses. These include inadequate selection and implementation of biosecurity measures suitable to mitigate the potential risks of disease incursion, suboptimal animal traceability, and insufficient disease awareness. These weaknesses make the sector particularly vulnerable to disease introduction and spread and hinder the application of effective control measures.

Both diseases featured certain characteristics during the epizootics in Greece, such as a delayed onset of clinical signs and an initial slow spread within affected flocks, that often hindered the surveillance efforts of the authorities to detect them quickly.

The authorities made efforts to partially address the limited availability of veterinary resources and of laboratory diagnostic capacity in the most affected regions. These limitations slowed down the application of disease surveillance in restricted zones and reduced the effectiveness of other control measures to curb the evolution of the epizootics. Additionally, in those regions, they did not carry out adequate epidemiological enquiries to ascertain the dynamics of transmission of the diseases, further limiting their ability to prevent and reduce viral circulation.

Despite those shortcomings, in the case of infection with peste des petits ruminants virus, proper enforcement of livestock movement restrictions and swift stamping-out efforts generally helped the authorities to contain the epizootic. On the contrary, the rapid progression of the second sheep pox and goat pox epizootic indicates that general restrictions, particularly enhanced biosecurity measures, were neither adequately followed nor effectively enforced to prevent the spread of the disease.

The report contains recommendations to Greece to address the main shortcomings identified.

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ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

Abbreviation	Explanation
AHL	Regulation (EU) 2016/429 of the European Parliament and of the Council, the Animal Health Law
DG(SANTE)	Directorate General for Health and Food Safety
EFSA	European Food Safety Agency
ELISA	Enzyme linked immunosorbent assay, which is a laboratory test method for the detection of antibodies and/or antigens.
Epizootic	Widespread occurrence of outbreaks of a disease in the country within a limited period.
EU	European Union
MANCP	Multi-annual National Control Plan
MRDF	Hellenic Ministry of Rural Development and Food (<i>Υπουργείο Αγροτικής Ανάπτυξης και Τροφίμων</i>)
NRL	National reference laboratory for SPGP and PPR
Outbreak	Confirmed case of a disease in a farm or epidemiological unit.
Peacetime	Periods when there are no ongoing outbreaks or epidemics in the country.
PCR	Polymerase chain reaction - a molecular biology test method that may be used for the detection of nucleic acid (typically from DNA viruses such as SPGP viruses)
PPR	Infection with peste des petits ruminants virus
RT-PCR	Reverse transcription polymerase chain reaction - a PCR test preceded by a reverse transcription used for RNA viruses such as PPR virus.
SPGP	Sheep pox and goat pox
TADs programme	Transboundary Animal Diseases programme
THRACE programme	Trans-boundary High Risk Area Coordinated Epidemio-surveillance programme
WOAH	World organisation for animal health

1 INTRODUCTION

This audit took place in Greece from 10 to 21 March 2025 after a remote session conducted on 6 March 2025. It formed part of the Directorate-General (DG) for Health and Food Safety work programme for 2025. The audit team comprised two auditors from the European Commission services, who were accompanied by representatives of the competent authority during the on-the-spot part of the audit.

The audit team held an opening meeting via videoconference on 6 March with the central competent authority, the Ministry of Rural Development and Food (MRDF). At this meeting, the audit team confirmed the objectives and scope of the audit, its agenda and itinerary, and requested additional information required for the satisfactory completion of the audit.

2 OBJECTIVES AND SCOPE

The objective of the audit was to evaluate the implementation of animal health controls in relation to sheep pox and goat pox (SPGP) and infection with peste des petits ruminants virus (PPR) in Greece.

The scope of the audit covered:

1. Official controls, awareness, and coordination between parties involved.
2. Establishment registration, animal identification for sheep and goats and movement controls.
3. Biosecurity on holdings and relevant establishments.
4. Effectiveness of preventive measures and early detection of new outbreaks.
5. Disease surveillance.
6. Sampling protocols and turn-around time for analytical results.
7. Measures taken in case of outbreaks.
8. Zoning and controls in restricted zones.
9. Emergency vaccination plans.

In pursuit of that objective, the audit team held the following meetings and visits:

Meetings / visits	No.	Description
Central competent authority	2	Including opening and closing meetings.
National Reference Laboratory (NRL)	1	Visit/meeting at the NRL for SPGP and PPR
Regional Units competent authorities	5	Meetings with participation of Regional competent authorities
Regional laboratory	1	Meeting with representatives of one regional laboratory
Small ruminant dairy farms – on-site visit and meeting with operators and	7	Establishments involved in SPGP or PPR outbreaks

officials.		
Small ruminant dairy farms – off-site meeting with operators and officials.	2	Establishments involved in SPGP outbreaks
Lamb fattening farms and assembly centres	1	Establishment involved in a PPR outbreak
Slaughterhouses	1	Establishment located in SPGP and PPR restricted zones

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

SPGP and PPR are category A listed diseases in accordance with Articles 5(3), 7 and 9(1)(a) of Regulation (EU) 2016/429 (the Animal Health Law – AHL). They are highly contagious viral diseases of sheep and goats. They may cause death, fever, nasal excretions, lung lesions, widespread skin lesions in the case of SPGP (macules, papules or vesicles) and painful erosive lesions in the mouth, ocular discharges and diarrhoea, in the case of PPR. Neither SPGP nor PPR are zoonotic. Most strains of SPGP viruses affect both sheep and goats, but some show a preference for one of the species. The PPR virus affects sheep and especially goats.

The transmission of SPGP and PPR is through direct contact between animals or, particularly in the case of SGPG, since the virus can survive in the environment, indirectly through contact with contaminated elements (clothing), vehicles, products (litter, feed), dust (airborne) or insects (mechanical vectors).

While SPGP and PPR are endemic in many African, Middle Eastern and Asian countries, before the epizootics of SPGP in 2024, in the EU there were in recent years sporadic outbreaks or recurrent epizootics of the disease in certain Member States (Greece, Bulgaria and Spain). Before the epizootic of PPR in Greece in 2024, in the EU there was only a previous small one in Bulgaria in 2018.

The European Commission provides financial support for the surveillance and early detection of SPGP and PPR in high-risk areas of southeastern Europe. In Greece, that support is channelled through Transboundary Animal Diseases (TADs) and Trans-boundary High Risk Area Coordinated Epidemio-surveillance (THRACE) programmes.

Greece confirmed the first outbreak of PPR in 2024. In contrast, SPGP had occurred there several times in the past. For example, Lesbos Island reported 36 SPGP outbreaks between December 2016 and January 2018. Evros region had 202 SPGP outbreaks from August 2013 to March 2015.

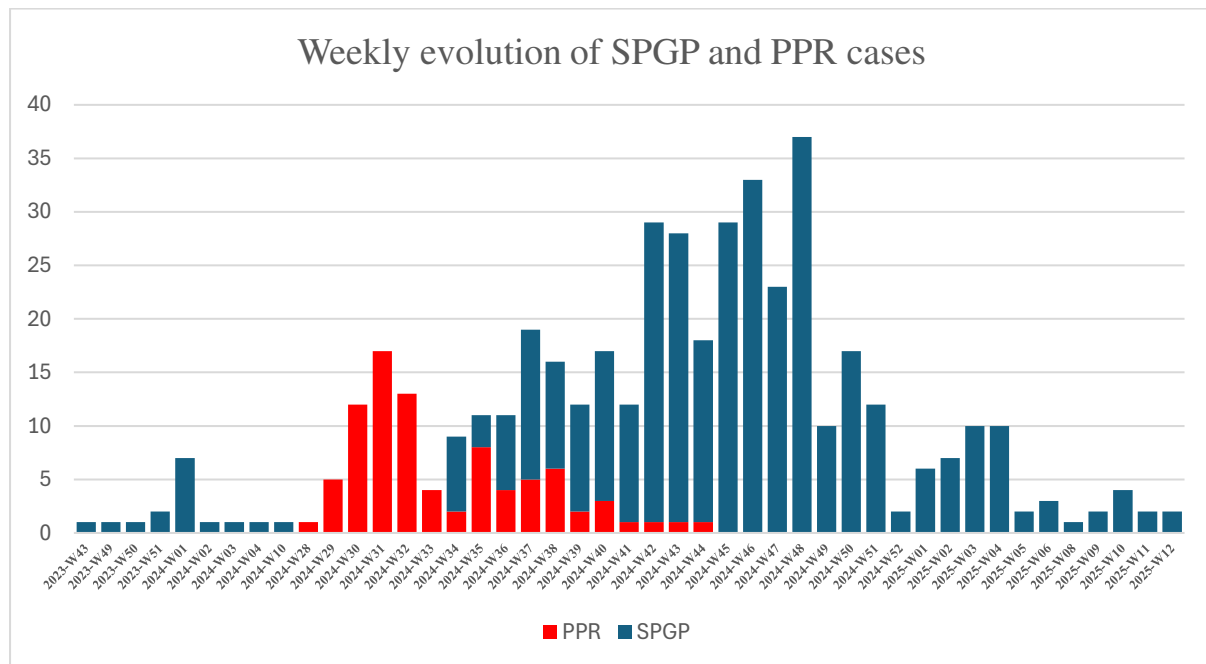
Greece requested EU funding to implement a national programme for SPGP eradication and early detection of PPR for 2021-2022¹ and again for 2023². In the past, Greece used vaccination to control SPGP in heavy affected areas, e.g. in 1987 in Lesbos, and Evros in 1988 and 1998.

After almost six years without SPGP, Greece confirmed a new outbreak on Lesbos Island on 24 October 2023. This followed several SPGP outbreaks in nearby areas of southwestern Türkiye. A cluster of eight outbreaks then occurred in Lokroi, Thessaly and Central Greece. Further outbreaks in that region continued until 7 March 2024.

A new epizootic began on 20 August 2024 in Macedonia and Thrace, with many outbreaks in these regions during the following months. On 18 October, SPGP reached the Peloponnese. Another outbreak was declared in the Aegean region on 28 November 2024. The latest SPGP outbreak in Greece at the time of this audit was confirmed on 19 March 2025.

On 11 July 2024, Greece confirmed its first PPR outbreak. It affected a sheep and goat establishment in Kalambaka, Thessaly region. Coincidentally, Romania confirmed its first PPR outbreak shortly after, on 20 July 2024. The disease spread locally at first. In August, Greece reported 36 new PPR outbreaks across Attica, Peloponnese, Crete, Macedonia, Thrace, and Thessaly. More outbreaks followed, with the last one confirmed on 31 October 2024.

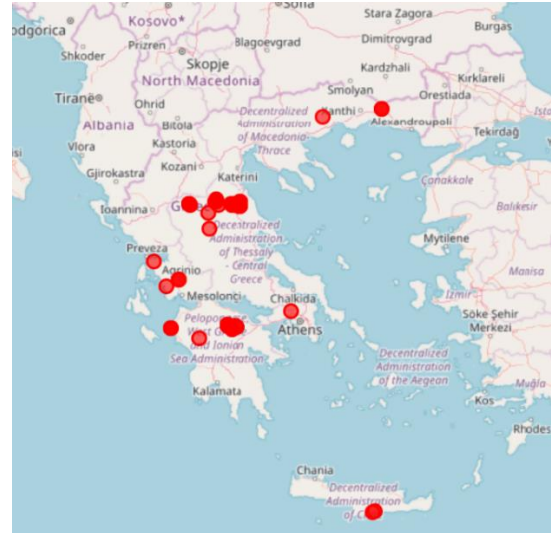
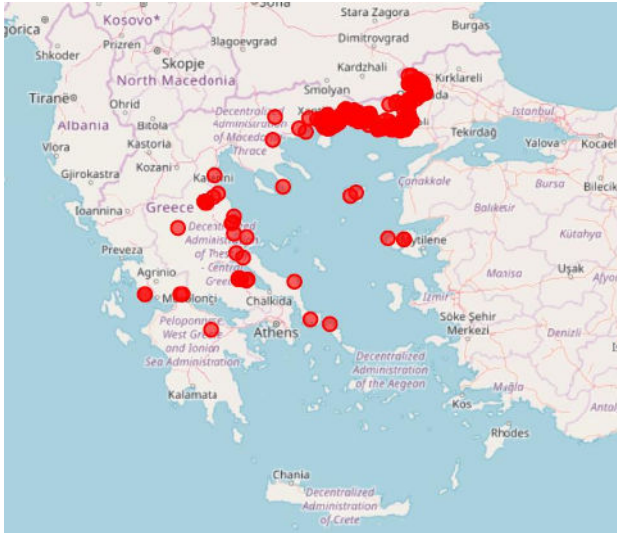
The following graph shows the weekly evolution of the three epizootics since October 2023 until the time of this audit.



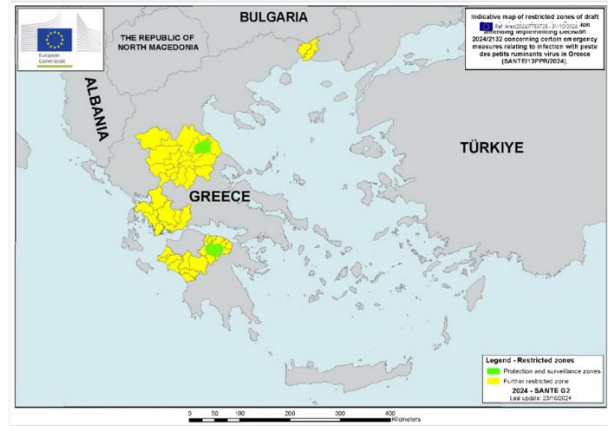
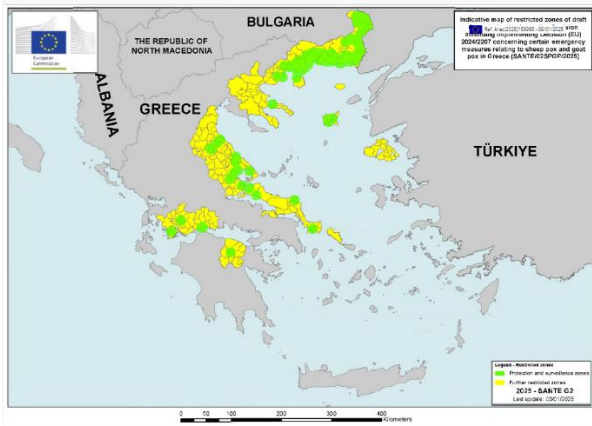
In total, there were 376 outbreaks of SPGP (nine in the first SPGP epizootic, from October 2023 to March 2024, and 367 in the second one, from August 2024 to the time of this audit) and 89 outbreaks of PPR. The maps here below show the geographical distribution of cases of SPGP (on the left) and of PPR (on the right).

¹ https://hadea.ec.europa.eu/system/files/2022-03/Sheep%20and%20goats%20pox_Greece.pdf

² https://hadea.ec.europa.eu/document/download/7464d025-6e8a-4c7b-8056-0698276ba9c9_en?filename=EL_4.pdf



During the epizootics of both diseases, several Commission Implementing Decisions established and adapted restricted zones around the outbreaks and introduced specific control measures. The maps here below show examples of the distribution of restricted zones for SPGP (on the left) and for PPR (on the right) at specific times during their respective epizootics.



EU Veterinary Emergency Teams visited Greece twice, providing technical support and assistance to the authorities for the control and eradication of SPGP (in December 2023) and of PPR (in July 2024).

Greece has the largest goat population and the third largest sheep population in the EU. According to EUROSTAT³, in 2023 Greece had 7 251 100 sheep (12.6% of the EU's sheep population) and 2 876 900 goats (26.9% of the EU's goat population).

³ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agricultural_production_-_livestock_and_meat#Livestock_population

5.1 AUTHORITIES AND GENERAL PROVISIONS

There is a system to implement and monitor EU rules, which can work in principle.

1. The Multi-annual National Control Plan (MANCP) of Greece provides an overview of the organisation of official animal health control systems in Greece. It can be found, under the 'Member State Links' tab, at:
<https://ec.europa.eu/food/audits-analysis/country/profile/details/GR>
2. The Hellenic Ministry of Rural Development and Food (MRDF), through its Directorate General of Veterinary Services, is the central competent authority for the animal health controls related to SPGP and PPR. Greece comprises 13 administrative Regions, which are further divided into 74 Regional Units. At regional level, the Hellenic Ministry of Interior, through its Regional Directorates of Veterinary Medicine and its Regional Units' Departments of Veterinary Medicine, is responsible for administering these controls.
3. Greece has national animal health legislation that supplements EU rules. It includes Presidential Decrees and Ministerial Decisions published in the Government Gazette. The MRDF issues technical instructions through circulars to regional official veterinarians and shares relevant information with farm operators. Although this report highlights issues with farm biosecurity, animal traceability, and epidemiological investigations, the national legal and administrative arrangements, and guidance for officials and operators, were generally adequate to support implementation and enforcement of EU rules.
4. The MRDF oversees controls at both Regional and Regional Unit levels. During the epizootics, it organised several teleconferences with the most affected Regions and conducted four on-the-spot verifications in 2024, focussing mainly on depopulation practices. Despite limited verification on the broader implementation of official controls and activities (e.g. surveillance sampling), regional officials made significant efforts to adhere to plans and manage the extra workload. However, the verification procedures did not detect key shortcomings, such as delayed surveillance in some restricted zones and weaknesses in epidemiological enquires.
5. Official veterinarians at the Regional Units conduct official controls on animal health, animal welfare, and food safety. According to the MANCP, there are 381 veterinarians: 52 at regional level and 329 at regional-unit level. This workforce, employed by the Hellenic Ministry of Interior, is supported by 26 seasonal veterinarians under

The veterinary services relied on a committed workforce, but staffing shortages and limited support affected the timely implementation of some measures.

Despite efforts, staff and laboratory shortages led to inability to effectively apply and enforce EU rules.

the TADs programme. Additionally, around 150 approved veterinarians (working for delegated bodies or in the Army), and some temporary staff, also supported official veterinarians during the control of SPGP and PPR in restricted zones.

6. During suspect cases and outbreaks, official veterinarians conducted multiple demanding tasks. These included investigating suspect cases, inspecting flocks at risk in restricted zones, collecting samples, conducting epidemiological enquiries, and tracing animal and product movements. They also oversaw culling, cleaning and disinfection in affected farms, and handled extensive paperwork, often with little or no administrative support. This created a heavy workload, given the high number of outbreaks and the size of the sheep and goat sector.
7. Temporary reinforcements and efficiency measures, such as setting specialised depopulation teams, partly compensated for the limited number of official veterinarians and the lack of administrative and technological support. Veterinarians showed exceptional commitment and flexibility. Many cancelled holidays, worked long hours – sometimes in extreme weather – and relocated temporarily. Still, staff shortages in some regions caused delays in farm visits within protection zones and weakened the quality of epidemiological enquiries.
8. In certain regions, delays in disease prevention and control measures resulted from insufficient qualified staff, notably veterinarians, and limited overall laboratory capacity. Despite organisational and personal efforts, this situation was not fully in line with the Member State responsibilities under Article 13 of the AHL.
9. Each year, the MRDF and the Hellenic Minister for Economic Affairs and Finance, issue a Joint Ministerial Decision on compensation for farmers required to cull animals during outbreaks. According to the Greek authorities, the 2024 Decision, published on 17 October 2024, set compensation ceilings based on average market values: EUR 250 per purebred sheep/goat (EUR 500 per ram/buck, EUR 80 per lamb/kid up to 3 months old and EUR 100 per older lamb/kid) or EUR 220 per crossbred sheep/goat (EUR 320 per ram/buck, EUR 70 per lamb/kid up to 3 months old and EUR 90 per older lamb/kid). These amounts exceed the EUR 140 ceiling established in the *Guidelines for Member States for EU funding of veterinary emergency measures*⁴, used by the EU to calculate cofinancing for emergency measures.

⁴ https://food.ec.europa.eu/system/files/2023-04/cff_animal_emergency-measures_ah-ms-guidelines.pdf

Compensation encouraged farmer compliance but had an unclear impact on early reporting of disease.

Farmers were fully compensated despite having non-compliances in their farms.

Authorities introduced disease control measures beyond those in EU rules.

Assessment of the epizootics is pending, no lessons learnt yet to improve future responses.

10. Compensation is crucial to support farmers, as it generally encourages prompt reporting of suspected cases and compliance. The audit confirmed that the new compensation rules improved compliance with control measures after outbreak confirmation, since uncooperative behaviour may lead to loss of payment. However, the impact on early reporting was unknown because the authorities have not assessed it, and available data did not allow for such analysis.
11. The Joint Ministerial Decision sets clear conditions for receiving compensation, including compliance with traceability, biosecurity measures, and early notification rules- requirements to be met before the outbreak, and that must be confirmed by an official veterinarian during the epidemiological enquiries. Yet, despite the frequent non-compliances the audit team found when visiting farms, Greece did not penalise farmer compensation during the three recent epizootics. Authorities did, however, take action for some of those non-compliances and imposed sanctions separately.
12. In all visited farms where compensation had been paid, farmers received the full amount per animal. However, in most cases, especially in dairy farms, the cost of restocking exceeded the compensation. Farmers reported that, despite the increase in compensation, the amounts still did not reflect the true market value of their animals.
13. The MRDF imposed two nationwide movement bans, lasting 26 and 8 days, to contain the diseases. The ban was particularly effective during the PPR epizootic. However, a surge in movements after lifting the first, longer ban coincided with the likely reintroduction of SPGP and unexpectedly helped spread the disease.
14. The MRDF temporarily suspended all sheep and goat movements from Greece to other Member States during the PPR epidemic. Later, a Commission Implementing Decision prohibited all such movements outside Greece. Authorities ensured compliance with these bans.
15. Regional and local disease control centres adopted additional measures: they reinforced movement controls with help from the Hellenic police and of the Port Authorities, imposed disinfection of roads connecting affected farms and grazing areas, cancelled livestock events and festivals, and raised awareness among hunters to keep their dogs away from livestock facilities.
16. The MRDF, through a Decision, established a group of experts from its services, academia and the Regions, to analyse the recent PPR epizootic and identify how the disease entered and spread in Greece.

At audit time, the group had not yet met. It will also evaluate response measures and identify weaknesses. The MRDF also planned to hold a teleconference with affected regions for a lessons-learned review covering PPR and SPGP outbreak responses.

Conclusions on authorities and general provisions

17. The overlapping epizootics of PPR and SPGP tested Greece's capacity to manage animal health emergencies. Despite efforts to adapt containment measures, these did not prevent the spread within and beyond affected areas.
18. Limited human resources slowed the response and limited the scope of control measures. Longstanding weaknesses in farm biosecurity, surveillance and animal traceability undermined early detection and disease control.
19. The new compensation policy supported farmer cooperation post-outbreak and improved adherence to disease control measures. However, authorities did not reduce payments for non-compliance with key animal health requirements, weakening the policy's effectiveness in improving compliance and preventing future outbreaks and raising questions about the efficient use of EU cofinancing to support it.
20. National movement bans, going beyond EU requirements, helped to contain PPR. However, authorities did not anticipate the negative impact of lifting restrictions prematurely and the resulting surge in animal movements, combined with delayed detection of a new SPGP incursion, contributed to the fast spread of that disease.
21. Greek authorities have not yet analysed and review the data and experiences gathered during the response to the PPR and SPGP outbreaks. This delay limits their ability to implement improvements that would better prepare the sheep and goat sector and strengthen emergency response system for future epizootics.

5.2 PREPAREDNESS AND PREVENTION

5.2.1 Animal traceability

Inadequate registration of establishments as number are allocated to operators instead to facilities.

22. The current system to register sheep and goat establishments and operators keeping sheep and goats under Article 101(1) of the AHL has deficiencies that hamper its use for disease prevention and control. It allocates unique registration numbers to operators rather than to establishments. These operator numbers are linked to a location, as required by Article 84(1)(b)(ii) of the AHL to register an establishment. However, several operators often share the same location. This creates 'cohabitation' of multiple operator numbers at one site where each keeps animals under a separate registration number.

23. As a result, the number of establishments in a given area cannot be reliably determined. This is not in line with Articles 84(1) and 93 of the AHL, which foreseen one establishment per location with a clear set of facilities. The audit team confirmed that these shared facilities usually involve frequent exchanges of animals between operators (e.g. young animals, animals just before being dispatched to a slaughterhouse). This complicates record keeping and increases the likelihood of errors, hampering animal traceability in the establishment. Despite this, when an outbreak occurs at one of those multi-operator establishments, the authorities treat the site as a single epidemiological unit.

24. According to EU Commission's Trade Control and Expert System, only one establishment in Greece is approved for assembly operations related to intra-Union trade. The Greek authorities consider such approval is only necessary if the establishment sends animals to other Member States. However, assembly establishments require specific approval under Article 94(1)(a) of the AHL. This involves compliance with the requirements outlined in Article 97(1)(a) of the AHL and in Article 5 of Delegated Regulation (EU) 2019/2035, which include aspects related to biosecurity, quarantine, enhanced traceability records and disease surveillance.

Insufficient control of EU requirements for assembly operations involved in intra-Union

25. There are other establishments that also conduct assembly operations and receive animals from other Member States. They are only approved under national rules, known as "type A dealers", and do not meet the stricter approval conditions mentioned above. Some of these establishments may have been involved in the further spread of PPR in Greece after its introduction through animals traded from another Member State. This is not in line with Articles 94(1)(a), 96(1)(e), and

<i>trade.</i>	97(1) of the AHL, and in Article 5 of Delegated Regulation (EU) 2019/2035.
<i>Inadequate official verification of compliance in establishments involved in national assembly operations.</i>	<p>26. The above-mentioned establishments, as well as others conducting similar assembly operations within Greece (sometimes after receiving animals from the former ones), were not subject to risk-based or regular official controls. Whether they are registered or approved, authorities must have sufficient information about those establishments to assess their risk of disease introduction and spread, as required by Articles 84(1) and 96(1) of the AHL. Establishments must apply biosecurity measures appropriate to those risks as laid down in Article 10(1)(b) and (4)(b) of the AHL. Based on this information, the authorities must carry out official controls following a risk-based approach or regular inspections following a minimum frequency, in line with Article 9(1) of Regulation (EU) 2017/625, and Article 3 of Implementing Regulation (EU) 2022/160). The Greek authorities were not complying with those EU legal provisions regarding those establishments.</p>
<i>Compliance with requirements on identification of sheep and goats.</i>	<p>27. Greece complies with EU requirements on the individual identification of sheep and goats. Lambs and kids sent directly from their farm of origin to a slaughterhouse before six months of age may be identified with ear tags containing only the operator’s registration number. Although missing one of the two required ear tags is common in Greece, most animals older than six months were properly identified.</p> <p>28. Each operator must keep a register to trace animals in their establishments. This includes recording births, deaths, individual identification numbers of adult animals, and an annual census. Most farmers use a logbook, sometimes stamped by officials during checks to confirm the accuracy of the records. Some use electronic records, which are not directly accessible to the authorities. In such cases, farmers must show a printout or show their screen during inspection.</p> <p>29. The audit team identified frequent failures in these records (e.g. missed births records for lambs, and animals without recorded movements). Auditors also found inaccuracies (e.g. false death dates to match annual census data or only indicating the year of death). Authorities often fail to detect these issues during official visits and epidemiological enquiries. This is not in line with requirements of Article 102(1) and (3) of the AHL, and Articles 22 and 23(1), (2) and (4) of Delegated Regulation (EU) 2019/2035.</p> <p>30. Despite improvements in the collection system for fallen stock,</p>

Poor record-keeping by operators and frequent burial of dead animals.

subsidised by national and regional funds, most operators in certain regions keep burying dead sheep and goats. The audit team observed that was a common practice rather than the exception in several farms visited.

31. This burial practice associated with its inaccurate recording hinders traceability. It is also a non-compliance with specific EU rules on collection of animal by-products not intended for human consumption. Derogations for burial only apply in remote or hard-to-access areas (Article 19 of Regulation (EC) No 1069/2009), which was not the case here. This practice also raises concerns about possible under reporting of disease suspicions linked to those deaths.

32. To verify compliance with traceability requirements, the authorities inspect 3% of the establishments each year based on risk. In the three regions visited, the authorities had followed their plans. In 2023, they inspected 155 establishments and found deficiencies in 16 (10.3%). In 2024, they inspected 160 and found deficiencies in 62 (38.7%). Authorities indicated they followed up on those deficiencies to ensure correction. In some cases they imposed administrative fines, and in a few serious ones referred them to the judiciary due to the operator's reluctance to address them. However, as noted earlier, these inspections fell short of ensuring compliance.

33. Farmer must conduct an annual census of adult animals at the end of each year and report the results to the regional veterinary authorities. The authorities enter the data into the national database. Alternatively, farmers can enter the data directly. This system helps the authorities to estimate the national flock size.

34. However, the database allows only to search for one establishment at a time, which limits its usefulness during outbreaks involving several epidemiologically linked establishments. As noted above, on-the-spot checks remain necessary because census data may be unreliable or outdated.

Verification of compliance with responsibilities on animal traceability applied as planned, but of limited effectiveness.

Inconsistent notification of movements hinders animal traceability, which delays identifying links during outbreaks.

35. Animal movements must be documented using a standardised movement document. This form must accompany each batch during transport. National rules on issuing the document and recording movements are sufficient to ensure animal traceability. Authorities at regional services and national level receive information such as origin and destination, number of animals, their identification numbers, details of both parties involved. Both the sender and the receiver must notify the authorities, who must update the database to close the movement. Therefore, the authorities had taken steps to

develop an identification and registration system for sheep and goats in line with Article 108(1) and (3) of the AHL, including provisions for recording of movements and a computerised database

36. Although the system requires both departure and arrival locations to report a movement, it does not flag incomplete records. The audit team found that operators may keep movement documents but had not submitted them to the regional authorities or notified the national database. This made traceability exercises difficult during disease outbreak investigations. In one case seen, during the investigation of one outbreak, an operator failed to report the reception of animals from a trader involved in spreading PPR. After a significant delay, an official veterinarian discovered the movement document at the establishment and identified the link.

5.2.2 Biosecurity measures

37. At the time of the audit, the authorities had not provided any guidance on biosecurity measures to sheep and goat farmers. They had taken some steps, such as promoting perimeter fencing around establishments. In some cases, they required improvements before allowing restocking after a disease outbreak. However, the operators met showed limited knowledge of basic biosecurity measures, even among professional farms that keep their flocks indoors. This is not in line with the requirements in Articles 10 and 11 of the AHL.

38. Outside the regions covered by the TADs programme, the authorities have not launched initiatives to raise awareness of PPR or SPGP, or to promote preventive practices. In the high-risk zones, they distributed brochures in 12 regional units and six islands. However, the rest of the country lacked similar efforts. This contradicts national legislation on the TADs programme, which requires authorities to raise awareness about those diseases and preventive measures nationwide.

Insufficient awareness and weak implementation of biosecurity measures.

39. The authorities verify compliance with biosecurity measures when conducting epidemiological enquiries or visiting farms in restricted zones. These visits include advice. However, the audit team could not confirm whether authorities treated biosecurity standards as mandatory or merely recommended. The audit team found only sporadic documented examples of enforcement. In restricted zones, some farms had disinfection points at entries and exits, and the authorities provided a list of suitable disinfectants. However, other basic biosecurity measures for people and vehicles were missing, and operator awareness was low.

Inadequate record-keeping on visitors and vehicles entering farms.

40. Farmers did not keep visitor logs. This limited the quality of data collected during epidemiological enquiries and showed weak understanding of biosecurity. Without logs, visits by traders, private veterinarians, other farmers or contractors could not be verified.
41. Investigations into several SPGP outbreaks suggested that gatherings of people were likely sources of infection. In these cases, authorities identified private vehicles, footwear, or clothing as potential transmission vectors. These observations highlight exposure risks at farm entry and exit points, including through contact with people or equipment.
42. The audit team confirmed that external transport vehicles pose a relevant risk for disease transmission in sheep and goat establishments. For example:
 - Milk collection vehicles: the authorities introduced additional risk-mitigation measures during outbreaks. However, most of the establishments visited by the audit team (except some newer ones) lacked facilities needed to apply these measures consistently. Operators typically do not maintain records of milk collection details (e.g. date and time, vehicle registration, driver).
 - Vehicles collecting animals for slaughter: these also enter farms and present similar biosecurity challenges. In some cases, vehicles may park outside the main operational or enclosed area of the farm or at an agreed collection point where farmers brought their animals.
43. Farmers usually shear sheep themselves or with help from family members. Sometimes, they hire external workers who use their own equipment or accept help from neighbouring farmers who bring their own tools. Authorities and operators met reported no presence of professional shearing services. The audit team found that there were no specific official procedures or guidance for safe sheep shearing practices. Farmers did not keep records on visitors entering the farm.
44. During peacetime, authorities do not carry out specific official controls to verify compliance with operators' responsibilities (record keeping, biosecurity, etc) except for those related to animal identification. The actions taken by the authorities to encourage operators to improve their biosecurity measures, and to enforce EU requirements particularly in the context of disease outbreaks, do not ensure consistent implementation. Therefore, they are not in line with provisions laid down in Article 13(2) of the AHL, in Article 9(1) of

Official veterinarians had good biosecurity practices.

Regulation (EU) 2017/625, and in Articles 12(1)(b), 19(5), 25(1)(e) and 40 of Delegated Regulation (EU) 2020/687.

45. Official veterinarians followed good personal biosecurity practices during their visits, including the use of disposable protective clothing, overshoes, or disinfected boots. The MRDF organised specific videoconferences on biosecurity practices for inspectors of organic farming systems and those working for the agency responsible for farming subsidies.
46. The rules for cleaning and disinfection of livestock vehicles at slaughterhouses were adequate, and official veterinarians regularly verified compliance. These rules and checks were enhanced during epizootics. Outside slaughterhouses, cleaning and disinfection rules for livestock vehicles met the minimum EU requirements, but were more difficult to verify and control, except within restricted zones where official veterinarians carried out specific checks. Greece does not have additional national requirements for cleaning and disinfection of vehicles transporting animals between farms at dedicated premises. The current framework presents challenges for effective official verification.
47. The MRDF has identified the weaknesses mentioned above and worked with the University of Thessaloniki to prepare a biosecurity manual for establishments keeping sheep and goats. They plan to distribute the manual widely in the sector. The MRDF had also arranged a series of events on biosecurity for operators across Greece in nine locations plus two online events.

5.2.3 Awareness of main related groups

Prior to the epizootics, awareness was adequate in higher-risk areas but insufficient elsewhere.

48. The MRDF publishes brochures and posters with the clinical signs of SPGP and PPR on its website. These materials were also displayed at offices of Regional Units and were used for raising awareness during official visits to farms within the protection and surveillance zones, as well as during meetings with stakeholders.
49. During peacetime, measures for raising awareness of SPGP and PPR among farmers focussed on geographic areas with higher risk of introduction of these diseases (12 Regional Units and six islands), as part of the TADs programme. These included the distribution of brochures. The active surveillance activities conducted in the framework of the TADs and THRACE programmes also contributed to raise awareness in these geographic areas. However, outside these regions, awareness was limited, particularly at the beginning of each

epizootic. This may have affected early detection of both diseases.

50. Authorities have not conducted specific awareness campaigns about SPGP and PPR for private veterinarians. General awareness among them was assumed, and they contributed to the early detection of outbreaks. However, there were cases of delayed notification. In these cases, private veterinarians initially treated animals without ruling out the potential disease suspicion. The relatively low number of suspected cases ruled out by laboratory testing, combined with the challenge of differential clinical diagnostic for these diseases, suggests lack of awareness in private veterinarians.

5.2.4 Contingency plan and instruction manuals

Contingency plan and instructions provided overall consistence despite regional disparities.

Horizon scanning and proactive approach.

Emergency vaccination has not been considered.

51. The contingency plan was published in the Decision 258933 on 18 August 2008 ⁽⁵⁾. The contingency plan was implemented ensuring consistency in handling the outbreaks.
52. Central and local disease control centres operated effectively, although the regional organisation, coordination, and resources varied. These differences affected the implementation of control measures and surveillance levels. In some cases, they led to delays in farm visits in protection zones and inconsistent use of laboratory testing. MRDF's circulars provided specific instructions to veterinary services and helped to ensure overall consistency.
53. MRDF regularly monitors outbreaks in neighbouring countries and issues circulars. These communications have promoted passive surveillance and, at times, prioritise active clinical surveillance under the THRACE programme. The first SPGP outbreak was detected shortly after one of these circulars, illustrating the value of this proactive approach.
54. Authorities have not considered emergency vaccination due to its associated trade restrictions. The contingency plan includes funding provisions for such vaccination.
55. The contingency plan provides for extra pay (salaries, daily allowances, and travel expenses) for MRDF staff and the Regions. It also covers funding and provision of reagents and consumables to the NRL. However, the plan does not provide for extending the NRL's working hours or designating temporarily additional

⁵ In its response to the draft report, the competent authority stated that the updated Emergency Plan is ref. No: 1747/386028/2023

laboratories, a measure necessary during the epizootics.

Conclusions on preparedness and prevention

56. The practice of registering multiple operators at a single location introduced unnecessary complexity. Incomplete movement records, lack of visitor logs, and poor-quality farm registers reduced the effectiveness of traceability during the epizootics. This hampered timely implementation of control measures, complicated epidemiological investigations, and increased the need for human and technical resources. All these factors impacted the decision-making process and implementation of control measures.
57. Although farm inspections and enforcement actions took place, they did not sufficiently address systemic weaknesses in animal traceability. As a result, data used to support disease control decisions remained unreliable, and the authorities faced challenges in gaining an accurate understanding of the epidemiological situation.
58. Establishments conducting assembly activities, including those receiving animals from other Member States, operated under uneven conditions, with gaps in traceability and biosecurity. This created points of vulnerability that likely contributed to disease introduction and further transmission.
59. Weak implementation of biosecurity measures on farms, combined with limited awareness and inconsistent official verification, increased the risk of disease incursion and spread. Although initiatives to raise awareness and provide guidance have been launched, it remains uncertain whether they will achieve sustained improvements in biosecurity practice.
60. Information campaigns and training activities focused primarily on high-risk areas. In other regions, lack of disease awareness among farmers and veterinarians likely contributed to delays in reporting suspicious cases, limiting early detection and the potential for prompt response.
61. The contingency plan and instructions overall facilitated the consistent implementation of measures despite regional disparities. Although the contingency plan included funding for response operations, it lacked provisions to extend laboratory working hours or days, or temporarily increase diagnostic capacity. This presented challenges during the epizootics, when rapid testing was essential for timely disease containment.

5.3 DISEASE DETECTION

5.3.1 *Passive surveillance*

- Awareness level conditioned prompt reporting of disease suspicions.*
62. In regions with a high risk of disease introduction, suspected cases were promptly reported. In other regions, there were delays in the notification of suspicions, even by private veterinarians.
63. In protection and surveillance zones, farmers received information about the symptoms, and many reported them when appeared. In many other cases, official veterinarians identified the symptoms during their clinical inspections.
64. Official records did not enable differentiation between cases reported by farmers and those identified through clinical examinations. The number of reported suspected cases that were ruled out by the NRL was also unclear due to limitations in databases and record-keeping.
- Differential diagnostic with similar disease was supported by laboratory testing.*
65. Some clinical symptoms of orf (a viral skin disease) resemble those of SPGP. Orf is considered common in Greece, although its prevalence is unknown. Authorities authorise vaccination against orf when operators confirm the disease. For this reason, the NRL received samples from flocks with clinical symptoms indicative of orf (32 in 2023, 104 in 2024). The NRL ruled out SPGP in all these cases and confirmed orf in some of them (18 in 2023 and 31 in 2024). Symptoms of bluetongue also bear resemblance to those of PPR. The NRL ruled out SPGP and PPR in three suspected bluetongue cases in 2023 and 218 cases in 2024.

5.3.2 *Active surveillance*

- Routine active surveillance in high-risk regions improved preparedness.*
66. During peacetime, active surveillance in high-risk regions is conducted as part of the TADs and THRACE programmes. These programmes have also contributed to the awareness of the disease in the high-risk regions.
67. Authorities conducted active surveillance through clinical examination on all farms in the protection and surveillance zones. They repeated these visits regularly (initially weekly, then less frequently due to limited capacity) until the surveillance zone was lifted. Some farms have been visited up to 14 times. However, not all regions managed to visit every farm within the protection and surveillance zones. In some cases, authorities also took samples for laboratory testing.
- Active surveillance in restricted zones*
68. When testing asymptomatic flocks in protection and surveillance

relayed on cycles of clinical examinations.

zones, authorities generally collected low number of samples. This sample size would only detect the disease if prevalence in the flock was high. Despite this, some tests detected the disease before symptoms appeared.

69. Authorities did not carry out laboratory testing on other SPGP and PPR susceptible species, such as wild goats or cattle.

5.3.3 Laboratory support

NRL supported the confirmation of diseases and routine surveillance in high-risk regions

70. The Centre of Veterinary Institutes of Athens is the NRL for SPGP and PPR.

71. For SPGP, the NRL tested skin lesions, blood, and occasionally oronasal swabs. The limited use of oronasal swabs, which have been found to be particularly effective for SPGP surveillance in other Member States, reflects the MRDF's focus on testing suspect cases with symptoms. For PPR, the type of samples included swabs (nasal and rectal), blood, and organs.

72. The NRL uses real-time PCR, conventional PCR, and ELISA to test for SPGP. For PPR, it uses real-time RT-PCR, conventional RT-PCR, and ELISA. The ELISA test for SPGP is designed to be used across multiple species; however, the laboratory is capable of distinguishing between infections caused by lumpy skin disease and SPGP. Since cattle vaccinations for lumpy skin disease ceased in 2023, they are unlikely to interfere with SPGP diagnostic. PCR and RT-PCR are used to confirm suspected cases and as primary tests for active surveillance in restricted zones. Serology through ELISA testing is used in some cases such as for active surveillance of PPR under the TADs programme (11 910 tests in 2023 and 6 602 tests in 2024), as part of the investigation of suspected cases of PPR (8 060 tests) and in selected SPGP outbreaks (152 tests in 2024) to gain insight into the temporal evolution of the infection.

Laboratory capacity was insufficient to support large-scale surveillance in restricted zones.

73. The NRL had sufficient capacity to confirm cases with clinical symptoms. However, it faced challenges testing large numbers of asymptomatic animals, particularly in situations of low intra-flock prevalence where a high number of samples per flock is necessary. Testing all farms in the zones was not feasible during multiple outbreaks. Authorities limited testing of asymptomatic flocks to those with strong epidemiological links and, following EU Veterinary Emergency Team's advice, relied on repeated clinical examinations in for active surveillance in restricted zones. Official veterinarians used their judgment to decide on testing during their

visits.

74. The same approach -clinical checks without sufficient laboratory testing- was generally used for suspect cases identified through epidemiological links (e.g. shared pastures, driveways, equipment, or poor biosecurity with neighbouring farms). In some asymptomatic flocks with strong epidemiological links, authorities carried out limited laboratory testing.
75. The NRL's turnover time depended on its working hours (eight hours per day, Monday to Friday) and the high volume of samples received, especially at the start of the PPR epizootic. The NRL processed samples as they arrive, without prioritisation, regardless of the origin. Staff made efforts to process as many samples as possible each working day.
76. The NRL lacked accreditation for key diagnostic methods: real-time PCR and ELISA for SPGP and real-time RT-PCR for PPR ⁽⁶⁾. This is not in line with Article 37, paragraph 5(a), and Article 100, paragraph 2, of the Regulation (EU) 2017/625. Nevertheless, the NRL has successfully participated in Interlaboratory Proficiency Test organised by the EU Reference Laboratories for SPGP and PPR.
77. Authorities temporarily designated two regional laboratories—one for both PPR and SPGP, and the other for PPR only. These laboratories used non-accredited diagnostic method, but the NRL, in collaboration with the EU Reference Laboratories, organised ad hoc interlaboratory proficiency tests to verify their performance. This initiative facilitated systematic surveillance testing in protection and surveillance zones in certain regions.
78. Samples were not linked to individual sheep identification. This approach reduced workload and typographical errors, but limited the ability to evaluate certain epidemiological aspects, such the role of goats or the reason for seropositivity in flocks previously tested as negative.
79. Authorities have not analysed the epidemiological role of goats or other aspects like intra-flock prevalence when symptoms appear or the best sample matrix. During the epizootics, authorities focussed on reacting to the outbreaks, leaving potential data analysis and

Tests were not covered by the laboratory accreditations, but results of proficiency test were satisfactory.

Emergency designation of two regional laboratories improved testing capacity.

⁶ In its response to the draft report, the competent authority stated that, at the time of the audit, the NRL had completed all the experiments required to accredit PCR SPGP and was waiting for the ESYD to be audited. This ESYD audit was carried out in the summer of 2025, when the NRL was also accredited for the PCR SPGP.

reviews for peacetime.

Conclusions on disease detection

80. Limited disease awareness in farmers and private veterinarians caused delays in notifications, particularly outside high-risk zones, It also reduced the sensitivity of passive surveillance and made early detection of cases in the protection and surveillance zones reliant on repeated official clinical inspections.
81. Low samples sizes from asymptomatic flocks in restricted zones hindered the effectiveness of active surveillance to detect disease early, reinforcing reliance on clinical signs and frequent inspections.
82. The NRL and temporary designated laboratories lack accreditation of some diagnostic tests, but demonstrated reliable performance through participation in proficiency tests. The laboratory has sufficient capacity to confirm clinical cases but faces challenges handling large volumes of samples from asymptomatic animals, impacting surveillance during outbreaks.

5.4 OUTBREAK MANAGEMENT

5.4.1 Measures on suspicion and confirmation of disease

- Suspicion cases were adequately handled particularly when the flock has animals with symptoms.*
83. When authorities receive a suspicion report, official veterinarians visit the farm without delay to confirm or rule it out. They record the date of suspicion as the date of this visit. Generally, the visit occurs the same day or the day after the report. During this visit, the veterinarians conduct clinical examinations and sampling, according to instructions. They also impose preliminary disease control measures to the farm and collect information for the epidemiological enquiry.
84. In some cases, authorities confirmed the disease based on clinical signs without waiting for laboratory confirmation. This reduced response times.
85. When suspicion arose based on epidemiological links without visible symptoms, sampling and laboratory testing were not always conducted. In some cases, the number of samples was too low to identify the disease at early stages, when flock prevalence is likely to be low. This is not fully aligned with Article 54, paragraph 2(b), of Regulation (EU) 2016/426 and Article 6, paragraph 2(b), of Regulation (EU) 2020/687. Instead, authorities relied on repeated clinical examinations by official veterinarians, following the same approach used for surveillance in protection and surveillance zones. In these cases, they also imposed movement restrictions on the affected establishments.
- Suspicion cases of asymptomatic flocks were followed up by clinical examinations without laboratory support in some cases.*
86. In line with the contingency plan, Regional Units suspended the issuance of movement permits when suspicion arose, particularly when symptoms were present. This created an informal movement ban and acted as a 'temporary restricted zone' until the official zones were established or the suspicion was ruled out.
87. Upon confirmation, authorities established restricted zones in line with EU requirements. In some cases, these zones exceeded the standard 3 km for protection zones or 10 km for surveillance zones. Additionally, the Regional Unit sometimes established larger unofficial protection zones by merging several protection zones.
88. The contingency plan requires official veterinarians to complete the epidemiological enquiry using a standard form annexed to it. It also requires them to check farm records in detail, including information on mortality, purchased or sold animals and visits by people. In many cases, completing the enquiry was difficult due to the high workload

There were weaknesses in the epidemiological enquires.

of front-line veterinary teams. Weaknesses in the operators' records and the lack of visitors logs further limited the quality and completion of these enquiries.

89. In practice, the official veterinarians visiting the affected farms conducted the epidemiological investigations. They did so without specialised epidemiological support and without systematically verifying the records used to supporting their findings.
90. Official veterinarians used the standard epidemiological enquiry form for their epidemiological investigations and traceability work. Although the form provides a useful structure, it does not include relevant details for a complete and effective investigation, contrary to as required by Article 57(2)(a), (b), and (e) of Regulation (EU) 2016/429. The form does not include:
 - Details on clinical presentation of the disease, such as the date of first symptoms, number and type of animals affected animals, stage of lesions, or details of laboratory results. These details are needed to estimate the likely date of disease introduction. While some clinical information was recorded separately, it was not generally used to adjust the investigation period. This does not align with the Article 57, paragraph 2(b), of Regulation (EU) 2016/429. In some cases, veterinarians estimated a time of disease introduction which preceded the standard period covered by the epidemiological enquiry.
 - Findings from the analysis of farm records or the movement database, which could reveal unrecorded animal movements or unexplained mortality. Discrepancies between the farm register, animal movement data and actual stock were unnoticed during epidemiological investigations. This is not in line with the Article 8, paragraph 3, of Regulation (EU) 2020/687.
 - Key biosecurity information, such as presence of perimeter fencing, pastures use, staff and visitors' practices or arrangement for vehicles access.
 - Epidemiological links to other farms (e.g. shared equipment, pastures, driveways, or offsite milk tanks). Although the form lists nearby farms and their distances, in some cases, clear epidemiological links were not recorded. Nevertheless, as the linked farms were within protection or surveillance zones, they were under movement restrictions and monitored through clinical visits, which eventually confirmed the disease.

91. The form includes a section for recording animals sent to slaughter for the purpose of tracing the meat and products. However, it does not include information about milking practices during the monitoring period (e.g. production, milk storage, date of collection) or the tracing of the milk dispatched (e.g. name of the dairy company, details of the collecting vehicle). This limits traceability of milk, although authorities collect milk route data separately from dairy operators.
92. Dairy companies provided milk collecting routes to veterinary services upon request, but these routes did not always clearly identify lorries and sometimes were confusing (e.g. including cattle operators), hindering their suitability for epidemiological investigations.
93. The form also lacks a checklist of common visitor activities on sheep and goat farms (e.g. shearing, trader visits, or equipment maintenance), which could prompt more complete investigations in the absence of farm visitor logs. The standard retrospective period covered by the form is 30 days before the visit, which exceeds the 21-day minimum set in EU law. However, investigations often did not count back from the date when symptoms first appeared, despite the known delay between infection and visible clinical signs in these diseases.
94. The audit identified weaknesses in completing the epidemiological enquiries. Key data were often missing and critical events not consistently recorded, limiting the ability to trace the likely pathways of disease introduction and spread. Investigations rarely aimed to determine the most likely date of disease entry or the underlying causes of spread. This is not in line with the Article 57, paragraph 2, of Regulation (EU) 2016/429. However, some epidemiological investigations successfully identified a main route of PPR spread, facilitating early detection and control.
95. Tracings focused on identifying epidemiologically linked farms but gave less attention to locating products, such as meat or milk, dispatched during the 21 days prior to confirmation. This is not fully in line with Article 19, paragraph 2(a), of the Regulation (EU) 2020/687. Nonetheless, other control measures such as systematic pasteurisation of all milk helped mitigate the risk of disease spread through these products.
96. The culling and preliminary disinfection of affected farms were conducted very efficiently under directly supervision of official veterinarians. In some regions, specialised teams led by an official veterinarian improved the efficient use of resources.

and cleaning and disinfection were conducted efficiently.

97. Animal carcasses were typically disposed of by on-site burial. When this was not authorised, they were transported to approved incineration plants.
98. Contractors carried out the final cleaning and disinfection. While official veterinarians generally did not supervise this process directly, they verified its completion through documentation.
99. At the time of the audit, some farms, particularly those affected by PPR, have been repopulated under official supervision. There have been no recurrences of disease in these repopulated farms.

5.4.2 Measures and controls in protection and surveillance zones

Visits to farms in the protection zone were generally conducted.

100. Authorities aim to visit all farms in the protection and surveillance zones, with visits to the surveillance zones going beyond EU legal requirements. These visits always include clinical examinations of all the sheep and goats in the flock and are also used to raise awareness among farmers and to verify compliance with restrictions. However, the prioritisation of visits to farms in the protection zone was not always adequate. Along with veterinary workforce limitations, this caused delays in detecting SPGP jeopardising the control of the disease.

Animal movement restrictions and controls on commodities were broadly adequate.

101. The use of laboratory testing during these visits in the protection and surveillance zones was variable. Considering the limited laboratory capacity and following advice from EU Veterinary Emergency Team, the central authority decided to stop sampling asymptomatic flocks and relied on repeated clinical examination instead. In one region, additional resources allowed for continuing the sampling and larger sample size per flock, which helped to detect cases earlier.
102. Meat from protection and surveillance zones was subject to risk mitigation treatments. In practice, no meat was produced from PPR outbreak zones, as the required heat treatment was not commercially viable. For SPGP outbreaks, the removal of offal was conducted, as required by the legislation.
103. In Greece, sheep and goat milk, which naturally has a pH below 7, is always pasteurised. This facilitates compliance with mitigation treatments required for SPGP and PPR.
104. Movement restrictions for animals were consistently applied in protection and surveillance zones. Local breaches occurred, particularly in certain zones and normally related to access to pastures. In some cases, police patrols were necessary to deter

breaches.

5.4.3 *Measures and controls in further restricted zones*

*Gaps in
movement and
product
restrictions at
further
restriction
zones.*

105. Authorities established further restricted zones around all surveillance zones to prevent the spread of diseases. These zones usually followed the boundaries of the Regional Units, facilitating the implementation of disease controls measures. However, for PPR, some were defined using municipality boundaries.
106. In principle, the same control measures applied in surveillance zones also applied in the further restriction zones. Authorities could derogate from some of these measures (e.g. active surveillance, mitigation treatments on products), if conditions set by subsequent Commission Implementing Decisions were met. These conditions evolved over time, focusing mainly on the movement of sheep and goats within and outside the further restricted zones.
107. Initially, movements of sheep and goats from a further restricted zone to destinations outside the zone were permitted under certain conditions (specific authorisation, pre-movement official clinical inspection, only for immediate slaughter within Greece, cleaning and disinfection of vehicle under official supervision before and after movement, consignment with animals from the same farm and official sealing of vehicle). Later, such movements were banned to prevent long distance spread of disease. Movements within the same zone were initially unrestricted but later allowed only for immediate slaughtered and under similar conditions indicated above.
108. Authorities ensured compliance and verification with movements conditions through the issuance of movement documents by Regional Units and official supervision at slaughterhouses.
109. For PPR, the MRDF derogated the heat treatment requirement for meat from further restricted zones on condition that the meat was consumed in Greece. It was implemented by using a blue health mark instead of the red one used for intra-EU trade or exports. Documented procedures did not clearly establish this marking procedure and its verification, but interviews indicated that the procedure was implemented.
110. For SPGP, authorities initially applied risk mitigation measures to meat from further restricted zones. These consisted in removing the offal and treating it as animal by-products. On 12 November 2024, the MRDF allowed one region to derogate from this requirement. As

Gaps in procedures and certification of products from further protection zones.

of 6 December 2024, the MRDF extended the derogation to all regions. Offal from further restricted zones was not restricted to consumption within Greece.

111. MRDF procedures do not guarantee that products of animal origin from restricted zones and placed on the EU market are accompanied by official certificates stating the treatment applied and the name of the listed disease causing the movement restrictions. This is not in line with the Article 3 of the Delegated Regulation (EU) 2020/2154.

Conclusions on outbreak management

112. Prompt farm visits after suspicion helped authorities react quickly, especially when clinical signs were visible. However, suspicions in asymptomatic flocks, including those based on epidemiological links, were mostly followed up by repeated clinical examinations, overloading the work of field official veterinarians. Limited or no testing of these flocks reduced the chances of detecting the disease in its early stages, potentially allowing further spread before confirmation.
113. The authorities implemented adequate control measures when outbreaks were suspected or confirmed. Culling and primary disinfection were completed particularly efficiently. This, together with proper disposal, supported disease containment.
114. Epidemiological investigations lacked depth and critical data, weakening outbreak analysis. The structure and content of the standard enquiry form, together with the lack of specialised support, limited the ability of official veterinarians to identify likely sources of infection and transmission pathways. Missing or incomplete information — including clinical timelines, movement data, and biosecurity factors — reduced the usefulness of these investigations for informing disease control decisions.
115. Control measures in restricted zones were generally adequate. Zoning and movement restrictions helped control spread but required intense enforcement. Authorities applied extensive movement restrictions which were crucial in limiting spread, particularly in difficult-to-control areas.
116. The implementation of risk mitigation measures for meat and milk was broadly adequate. The absence of systematic certification procedures for treated products increased the risk of market uncertainty and weakened official assurances for intra-EU trade.

6 OVERALL CONCLUSION

The audit found that Greece faced significant challenges in implementing animal health controls during the overlapping outbreaks of SPGP and PPR. Despite commendable efforts by

the authorities to contain the spread, longstanding systemic weaknesses in surveillance, traceability, and biosecurity reduced the effectiveness of the response. Limited human and laboratory resources further constrained the implementation of key control measures.

While the authorities acted promptly in many cases, including with movement restrictions and culling, these efforts were undermined by delays in detection (⁷), insufficient epidemiological analysis, and gaps in the enforcement and verification of preventive measures. Inconsistencies in traceability and biosecurity at farm and assembly level increased the risk of disease spread. The lack of a timely review of the response experience limits opportunities for structured improvement.

The audit concludes that although the framework for managing animal health emergencies is in place, its implementation needs strengthening to ensure more effective prevention, early detection, and control of future epizootics affecting small ruminants in Greece.

7 CLOSING MEETING

The audit team held a closing meeting with the veterinary authorities on 21 March 2025 where they presented the main findings and preliminary conclusions of the audit. During this meeting, the competent authority further explained the compensation policies, the measures for marking meat intended for national consumption, and the measures taken or planned to address weaknesses in biosecurity and epidemiological inquiries. The authorities also stated that, in their opinion, animal traceability procedures comply with legal requirements. The audit team acknowledged this but explained why its use for outbreak control was suboptimal.

8 RECOMMENDATIONS

The competent authority is requested to provide details of the actions taken and planned, including deadlines for their completion ('action plan'), aimed at addressing the recommendations set out below. Regarding those non-compliances noted in the audit report which did not result in a recommendation being made, the competent authority is, nevertheless, requested to address these. The effectiveness of the actions taken to address such non-compliances will be assessed in future audits on this topic.

No.	Recommendation
1.	To ensure that operators and establishments keeping sheep and goats implement biosecurity measures appropriate to their type of production (e.g. dairy production), activity (e.g. assembly operations), and husbandry practices (e.g. permanent housing, shared pastures). And to ensure that these measures are subject to risk-based official verification at an appropriate frequency and that non-compliance are effectively

⁷ Clarification was provided to the Competent Authority that “delays in detection” primarily refers to the time taken to suspect disease.

No.	Recommendation
	<p>addressed or corrected and compliance is enforced.</p> <p>Legal basis: Article 10, paragraphs 1(b) and 4(b), of Regulation (EU) 2026/429, Article 25, paragraph 1 (e), of Regulation (EU) 2020/687, and Articles 20, paragraph 1, 12, paragraph 1, and 138 of Regulation (EU) 2017/625.</p> <p>Recommendation based on conclusion: 59</p> <p>Associated findings: 11, 37, 39, 40 and 44</p>
2.	<p>To ensure that, at least in establishments located in the restricted zones, operators keep accurate and up-to-date records of all persons visiting the establishment and made them available to the competent authority upon request.</p> <p>Legal basis: Article 25, paragraph 1(f), and Article 40 of the Delegated Regulation (EU) 2020/687.</p> <p>Recommendation based on conclusion: 56</p> <p>Associated findings: 40 and 43</p>
3.	<p>To ensure that the accreditation scope for official laboratories includes all the methods they use for detecting SPGP and PPR infections.</p> <p>Legal basis: Article 37, paragraph 5(a), and Article 100, paragraph 2, of the Regulation (EU) 2017/625.</p> <p>Recommendation based on conclusion: 82</p> <p>Associated findings: 76 and 77</p>
4.	<p>To ensure that investigations of suspect cases without clinical signs but with epidemiological links to outbreaks, include the collection of an adequate number and type of samples for laboratory examinations.</p> <p>Legal basis: Article 54, paragraph 2(b) of Regulation (EU) 2016/426 and Article 6, paragraph 2(b) of Delegated Regulation (EU) 2020/687.</p> <p>Recommendation based on conclusion: 112</p> <p>Associated findings: 85</p>
5.	<p>To ensure that epidemiological enquiries are sufficiently detailed to allow the identification of the likely source of infection and transmission pathways, including through the systematic collection and analysis of key data such as clinical timelines, movement history, and biosecurity factors, and that all relevant epidemiological links are thoroughly investigated.</p> <p>Legal basis: Article 57(2)(a) and (b), 57(2)(c) and (d) of Regulation (EU) 2016/429.</p> <p>Recommendation based on conclusion: 114</p> <p>Associated findings: 90, 93 and 94</p>

No.	Recommendation
6.	<p>To ensure that products of animal origin from animals produced or processed in establishments, food businesses or zones subject to emergency measures or movement restrictions, including further restricted zones and cases where mitigation measures have been applied, are accompanied by official certificates indicating all the required information.</p> <p>Legal basis: Article 3 of the Delegated Regulation (EU) 2020/2154.</p> <p>Recommendation based on conclusion: 116</p> <p>Associated findings: 111</p>

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 (EU) 2016/429	OJ L 84, 31.3.2016, p. 1–208	Regulation (EU) 2016/429 of the European Parliament and of the Council of 9 March 2016 on transmissible animal diseases and amending and repealing certain acts in the area of animal health ('Animal Health Law')
Regulation (EU) 2018/1882	OJ L 308, 4.12.2018, p. 21–29	Commission Implementing Regulation (EU) 2018/1882 of 3 December 2018 on the application of certain disease prevention and control rules to categories of listed diseases and establishing a list of species and groups of species posing a considerable risk for the spread of those listed diseases

Legal Reference	Official Journal	Title
Regulation (EU) 2020/2002	OJ L 412, 8.12.2020, p. 1–28	Commission Implementing Regulation (EU) 2020/2002 of 7 December 2020 laying down rules for the application of Regulation (EU) 2016/429 of the European Parliament and of the Council with regard to Union notification and Union reporting of listed diseases, to formats and procedures for submission and reporting of Union surveillance programmes and of eradication programmes and for application for recognition of disease-free status, and to the computerised information system
Regulation (EU) 2020/2154	OJ L 431, 21.12.2020, p. 5–8	Commission Delegated Regulation (EU) 2020/2154 of 14 October 2020 supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards animal health, certification and notification requirements for movements within the Union of products of animal origin from terrestrial animals
Regulation (EU) 2020/687	OJ L 174, 3.6.2020, p. 64–139	Commission Delegated Regulation (EU) 2020/687 of 17 December 2019 supplementing Regulation (EU) 2016/429 of the European Parliament and the Council, as regards rules for the prevention and control of certain listed diseases
Regulation (EU) 2020/688	OJ L 174, 3.6.2020, p. 140–210	Commission Delegated Regulation (EU) 2020/688 of 17 December 2019 supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council, as regards animal health requirements for movements within the Union of terrestrial animals and hatching eggs
Regulation (EU) 2020/689	OJ L 174, 3.6.2020, p. 211–340	Commission Delegated Regulation (EU) 2020/689 of 17 December 2019 supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards rules for surveillance, eradication programmes, and disease-free status for certain listed and emerging diseases

Legal Reference	Official Journal	Title
Regulation (EU) 2023/361	OJ L 52, 20.2.2023, p. 1–42	Commission Delegated Regulation (EU) 2023/361 of 28 November 2022 supplementing Regulation (EU) 2016/429 of the European Parliament and the Council as regards rules for the use of certain veterinary medicinal products for the purpose of prevention and control of certain listed diseases
Regulation (EU) 2019/2035	OJ L 314, 5.12.2019, p. 115–169	Commission Delegated Regulation (EU) 2019/2035 of 28 June 2019 supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards rules for establishments keeping terrestrial animals and hatcheries, and the traceability of certain kept terrestrial animals and hatching eggs
Regulation (EU) 2020/686	OJ L 174, 3.6.2020, p. 1–63	Commission Delegated Regulation (EU) 2020/686 of 17 December 2019 supplementing Regulation (EU) 2016/429 of the European Parliament and of the Council as regards the approval of germinal product establishments and the traceability and animal health requirements for movements within the Union of germinal products of certain kept terrestrial animals
Regulation (EU) 2021/520	OJ L 104, 25.3.2021, p. 39–51	Commission Implementing Regulation (EU) 2021/520 of 24 March 2021 laying down rules for the application of Regulation (EU) 2016/429 of the European Parliament and of the Council with regard to the traceability of certain kept terrestrial animals
Regulation (EC) No 1099/2009	OJ L 303, 18.11.2009, p. 1-30	Council Regulation (EC) No 1099/2009 of 24 September 2009 on the protection of animals at the time of killing
Regulation (EC) No 1069/2009	OJ L 300, 14.11.2009, p. 1-33	Regulation (EC) No 1069/2009 of the European Parliament and of the Council of 21 October 2009 laying down health rules as regards animal by-products and derived products not intended for human consumption and repealing Regulation (EC) No 1774/2002 (Animal by-products Regulation)

Legal Reference	Official Journal	Title
Regulation (EU) No 142/2011	OJ L 54, 26.2.2011, p. 1-254	Commission Regulation (EU) No 142/2011 of 25 February 2011 implementing Regulation (EC) No 1069/2009 of the European Parliament and of the Council laying down health rules as regards animal by-products and derived products not intended for human consumption and implementing Council Directive 97/78/EC as regards certain samples and items exempt from veterinary checks at the border under that Directive
Regulation (EU) 2022/160	OJ L 26, 7.2.2022, pp. 11–16	Commission Implementing Regulation (EU) 2022/160 of 4 February 2022 laying down uniform minimum frequencies of certain official controls to verify compliance with Union animal health requirements in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council and repealing Regulations (EC) No 1082/2003 and (EC) No 1505/2006