



Measurement and Reduction of Administrative Burdens in 13 sectors in Greece

Final Report Food Safety



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Table of Contents

Acronyms and Abbreviations	5
Executive summary	7
1. Introduction	10
1.1. Background	10
1.2. Project approach	10
1.3. Methodology	11
2. Introduction to priority area and overview of measurement results	14
2.1. Selection of IOs and respective laws and regulations	14
2.2. High level measurement results.....	26
3. Action Plan and Recommendations for Priority Area Food Safety.....	28
3.1. Identification of potential simplification and reduction options.....	29
3.2. Recommendations for the priority area Food Safety.....	29
3.2.1. Codify or catalogue laws and regulations about food business licensing, including health regulations, maintain their stability and provide guidance to businesses	31
3.2.2. One-stop-shops for food businesses	37
3.2.3. Electronic submission of documents to one-stop-shop	43
3.2.4. Single integrated process to replace establishment and operating licences for food industrial/manufacturing plants, incorporating establishment inspection and approval only if handling animal origin products.....	48
3.2.5. Health Regulated Establishments trading in food: notification of commencement (estimate of burdens already reduced since measurement) ...	54
3.2.6. Single reporting of information by slaughter houses.....	56
3.2.7. Additional related opportunities to reduce administrative burdens	59
3.3. Suggested sequencing and prioritisation	60
3.4. Other issues	61
4. Conclusion.....	62
Annex 1: Analysis of information obligations and quantification of administrative costs .	64
Annex 2: Forms: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (IO 29) and obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (IO30) - (Industries/small manufacturing units).....	110
Annex 3: Forms: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (IO 29) and obligation to obtain an establishment licence for a food business, including relevant inspections and	

	establishment approval number, where appropriate (IO30) - (health regulated establishments)	137
Annex 4:	Forms: Obligation to keep records, submit meat balances and related inspection – IO 32	142
Annex 5:	Forms: Obligation to keep records, submit milk balances (dairy farmers and producers) – IO 33	144
Annex 6:	Hourly rate per employee type	153

Tables

Table 2.1:	Regulatory framework	14
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Figures

Figure 2.1:	Total identified Administrative Cost for the priority area	26
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Acronyms and Abbreviations

The list below provides the abbreviations used throughout the report. All terms related to the Standard Cost Model (SCM) method are described in detail in the Greek SCM method paper, ‘Manual for the implementation of the Standard Cost Model in Greece’. Following this paper in this report the following abbreviations are used:

AB	Administrative Burden
AC	Administrative Cost
BAU	Business As Usual
CC	Consultancy Cost
ELGO-DIMITRA	Hellenic Milk and Meat Organisation
f	frequency
HRE	Health Regulated Establishment (KYE)
IO	Information Obligation
KEP	Citizens Service Centre
NEB	Normal Efficient Business
OOP	Out of Pocket cost
P	Price
PA	Priority Area (in SCM often referred to as ‘Sector’)
Q	Quantity

Executive summary

This report presents the findings from the measurement of the selected information obligations in the priority area Food Safety, together with recommendations to reduce administrative burdens.

The measurement involved interviews with businesses and experts. The information obligations selected for this area form the seventh largest proportion of administrative costs and burdens in this project. They represent a **total administrative cost of EUR 92.58 million to businesses in Greece**. Of this, **EUR 80.24 million (87%) has been classified as administrative burdens**. The remainder is business-as-usual cost which businesses would be likely to continue to incur if the obligations did not exist.

Food safety is regulated to a large extent at the EU level, often by directly applicable Regulations with limited national variation. This makes it challenging for a national administrative burden measurement exercise. Many businesses understand the value of working within food safety requirements. It is also difficult to separate food safety measures, narrowly defined, from wider measures affecting the food industry and businesses handling food which are sometimes seen by business or consumers as being justified for reasons of food safety. In terms of regulatory policy, the purpose of a measure is not always immediately obvious as food quality, food safety or general regulation of economic activity. For this reason, the obligations measured are not narrowly defined food safety measures, but wider regulatory measures affecting the food industry which interact with food safety requirements.

The government made a significant reduction in administrative burdens in December 2013 by changing the rules for Health Regulated Establishments (food and drink retailers). We calculate this will reduce administrative burdens by EUR 6 255 020 based on the measurement. Designated KEPs will also act as one-stop-shops for these businesses, and the recommendation below on one-stop-shops has also been partly implemented for HREs, with scope for a greater value-adding role for the KEPs in this areas. We also acknowledge that the government is clarifying food safety inspection roles with new legislation.

The following recommendations are made as an action plan to reduce administrative costs and burdens in the selected obligations¹:

Recommendation	Calculated reduction in administrative costs	Calculated reduction in administrative burdens
Codify or catalogue laws and regulations about food business licensing, including health regulations, maintain their stability and provide guidance to businesses*	EUR 2 355 434	EUR 2 355 434
One-stop-shops for food businesses*	EUR 31 893 507	EUR 31 893 507

¹ In line with standard practice, the reduction calculations have been made individually for each recommendation. It is therefore not possible to add together these calculated reductions to obtain an overall total reduction because different recommendations affect the same obligations. The overall reduction obtained depends on the sequencing of recommendations. The impact of the recommendations marked * would be reduced by the other recommendations being implemented, and the impact of recommendations which are not marked would be affected similarly by prior implementation of the recommendations marked *.

Electronic submission of documents to one-stop-shop*	EUR 1 427 689	EUR 1 427 689
Single integrated process to replace establishment and operating licences for food industrial/manufacturing plants, incorporating establishment inspection and approval only if handling animal origin products*	EUR 340 985	EUR 340 985
Single reporting of information by slaughter houses	EUR 803 384	EUR 803 384

The recommendation to **catalogue or codify the law about food business licensing, including health regulations, ensure its stability and provide guidance to businesses** would help food businesses understand the full range of regulation which applies to them, and could also help the administration by highlighting how different areas interact.

The recommendation to **establish one-stop-shops for food businesses, including Health Regulated Establishments selling food and drink** involves creating a single point of contact and advice for these businesses for their interactions with different public authorities, including those dealing directly with food safety and those more concerned with business licensing. This would not only make it easier for businesses to contact the different authorities, it also removes possibilities for bribery, which was identified as an issue during the measurement of the obligations for food business licensing.

The recommendation to **allow electronic submission of documents to food business one-stop-shops** would make it easier for businesses to communicate information to different public authorities via one-stop-shops, and would allow businesses to receive information about progress of different administrative processes from the one-stop-shops.

The recommendation to **implement a single integrated registration for food industrial/manufacturing plants** would move from a two stage establishment licence and operating licence process to a registration process based on declarations which ensures the businesses are known to and registered with the authorities. It would remove an element of approval of economic activity by the authorities. The requirements of EU law on prior approval and inspection of food operating businesses handling products of animal origin would be maintained.

The recommendation to **allow slaughterhouses to report data to only one authority** would remove some duplication in the current arrangements and make better use of the existing online system for reporting run by ELGO-DIMITRA.

The **implementation of recommendations** in this area should be given medium priority because they affect a specific sector of the economy, but one which is active in domestic production and services and is seen as a potential area of growth. The recommendations about one-stop-shops and reforms to business licensing will help new businesses in this sector.

Different and **additional options and suggestions** were made by stakeholders about obligations in the priority area Food Safety. These are included to provide additional material for the Greek government to consider further measures to simplify and reduce administrative burdens and irritation.

The measurement covered the following selected obligations in the priority area:

Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal origin / products of non-animal origin)

Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal origin / products of non-animal origin)

Obligation to keep records about suppliers and customers when trading in additives for use in animal nutrition

Obligation to keep records, submit meat balances and related inspections (meat trade)

Obligation to keep records, submit milk balances (dairy farmers and producers)

1. Introduction

1.1. Background

The Ministry of Administrative Reform and e-Government of the Hellenic Republic (“the Ministry”) and the Organisation for Economic Co-operation and Development (“the OECD”) signed a Contribution Agreement in the last quarter of 2012 for OECD to carry out this project to measure and reduce administrative burdens in 13 key sectors of the Greek economy.

The project is expected to provide independent assessment, using the Greek modification of the internationally-recognised Standard Cost Model (“SCM”), to help to identify shortcomings and unnecessary administrative burdens for business in the regulatory environment that hinder the functioning of markets, damaging long-term growth and limiting benefits to corporate and household consumers. The SCM is a method for determining the administrative costs for business imposed by regulation. The SCM breaks down regulation into a range of manageable components that can be measured. The SCM neither addresses nor questions the policy objectives of each piece of regulation. As such, the measurement and analysis focus only on the administrative activities that must be undertaken in order to comply with regulation, not on the benefits that accrue from the legislation.

Economic recovery in any country is partly hampered by the quality of the regulatory framework. In 2006, the European Commission estimated that administrative costs amounted to approximately 6.8% of Greek GDP, and that a reduction of 25% in administrative costs in Greece might yield benefits of an increase of up to 2.4% of GDP by 2025.

This report describes the situation regarding administrative costs and administrative burdens at 1 September 2013 for the Food Safety priority area. It was prepared by the OECD Secretariat in co-operation with Capgemini Consulting Netherlands and Deloitte Business Solutions SA Greece and, for legal analysis, in co-operation with M & P Bernitsas Law Offices. The report gives an overview of the measurement results of the burden in the Food Safety and makes specific recommendations to reduce administrative burdens in this priority area.

1.2. Project approach

The project covers information obligation (IOs) stemming from different laws and regulations grouped into 13 Sectors or priority areas (PAs):

1. Agriculture and agricultural subsidies
2. Annual accounts/company law
3. Energy
4. Environment
5. Fisheries
6. Food safety
7. Pharmaceutical legislation
8. Public procurement
9. Statistics
10. Tax law (VAT)
11. Telecommunications
12. Tourism
13. Working environment/employment relations

The project uses the Greek Standard Cost Model (SCM) methodology as its basis and is structured in the following five phases.

1. Screening and collection of sector relevant laws and regulations
2. Qualitative scan of mapped regulations
3. Quantitative measurement of administrative burdens selected
4. Formulation of recommendations for redesigning/abolishing (parts of) laws and regulations
5. Publication and exploitation

The first phase of the project concerned the screening and selection of relevant laws and regulations by means of desk research. The result of this step was an overview of all regulations potentially causing administrative burdens in the 13 different Priority Areas.

Based on this overview, a qualitative scan of the mapped regulations was performed in order to identify the most likely burdensome and/or irritating areas. This scan, accompanied with additional meetings with key stakeholders, resulted in a selection of obligations for in-depth assessment.

The final report covers in depth stages 3 and 4: the results from the work undertaken under the quantitative measurement of administrative burdens stemming from selected laws and regulations and the formulation of recommendations to reduce administrative burdens in the Priority Area Food Safety.

More precisely this report contains:

- A description of the IOs and respective laws and regulations in measurement scope for the priority area Food Safety
- The main findings of the measurement
- Recommendations with quantified reduction proposals

This report does not include a detailed description of the methodology followed in the different stages. An analysis of the measured IOs within this priority area is in Annex 1.

The words “businesses” and “companies” are used interchangeably throughout this report. Where necessary, the term “businesses” includes sole traders and freelancers.

1.3. Methodology

The methodology used during this project is based on the ‘Manual for the implementation of the Standard Cost Model in Greece’ A short introduction to the main characteristics of the measurement approach is presented below.

The Standard Cost Model Manual (SCM) is a widely recognised method to calculate administrative burdens, which has been applied in many international projects from 2002 onwards. The model breaks down administrative costs imposed by legal acts into components that can be assessed with reasonable accuracy. The tool is characterised by the economic approach to law-making and regulation. Its aim is to identify all obligations arising from

specific legislation, which render the law and procedures particularly aggravating to the functioning of the market and the economy.

The methodology neither addresses nor questions the fundamental objectives of legislation. Instead, the measurement focuses only on the administrative activities that must be undertaken in order to comply with legislation. The scope of this measurement lies within measuring the administrative costs for business to be compliant.

The SCM method during this project focuses solely on the administrative costs for businesses. Thus, administrative costs are defined as the costs incurred by businesses in meeting IOs. An IO is defined as: “An obligation contained in legal, regulatory or other explanatory text of the public administration and which require from the company to provide data to public authorities or third parties, or to maintain data which can be made available to public authorities or others if requested. Moreover, obligation which imposes the above but has been adopted by the daily administrative practice in public services.”

Every IO has attributes that describe:

- Content of the data required or “data requirement” (what must be provided)
- Target group (the population that must provide it)
- The frequency of the obligation (when it must be provided)

IOs can stem from either EU legislation or from nationally implemented laws and regulations. This project focuses on both IOs stemming directly from EU legislation and on those stemming from the national implementation of EU legislation.

During stage two of the project particular attention has been paid to screening and identifying of “over-implementation” (or “gold-plating”) of an EU legal act at national level, in terms of additional IOs or procedural requirements, amended frequency, or population (i.e. coverage) as this could lead to an increase in administrative costs linked to the provisions of EU legislation, as well as national measures.

The SCM method distinguishes between information that would be collected and processed by business even in the absence of the legislation and information that is solely gathered for the purpose of the legal obligation. The former are called “business-as usual” (BAU) costs, the latter administrative burdens. Together, the administrative burdens and business-as-usual costs constitute the administrative costs on businesses.

Altogether, the total administrative costs for business are assessed on the basis of the average cost of the required administrative activity (Price) multiplied by the total number of occurrences of the obligation performed per year (Quantity). The cost is estimated by multiplying a standard tariff attributed to a specific employee type (base on average labour cost per hour including *pro rata* overheads) by the time per action (the internal costs). Where appropriate, other types of cost such as outsourcing/consulting costs, equipment or costs of supplies that can reasonably be attributed to an information obligation are taken into account (the external costs). Furthermore, for this measurement, “additional costs” (costs posted on businesses which do not stem from laws and regulations but which are faced as part of a specific IO) are separately taken into account. The quantity is calculated as the frequency of the required activities multiplied by the number of entities concerned. This results in the following core equation of the SCM method:

$$\sum P \times Q$$

Where

- P (Price) = Tariff \times Time
- Q (Quantity) = number of entities \times frequency.

In stage 3 of the project, interviews and expert assessments were conducted to estimate the time and other costs for businesses to comply with IOs. All results were standardised with the objective of providing a single estimate of what would be required for a normally efficient business to complete each of the administrative activities in order to comply with the IO. Information on the quantity was gathered by public servants from government sources and desk research. If no Q was available or further work seemed necessary, an informed estimate was made by Capgemini Consulting Netherlands and Deloitte Business Solutions SA Greece.

It should be emphasised that the goal of the standardisation is not to average the cost data obtained through the interviews and/or expert assessments but to derive a plausible result for a normally efficient business for each IO. The SCM method defines a normally efficient business as a business within the target group that performs administrative activities required by the IO neither better nor worse than may be reasonably expected.

2. Introduction to priority area and overview of measurement results

2.1. Selection of IOs and respective laws and regulations

The table below provides the selection of IOs and the respective national laws and regulations and the relevant EU legislation which were identified and examined during the previous stages of the project and in which the selected IOs within the priority area Food Safety are contained and/or in which they have a legal base.

Annex 1 provides a detailed description and process models of the IOs.

Table 2.1: Regulatory framework

Information Obligation	Laws and legislation in scope
IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries/small manufacturing units and Health Regulated Establishments)	<p><u>Industries and small manufacturing units</u></p> <p>Primary national legislation:</p> <p>Law 3325/2005 on the establishment and operation of industries.</p> <p>Law 3982/2011 on the simplification of the licensing procedures of technical profession and industrial processing activities.</p> <p>Law 4072/2012 regarding the improvement of the business environment, amending Law 3982/2011.</p> <p>Law 4155/2013 on the National System of Electronic Public Tenders.</p> <p>See also:</p> <p>Draft framework law on simplification of business licensing published for consultation on 18 February 2014</p> <p>Secondary national legislation:</p> <p>Ministerial Decision 6320/416/Φ31/23.5.2013 (GG 230/E/23.05.2013) on the founding of the Central Coordination Licensing Unit under art. 32 of Law 3982/2011.</p> <p>Ministerial Decision 483/35/Φ.15 (GG 158/B/03.02.2012) on the documentation and process required for the licensing of the activities provided for in Law 3982/2011.</p> <p><u>Units handling products of animal and non-animal origin</u></p> <p>Primary national legislation:</p> <p>Law 111/1975 on the establishment of slaughterhouses and poultry slaughterhouses.</p>

Information Obligation	Laws and legislation in scope
	<p>Law 4235/2014 on the administrative measures, procedures and sanctions on the field of food law.</p> <p>Secondary national legislation:</p> <p>Presidential Decree 79/2007 on necessary measures for the execution of the Regulations 178/2002, 852/2004, 853/2004, 854/2004 and 882/2004 of the European Parliament and of the Council concerning food hygiene and health conditions for certain products of animal origin, official controls for certain products and harmonization of the Hellenic veterinary legislation with Directive 2004/41/EC.</p> <p>Presidential decree 8/2012 on the licensing procedure required for poultry slaughterhouses.</p> <p>Presidential decree 490/1976 on the licensing procedure for poultry slaughterhouses, repealed by PD 8/2012.</p> <p>Presidential decree 460/1978 on the licensing procedure for slaughterhouses, repealed by PD 8/2012.</p> <p>Ministerial Decision 196008 (GG 2631/B/09.11.2011) regarding the simplification of the licensing procedure for slaughter houses.</p> <p>Ministerial Decision 205/34526 (GG 1279/B/11.04.2012) regarding the simplification of the licensing procedure for slaughterhouses, amending Ministerial Decision 196008.</p> <p>Ministerial Decision 15523/2006 (1187/B/31.8.2006) on the necessary additional measures for the implementation of the (EC) Regulations 178/2002, 852/2004, 853/2004, 854/2004 and 882/2004 of the European Parliament and the Council and harmonization of the Directive 2004/41/EC of the European Parliament and the Council.</p> <p>EU Legislation:</p> <p>Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs.</p> <p>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.</p> <p>Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004</p>

Information Obligation	Laws and legislation in scope
	<p>laying down specific rules for the organization of official controls on products of animal origin intended for human consumption.</p> <p>Regulation (EC) 853/2004 of the European Parliament and of the Council, Laying down specific hygiene rules for on the hygiene of foodstuffs.</p> <p>Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.</p> <p>Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC.</p> <p>Commission Regulation (EC) No 2074/2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organization 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.</p> <p>Commission Regulation (EC) No 2076/2005 laying down transitional arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004.</p> <p>Commission Regulation (EC) No 1662/2006 amending Regulation (EC) No 853/2004 of the European Parliament and of the Council laying down specific hygiene rules for food of animal origin.</p> <p>Council Regulation (EC) No 1791/2006 adapting certain Regulations and Decisions in the fields of free movement of goods, freedom of movement of persons, company law, competition policy, agriculture (including veterinary and phytosanitary legislation), transport policy, taxation, statistics, energy, environment, cooperation in the fields of justice and home affairs, customs union, external relations, common foreign and security policy and institutions, by reason of the accession of Bulgaria</p>

Information Obligation	Laws and legislation in scope
	<p>and Romania.</p> <p>Commission Regulation (EC) No 1243/2007 amending Annex III to Regulation (EC) No 853/2004 of the European Parliament and the Council laying down specific hygiene rules for food of animal origin.</p> <p>Commission Regulation (EC) No 1020/2008 amending Annexes II and III to Regulation (EC) No 853/2004 of the European Parliament and of the Council laying down specific hygiene rules for food of animal origin and Regulation (EC) No 2076/2005 as regards identification marking, raw milk and dairy products, eggs and egg products and certain fishery products.</p> <p>Regulation (EC) No 219/2009 of the European Parliament and of the Council.</p> <p>Commission Regulation (EC) No 1161/2009 amending Annex II to Regulation (EC) No 853/2004 of the European Parliament and of the Council as regards food chain information to be provided to food business operators operating slaughterhouse.</p> <p><u>Health Regulated Establishments</u></p> <p>Primary national Legislation</p> <p>Law 2520/1940 on health regulation provisions.</p> <p>Secondary national legislation:</p> <p>Ministerial Decision ΔΙΑΔΠ/ΦΑ21/34824 (GG 3402/31.12.2013) on the simplification of the licensing and operation of the Health Regulated Establishments.</p> <p>Joint Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1/31600/2013 GG 3106/09.12.2013) on the simplification of the licensing procedure of Health Regulated Establishments.</p> <p>Joint Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1/9386 GG 1409/B/30.04.2012) on the simplification of the licensing procedure of Health Regulated Establishments.</p> <p>Ministerial Decision Nr. Υ1γ/Γ.Π/οικ. 96967/2012 Sanitary terms and conditions of operation of food and drink companies and other provisions.</p> <p>Joint Ministerial Decision 21220/2011 on the simplification of the licensing procedure of Health Regulated Establishments, repealed by YA ΔΙΑΔΠ/Φ.Α.2.1/31600/2013.</p>

Information Obligation	Laws and legislation in scope
	<p>Circulars</p> <p>Administrative Circular under protocol number Y1γ/Γ.Π./οικ.4476/14.01.2013, issued by the Ministry of Health.</p> <p>EU Legislation:</p> <p>Regulation (EC) No 852/2004 of the European Parliament and of the Council on the "hygiene of foodstuffs", as amended.</p> <p>Regulation (EC) No 853/2004 of the European Parliament and of the Council, laying down specific hygiene rules for on the hygiene of foodstuffs.</p> <p>Regulation (EC) No 219/2009 adapting a number of instruments subject to the procedure referred to in Article 251 of the Treaty to Council Decision 1999/468/EC with regard to the regulatory procedure with scrutiny.</p> <p>Commission Regulation (EC) No 1019/2008 amending Annex II to Regulation (EC) No 852/2004 of the European Parliament and of the Council on the hygiene of foodstuffs.</p> <p>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.</p> <p>Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.</p> <p>Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.</p> <p>Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs.</p>
<p>IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries/small manufacturing</p>	<p><u>Industries and small manufacturing units</u></p> <p>Primary national legislation:</p> <p>Law 3325/2005 on the establishment and operation of industries.</p> <p>Law 3982/2011 on the simplification of the licensing procedures of technical profession and industrial</p>

Information Obligation	Laws and legislation in scope
units)	<p>processing activities.</p> <p>Law 4072/2012 regarding the improvement of the business environment, amending Law 3982/2011.</p> <p>Law 4155/2013 on the National System of Electronic Public Tenders.</p> <p>See also:</p> <p>Draft framework law on simplification of business licensing published for consultation on 18 February 2014</p> <p>Secondary national legislation:</p> <p>Ministerial Decision 6320/416/Φ31/23.5.2013 (GG 230/E/23.05.2013) on the founding of the Central Coordination Licensing Unit under art. 32 of Law 3982/2011.</p> <p>Ministerial Decision 483/35/Φ.15 (GG 158/B/03.02.2012) on the documentation and process required for the licensing of the activities provided for in Law 3982/2011.</p> <p><u>Units handling products of animal and non-animal origin</u></p> <p>Primary national legislation:</p> <p>Law 111/1975 on the establishment of slaughterhouses and poultry slaughterhouses.</p> <p>Law 4235/2014 on the administrative measures, procedures and sanctions on the field of food law.</p> <p>Secondary national legislation:</p> <p>Presidential Decree 79/2007 on necessary measures for the execution of the Regulations 178/2002, 852/2004, 853/2004, 854/2004 and 882/2004 of the European Parliament and of the Council concerning food hygiene and health conditions for certain products of animal origin, official controls for certain products and harmonization of the Hellenic veterinary legislation with Directive 2004/41/EC.</p> <p>Presidential decree 8/2012 on the licensing procedure required for poultry slaughterhouses.</p> <p>Presidential decree 490/1976 on the licensing procedure for poultry slaughterhouses, repealed by PD 8/2012.</p> <p>Presidential decree 460/1978 on the licensing procedure for slaughterhouses, repealed by PD 8/2012.</p> <p>Ministerial Decision 196008 (GG</p>

Information Obligation	Laws and legislation in scope
	<p>2631/B/09.11.2011) regarding the simplification of the licensing procedure for slaughterhouses.</p> <p>Ministerial Decision 205/34526 (GG 1279/B/11.04.2012) regarding the simplification of the licensing procedure for slaughterhouses, amending Ministerial Decision 196008.</p> <p>Ministerial Decision 15523/2006 (1187/B/31.8.2006) on the necessary additional measures for the implementation of the (EC) Regulations no.178/2002, 852/2004, 853/2004, 854/2004 and 882/2004 of the European Parliament and the Council and harmonization of the Directive 2004/41/EC of the European Parliament and the Council.</p> <p>EU Legislation:</p> <p>Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs.</p> <p>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.</p> <p>Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organization of official controls on products of animal origin intended for human consumption.</p> <p>Regulation (EC) 853/2004 of the European Parliament and of the Council, Laying down specific hygiene rules for on the hygiene of foodstuffs.</p> <p>Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.</p> <p>Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC.</p> <p>Commission Regulation (EC) No 2074/2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the</p>

Information Obligation	Laws and legislation in scope
	<p>organization 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.</p> <p>Commission Regulation (EC) No 2076/2005 laying down transitional arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004.</p> <p>Commission Regulation (EC) No 1662/2006 amending Regulation (EC) No 853/2004 of the European Parliament and of the Council laying down specific hygiene rules for food of animal origin.</p> <p>Council Regulation (EC) No 1791/2006 adapting certain Regulations and Decisions in the fields of free movement of goods, freedom of movement of persons, company law, competition policy, agriculture (including veterinary and phytosanitary legislation), transport policy, taxation, statistics, energy, environment, cooperation in the fields of justice and home affairs, customs union, external relations, common foreign and security policy and institutions, by reason of the accession of Bulgaria and Romania.</p> <p>Commission Regulation (EC) No 1243/2007 amending Annex III to Regulation (EC) No 853/2004 of the European Parliament and the Council laying down specific hygiene rules for food of animal origin.</p> <p>Commission Regulation (EC) No 1020/2008 amending Annexes II and III to Regulation (EC) No 853/2004 of the European Parliament and of the Council laying down specific hygiene rules for food of animal origin and Regulation (EC) No 2076/2005 as regards identification marking, raw milk and dairy products, eggs and egg products and certain fishery products.</p> <p>Regulation (EC) No 219/2009 of the European Parliament and of the Council.</p> <p>Commission Regulation (EC) No 1161/2009 amending Annex II to Regulation (EC) No 853/2004 of the European Parliament and of the Council as regards food chain information to be provided to</p>

Information Obligation	Laws and legislation in scope
	<p>food business operators operating slaughterhouses.</p> <p><u>Health Regulated Establishments</u></p> <p>Primary national Legislation</p> <p>Law 2520/1940 on health regulation provisions.</p> <p>Secondary national legislation:</p> <p>Ministerial Decision ΔΙΑΔΠ/ΦΑ21/34824 (GG 3402/31.12.2013) on the simplification of the licensing and operation of the Health Regulated Establishments.</p> <p>Joint Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1/31600/2013 GG 3106/09.12.2013) on the simplification of the licensing procedure of Health Regulated Establishments.</p> <p>Joint Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1/9386 GG 1409/B/30.04.2012) on the simplification of the licensing procedure of Health Regulated Establishments.</p> <p>Ministerial Decision Nr. Υ1γ/Γ.Π/οικ. 96967/2012 Sanitary terms and conditions of operation of food and beverages companies and other provisions.</p> <p>Joint Ministerial Decision 21220/2011 on the simplification of the licensing procedure of Health Regulated Establishments, repealed by YA ΔΙΑΔΠ/Φ.Α.2.1/31600/2013.</p> <p>Circulars</p> <p>Administrative Circular under protocol number Υ1γ/Γ.Π/οικ.4476/14.01.2013, issued by the Ministry of Health.</p> <p>EU Legislation:</p> <p>Regulation (EC) No 852/2004 of the European Parliament and of the Council on the "hygiene of foodstuffs", as amended.</p> <p>Regulation (EC) No 853/2004 of the European Parliament and of the Council, laying down specific hygiene rules for on the hygiene of foodstuffs.</p> <p>Regulation (EC) No 219/2009 adapting a number of instruments subject to the procedure referred to in Article 251 of the Treaty to Council Decision 1999/468/EC with regard to the regulatory procedure with scrutiny.</p> <p>Commission Regulation (EC) No 1019/2008 amending Annex II to Regulation (EC) No 852/2004 of the European Parliament and of the Council on the</p>

Information Obligation	Laws and legislation in scope
	<p>hygiene of foodstuffs.</p> <p>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.</p> <p>Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.</p> <p>Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.</p> <p>Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs.</p>
<p>IO 31: Obligation to keep records about suppliers and customers when trading in additives for use in animal nutrition</p>	<p>Primary national Legislation</p> <p>Law 185/1973 on the measures required for the improvement of animal nutrition.</p> <p>Law 3698/2008 on the provisions regarding animal nutrition.</p> <p>Secondary national legislation:</p> <p>Ministerial Decision 326385/2009 (GG 2103/B/29.09.2009) on the determination of necessary additional measures for the implementation of Regulation (EC) No. 1831/2003 of the European Parliament and of the Council on additives used in animal alimentation.</p> <p>EU Legislation:</p> <p>Regulation (EC) No 1831/2003 of the European Parliament and of the Council on additives for use in animal nutrition.</p> <p>Commission Regulation (EC) No. 378/2005 on detailed rules for the implementation of Regulation (EC) No. 1831/2003 of the European Parliament and of the Council as regards the duties and tasks of the Community Reference Laboratory concerning applications for authorisations of feed additives.</p> <p>Commission Regulation (EC) No 386/2009 amending Regulation (EC) No 1831/2003 of the European Parliament and of the Council as regards the establishment of a new functional group of feed</p>

Information Obligation	Laws and legislation in scope
	<p>additives</p> <p>Regulation (EC) No 1831/2003 laying down requirements for feed hygiene</p> <p>Regulation (EC) No 178/2002 of the European Parliament and of the Council for food of animal origin.</p> <p>Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.</p> <p>Commission Regulation (EC) No 429/2008 of 25 April 2008 on detailed rules for the implementation of Regulation (EC) No 1831/2003 of the European Parliament and of the Council as regards the preparation and the presentation of applications and the assessment and the authorisation of feed additives</p>
<p>IO 32: Obligation to keep records, submit meat balances and related inspections (meat trade)</p>	<p>Primary national legislation:</p> <p>Law 2127/1993 on the implementation of the European law regarding the tax regime of the oil products.</p> <p>Secondary national legislation:</p> <p>Ministerial Decision 412/2012 (GG 149/B/03.02.2012) on the control of the Greek meat Market in relation to the country of origin or place of provenance and keeping meat monthly balances</p> <p>Ministerial Decision 282441 (GG 631/B/03.04.2009) in relation to the country of origin or place of provenance and keeping meat monthly balances, repealed by Ministerial Decision 412/2012.</p> <p>Ministerial Decision 312898 (GG 1577/B/31.07.2009) in relation to further details on the enactment of Ministerial Decision 282441, repealed by Ministerial Decision 412/2012.</p> <p>Joint Ministerial Decision 647/27509 (GG 539/B/07.03.2013) on the electronic connection of businesses with ELGO-DIMITRA</p> <p>Ministerial Decision 188763 (GG 2284/B/13.10.2011) on the founding of the "Hellenic Agricultural Organization- Dimitra".</p> <p>EU Legislation:</p> <p>Commission Implementing Regulation (EU) No 931/2011 of 19 September 2011 on the traceability requirements set by Regulation (EC) No 178/2002 of</p>

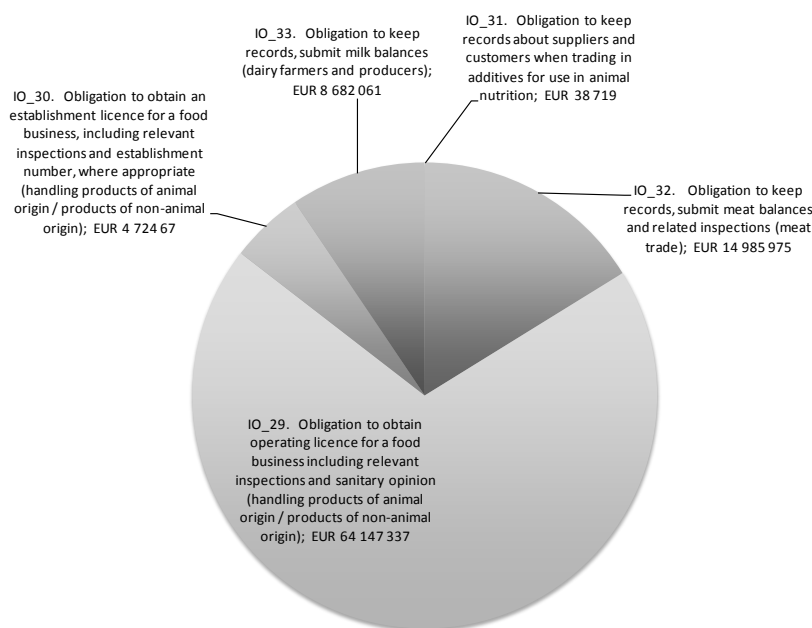
Information Obligation	Laws and legislation in scope
	<p>the European Parliament and of the Council for food of animal origin.</p> <p>Regulation (EC) No 178/2002 of the European Parliament and of the Council for foods of animal origin.</p>
<p>IO 33: Obligation to keep records, submit milk balances (dairy farmers and producers)</p>	<p>Primary national legislation</p> <p>Law 3895/2010 on the abolishment and merger of units and directorates of the public sector.</p> <p>Secondary national legislation:</p> <p>Ministerial Decision 175180 (GG14721/B/02.08.2011 on measures for the control of production, processing etc. of milk.</p> <p>Ministerial Decision 188763 (GG 2284/B/13.10.2011) on the founding of the "Hellenic Agricultural Organization- Dimitra".</p> <p>EU Legislation:</p> <p>Regulation (EC) No 1234/2007 of 22 October 2007 establishing a common organisation of agricultural markets and on specific provisions for certain agricultural products (Single CMO Regulation).</p> <p>Commission Regulation (EU) No 479/2010 of 1 June 2010 laying down rules for the implementation of Council Regulation (EC) No 1234/2007 as regards Member States' notifications to the Commission in the milk and milk products sector.</p> <p>Regulation (EU) No 605/2010 of 2 July 2010 laying down animal and public health and veterinary certification conditions for the introduction into the European Union of raw milk and dairy products intended for human consumption.</p>

2.2. High level measurement results

The total administrative cost for the Priority Area Food Safety is **EUR 92.58 million**, with 13% of this cost to be considered as business-as-usual. Therefore the administrative burden amounts to **EUR 80.24 million** for the Priority Area Food Safety.

The pie chart below provides the high-level findings of the measurement. It contains the administrative cost per information obligation within this priority area.

Figure 2.1: Total identified Administrative Cost for the priority area



The most burdensome IO within this Priority Area is IO 29 - “Obligation to obtain operating licence for food business including relevant inspections and sanitary opinion (handling products of animal origin / products of non-animal origin)”, accounting for 69% of the total administrative cost of the PA, due to the fact that it includes the licensing of two industries, animal and non-animal origin, and also the licensing of health regulated establishments, where licences require a significant amount of time for gathering of the required documents alone.

The IO related to meat balances accounts for 16% of the total administrative cost of the PA. The IO 33, which is related to the milk balances, is the third burdensome IO of the PA accounting for 9% of the total administrative cost of this Priority Area.

Finally IOs 31 and 30 are the less burdensome IOs of this PA, accounting for 0.04% and 5% in administrative costs respectively.

The Information Obligations, as well as the laws and regulations of the Priority Area in concern are diversified enough to cover a variety of costs within this Priority Area. They do differ in terms of benefit for society, governance structure and/or target group. Comparing several IOs in terms of administrative cost therefore creates a picture that must be interpreted with considerable caution. The figure above presents the share of administrative cost per IO as part of the total administrative cost in the Priority Area Public Food Safety. The unit of comparison in the figure is total administrative cost.

Furthermore, this measurement covers only a selection of all legislation relevant to the Priority Area. Therefore, additional administrative cost and burden exist that has not been covered by the measurement. A detailed description of the origin, process and measurement results of the IOs is presented in Annex 1.

3. Action Plan and Recommendations for Priority Area Food Safety

This chapter describes the consideration of alternatives to the current situation for the IOs measured. It makes and quantifies recommendations to simplify the current situation and reduce administrative burdens. It also describes the suggested sequencing and prioritisation of the reduction proposals and suggested ways to facilitate their implementation. The recommendations are explained in detail and quantified on the basis of previous experiences and expert assessments.

The recommendations to reduce administrative burdens and costs in the priority area Food Safety are calculated to reduce administrative costs and burdens by the following amounts:

Recommendation	Calculated reduction in administrative costs	Calculated reduction in administrative burdens
Codify or catalogue laws and regulations about food business licensing, including health regulations, maintain their stability and provide guidance to businesses*	EUR 2 355 434	EUR 2 355 434
One-stop-shops for food businesses*	EUR 31 893 507	EUR 31 893 507
Electronic submission of documents to one-stop-shop*	EUR 1 427 689	EUR 1 427 689
Single integrated process to replace establishment and operating licences for food industrial/manufacturing plants, incorporating establishment inspection and approval only if handling animal origin products*	EUR 340 985	EUR 340 985
Single reporting of information by slaughter houses	EUR 803 384	EUR 803 384

We have also calculated for this priority area the reduction in administrative burdens for Health Regulated Establishments (food and drink retailers) following the changes made by the government in December to move from an application for approval to operate to a notification with pre-approval followed by *ex post* inspection. These are shown in the table below:

Action	Calculated reduction in administrative costs	Calculated reduction in administrative burdens
Health Regulated Establishments trading in food: notification of commencement (estimate of burdens already reduced since measurement)	EUR 6 255 020	EUR 6 255 020

Note that adding together the individual reduction calculations for each recommendation gives an understanding of the magnitude of the potential reduction, rather than an exact figure. In line with standard practice, the reductions are calculated separately for each recommendation based on the costs as measured for this project. The impact of the recommendations marked * would be reduced by the other recommendations being implemented in advance, and the impact recommendations which are not marked would be affected similarly by prior implementation of the unmarked recommendations.

3.1. Identification of potential simplification and reduction options

During stage 4 of the project, potential simplification and reduction options were identified as appropriate from the views of businesses expressed during the measurement stage, stakeholder views, experience of other administrative burden reduction exercises, and the views of the teams of Greek public servants involved in the project.

Potential simplification and reduction options were developed by Greek public servants on the basis of a structured questionnaire developed by the OECD using the “IO Burden Reduction Pyramid” which was developed by the Capgemini, Deloitte and Ramboll consortium as part of the EU project on baseline measurement and reduction of administrative costs in 2009-10. The questionnaire asked public servants to respond to the following prompts, in order, about each IO measured:

1. What is the policy goal of the IO?
2. Option A: Remove completely this IO in order to reduce administrative burdens (arguments in favour, arguments against, conclusion)
3. Option B: Redesign public administration processes in this IO to reduce administrative burdens (identify opportunities for public administration to act in a less burdensome way, and conclude which appear most suitable)
4. Option C: Target the IO more precisely to the policy goal (identify less burdensome ways to meet the policy goal identified, and conclude which appear most suitable)
5. Option D: Make the IO as flexible as possible for business (identify ways to make complying with the IO more flexible for business, and conclude which appear most suitable)
6. Option E: Reduce the variables in the SCM equation: Population, frequency, time and tariff (identify possible changes to each of the four variables, and conclude which appear most suitable)

This provided a structured way to consider larger reforms ahead of smaller reforms, and ensured that attention was not only on small changes to the variables of the SCM equation.

3.2. Recommendations for the priority area Food Safety

Certain measures from the potential simplification and reduction measures were examined further in order to develop a compatible set of recommendations for the project which could form a coherent action plan for administrative burden reduction for the project. The potential measures which have been developed into recommendations are those which appear to have the potential to make meaningful reductions to administrative burdens or irritation factors, and which appear to be compatible with the overall policy goals of the obligations.

The recommendations are presented individually in the remainder of this section. The background to each recommendation is described, as well as the current situation as presented to the project and the desired future situation which would happen if the recommendation was implemented. A list of the relevant parts of legislation and regulation which would need to be considered for amendment. This is based on the project team's assessment of the original legal mapping done by the Greek public servants in Stage 1 of the project, and also on additional legal analysis in order to identify relevant provisions and compatibility with EU law. Finally, an assessment is made of the likely reduction in administrative burdens which would result from the implementation of each recommendation.

As is common practice in administrative burdens exercises, the reduction in administrative burdens for each recommendation is provided independently, i.e. the reduction is calculated on the basis of the implementation of each recommendation from the current situation, and no account is taken of the combined effect of recommendations. This means that the total reduction in administrative burdens which would be achieved by implementing all recommendations cannot be calculated by simply adding together the reductions for each recommendation; further analysis would be required once it was clear which recommendations would be implemented.

3.2.1. Codify or catalogue laws and regulations about food business licensing, including health regulations, maintain their stability and provide guidance to businesses

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 2 355 434 and administrative costs by the same amount on a stand-alone basis.

The laws and regulations about food business licensing, including health regulations, should be codified as far as possible, or at least catalogued so that they can be referred to easily by business, regardless of the responsible ministry or body. One public body should be given overall responsibility for enforcing common commencement dates, so that the laws and regulations change for business only on two dates each year, except in food safety emergencies. Guides and manuals should be produced to help businesses understand what they need to do to comply.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries and Health Regulated Establishments)

IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)

Background and rationale

Currently food businesses spend a significant amount of time familiarising themselves with the regulation affecting them - whether this is food safety or wider food business regulation (licensing and registration). This time is greater for small businesses which do not have expertise and experience. Businesses also spend time communicating with authorities as a result of unclear directions and instructions which lead to mistakes when they supply the required documentation. In addition, there are frequent changes in the regulation, again making it difficult for a business to familiarise itself with the requirements.

In measurement, businesses reported that they found it difficult to understand the involvement of different authorities and their respective roles, and to track themselves all changes to the legislation. The issue is therefore wider than the IOs under examination and affects how the food production and retail industries are regulated in total. We found that food businesses which were less experienced were more likely to outsource activities leading to acquiring an operating licence because they did not understand what they had to do, and that food businesses without experience also had to spend time establishing good relationships with the authorities in order to facilitate the licensing procedure. Health Regulated Establishments also noted that although there was nominally one single licensing authority (the Municipality) they had to contact many different authorities in order to obtain the documents required to operate, and this was a major irritation which caused delays as well as extra time and costs.

This recommendation therefore addresses a need for a codification or systematic catalogue of all legislation regarding the establishment and operating licensing of food businesses (industries and health regulated establishments), including the legislation regarding sanitary requirements. This should be supplemented by guides and manuals for food businesses with clear information on requirements, responsibilities and rights of both the business and the responsible authorities. These should include decision trees and case examples which address separately different types of food business.

Amendments to the law and secondary legislation covering specific issues relating to different types/categories of food business will be required at different times. In all cases, common commencement dates for all amendments and secondary legislation to be brought into effect - for example two dates each year - should be set and publicised in advance. The Government should commit to making no changes/no new requirements except on these dates. Changes should be publicised well before they come into effect by updating the guidelines and manuals to business and issuing of explanatory bulletins for business. It is sometimes necessary to introduce emergency measures immediately, for example following food contamination or disease outbreaks. Of course this should remain possible, but general changes to the rules should be introduced in a much more controlled way. The discipline involved in common commencement dates means it is important to give part of the administration the responsibility and power to ensure the government maintains such a commitment.

We note that, for Health Regulated Establishments, licensing procedures have been simplified and clarified by recent amendments introduced by Joint Ministerial Decision. ΔΙΑΔΠ/ΦΑ21/34824 (GG 3402/31.12.2013). There is still room for further codification and the development of a catalogue of regulation, especially in the area of sanitary requirements, and the central development of guidelines and manuals to be used by competent authorities and businesses.

Small food businesses in particular are likely to benefit from guidance not only on food business regulation and licensing processes but also on food safety. It would be useful to integrate both aspects. In international comparison, the UK Food Standards Agency launched in 2005 a programme to provide practical advice to small food businesses. “Safer Food Better Business” provides information to support compliance with food safety rules. This is displayed alongside information about how to register a small food business with the local authority, even though this registration is not handled by the Food Standards Agency. The programme was developed by the agency together with stakeholders, and guides are available covering different types of shops, restaurants, cafés and catering businesses.²

Description of current situation

A significant irritation factor in establishing and licensing food businesses is the large number of laws and regulations and lack codification, as well as the absence of public manuals and guidance to support businesses and licensing authorities in these processes. More specifically:

There is regulation on establishment and operating licensing for industries and small manufacturing units (all business sectors included).

There is regulation on the establishment approval of businesses handling food of animal origin, but no connection is made to the complementary regulation regarding establishment

² see <http://www.food.gov.uk/business-industry/caterers/startingup> and <http://www.food.gov.uk/business-industry/caterers/sfbb/>

and operating licensing for industries and small manufacturing units, and this leads to a lack of clarity.

There is regulation on the establishment and operation of health regulated establishments (where respective food businesses are also included). This regulation also includes general sanitary requirements.

There is secondary regulation about the implementation of these regulations, which sets out the documentation the business is required to submit to authorities in order to obtain an establishment and operating licence.

There are no guidelines or manuals with clear directions about the licensing requirements and assistance to businesses.

Description of desired situation

Food business registration and licensing law is consolidated, as far as possible, or at least there is a publicly available catalogue, so that it is clear which provisions apply in which cases.

One authority is responsible for the oversight and coherence of food business registration and licensing regulation. This includes ensuring that changes to food business registration and licensing, including to secondary legislation, are brought into effect at specified intervals, e.g. only two dates per year, and these dates are fixed and announced in advance. Emergency legislation can be introduced at any time.

The law is complemented by manuals and guidelines for food businesses which are activity specific and include decision trees, clear directions and examples of business registration/licensing. Guides for small food businesses include both registration/licensing and food safety.

Changes to food business registration/licensing are well-publicised. Bulletins for businesses and licensing/regulatory authorities explain the changes and their relevance. Changes are also made to the relevant manuals and guides on time.

Legislation to be examined

The main national and EU legislation to be examined and considered is set out below, categorised on the basis of the three segment industries operating in the area of Food safety, as identified in the previous stages of this Project: (i) industries and small manufacturing units, (ii) units handling products of animal and non-animal origin and (iii) Health Regulated Establishments.

1. National Legislation

(i) Legislation governing the industries and small manufacturing units

Legislation No.	Main articles of interest	Comments
Law 3325/2005 (GG 68/A/11.03.2005)	Art. 4 par. 6, 7, 8b, and 9, art. 6 par. 1, 2, and 7, art. 10 par. 8.	This law governs the licensing procedures for industries and small manufacturing units. Most of the articles of this law have been repealed by the recently enacted Law 3982/2011, while some of its articles are still in force.
Law 3982/2011 (GG	Art. 17, 18, 19, 20, 21, 25, 26.	This law simplifies the licensing procedures required for the establishment and operation of industries and small

143/A/17.06.2011)		manufacturing units.
Ministerial Decision 483/35/Φ.15 (GG 158/B/03.02.2012)	Art. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10.	This decision sets the documentation needed in order for the establishment and operation licenses provided by Law 3982/2011 to be issued.
See also: Draft framework law on simplification of business licensing published for consultation on 18 February 2014	Proposed art. 4, 5, 6, 7, 8, 9, 10, 11.	This law draft introduces further simplification on the licensing procedure by enabling a business to operate without an operating licence, under certain conditions. However, given that the Annexes referred in this law draft are not public yet, we are not in a position to be certain on the activities/ fields covered by this specific law draft.

(ii) Legislation governing the units handling products of animal and non-animal origin

Legislation No.	Main articles of interest	Comments
Presidential Decree 79/2007 (GG 95/A/03.05.2007)	Art. 5, 6, 7, 8, 9, 10, 11.	This law governs the licensing process for units handling products of animal origin.
Law 111/1975 (GG 174/A/22.08.1975)	Art. 2	This law sets forth general guidelines for the licencing process regarding the establishment and operation of slaughterhouses.
Presidential Decree 8/2012 (GG 11/A/31.01.2012)	Art. 3, 4, 5, 8.	This law sets forth the licencing procedure for the establishment and operation of poultry slaughterhouses.
Ministerial Decision 1960008 (GG 2631/B/09.11.2011)	-	By virtue of this decision, the administrative procedure regarding the issuance of the licences for the establishment and operation of poultry slaughterhouses can be carried out by the Citizens Service Centres (KEP).
Ministerial Decision 15523 (GG 1187/B/31.08.2006)	Art. 4, 5, 6	This decision governs the licensing process for the establishment and operation of food businesses.
Law 4235/2014 (GG 32/A/23.11.02.2014)	Art. 9, 10.	This newly enacted law introduces the sanctions of revocation of the establishment and operation licences, in case of businesses not complying with their specific obligations.

(iii) Legislation governing the Health Regulated Establishments

Legislation No.	Main articles of interest	Comments
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1 ./31600 (GG 3106/B/09.12.20 13)	Art. 1, 2, 3.	By virtue of this decision, the licensing of the Health Regulated Establishments is simplified.
Ministerial Decision Υ1γ/ΓΠ/οικ. 96967 (GG 2718/B/08.10.20 12)	Art. 4, 5.	This decision sets the rules of fulfilment of the applicable sanitary conditions, in order for Health Regulated Establishments in the field of food and beverages to legally operate.
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1 ./9386 (GG 1409/B/30.04.20 12)	-	By virtue of this decision, the administrative procedure for issuance of the licences for the establishment and operation of Health Regulated Establishments can be carried out by the Citizens Service Centres (KEP).
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1 ./34824 (GG 3402/B/31.12.20 13)	Art. 1, 2, 3, 4.	This decision regulates the administrative procedure for the issuance of the operation pre-approval and the notification of the operation of Health Regulated Establishments categorized as "Health Regulated Establishments for the retail sale of food and beverages".

2. European Union Legislation to be considered
(references are made to the consolidated versions)

- Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs (Art. 6).
- Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organization of official controls on products of animal origin intended for human consumption (Art. 3).
- Regulation (EC) 853/2004 of the European Parliament and of the Council, Laying down specific hygiene rules for on the hygiene of foodstuffs (Art. 3,4).

Assessment of impact on administrative costs and burdens

This change would affect food businesses subject to licensing and/or registration requirements, including food manufacturing and production and Health Regulated Establishments, including shops.

These businesses would:

- Identify more easily which regulatory requirements apply to them for their licensing/registration, and be able to gather the correct documents without asking different authorities for advice and clarification.
- Be able to identify from guides and manuals the processes they need to follow to comply with regulatory requirements.

The implementation of the recommendation will reduce the time spent by businesses familiarising themselves with and complying with legislation, as well as the time spent gathering documentation and communicating with responsible authorities as a result of the absence of clear directions and guidelines about licensing and registration procedures. For IO 29, it has been calculated that the overall time will be reduced by 13% for food industries, i.e. almost 10 hours (both animal and non-animal) and by 14% for health regulated establishments, i.e. approx.8 hours. For IO 30, the overall time will be reduced by 19% (i.e. 12 hours) and 20% (i.e. 24 hours) respectively for industries handling food of non-animal origin and industries handling food of animal origin.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 2 355 434 in both administrative burdens and administrative costs.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:
AB=EUR 68 399 538.15 AC=EUR 68 872 004.93	AB=EUR 66 044 104.23 AC=EUR 66 516 571.01	Reduction of EUR 2 355 434 AB EUR 2 355 434 AC

of which:

IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries and Health Regulated Establishments)		
Measurement results: P (sum segments) = EUR 6 222.46 f= 1 Q= 10 309 BAU= 0% AB=EUR 64 147 337.09 AC=EUR 64 147 337.09	Estimated future figures: P (sum segments) = EUR 6 011.51 f= 1 Q= 10 309 BAU= 0% AB=EUR 61 972 683.53 AC=EUR 61 972 683.53	Potential reduction: Reduction of 3.4% (of IO 29) Reduction of EUR 2 174 654 AB EUR 2 174 654 AC
IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)		
Measurement results: P (sum segments) = EUR 15 290.19 f= 1 Q= 309 BAU= 10% AB=EUR 4 252 201.06 AC=EUR 4 724 667.84	Estimated future figures P (sum segments) = EUR 14 705.14 f= 1 Q= 309 BAU= 10% AB=EUR 4 071 420.70 AC=EUR 4 543 887.48	Potential reduction: Reduction of 4.3% (of IO 30) Reduction of EUR 180 780.36AB EUR 180 780.36 AC

3.2.2. One-stop-shops for food businesses

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 31 893 507 and administrative costs by the same amount on a stand-alone basis.

The government should build on the introduction of one-stop-shops at designated KEPs for Health Regulated Establishments, as introduced by Joint Ministerial Decision ΔΙΑΔΠ/ΦΑ21/34824, and also introduce one-stop-shops for food industry businesses. These would act as intermediaries for the approvals needed from different authorities. Benefits come from businesses no longer moving information between the different authorities, and also reduced direct contact with different authorities leading to fewer opportunities for corruption.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 29: Obligation to obtain operating license for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries and Health Regulated Establishments)

IO 30: Obligation to obtain an establishment license for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)

Background and rationale

Currently, food industry businesses must contact many different authorities as they gather the approvals required before they can apply for their establishment or operating licence. This reflects divisions of responsibility between different agencies, for example for food safety, building regulations, certificates of compliance and fire protection. At the time of measurement, Health Regulated Establishments also had to communicate with different parts of the Municipality, for example on urban planning and sanitary issues as well as the fire brigade.

A common theme in the interviews with businesses was the time they spent moving information between these different authorities, even in the case of different departments within the same authority. They also did this to avoid delays which would occur if the information moved officially between different authorities or departments. The measurement also showed significant “facilitation payments” which were paid at different times during the process of licensing of Health Regulated Establishments, and such payments were also implied during industry licensing, however no specific amounts were reported.

The introduction of one-stop-shops for food businesses would reduce the amount of time which business spend moving information between different authorities and within authorities, and would also reduce the opportunities for facilitation payments, because there would be a reduced interface between the business and public authorities.

A food business would be able to submit all necessary documents and make all necessary arrangements with one authority, which would then act as intermediary for all other authorities which need to be involved to complete the process. This should include being able to ask for advice on processes to follow.

Since measurement, Joint Ministerial Decision ΔΙΑΔΠ/ΦΑ21/34824 (GG 3402/31.12.2013) has designated Citizens Service Centres (KEP) to act as one-stop-shops for notification/licensing procedures for Health Regulated Establishments, so this part of the recommendation has already been implemented in law.

For food industry businesses, Law 3982/2011 provides for a series of authorities (Regional Development Directorates, the Technical Chamber of Greece, regional Chambers and designated Citizens Service Centres (KEP)) to act as one-stop-shops for industry licensing, however additional legal and practical steps must be taken in order to make this fully operational.

We recommend that the government fully implements one-stop-shops for food businesses, as well as continuing the one-stop-shop arrangements for Health Regulated Establishments. For food businesses handling products of animal origin, this should include liaison with the regional veterinary authority.

Description of current situation

The regulatory framework on licensing procedures provides for specific licensing authorities. However, a business needs to communicate with a series of authorities when preparing to apply for an establishment or operating licence, because the pieces of information required are obtained from different authorities.

In order to avoid delays in the official exchange of information between responsible authorities, a business often chooses to transmit the documents between authorities by itself.

As a result, businesses applying for an establishment or operating licence spend more time visiting and communicating with responsible authorities face-to-face.

Description of desired situation

All food industry business approval and registration procedures are performed through one authority which acts as a one-stop-shop. This authority is chosen by the Greek government based on its assessment of the most convenient for business, and could be one of those listed in Law 3892/2011. This authority is responsible for co-ordinating and exchanging all information and documents between the different authorities involved in approving and inspecting food businesses. The business only communicates with the different authorities through the designated one-stop-shop authority.

Designated one-stop-shop authorities are staffed with personnel with specialised training in food industry and other procedures who can provide guidance to businesses. Guidelines and manuals (see previous recommendation) are available in the one-stop-shop.

For Health Regulated Establishments, designated KEPs act as one-stop-shops for food retail businesses, restaurants and cafés for their registration and licensing arrangements, and ensure that the businesses do not have to contact municipal authorities directly during the process, reducing the opportunity for facilitation payments.

Legislation to be examined

Following a thorough assessment of the current situation and in order for the above draft recommendation to be effectively implemented, a simplification and an active enforcement of the relevant primary and secondary legislation in force is necessary, which should take into account the existing obligations of EU law in this area.

The main national and EU legislation to be examined is set out below, categorised on the basis of the three segment industries operating in the area of Food safety, as identified in the previous stages of this Project: (i) industries and small manufacturing units, (ii) units handling products of animal and non - animal origin and (iii) Health Regulated Establishments.

1. National Legislation

(i) Legislation governing the industries and small manufacturing units,

Legislation No.	Main articles of interest	Comments
Law 3982/2011 (GG 143/A/17.06.2011)	Art.17 par.14, 19, 25, 26, 32	By virtue of this law, the Directorates of Development of the respective Prefectures, the Directorates of Development of the Ministry of Development, the Directorates of establishment of oil companies, the Technical Chamber of Greece, and the regional technical Chambers are designated as Competent Licensing authorities. The Central Coordination Licensing Unit is also established.
Ministerial Decision 6320/416/Φ31/23. 5.2013 (GG 230/E/23.05.2013).	Art. 1	By virtue of this decision, the Central Coordination Licensing Unit under art. 32 of Law 3982/2011 is staffed.
Ministerial Decision 483/35/Φ.15 (GG 158/B/03.02.2012)	Art. 2, 3, 4, 5, 6, 7, 8, 9, 10. 15	This decision sets forth the documentation required in order for the licences of Law 3982/2011 to be issued. It also sets the response - timeframes to be followed by the Competent Authorities.
See also: Draft framework law on simplification of business licensing published for consultation on 18 February 2014	Proposed art. 4, 5 par. 10, art. 6 par. 5, art. 7, art. 25, art. 26.	This law draft introduces further simplification on the licensing procedure. However, given that the Annexes referred in the law draft are not public yet, we are not in a position to be certain on the activities/ fields covered by this specific law draft.

(ii) Units handling products of animal and non animal origin

Legislation No.	Main articles of interest	Comments
Presidential Decree 79/2007 (GG 95/A/03.05.2007)	Art. 3, 4, 5, 6, 7	By virtue of this decree, the Veterinary Authorities of the Prefecture and the Prefecture itself are designated as competent authorities for the licensing of businesses handling products of animal origin.
Presidential Decree 8/2012	Art. 3	By virtue of this decree, the Veterinary Directorate of the Prefecture and the Prefecture

(GG 11/A/31.01.2012)		itself are designated as competent authorities for the licensing of poultry slaughterhouses.
Ministerial Decision 1960008 (GG 2631/B/09.11.2011)	-	By virtue of this decision, the administrative procedure regarding the issuance of the licences for the establishment and operation of slaughter houses is undertaken by the Citizens Service Centres (KEP).
Ministerial Decision 15523 (GG 1187/B/31.08.2006)	Art. 2, 3, 4, 5	This decision governs the licensing process for the establishment and operation of food businesses. By virtue of this decision the Municipalities, the Veterinary Directorate of the Prefecture, the Directorates of Development of the Prefectures are designated as competent authorities.

(iii) Legislation governing the Health Regulated Establishments

Legislation No.	Main articles of interest	Comments
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1./31600 (GG 3106/B/09.12.2013)	Art. 1, 2.	By virtue of this decision, the licensing of the Health Regulated Establishments is undertaken by the Municipalities.
Ministerial Decision Υ1γ/ΓΠ/οικ. 96967 (GG 2718/B/08.10.2012)	Art.4, 5	This decision sets the rules and the sanitary conditions to be fulfilled in order for Health Regulated Establishments in the field of food and beverages to operate.
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1./9386 (GG 1409/B/30.04.2012)	-	By virtue of this decision, the administrative procedure of issuance of the licences for the establishment and operation of Health Regulated Establishments can be carried out by the Citizens Service Centres (KEP).
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1./34824 (GG 3402/B/31.12.2013)	Art. 1, 2, 3, 4.	By virtue of this decision, the administrative procedure governing the issuance of the pre-approval for the operation and notification of the operation of those Health Regulated Establishments falling into the category of Health Regulated Establishments for the retail sale of food and beverages can be carried out by the Citizens Service Centres (KEP) or electronically by ERMIS-EUGO.

2. European Union Legislation to be considered

(references are made to the consolidated versions)

Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs (Art. 6).

Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organization of official controls on products of animal origin intended for human consumption (Art. 3).

Regulation (EC) 853/2004 of the European Parliament and of the Council, Laying down specific hygiene rules for on the hygiene of foodstuffs (Art. 3,4).

Assessment of impact on administrative costs and burdens

This change would affect (a) food industry businesses applying for establishment and operating licences and approvals and (b) food businesses which are Health Regulated Establishments (for example food shops and cafés).

For Health Regulated Establishments, designated KEPs were established as one-stop-shops by Ministerial Decision ΔΙΑΔΠ/ΦΑ21/34824 (GG 3402/31.12.2013), and the government should ensure they are able to offer advice to businesses who wish to set up in this sector.

These businesses would:

- No longer be required to visit many different authorities in order to prepare for registration and approval, since all arrangements could be made and information submitted via the one-stop-shop.
- No longer need to move information between the different authorities involved in the procedures, because this would be done where necessary via the one-stop-shop.
- Particularly for Health Regulated Establishments, avoid direct contact with different parts of the administration which removes opportunities for corruption.

Based on the situation measured, for IO 29 overall time across each one of the three segments - industries handling food of non-animal origin, industries handling food of animal origin and health regulated establishments - is expected to be reduced by 23% (i.e. 16 hours), 19% (i.e. 16 hours) and 16% (i.e. 10 hours) respectively. A small reduction in out of pocket costs is also achieved due to a reduction in transportation costs. A significant reduction overall results from the reduction of facilitation payments measured (EUR 2 900) because the business has less direct contact with the relevant authorities. For IO 30, the overall time will be reduced by 19% (i.e. 12 hours) and 25% (i.e. 16 hours) for industries handling food of non-animal and of animal origin respectively.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 31 893 507 in administrative burdens and administrative costs.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:
AB=EUR 68 399 538.15 AC=EUR 68 872 004.93	AB=EUR 36 506 031.47 AC=EUR 36 978 498.25	Reduction of EUR 31 893 507 AB EUR 31 893 507 AC

of which:

IO 29: Obligation to obtain operating license for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries and Health Regulated Establishments)		
Measurement results: P (sum segments) = EUR 6 222.46 f= 1 Q= 10 309 BAU= 0% AB=EUR 64 147 337.09 AC=EUR 64 147 337.09	Estimated impact (future figures): P (sum segments) = EUR 3 146.68 f= 1 Q= 10 309 BAU= 0% AB=EUR 32 439 129.57 AC=EUR 32 439 129.57	Potential reduction: Reduction of 49.4% (of IO 29) Reduction of EUR 31 708 207.52 AB EUR 31 708 207.52 AC
IO 30: Obligation to obtain an establishment license for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)		
Measurement results: P (sum segments) = EUR 15 290.19 f= 1 Q= 309 BAU= 10% AB=EUR 4 252 201.06 AC=EUR 4 724 667.84	Estimated impact (future figures): P (sum segments) = EUR 14 690.51 f= 1 Q= 309 BAU= 10% AB=EUR 4 066 901.90 AC=EUR 4 539 368.68	Potential reduction: Reduction of 4.4% (of IO 30) Reduction of EUR 185 299.16 AB EUR 185 299.16 AC

3.2.3. Electronic submission of documents to one-stop-shop

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 1 427 689 and administrative costs by the same amount on a stand-alone basis.

If the government proceeds to implement a one-stop-shop for food businesses, administrative burdens on food businesses can be reduced further by allowing them to submit information to it electronically. The one-stop-shop would then be responsible for submitting this information to other public authorities and uploading it to online systems. This would include applications and information for the different permits and certificates required by food businesses and health regulated establishments dealing with food before they can begin operating.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries and Health Regulated Establishments)

IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)

Background and rationale

At the time of measurement, food businesses spent time in the business licensing process, and in obtaining the pre-requisite approvals (for example with planning services, fire services health authorities), exchanging hard copy information with different public authorities.

This recommendation addresses the need for electronic submission of documentation for these different authorities via the one-stop-shop (see section 3.2.2) in order to obtain the pre-requisite approvals and permits which are required before the current establishment or operating licence or Health Related Establishments notification. It is connected to the establishment of a one-stop-shop to help food businesses meet the requirements of different authorities, and involves creating online services for the one-stop-shop.

We recommend that businesses should be able to submit and exchange information with the one-stop-shop electronically. The one-stop-shop would be responsible for passing these documents to the relevant authorities, or uploading them to relevant systems. This does not require full integration of the one-stop-shop submission with other systems, but it is a way for the businesses to simplify their communication with the one-stop-shop. Electronic files with the documentation from each business could also be kept by authorities and used for renewal or changes to the existing pre-requisite licences, so that the business will not have to resubmit existing documentation. Guidelines and manuals (see section 3.2.1) would also be available online.

The implementation of this recommendation would save businesses significant time in the communication and submission process, as well as from the following up of their progress

with the different permits and approvals, which could be provided electronically via the one-stop-shop.

Description of current situation

The regulatory framework on the pre-requisite licensing and permitting procedures for food industries does not provide for any electronic exchange of documentation between the business and the different regulatory authorities.

For health regulated establishments, Joint Ministerial Decision ΔΙΑΔΠ/ΦΑ21/34824 (G.G. 3402/31.12.2013) envisages the submission of notifications using ERMIS. This development will help with the submission of information by those businesses when implemented.

Currently, food businesses and health regulated establishments spend significant time visiting and communicating with different responsible authorities as they obtain the pre-requisites for the establishment and operating licence.

Description of desired situation

All documentation to obtain the pre-requisite approvals and permits before a food business can make a registration allowing it to operate is submitted electronically to the one-stop-shop for food businesses or health regulated establishments.

The one-stop-shop distributes the applications and documents to the different authorities, or uploads them to relevant systems.

The business can receive from the one-stop-shop electronic updates on the progress with its different applications and notifications.

Regulations and licensing manuals (see section 3.2.1) are also available electronically.

Legislation to be examined

Following a thorough assessment of the current situation and in order for the above draft recommendation to be effectively implemented, a simplification and an active enforcement of the relevant primary and secondary legislation in force is necessary, which should take into account the existing obligations of EU law in this area.

The main national and EU legislation to be examined is set out below, categorised on the basis of the three segment industries operating in the area of Food safety, as identified in the previous stages of this Project: (i) industries and small manufacturing units, (ii) units handling products of animal and non - animal origin and (iii) Health Regulated Establishments.

1. National Legislation

- (i) Legislation governing the industries and small manufacturing units

Legislation No.	Main articles of interest	Comments
Law 3982/2011 (GG 143/A/17.06.2011)	Art. 19, 20, 21, 23, 24, 25, 26, 28.	This law simplifies the licensing procedures required for the establishment and operation of industries and small manufacturing units.
Ministerial Decision	Art. 1, 2, 3, 4, 5,	This decision sets the documentation needed in

483/35/Φ.15 (GG 158/B/03.02.2012)	6, 7, 8, 9, 10.	order for the establishment and operation licenses provided by Law 3982/2011 to be issued.
Draft legislation of the Ministry of Development regarding the simplification of the licensing process for industries.	Proposed art. 5, 6, 7, 8, 9, 10.	This draft law simplifies the licensing procedure by enabling a business unit to operate without an operation license, under certain conditions.
See also: Draft framework law on simplification of business licensing published for consultation on 18 February 2014	Proposed art. 4, 5 par. 10, art. 6 par. 5, art. 7, art. 8, art. 9, art. 10, art. 11, art. 25, art. 26.	This law draft introduces further simplification on the licensing procedure. However, given that the Annexes referred in the law draft are not public yet, we are not in a position to be certain on the activities/ fields covered by this specific draft law.

(ii) Legislation governing the units handling products of animal and non - animal origin

Legislation No.	Main articles of interest	Comments
Presidential Decree 79/2007 (GG 95/A/03.05.2007)	Art. 5, 6, 7, 8, 9, 10, 11.	This law governs the licensing process for units handling products of animal origin.
Presidential Decree 8/2012 (GG 11/A/31.01.2012)	Art. 3, 4, 5, 6, 8.	This law sets forth the licensing procedure for the establishment and operation of poultry slaughterhouses.
Ministerial Decision 1960008 (GG 2631/B/09.11.2011)	-	By virtue of this decision, the administrative procedure regarding the issuance of the licences for the establishment and operation of poultry slaughter houses can be carried out by the Citizens Service Centres (KEP).
Ministerial Decision 15523 (GG 1187/B/31.08.2006)	Art. 4, 5, 6, 7, 8, 13, 14, 15, 18.	This decision governs the licensing process for the establishment and operation of food businesses.

(iii) Legislation governing the Health Regulated Establishments

Legislation No.	Main articles of interest	Comments
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1./31600 (GG 3106/B/09.12.2013)	Art. 1, 2, 3.	By virtue of this decision, the licensing of the Health Regulated Establishments is simplified.
Ministerial Decision Υ1γ/ΓΠ/οικ. 96967 (GG 2718/B/08.10.2012)	Art. 4, 5, 6.	This decision sets the rules of fulfilment of the applicable sanitary conditions, in order for Health Regulated Establishments in the field of food and beverages to legally operate.
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1./9386	-	By virtue of this decision, the administrative procedure for issuance of the licences for the

(GG 1409/B/30.04.2012)		establishment and operation of Health Regulated Establishments can be carried out by the Citizens Service Centres (KEP).
Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1./34824 (GG 3402/B/31.12.2013)	Art. 1, 2, 3, 4.	This decision regulates the administrative procedure for the issuance of the operation pre-approval and the notification of the operation of Health Regulated Establishments categorized as "Health Regulated Establishments for the retail sale of food and beverages".

2. European Union Legislation to be considered

(references are made to the consolidated versions)

Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs (Art. 6).

Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organization of official controls on products of animal origin intended for human consumption (Art. 3).

Regulation (EC) 853/2004 of the European Parliament and of the Council, Laying down specific hygiene rules for on the hygiene of foodstuffs (Art. 3, 4).

Assessment of impact on administrative costs and burdens

This change would affect (a) food industry businesses which have to obtain different approvals from a range of public authorities before they can operate and (b) food businesses which are Health Regulated Establishments (for example food shops and cafés). It would simplify their communication with the one-stop-shops described in section 3.2.2.

These businesses would:

- Be able to submit electronically to the one-stop-shop applications and supporting information which they must provide for different public authorities before they can begin operating
- Be able to rely on the one-stop-shop to send these applications to the relevant authority, or upload them to the relevant online systems
- Receive electronic updates on progress with the different applications from the one-stop-shop

It has been calculated that for IO29 overall time will be reduced by 6 hours for industries handling food of non-animal origin, and 4 hours for health regulated establishments. A small reduction is also achieved in out of pocket costs by the elimination of photocopying. For IO30, the overall time will be reduced by a further 2 hours for industries handling food of non-animal origin and 16 hours for industries handling food of animal origin.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 1 427 689 in both administrative burdens and administrative costs.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:
AB=EUR 68 399 538.15 AC=EUR 68 872 004.93	AB=EUR 66 971 849.39 AC=EUR 67 444 316.17	Reduction of EUR 1 427 689 AB EUR 1 427 689 AC

of which:

IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries and Health Regulated Establishments)		
Measurement results:	Estimated future figures:	Potential reduction: (2.2% of IO29 AB)
P (sum segments) = EUR 6 222.46 f= 1 Q= 10 309 BAU= 0% AB=EUR 64 147 337.09 AC=EUR 64 147 337.09	P (sum segments) = EUR 6 086.93 f=1 Q= 10 309 BAU=0% AB=EUR 62 750 193.16 AC=EUR 62 750 193.16	Reduction of EUR 1 397 143.93AB EUR 1 397 143.93AC
IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)		
Measurement results:	Estimated future figures	Potential reduction: (0.6% of IO 30 AB)
P (sum segments) = EUR 15 290.19 f= 1 Q= 309 BAU= 10% AB=EUR 4 252 201.06 AC=EUR 4 724 667.84	P (sum segments) = EUR 15 191.34 f= 1 Q= 309 BAU=10% AB=EUR 4 221 656.23 AC=EUR 4 694 123.01	Reduction of EUR 30 544.83AB EUR 30 544.83 AC

3.2.4. Single integrated process to replace establishment and operating licences for food industrial/manufacturing plants, incorporating establishment inspection and approval only if handling animal origin products

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 340 985 and administrative costs by the same amount on a stand-alone basis.

The establishment and operating licences for food industry businesses should be integrated into a single process. For food industry businesses handling products of animal origin, this should include the establishment approval and inspection, which is an obligation of Regulation (EU) 853/2004. No approval obligation exists in Regulation (EU) 852/2004 for food industry businesses handling products of non-animal origin.

This would reduce the time which food industry businesses spend on licensing, and it would also help businesses begin operations more quickly.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries)

IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)

Background and rationale

Food industry businesses (animal origin and non-animal origin) must currently obtain two business licences which involve *ex ante* approval. First, they obtain an establishment licence, then they must obtain an operating licence. The licensing arrangements do vary depending on whether a business is considered to be high, medium or low nuisance.

Food industry businesses handling products of animal origin must obtain two establishment licences: one from the Regional Veterinary Authorities and the second establishment licence from the Regional Development Authorities. Food industry businesses handling no products of animal origin only require the establishment licence from the Regional Development Authorities.

The establishment licence and the completion of the establishment are prerequisites for applying for an operating licence.

Again, Food industry businesses handling products of animal origin must obtain two operating licences: one from the Regional Veterinary Authorities which includes the issuing of the establishment approval number by the Ministry of Agriculture and Rural Development, and the second establishment licence from the Regional Development Authorities. Food industry businesses handling no products of animal origin only require the operating licence from the Regional Development Authorities.

It is possible to remove *ex ante* licensing for food businesses which do not handle products of animal origin, and instead use a notification system. Registration of food businesses remains a requirement of Regulation (EC) 852/2004, Article 6, but *ex ante* approval is only required by EU law in some cases (mainly handling food of animal origin). In other cases, Member States may choose to require an *ex ante* inspection and approval. It is therefore possible to simplify the current two stage process into a single licence for plants handling food of animal origin, integrating the establishment approval required by Regulation 853/2004.

A form of registration of food industry businesses remains required by EU law, as described above. A simplified system would work in the following way:

In order for the food industry business to begin operations, it would take the following steps:

a) Submit a notification to the one-stop-shop in the form of a solemn declaration stating it met the requirements currently set by the law for the establishment licence (environmental permit-AEPO, building permission, fire protection, etc.); the business will be able to begin set-up activity following the submission of the notification, and relevant authorities will be able to inspect the site at any time.

b) After completion of the establishment:

- Businesses handling only food of non-animal origin would submit a second notification to the one-stop-shop in the form of a solemn declaration, stating that the establishment is completed according to regulatory requirements and the first notification, and that all regulatory requirements are met for the operating licence (technical staff, fire protection, waste disposal etc.). They would then be able to commence operations. Inspection would be possible at any time. There would therefore be an operating notification, rather than an operating licence.
- Businesses handling food of animal origin would submit a second notification to the one-stop-shop in the form of a solemn declaration reporting the completion of establishment and the fulfilment of all requirements that are currently set for the operating licence. This will also form a request for inspection in order to obtain the establishment approval number. The Regional Veterinary Authorities would be bound by law to perform the inspection with an on-site visit and, if satisfied, issue the establishment approval within specific time-limits, and this would be the event which triggered the registration to operate. The approval would be notified to the regional development authority and the business, and the business would then be able to commence operations. The responsible authorities will be able to inspect at any time to perform other inspections.

The use of declarations rather than the submission of copy documents from different public authorities would reduce the burden on businesses to provide certified and verified copies. Public authorities should attempt to obtain copies of these documents from other authorities *ex officio* in cases where they believe a false declaration has been made.

In international comparison, Ireland and the UK both operate systems of registration for food operating businesses, rather than *ex ante* licensing, while respecting the need for pre-operating inspection of businesses handling products of animal origin.

Description of current situation

Industries handling food of animal or non-animal origin have to obtain an establishment licence and then an operating licence in order to commence operations.

The process mostly involves the submission of several other permits and certificates that the business has obtained from other authorities to the licensing authority (Regional Development Directorates) in order to be actively approved and licensed.

In addition, industries handling food of animal origin are obliged (apart from the establishment licence issued by the Regional Development Directorate), to obtain also an establishment approval from the Regional Veterinary Authorities, which is part of the food safety provisions of EU law.

The above processes result in businesses spending significant time gathering and resubmitting documentation to authorities (approvals and permits that the business has already obtained from other authorities) and communicating with the authorities. There are also currently significant opportunity costs due to the delays between licensing procedures and the lack of possibility to begin operations before final approval.

Description of desired situation

Food industry businesses follow a single process of establishment and operating registration, incorporating the necessary inspection and approval of a food industry business handling products of animal origin.

Businesses commence establishment by submitting a notification which contains a solemn declaration that they fulfil respective requirements.

Businesses handling food of non-animal origin commence operations (after completion of establishment) after they submit a notification which contains a solemn declaration that they fulfil respective requirements.

Businesses handling food of animal origin obtain the establishment approval, including the relevant inspection before commencement of operations. They then submit the notification containing a solemn declaration that they fulfil respective requirements (including the fact that they have been inspected and have received an establishment approval under Regulation (EU) 853/2004.

Any further checks are performed *ex post*, and checks which involve confirming whether a food business actually has received a certificate or approval from a relevant public body are made by the inspecting body contacting the relevant public body.

Businesses spend less time gathering and resubmitting copy documents and are able to commence operations sooner.

The registration of the business must be kept up to date by notifying the one-stop-shop of changes, including changes to activity, since this is a requirement of EU law.

Legislation to be examined

Following a thorough assessment of the current situation and in order for the above draft recommendation to be effectively implemented, a simplification of the relevant primary and secondary legislation in force is necessary, which should take into account the existing obligations of EU law in this area.

The main national and EU legislation to be examined is set out below:

1. National Legislation

(i) Legislation governing the industries and small manufacturing units

Legislation No.	Main articles of interest	Comments
Law 3325/2005 (GG 68/A/11.03.2005)	Art. 4 par. 6, 7, 8b, and 9, art. 6 par. 1, 2, and 7, art. 10 par. 8.	This law governs the licensing procedures for industries and small manufacturing units. Most of the articles of this law have been repealed by the recently enacted Law 3982/2011, while some of its articles are still in force.
Law 3982/2011 (GG 143/A/17.06.2011)	Art. 17, 18, 19, 20, 21, 25, 26.	This law simplifies the licensing procedures required for the establishment and operation of industries and small manufacturing units.
Ministerial Decision 483/35/Φ.15 (GG 158/B/03.02.2012)	Art. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10.	This decision sets the documentation needed in order for the establishment and operation licences provided by Law 3982/2011 to be issued.
Draft legislation of the Ministry of Development regarding the simplification of the licensing process for industries.	Proposed art. 5, 6, 7, 8, 9, 10.	This law draft introduces further simplification on the licensing procedure by enabling a business unit to operate even prior to the issuance of its operation license, under certain conditions.
See also: Draft framework law on simplification of business licensing published for consultation on 18 February 2014	Proposed art. 4, 5, 6, 7, 8, 9, 10.	This law draft introduces further simplification on the licensing procedure. However, given that the Annexes referred in the law draft are not public yet, we are not in a position to be certain on the activities/ fields covered by this specific draft law.

(ii) Legislation governing the units handling products of animal and non animal origin

Legislation No.	Main articles of interest	Comments
Presidential Decree 79/2007 (GG 95/A/03.05.2007)	Art. 5, 6, 7, 8, 9, 10, 11.	This law governs the licensing process for units handling products of animal origin.
Law 111/1975 (GG 174/A/22.08.1975)	Art. 2	This law sets forth general guidelines for the licensing process regarding the establishment and operation of slaughterhouses.
Presidential Decree 8/2012 (GG 11/A/31.01.2012)	Art. 3, 4, 5, 8.	This law sets forth the licensing procedure for the establishment and operation of poultry slaughterhouses.
Ministerial Decision 1960008 (GG 2631/B/09.11.2011)	-	By virtue of this decision, the administrative procedure regarding the issuance of the licences for the establishment and operation of poultry

		slaughterhouses can be carried out by the Citizens Service Centres (KEP).
Ministerial Decision 15523 (GG 1187/B/31.08.2006)	Art. 4, 5, 6	This decision governs the licensing process for the establishment and operation of food businesses.
Law 4235/2014 (GG 32/A/23/.11.02.2014)	Art. 9, 10.	This newly enacted law introduces the sanctions of revocation of the establishment and operation licences, in case of businesses not complying with their specific obligations.

2. European Union Legislation to be considered

(references are made to the consolidated versions)

Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs (Art. 6).

Regulation (EC) No 854/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific rules for the organization of official controls on products of animal origin intended for human consumption (Art. 3).

Regulation (EC) 853/2004 of the European Parliament and of the Council, Laying down specific hygiene rules for on the hygiene of foodstuffs (Art. 3, 4).

Assessment of impact on administrative costs and burdens

This change would affect food operating businesses involved in the food industry who currently apply for establishment and operating licences, or those businesses which wish to begin operations in this field.

These businesses would:

- No longer be required to obtain *ex ante* approval from Regional Development Authorities by applying for separate establishment and operating licences.
- Instead follow a single registration process, which would integrate the necessary *ex ante* inspection and approval from veterinary authorities for food business operators handling products of animal origin.
- Submit solemn declarations for the establishment and operation notifications, and no longer be required to submit copies of relevant certificates.
- Be subject to risk based *ex post* control and inspection

The implementation of the proposal will reduce the time spent by the business on the preparation of documentation. For businesses handling food of animal origin, time will be reduced further, since they are currently obliged to submit almost the same documentation to two different authorities.

It has been calculated that for IO 29 overall time will be reduced by 11% (i.e. 8-9 hours) both for industries handling food of non-animal origin and for industries handling food of animal origin. For IO 30, the overall time will be reduced by 9% (i.e. 5 hours) and 20% (i.e. 25 hours) for industries handling food of non-animal and industries handling food of animal origin respectively.

The implementation of the proposal will also have a significant impact on opportunity costs and irritation, since it will allow new businesses to commence operations earlier.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 340 985 in administrative burdens and administrative costs by a similar amount.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:
AB=EUR 6 469 838.15 AC=EUR 6 942 304.93	AB=EUR 6 128 852.75 AC=EUR 6 601 319.53	Reduction of EUR 340 985 AB EUR 340 985 AC

of which:

IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries segment)		
Measurement results :	Estimated impact (future figures):	Potential reduction:
P (sum segments) = EUR 6 885.56 f= 1 Q= 309 BAU= 0% AB=EUR 2 127 637.09 AC=EUR 2 127 637.09	P = EUR 6 576.21 f= 1 Q= 309 BAU= 0% AB=EUR 2 032 048.65 AC=EUR 2 032 048.65	Reduction of 4.5% (of IO 29) \ Reduction of EUR 95 588.44 AB EUR 95 588.44 AC
IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (handling products of animal & non animal origin - Industries)		
Measurement results :	Estimated impact (future figures):	Potential reduction:
P (sum segments) = EUR 15 290.19 f= 1 Q= 309 BAU= 10% AB=EUR 4 252 201.06 AC=EUR 4 724 667.84	P = EUR 14 787.28 f= 1 Q= 309 BAU= 10% AB=EUR 4 096 804.10 AC=EUR 4 569 270.88	Reduction of 3.7% (of IO 30) Reduction of EUR 155 396.96 AB EUR 155 396.96 AC

3.2.5. Health Regulated Establishments trading in food: notification of commencement (estimate of burdens already reduced since measurement)

Summary

We calculate that the government's action in December 2013 to change the requirements for health related establishments trading in food (from an application for approval to operate to a notification with pre-approval followed by *ex post* inspection) will reduce administrative burdens by EUR 6 255 020 and administrative costs by the same amount on a stand-alone basis.

IOs affected

This reduces administrative costs primarily for the following Information Obligations:

IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (Health Regulated Establishments)

Background

The government has made changes since measurement which allow Health Regulated Establishments selling retail food and drink to submit information based on solemn declarations and operate under pre-approval following a notification to the responsible authority, rather than waiting for final approval. This change allows these businesses to avoid incurring running costs during a non-operational period and reduces the time spent on gathering and submitting different documentation.

The Joint Ministerial Decision provides for the submission of an application/solemn declaration by the business, along with a solemn declaration by the building administrator about the approval of establishment of the business according to the building regulations. This is used as the basis for pre-approval from the municipal authorities. Pre-approval must be issued within 15 days, otherwise the application is considered as accepted. After the pre-approval, the business submits solemn declarations about its conformity to the regulatory requirements and a fee. The municipality issues verification of submission and the business may commence operations immediately. The responsible authorities perform inspections *ex post* on a minimum sample of 20% of businesses.

The area map to be submitted for pre-approval is obtained *ex officio* by the licensing authority. The copy of the building permit allowing for Health Regulated Establishment use can also be obtained *ex officio* by the licensing authority.

Description of previous situation

Until Joint Ministerial Decision ΔΙΑΔΠ/ΦΑ21/34824, health regulated establishments selling retail food and drink had to obtain an operating licence from the municipal authorities through a process comprising two stages of pre-approval and approval. (The obligation to obtain an operating licence still applies for other Health Regulated Establishments handling food products.)

In these two stages the business had to submit a series of documents, including certificates and permits obtained from other authorities, wait for the licensing authority to examine the submitted documentation and the responsible audit authorities to perform inspections until it obtained the operating licence and commenced operations.

As a result businesses spent significant time gathering and submitting required documentation, and they were not allowed to commence operation until final approval was granted.

Description of new situation

Retailers of food and drink (health regulated establishments) are able to commence operations only by submitting solemn declarations – at the stage of pre-approval and approval - with regard to the fulfilment of regulatory requirements.

At the stage of pre-approval, the responsible authority is legally bounded to examine the application with regards to fulfilment of minimum requirements within a very specific time-limit, otherwise the application is considered approved.

After pre-approval, the business notifies the responsible authority about commencement of its operations and responsible authorities may perform respective audits *ex post*.

Assessment of impact on administrative costs and burdens

This change affects food and drink retailers which are health regulated establishments.

The overall time spent by the business is reduced by 19% (i.e. 11 hours); out of pocket costs are reduced, as a result of reduced costs for photocopies and reductions in seminars. Additional costs related to inspections are also reduced by EUR 200 as a result of inspections being performed only on a sample of businesses. Overall a 10% cost reduction is achieved.

On this basis, the reductions in administrative burdens and costs for this action have been calculated as a reduction of EUR 6 255 020 in both administrative burdens and in administrative costs.

Total for this action		
Measured relevant IOs:	Estimated future figures:	Reduction:
AB=EUR 62 019 700.00 AC=EUR 62 019 700.00	AB=EUR 55 764 680.00 AC=EUR 55 764 680.00	Reduction of EUR 6 255 020 AB EUR 6 255 020 AC

3.2.6. Single reporting of information by slaughter houses

Summary of recommendation

The implementation of this recommendation is calculated to reduce administrative burdens by EUR 803 384 and administrative costs by the same amount on a stand-alone basis.

The government should replace the submission of slaughter information in three different ways with single submission using the existing ELGO-DIMITRA database, and information sharing with the Regional Veterinary Authorities and Regional Commerce Directorates.

IOs affected

This recommendation reduces administrative costs primarily for the following Information Obligations:

IO 32: Obligation to keep records, submit meat balances and related inspections (meat trade)

Background and rationale

Currently, there is significant overlap in information which is collected and held ready for inspection or submitted on a daily basis by slaughterhouses to the relevant authorities.

Slaughterhouses submit daily records from the electronic slaughter book to ELGO-DIMITRA. They also submit slaughter book information to regional veterinary authorities in hard-copy form, and specific information which is included also in slaughter books is submitted to the regional commerce directorates. From measurement, we know that businesses consider the electronic submissions to ELGO-DIMITRA to be less burdensome than the hard-copy records.

We recommend that the information submitted daily to ELGO-DIMITRA should be modified slightly if necessary (consolidated) and shared with regional veterinary authorities and regional commerce directorates. This would reduce the amount of information recording which is required by businesses as well as ensure that different authorities rely on the same reported information and make good use of the existing online system. It is important to ensure that the modifications to the information required do not add to burdens on business, and that the value of additional information is assessed before it is added to the declaration to ELGO-DIMITRA.

We understand from our discussions with the authorities that they are already working on such a change, and that in practice the regional veterinary authorities do often already rely on information submitted electronically, rather than just the hard-copy information. This demonstrates both the opportunity for information sharing, and positive steps to reduce the burdens on businesses.

Description of current situation

Slaughterhouses are obliged to gather information and submit their electronic slaughter books to ELGO-DIMITRA, via an on-line platform on a daily basis (monthly for poultry information).

Additionally, slaughterhouses are obliged to keep their slaughter books in hard copies and have the information available on a daily basis to the regional veterinary authorities.

They are also obliged to keep extra records about arrivals/purchases and departures/sales of animals/meat and keep the information available for inspection by regional commerce authorities.

Description of desired situation

Slaughter houses gather the required information as set by the EU regulatory framework in electronic slaughter books-files and submit the information each month to only one designated authority (ELGO-DIMITRA) via the existing on-line platform.

The electronic system can be accessed by all other authorities that need to retrieve information.

Legislation to be examined

Following a thorough assessment of the current situation and in order for the above draft recommendation to be effectively implemented, a simplification and an active enforcement of the relevant primary and secondary legislation in force is necessary, which should take into account the existing obligations of EU law in this area.

The main national and EU legislation to be examined is set out below:

1. National Legislation

Legislation No.	Main articles of interest	Comments
Law 2127/1993 (GG 28/A/6.4.1993)	Art. 94 par. 2 h	By virtue of this law, ELOGAK is responsible authority for the meat balances to be submitted to.
Ministerial Decision 188763 (GG 2284/B/13.10.2011)	Art. 1	By virtue of this decision ELOGAK is merged in the newly founded Hellenic Agriculture Association- Dimitra.
Ministerial Decision 412/8932 (GG 149/B/03.02.2012)	Art. 2 par. 2 b, art. 3, 4, 6, 7, 8	This decision sets the obligation for the interested parties to submit electronically to Hellenic Agriculture Association- Dimitra the Slaughter book. In addition, this decision sets the obligation for slaughter houses to keep records to be presented upon inspections of the competent authorities.
Ministerial Decision 647/27509 (GG 539/B/07.03.2013)	Art. 1, 2, 3, 4, 5	This decision regulates the on line system for the submission of the requested information to Hellenic Agriculture Association- Dimitra.

2. European Union Legislation to be considered

(references are made to the consolidated versions)

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 (Art. 3).

Assessment of impact on administrative costs and burdens

This change would affect slaughterhouses.

These businesses would:

- No longer be required to keep separate hard-copy records for regional veterinary authorities and regional commerce
- Be able to submit information once using the existing ELGO-DIMITRA online system.

The overall time spent by slaughter houses on keeping records and reporting similar information to authorities is reduced, affecting all related obligations. The impact of this recommendation can be counted on the basis of IO 32, as it will effectively replace the rest of the related obligations. Since this recommendation affects only slaughterhouses, and slaughterhouses were only some of the businesses measured, it has been estimated that it can result in a 2% reduction in overall time spent.

On this basis, the reductions in administrative burdens and costs for this recommendation have been calculated as a reduction of EUR 803 384 in administrative burdens and administrative costs.

Total for this recommendation		
Measured relevant IOs:	Estimated future figures:	Reduction potential:
AB= EUR 7 492 987.66 AC= EUR 14 985 975.31	AB= EUR 6 689 604.00 AC= EUR 14 182 591.66	Reduction of EUR 803 384 AB EUR 803 384 AC

of which:

IO 32: Obligation to keep records, submit meat balances and related inspections (meat trade)		
Measurement results:	Estimated impact (future figures):	Potential reduction:
P (sum segments) = EUR 2 575.80 f= 1 Q= 5 818 BAU= 50% AB=EUR 7 492 987.66 AC=EUR 14 985 975.31	P = EUR 2 437.71 f= 1 Q= 5 818 BAU= 53% AB=EUR 6 689 604.00 AC=EUR 14 182 591.66	Reduction of 10.7% (of IO 32 AB) Reduction of EUR 803 384 AB EUR 803 384 AC

3.2.7. Additional related opportunities to reduce administrative burdens

Food industry licensing: Additional effects: Reduction of opportunity costs

The delays and waiting times currently experienced in business licensing processes create opportunity costs for the businesses. Although opportunity costs are not part of the SCM measurement, recent work by the Federation of Hellenic Enterprises (SEV) has made a significant contribution to calculate them.³ According to these calculations, the opportunity cost for food industry licensing is calculated at 7.5% of the total investment value.⁴ In particular, it has been calculated that for an investment of EUR 2.6 million, a five-month delay in the business licensing process leads to an opportunity cost ranging from EUR 75 353 to EUR 87 028.

The recommendations above, especially the recommendation in section 3.2.4, will not only reduce the administrative burdens for business, but will also contribute to a reduction of the waiting time and therefore the opportunity costs.

Review the information submitted about meat balances for businesses other than slaughter houses

In general, the information required for the submission of meat balances should be reviewed and consolidated with a view to minimising burdens, and the reasons for submission should be made more transparent for businesses. The reasons for requesting information can relate to overseeing the meat trade especially in terms of traceability, food safety and origin, including EU obligations, as well as statistical purposes. Businesses involved in the meat-trade are obliged to keep records about food traceability (according to EU regulations), and the scope and extent of reporting the information to public authorities was called into question during measurement. A reduction in the reporting of information to public authorities would reduce burdens on business.

Online submission and simplification of declarations of milk balances

We understand from our discussions with the authorities that they are planning to allow the submission of milk balances online through a central electronic platform. This will result in less time being taken by businesses to complete and submit the declaration. Although there may be wider benefits for businesses or the public authorities, we consider that the reduction in administrative burdens from this change will be marginal, since submission is currently made electronically by e-mail.

A more significant reduction in administrative burdens could be achieved if, after consultation between public authorities and businesses, the purpose of reporting each required item of information was re-assessed and unnecessary information was omitted. We understand this is not part of the current plan and a reduction in the information provided is considered problematic by the authorities. As an illustration of the benefits which could be achieved, we calculated on the basis of the results of measurement that a reduction of 10% in the information supplied would reduce overall time for business by 8% (i.e. almost 5 days per year), which would lead to an administrative burden reduction on the basis of this measurement of nearly EUR 698 000 in total.

³ SEV: “Entrepreneurship without Barriers”, Athens, April 2011

⁴ SEV: Business Environment Observatory, Business Licensing, Athens, July 2013

3.3. Suggested sequencing and prioritisation

The sequencing and prioritisation of these recommendations should depend on both their relative impact and difficulty. The difficulty is best appreciated by the relevant Ministries of the administration, which also have competing priorities.

The Food Safety priority area is the seventh largest priority area covered by this project in terms of the size of its administrative burdens and it affects a specific group of businesses in the economy, including retailers. Therefore in relative terms within the administrative burden reduction project, the implementation of recommendations in this area should be accorded medium priority.

Comparative analysis of the recommendations shows that:

- **The government has already made a significant impact on reducing administrative burdens for Health Regulated Establishments selling food and drink.** This has been achieved by moving from an application to the Municipal Authorities for approval to operate to a notification with pre-approval followed by *ex post* inspection.
- **Establishing one-stop-shops for food business regulation** will have the highest impact in reducing administrative burdens. It involves designating an authority which will act as intermediary between food businesses and the many different authorities which they must deal with in order to secure approvals to start operations. The impact is significant because it reduces the opportunity for different facilitation payments which were reported during the measurement. **Allowing electronic communication between businesses and the one-stop-shops** will reduce administrative burdens further, but nowhere near as significantly as setting up the one stop shops themselves.
- The recommendation to **move in a similar way for food business operators (for example, manufacturers) from business licensing to business notification**, incorporating the establishment approval and inspection required by EU law for food business operators handling food of animal origin, would make the registration practice more similar across different parts of the food industry. It has some impact on administrative burdens, but it is likely to have a greater impact in reducing the time it takes for a food business operator to meet regulatory conditions before it begins trading.
- **The recommendation to codify or catalogue food legislation, maintain its stability and produce guides and manuals for food businesses** involves making the rules clearer and helping businesses navigate them, so that development of the sector is assisted as well as administrative burdens reduced.
- The recommendation on **single reporting of data by slaughterhouses** will have an impact on a particular type of business, and will reduce their reporting requirements. Its speed is determined by the plans already underway and IT development schedules.

The recommendations on one-stop-shops, moving to business notification and better organising legislation and regulation are inter-connected. The establishment of one-stop-shops is likely to take time to organise, and their role is likely to depend on the legal framework within which they operate. Therefore it would be useful to make any changes to the legal framework on licensing (moving to registration), then catalogue the law and decide in detail on the role of one stop shops before developing guides and handbooks, and then

activating the one-stop-shops. IT development for one-stop-shops should depend on the IT capacity available in the agency which takes on the role.

The changes to reporting for slaughterhouses could be pursued separately, but it would also be useful to combine them with a wider review of information reported by meat-trade businesses, as suggested in section 3.2.7

Government and businesses should co-operate and act jointly in order to successfully reduce administrative burdens. The government should take the lead in abolishing and/or simplifying regulations or practices and involve and consult sector organisations and businesses throughout the implementation process.

3.4. Other issues

The following relevant issues were raised by stakeholders during the project. They are not administrative burden reduction recommendations within the scope of this priority area, but they are irritations to business which the government could consider addressing:

- A concern that public authorities involved in licensing businesses do not demonstrate an attitude of “serving the business”
- Questions about the value of using training seminars to certify competence in technical and food safety, since the seminars do not ensure compliance with food safety requirements
- A desire for the designation of more industrial zones by the state, since business licensing is easier in these areas.
- The 5 year record keeping period for animal nutrition products is perceived as too long, and causes some irritation to businesses, given that the expiry period of the products is around 4 months.
- Butchers are irritated by the extra cost of having to buy a weighing machine which can print out a month “Z” record, which appears to be double the cost of the a weighing machine which would otherwise meet their needs.
- A lack of understanding among meat businesses of the reasons they are recording and reporting information to public authorities.

4. Conclusion

This report identifies the priority area Food Safety as the seventh largest of the 13 priority areas covered by the project in terms of the total administrative costs and administrative burdens measured. On the basis of the fieldwork, the total administrative costs were measured at EUR 92.58 million and the total administrative burdens at EUR 80.24 million.

This is explained in part by an accepted need to ensure high food safety standards. Indeed, food safety is regulated to a large extent at the EU level, and businesses work within food safety requirements which are also essential to their own business. It is also difficult to separate food safety measures, narrowly defined, from wider measures affecting the food industry and businesses handling food. In terms of regulatory policy, the purpose of a measure is not always immediately obviously food quality, food safety or general regulation of economic activity. For this reason, the obligations measured are not narrowly defined food safety measures, but wider regulatory measures affecting the food industry which interact with food safety requirements.

The specific information obligations measured affect businesses of different types in different ways. For example, the licensing requirements are different for food business operators (such as manufacturers) and Health Regulated Establishments (such as retailers). Food safety requirements may be pre-requisites to or integrated into other requirements in different ways. There is a clear difference in the regulation of establishments handling products of animal origin, and those handling no such products. This has been reflected in the measurement.

The government has already made a significant reduction in administrative burdens in the obligations measured by changing the rules for Health Regulated Establishments (food and drink retailers) and moving from an application for approval to operate to a notification with pre-approval followed by *ex post* inspection. We calculate this will reduce administrative burdens by **EUR 6 255 020**. Designated KEPs will also act as one-stop-shops for these businesses, so that recommendation may also be regarded as partly implemented insofar as the KEPs operate on the basis described in section 3.2.2.

This report makes five recommendations for administrative burden reduction measures on Food Safety⁵:

Recommendation	Calculated reduction in administrative costs	Calculated reduction in administrative burdens
Codify or catalogue laws and regulations about food business licensing, including health regulations, maintain their stability and provide guidance to businesses*	EUR 2 355 434	EUR 2 355 434

⁵ In line with standard practice, the reduction calculations have been made individually for each recommendation. It is therefore not possible to add together these calculated reductions to obtain an overall total reduction because different recommendations affect the same obligations. The overall reduction obtained depends on the sequencing of recommendations. The impact of the recommendations marked * would be reduced by the other recommendations being implemented, and the impact of recommendations which are not marked would be affected similarly by prior implementation of the recommendations marked *.

One-stop-shops for food businesses*	EUR 31 893 507	EUR 31 893 507
Electronic submission of documents to one-stop-shop*	EUR 1 427 689	EUR 1 427 689
Single integrated process to replace establishment and operating licences for food industrial/manufacturing plants, incorporating establishment inspection and approval only if handling animal origin products*	EUR 340 985	EUR 340 985
Single reporting of information by slaughter houses	EUR 803 384	EUR 803 384

The recommendation to create one-stop-shops for food businesses and health regulated establishments (food and drink retailers) has such a significant impact because it removes opportunities for facilitation payments during the process of setting up these businesses.

The involvement of businesses is key to achieving the burden reduction through implementation. The government should take the lead and also ensure that businesses and their representatives are consulted and engaged during implementation to assure that solutions are well-designed.

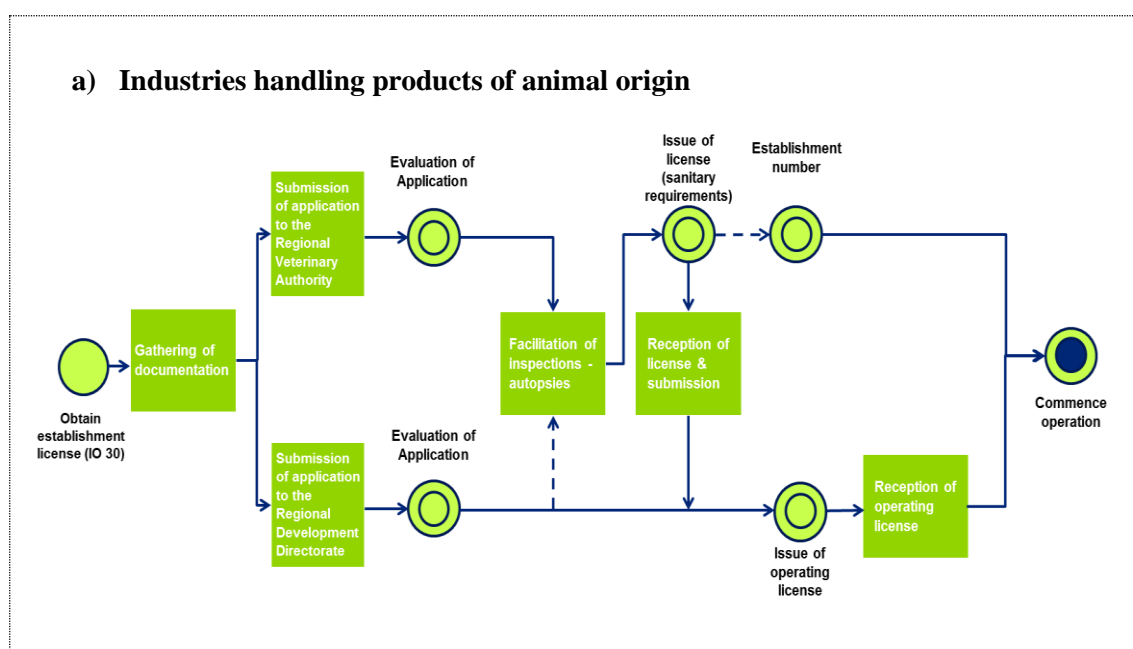
Annex 1: Analysis of information obligations and quantification of administrative costs

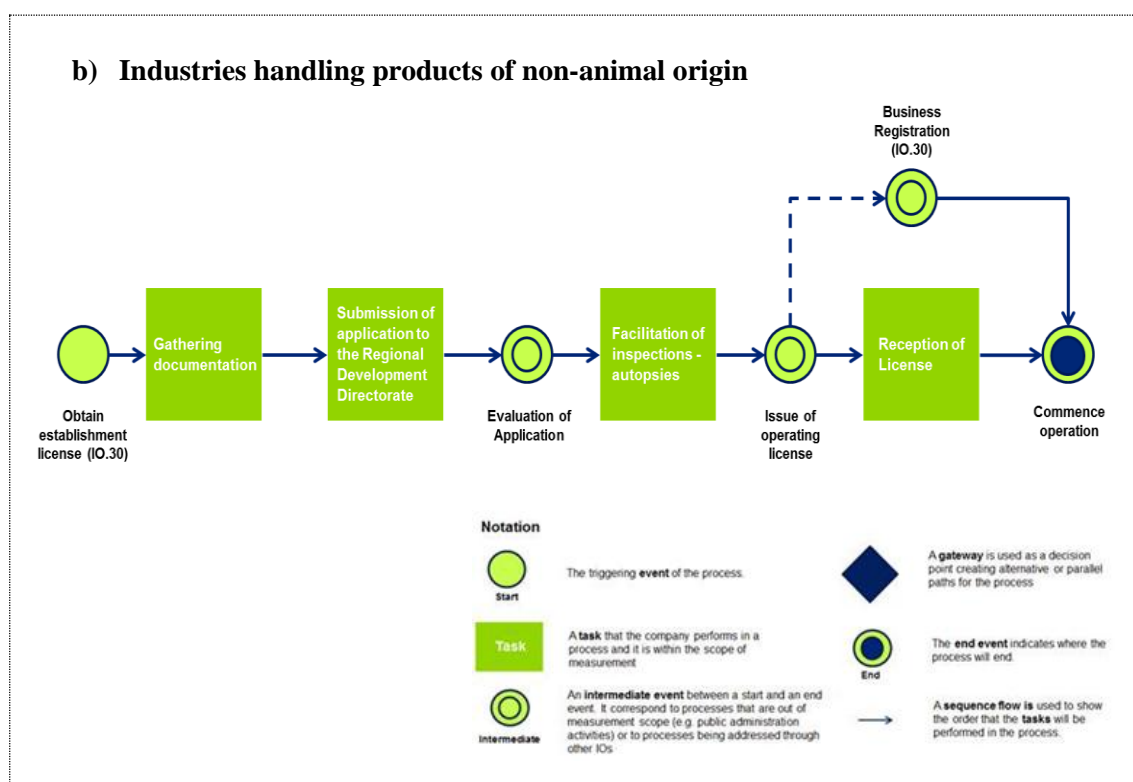
This Annex provides the measurement results of the study per IO within this Priority Area. For every IO the origins and process description are presented and the detailed measurement results are described and analysed.

1.1. Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (handling products of animal & non animal origin – Industries/ small manufacturing units and Health Regulated Establishments) - IO 29

1.1.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.1: Process for complying with the requirement “Obligation to obtain an operating licence for a food business, including relevant inspections and sanitary opinion”





Industries and small production/manufacturing units

The process for complying with the IO of obtaining an operating licence by a food industry or small production/manufacturing unit is shown in the Figure below. The process is distinguished between **businesses handling products of animal origin** and **businesses handling products of non-animal origin**. Below these processes, the process for **health regulated stores** is explained.

The IO refers to the obligation of **industries and small production / manufacturing units** (establishment with equipment of no more than 22kW engine power and 50kW heat potential) of food products to obtain a licence in order to be able to commence operation. These businesses can be distinguished between those **handling food products of animal origin** and those **handling food products of non-animal origin**.

The main regulation governing the establishment of industries and small production/manufacturing units is Law 3325/2005 (Gov. Gazette 68/A5), as well as Law N. 3982/2011 (Gov. Gazette 143/A), whereas for businesses involved in the production of food products of animal origin respective obligations are set by Presidential Decree 79/2007 (Gov. Gazette 95/A) and Joint Ministerial Decision 15523/2006 (Gov. Gazette 1187/B).

NOTE 1: Businesses handling food products of animal origin (as described in Regulation (EC) 853/2004), in order to operate have to issue two operating licences: a) an operating licence regarding sanitary requirements by the Regional Veterinary Authorities, including an establishment approval number issued by the Ministry of Agricultural Development and Food, which is issued after the issuance of the operating licence and b) an operating licence by the Regional Development Directorates.

NOTE 2: With regard to the operating licence issued by the Regional Development Authorities, documentation required by the business in order to apply varies according to the type of business – business of low, medium and high nuisance. Law 3982/2011 provides for

simplified procedures with regard to low and medium nuisance businesses, which are mainly small/medium manufacturing units. In this respect the following analysis focuses on industries and the provisions governing the operating licences of these businesses.

NOTE 3: Obtaining an establishment licence (as described in IO 30) and completion of the establishment is a pre-requisite in order for the business to be able to apply for an operating licence.

The process to obtain the operating licence(s) includes the following steps:

Step 1: Gather documentation

a) Businesses handling food products of animal origin

The interested party, after obtaining the establishment licence regarding sanitary requirements, and completing the establishment, in order to apply for an operating licence regarding sanitary requirements, submits to the **Regional Veterinary Authorities** the following documentation:

- Application
- Final plan of the establishment with detailed description of establishment spaces and equipment
- Any other new/updated documentation that differentiates/updates the documentation submitted during the application for the establishment licence.

With regard to applying for an operating licence by the **Regional Development Authorities** the interested party has to collect the following documentation:

- Application
- Solemn declaration by a Mechanical Engineer and the Owner with regard to conformity to the terms of the establishment licence and the assurance of the proper operation of the equipment

As well as special documentation according to requirements, such as:

- Fire protection certificate
- Solemn Declaration with regard to the number and specialization of technical staff that will be used
- Permit for wastewater disposal
- Building permit, if provided for in the establishment licence
- Certificates regarding plumbing installations
- Permit for water use, when appropriate
- Final diagrams of the establishment with detailed description of the establishment areas and equipment.
- Solemn declaration by a certified electrician with regard to electrical installations

- Certification of Conformity with sanitary requirements by the Responsible Authority or relevant Licence (for businesses handling food of animal origin)
- Other ad hoc documentation (e.g. building regulations when establishment is within multi-block building, traffic link certification etc.).

Fees for operating licences are set by the respective regulations.

b) Businesses handling food products of non-animal origin

The interested party has to collect the documentation mentioned above only with regard to the application to the Regional Development Authorities.

Step 2: Submission of application to the respective authority

a) Businesses handling food products of animal origin

The interested party submits the required documentation to the Regional Veterinary Authority in order to apply for an operating licence regarding sanitary requirements and also submits the required documentation to the Regional Development Authorities in order to apply for an operating licence.

b) Businesses handling food products of non-animal origin

The interested party submits the required documentation to the Regional Development Authorities in order to apply for an operating licence.

Step 3: Facilitation of inspections

The applications are evaluated by the Committees of the Responsible Authorities and an inspection - autopsy of the establishment is performed by the responsible authorities in order to certify the conformity with the establishment requirements as well as conformity with sanitary regulations.

Regional Veterinary Authorities are responsible for the autopsy of businesses involved in food products of animal origin and the issuance of the operating licence regarding sanitary requirements, which (as described above) is a pre-requisite for the issuance of the operating licence by the Regional Development authorities.

Regional Agricultural Development Directorates are responsible for the autopsy – issuance of Certification of Conformity of businesses involved in food products of plant origin.

Regional Commercial Directorates and the General Chemistry of the State are responsible for the issuance of the Certification of Conformity for businesses producing alcoholic beverages.

Regional Development Authorities perform autopsies in order to verify conformity of the business establishment to the terms set in the establishment licence.

Step 4: Issuance and reception of licence

a) Businesses handling food products of animal origin

Following a positive evaluation of the responsible authority the operating licence regarding sanitary requirements is issued and received by the business, and submitted to the Regional Development authorities as required for the issuance of the operating licence.

Following a positive evaluation of the Regional Development authorities the operating licence is issued and received by the business.

b) Businesses handling food products of non-animal origin

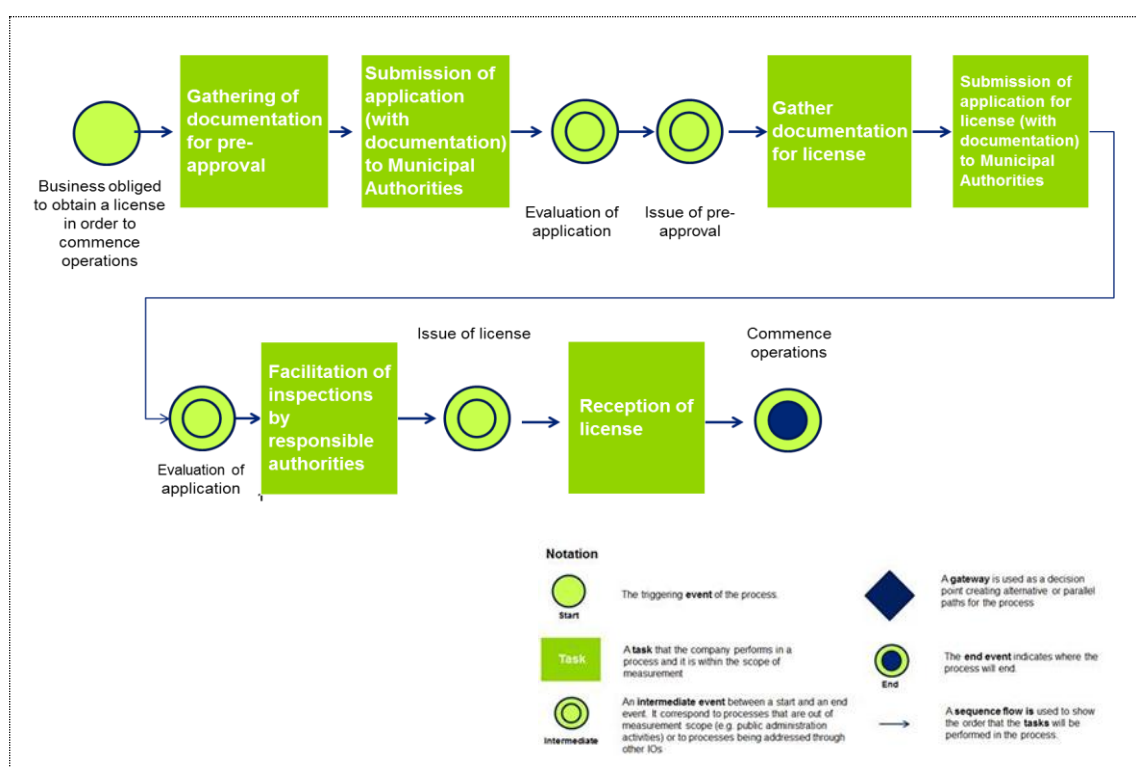
Following a positive evaluation of the inspection authorities and the Regional Development authorities the operating licence for sanitary re issued and received by the business.

As described in IO 30, after the issuance of the operating licence, an in order for the business to be able to commence operations, a registration or establishment approval number has to be issued by the responsible authorities.

Other health regulated establishments

The process for complying with the IO of obtaining an operating licence by health regulated food businesses, with a focus on food stores, restaurants and relevant establishments licenced by the Municipal Authorities is shown in the Figure below.

Figure 1.2: Process for complying with the requirement “Obligation to obtain an establishment-operating licence for a food business, including relevant inspections and sanitary opinion (handling products of animal origin / products of non-animal origin)”



The IO refers to the obligation of food & beverage businesses – as referred in the Ministerial Decision 96967/2012, Gov. Gazette 2718/B and Joint Ministerial Decision 21220/2011, Gov. Gazette 2496/B [NB: This Ministerial Decision has been repealed since measurement by Ministerial Decision ΔΙΑΔΠ/Φ.Α.2.1/31600/2013 (GG 3106/B'/09.12.2013)]

and licenced by Municipal Authorities, with focus on commercial food establishments and food services providers (e.g. stores and restaurants), to obtain a licence in order to be able to commence operation, according to Joint Ministerial Decree 96967/2012.

For this kind of businesses there is no distinction between establishment and operating licence. They are obliged to obtain one licence for which pre-approval and final approval is necessary. The licence is granted by the Municipal Authorities.

The IO refers to food & beverage businesses, of both animal origin and non-animal origin. Categories of such businesses include

- Retailers and wholesalers: super-markets, cash and carry, groceries, butchers, fishmongers, cellars also selling nuts, bakery shops, fruit sellers, sellers of cold cuts and cheese products, sellers of coffee products, mixed stores, free markets, as well as small sellers
- Food & beverage service providers: Restaurants, bars etc.

The process of obtaining an establishment-operating licence for the aforementioned businesses includes two main stages - pre-approval and final approval/licence -, which are broken-down in the following steps:

Step 1: Gathering of required documentation for pre-approval

Food & beverage business under consideration, in order to apply for pre-approval are obliged to collect the following documentation is required:

- Area diagram which indicates the exact position of the establishment.
- Regulation of the building where the store is located, or failing that a Solemn declaration by the building administrator regarding permission for establishment by the building owners.
- Certificate of urban planning on land use and building permit property (stamped copy from the Department of Urban Planning where the permit documentation is filed)

It should be noted that the Circular for clarification on M.D. 96967/2012 states that the business operator after selecting the store's site and checking the legality of space and land use, and before applying for pre-approval, can apply for initial check by the Sanitary Authorities, submitting a brief description of the business accompanied by floor plan layouts with detailed mapping of spaces and their uses, workflow, equipment etc. in two copies. With this application, the opinion of the Sanitary Authorities will be required so as to proceed with the request for pre-approval. On the floor plan layouts the positive opinion of the Sanitary Authorities must be mentioned, so as for the operator to be ensured and the Authorities will be bounded to a positive opinion for authorization when the application is submitted by the Municipal Authorities to the Sanitary Authority for inspection.

Step 2: Submission of the documents to the Municipal Authorities

The interested party submits the aforementioned documents to the Municipal Authorities along with the following:

- a) Pre-approval application - Solemn declaration (list name and address of the company, the representative, the type of offered services).
- b) Respective fee (if required by the Municipal Authority)

Step 3: Evaluation of the application

The responsible Municipal Committee evaluates the application

Step 4: Decision for pre-approval

Issue of pre-approval by the Municipal Authorities

Step 5: Gathering of required documentation for licence

After issuance of the pre-approval the interested party collects the following documentation in order to apply for final approval, i.e. the licence to operate.

- The statutory documents, which prove the ownership or leasing of the establishment, or tenancy agreement stamped by the Tax Office.
- Copies of the building permit recently stamped by the Urban Planning Authority and building diagrams signed by Mechanical Engineer. Specifically, the Mechanical engineer's plans should include layout of all of the sites, construction and equipment, and detailed flow chart of a business activity (i.e. the flow of raw materials from the point of entering the company until the exit of the product).
- Statement from a licenced electrician that the electrical installations meet the conditions for safe installation (electrician's stamp).
- Certificate issued by the Fire Brigade – according to the type of establishment it can be acquired by the Municipal Authorities ex officio after the submission of the respective fire protection study.
- Health book (photocopy) from the Health Department.
- Photocopy of I.D.
- Photographs (optional for the licence)
- Solemn Declaration (certified by Public Authority) with regard to Criminal Records for the stores that offer alcohol drinks.
- Commencement of activity from the Tax Office.
- Association Memorandum for legal entities
- Declaration for the appointment of Sanitary Responsible
- Certification of traditional butcher (for butcher shops)

Step 6: Submission of documentation to the Municipal Authorities

The interested party submits the aforementioned documents to the Municipal Authorities along with an application – Solemn declaration (list name and address of the company, the representative and the type of offered services) and the Respective fee.

Step 7: Evaluation of the application

The responsible Municipal Committee evaluates the application for licence. The file is forwarded to the other Responsible Authorities (**Sanitary Authorities for sanitary inspection** and Fire Brigade for Fire Protection Certificate if required) for the inspection and opinion issuance.

Step 8: Facilitation of inspection

The business is obliged to facilitate inspections performed by responsible authorities, which submit an opinion on the conformity of the business to the requirements specified according to the type of establishment.

Step 9: Issue & reception of licence

Following a positive evaluation of the application a licence is issued for the business to commence activities.

1.1.2. Results from measurement and quantification

Table 1.1 Composition of Administrative Cost and Administrative Burden (IO 29)

PA: Food Safety	Price (P)				Nr of entities / occurrences (q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 29: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion									
Industries (animal origin)	6 000	1 400	2 500	6 382	156	1	0	1.00	1.00
Industries (non-animal origin)	4 770	1 400	2 500	5 873	153	1	0	0.90	0.90
Health Regulated Establishments	3 510	1 000	550	6 202 ⁶	10 000	1	0	62.02	62.02

The IO refers to the obligation that businesses handling food products have to obtain an operating licence from the respective licensing authorities before commencement of their operations. There is segmentation within the IO resulting from the different licensing procedures that food businesses have. In this respect, there are different licensing procedures for:

- Industries handling products of animal origin
- Industries handling products of non-animal origin and
- Health regulated establishments (referring mainly to food stores and food service providers)

⁶ P include additional costs for acceleration of the process of EUR 3,200. These amount to total additional costs of EUR 32 M in AC and AB.

The Price (P) represents the administrative cost incurred by the normal efficient business in each segment in order to obtain an operating licence. With respect to the number of occurrences, this refers to the number of applications for operating licences submitted annually to the respective licensing authorities (average of period 2010-2012 for industries and 2012 data for health regulated establishments). The activities related to the IO are performed by business staff who are categorised as professionals⁷.

Industries (animal and non-animal origin)

Standardised description of the activities related to the IO (IO 29 – Industries)

The process to obtain the operating licence(s) includes the following steps, which follow the issuance of an establishment licence for the business and the completion of the construction of the establishment by the business:

With regard to professionals performing the activities, and as far as industries are concerned, there are activities that require work of a mechanical engineer. These activities are undertaken by an in-house mechanical engineer in the case of a normal efficient business. Other than the mechanical engineer, usually activities are undertaken by the business owner / general manager and at least one other business professional.

1. Gathering of documentation

As above noted, and in order to operate, businesses – and more specifically industries of high nuisance- handling food products of animal origin, have to issue two operating licences:

- a) an operating licence regarding sanitary requirements by the Regional Veterinary Authorities, including an establishment approval number issued by the Ministry of Agricultural Development and Food (described in IO 30) and
- b) an operating licence by the Regional Development Directorates.

In this respect, **businesses handling food products of animal origin**, in order to apply for an operating licence regarding sanitary requirements, are required to complete an application form, to develop final plans of the establishment (undertaken by a mechanical engineer) and gather any other documentation that may have been updated or altered during the period of the establishment. The submission of the documentation to the Regional Veterinary Authority takes 960 minutes (2 days) for a normal efficient business.

With regard to applying for an operating licence by the Regional Development Authorities, a normal efficient business (both handling food products of animal origin and non-animal origin) follows the below steps.

- A solemn declaration with regard to specialised technical staff that is going to be used, as well as a solemn declaration with regard to the establishment (that everything was executed according to establishment licence) are completed with the contribution of the business owner, the in-house mechanical engineer and the technical department manager. The solemn declaration has to be verified by a respective authority (usually KEP). A total of 1 200 minutes (20 hours) is needed by the normal efficient business for the whole procedure.
- A fire protection certificate is obtained and requires about 1200 minutes (20 hours) for the in-house mechanical engineer to complete the study on active fire protection

⁷ The standard hourly rates per employee type are in Annex 6

(‘energitikí pyroprostasia’), submit it to the Fire Protection Authority and get the certificate. It should be noted that takes around 1 month for such a certificate to be issued by the authority.

- A copy of the building permit is verified by the Urban Planning Authority and for this the in-house mechanical engineer will spend 480 minutes (1 day).
- Certificates about steam generators and gas tanks are obtained after validation by the respective certification authorities an activity that requires the in-house mechanical engineer to spend 120 minutes (2 hours).
- A business professional spends 60 minutes to gather contracts about use of disposal.
- The in-house mechanical engineer spends 180 minutes (3 hours) to draw the final diagrams of the establishment. For businesses handling food products of animal origin, this time has already been included in the time spent for obtaining the operating licence regarding sanitary requirements by the Regional Veterinary Authority, since this activity is performed within this process.
- Obtain a permit for wastewater disposal and a permit for water use, when appropriate which however are not included in time calculations in this IO, since these are considered to be very specific IOs on their own.

In total the gathering of documentation required by the Regional Development Authorities, as described above, takes 3 240 minutes (6.8 days) for a normal efficient business handling non-animal origin food products to complete, including external meetings. In this time 120 minutes (2 hours) should be added for familiarisation with the legislation and 480 minutes (8 hours) for internal meetings.

For a normal efficient business handling products of animal origin, 3 060 minutes (6.4 days) are spent for gathering the required documentation, including external meetings. In this time 120 minutes (2 hours) should be added for familiarisation with the legislation and 720 minutes (12 hours) for internal meetings.

2. Submission of application to the respective authority

The authorised by the business person prepares the file with required documentation which takes 30 minutes for businesses handling food products of non-animal origin and 60 minutes for businesses handling food products of animal origin and then submits the files to the respective authorities:

- for **businesses handling food products of animal origin** the respective Regional Veterinary Authority as well as the respective Regional Development Authority
- for **businesses handling food products of non-animal origin** the respective Regional Development Authority.

The time needed by the normal efficient business to submit the documentation in order to apply for the operating licence(s) is 120 minutes for the businesses handling food products of non-animal origin and 240 minutes for the businesses handling food products of animal origin, since there are two authorities and applications involved in this case.

Time needed for authorisation of the person submitting the application has not been taken into consideration here, since this activity is performed during the first stage of the licensing procedure – namely in the establishment licensing procedure (as described in IO 30).

3. Facilitation of inspections

The applications are evaluated by the Committees of the Responsible Authorities and an inspection - autopsy of the establishment is performed by the responsible authorities in order to certify the conformity with the establishment requirements as well as conformity with sanitary regulations.

Regional Veterinary Authorities are responsible for the autopsy of businesses involved in food products of animal origin and the issuance of the operating licence regarding sanitary requirements, which (as described above) is a pre-requisite for the issuance of the operating licence by the Regional Development authorities.

Regional Agricultural Development Directorates are responsible for the autopsy – issuance of Certification of Conformity of businesses involved in food products of plant origin.

Regional Commercial Directorates and the General Chemistry of the State are responsible for the issuance of the Certification of Conformity for businesses producing alcoholic beverages.

Regional Development Authorities perform autopsies in order to verify conformity of the business establishment to the terms set in the establishment licence.

With regard to inspections, it should also be noted that the Fire Protection Authorities also perform inspections in order to issue the Fire Protection certificate, which is a pre-requisite for obtaining the operating licence. For all the autopsies involved the normal efficient business (both animal and non-animal origin) has to spend usually 720 minutes (12 man-hours) in order to facilitate them.

4. Issuance and reception of licence

With regard to **businesses handling food products of animal origin**, following a positive evaluation of the responsible Regional Veterinary Authority, the operating licence regarding sanitary requirements is issued and received by the business, and submitted to the Regional Development authorities as required for the issuance of the operating licence.

Following a positive evaluation of the Regional Development authorities the operating licence is issued and received by the business (**both businesses handling animal and non-animal origin food products**). For this step the normal efficient business has to spend usually 60 minutes (1 hour) if it is only one licence involved (case of businesses handling food products of non-animal origin) and double this time – 120 minutes - if there are two licences involved (case of businesses handling food products of animal origin).

As described in IO.30 (as detailed below), after the issuance of the operating licence, and in order for the business to be able to commence operations, a registration or establishment approval number has to be issued by the responsible authorities (this is described in IO 30).

With regard to **costs related to IO 29**, for industries handling food products of animal and non-animal origin, there are:

- **consulting costs** amounting to EUR 1 400 include inspection and issuance of certificates for steam generators (500EUR per generator, average 2 generators per establishment) and gas tanks (EUR 400 per tank).

- **out of pocket costs** correspond to licensing fees, which vary according to the technical equipment of the business and to the corresponding size of its investment (based on standard mathematical equation). According to the interview responses, the licensing fee corresponding to a normal efficient business is EUR 2 500. No equipment costs have been reported.
- it has been reported that additional costs usually for the acceleration of the procedure do exist, but specific data on these costs was not given during the interviews and thus has not been included in the measurement.
- there are no activities performed which would otherwise be part of the normal business process of a business and as such BAU is considered to be 0%.

Standardised description of the activities related to the IO 29 – HRE

The IO refers to the obligation of food & beverage businesses, with focus on commercial food establishments and food service providers (e.g. stores and restaurants), to obtain a licence in order to be able to commence operation. For this kind of businesses there is no distinction between the establishment and the operating licence: They are obliged to obtain one single licence for which pre-approval and final approval is necessary. The licence is granted by the Municipal Authorities.

The process of obtaining an establishment-operating licence for the aforementioned businesses includes two main stages - **pre-approval** and **final approval/licence** -, which are broken-down in the following steps:

1. Gathering of required documentation for pre-approval

The normal efficient business usually spends some 90 minutes to get familiarised with the IO. The business operator, after selecting the place of establishment and in order to apply for pre-approval proceeds to the following:

- Visits the Urban Planning Authority in order to check the legality of space and land use, according to the topographic diagram of the area. Upon approval, the operator also obtains a certificate on land use and a stamped copy of the building permit. After applying, the business operator will usually get the documents after 2 or 3 days, as long as there are no issues with the land use.
- Obtains the building regulation where the store is going to be located, or if non available, a Solemn declaration by the building administrator regarding permission for establishment by the building owners. The Solemn declaration has to be verified with regard to the authenticity of the signature by a respective authority – usually KEP - and as such the business owner has to go to the respective authority with the building administrator. If the building regulation does not allow the establishment to operate, a meeting between the owners need to be held, which could lead to a decision to change the building regulation.

It should be noted that the regulation (on its recent amendments) provides for the business operator to be able to apply for an initial check by the Sanitary Authorities. After having selected a location and verified its legality of use, the operator has the possibility to apply for this check so as to proceed for the pre-approval. This activity is optional and not common among the interviewees (due the recent amendment and the lack of awareness); it is therefore not included in the standard measurement even if it has been reported by one of the interviewees.

In addition, during this step the business owner actually spends time to gather all the documentation required to obtain the licence (see step 5 below), and sometimes submits to the Municipal Authorities all the documentation from the stage of pre-approval. However, for calculation reasons it has been assumed that the business follows the steps as defined by the regulatory framework and thus time to collect the required documentation has been allocated to each step of the activity respectively.

In this respect the normal efficient business spends approximately 710 minutes to gather required documentation during the first stage of pre-approval, along with some time for checking documentation and meetings with the Mechanical Engineer or other experts.

2. Submission of the documents to the Municipal Authorities.

The business operator submits the aforementioned documents to the Municipal Authority along with a completed pre-approval application form which is actually a Solemn declaration listing the name and address of the business, the representative and the type of offered services. According to the interviewees, 60 minutes are needed in order for the business operator to proceed to the Authority for the submission of the documentation.

3. Evaluation of the application

The responsible Municipal Committee evaluates the application. At this point, no significant time has been reported on behalf of the businesses.

4. Decision for pre-approval

The Municipal Authority issues the pre-approval which will take at least one week, since the Municipal Committee meets only once a week.

5. Gathering of required documentation for licence

After the business operator is informed for the issuance of the pre-approval, he proceeds with the gathering of the rest of the documentation in order to apply for the final approval, i.e. the licence to operate. In this respect, the business owner:

- Obtains the statutory documents, which prove the ownership or leasing of the establishment, or tenancy agreement and visits the Tax Office in order to have them stamped. In the Tax Office the business operator is also required to declare his commencement of activity. This however has not been included in the calculations since it is considered to constitute a different IO that should be examined on its own.
- Uses the services of the Mechanical Engineer for the development of the establishment's plans, which have to be signed by the Mechanical Engineer and be stamped by the Urban Planning Authority.
- Obtains a statement from a licenced electrician that the electrical installations meet the conditions for safe installation (electrician's stamp). This is obtained by the electrician in charge of the establishment's electrical installation which in some of the cases is charged separately.
- Visits the Fire Brigade to obtain a Fire Protection Certificate. Although the regulation provides for its ex officio acquirement after submission of a relevant study by the business operator, usually the business operator acquires the certificate on his own. This study is outsourced to a Mechanical Engineer. It should be noted that a fire protection study is not required in all cases and it depends on the type and size of establishment (in some cases only receipts of buying fire extinction equipment are

required). Additionally, it should be noted that for the issuance of this certificate an autopsy by the Fire Brigade may take place.

- Visits a doctor/hospital to take the required medical exams, which the business owner submits to the Health Authority in order to obtain a Health book.
- Makes a photocopy of his I.D.
- Completes a Solemn Declaration with regards to his Criminal Record, if the establishment concerns a store that offers alcohol drinks. This declaration needs to be verified for authentication by a respective authority – usually KEP.
- Completes a Solemn Declaration for the appointment of Sanitary and Technical Safety Responsible, which has to be verified as well for the authenticity of the signature. Apart from the Solemn declaration, the business operator (usually the responsible for sanitary and safety issues) has to take up seminars in order to be certified and submit the certification as part of the licensing documentation. These seminars are mostly held by certified private institutions, last usually 600 minutes (10 hours) and have an extra cost (described below in out of pocket costs of the IO). It should be noted that there are cases where the technical – sanitary responsible is not obliged to take up seminars, but this is only the case for holders of a degree in a relevant profession.

In general, according to the interview responses it has been estimated that the normal efficient business spends 2 380 minutes (around 5 days) to gather all the aforementioned documentation required for the stage of approval of the licence, including checks on the documentation and internal and external meetings.

6. Submission of documentation to the Municipal Authorities

The business operator (or any authorized person) submits the aforementioned documents to the Municipal Authorities and the respective fee (see below in out of pocket costs). A normal efficient business needs usually 60 minutes to complete this activity.

7. Evaluation of the application

The responsible Municipal Committee evaluates the application for licence. As provided by the regulations, the file is forwarded to the other Responsible Authorities (Sanitary Authorities for sanitary inspection and Fire Brigade for Fire Protection Certificate if required) for the inspection and opinion issuance. It should however be noted the business operator in order to facilitate the licensing procedure and avoid delays, may have to deliver the files himself. In this respect, the business operator usually takes the file to the Sanitary Authorities, which perform an autopsy, and takes it back after the evaluation to the Municipal Authority. For this the normal efficient business spends approximately 120 minutes (2 hours).

8. Facilitation of inspection

The business operator attends the sanitary autopsy and facilitates the procedure, which, as according to the interviewees, lasts usually 30 minutes for the normal efficient business.

9. Issuance & reception of licence

Following a positive evaluation of the application, a licence is issued for the business to commence activities. For that, the business operator goes to the municipal authorities to collect it and spends about 60 minutes. The opinion by the Sanitary Authorities after their inspection is a milestone in the licensing procedure, as it usually determines whether the

licence will be granted or not. So as to avoid the eventual delays of the issuance of the licence, it is common for a business to commence operations before actually receiving the licence.

With regard to costs related to IO 29 for a health regulated establishment – normal efficient business, there are:

- consulting costs of about EUR 1 000 including costs of a mechanical engineer and a certified electrician
- out of pocket and equipment costs amounting in total EUR 550 including licence fee (EUR 150), cost of photocopies of documentation required to be submitted (EUR 20), cost of seminars on Technical-Food Safety (EUR 250), transportation costs to the Authorities (EUR 30) and costs for medical exams to obtain health certificate (EUR 100),
- additional costs of approximately EUR 3 200 regarding the facilitation of the whole procedure, including sanitary inspections. These costs which are included in (P) (Table 2.2 - health regulated establishments segment) amount to total additional costs of EUR 32 M included in AC and AB.

1.1.3. Analysis of measurement results - Industries

The measurement results show that if the segment Industries of this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 1.9 million.

The information obligation in scope, requiring time and costs for businesses, is perceived as of high importance, since this application is the basis for the commencement of operations. It is important to mention that, as this application is entirely done for the purpose to obtain the operating licence (including the additional one regarding sanitary requirements for businesses handling food products of animal origin), there are no Business-as-usual activities.

In general and with regard to all the steps described above, the most burdensome and time consuming activity regards the gathering of information including checks on the information. It requires about 65% of the total time that the business spends in the case of businesses handling food products of animal origin and about 64% of the total time for businesses handling food products of non-animal origin). In the case of businesses handling food products of animal origin, extra time is actually needed to visit a different authority and apply for the operating licence regarding sanitary requirements, where the main document that they submit (final plans of the establishment) needs also to be submitted to the Regional Development Authority for the issuance of the operating licence.

The activity of facilitating inspections is also time-consuming (about 17% for businesses handling food products of animal origin and about 15% handling food products of non-animal origin), followed by external meetings (around 10-11% for both segments).

With regard to time consumed by the business for responding to the IO requirements, a main differentiation point seems to be the level of experience of the people involved in the process. It appears through the interviews that a business that is less experienced with licensing procedures will either have to outsource more activities (activities performed by in-house mechanical engineer), or will need to spend much more time in familiarising with the IO and establishing good relationships with the authorities in order to be able to facilitate the licensing procedure.

With regard to differentiations between businesses (industries) handling food products of animal origin and businesses (industries) handling food products of non-animal origin, main differentiation point is the obligation of the former to obtain an extra licence regarding sanitary requirements. This is a process that requires the business to spend extra time for gathering of required documentation including external and internal meetings (extra time spent by the normal efficient business handling food products of animal origin amounts to 1 020 minutes – 2 days) and visiting responsible authorities to submit documentation and receive the additional licence (extra time spent by the normal efficient business handling food products of animal origin amounts to 210 minutes).

It should be noted that the IO can be even more burdensome if time and costs that are related to the permits and certificates required for the operating licence are taken into account. Some have been excluded from the measurement, since they are regarded as separate IOs that need to be examined on their own. Additional time will also be needed for the business, if it is required to gather other ad hoc documentation (e.g. building regulations when the establishment is within multi-block building, traffic link certification etc.), which have not been taken into consideration in the current measurements of the IO as they do not constitute usual documentation and are very case-specific.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

- Two licensing procedures involved in the operation licensing of industries handling food products of animal origin

Industries handling food products of animal origin are obliged to obtain two different licences for their operation, an operating licence by the Regional Development Authorities and a separate one regarding sanitary requirements by the Regional Veterinary Authorities, whereas the latter one is pre-requisite for the obtaining the first one. This entails the submission of similar documentation to two different authorities, which is time consuming and thus an extra burden for the business, and additionally the licence regarding sanitary requirements has to be received and submitted to the Regional Development Authorities by the business itself.

- Extensive number of regulatory documents related to the IO, lack of codification and unclear processes

According to the interviewees, there is an extensive number of regulatory documents (laws, ministerial decisions, presidential decrees, circulars etc.) related to the process of obtaining an operating licence for a food business-industry. Especially for industries handling food products of animal origin there are additional pieces of regulation stemming from the respective sanitary requirements, which do not establish a clear link to the operating licence issued by the Regional Development Authorities. The aforementioned, in combination with the lack of codification of the respective legislation and the information published by different authorities responsible for the issuance, have therefore a difficulty in understanding the process and the obligation stemming from this IO. This difficulty is bigger in case of businesses with fewer experiences with such obligations. This result in extra time and cost with regard to familiarisation with the IO, the documentation to be submitted which has to be corrected often enough, etc.

This problem can also be seen with regard to regulation regarding sanitary requirements themselves. Although interviewed businesses in general stated that they consider sanitary

requirements a necessity, they stated that the regulation is not clear enough to guide them in the execution of their obligations, resulting in having to do amendments in their establishment plans submitted to the authorities, or in the establishments themselves. In addition, it has been stated that certain vagueness in legislation has often led to subjective judgments by the responsible authorities.

Moreover, it was stated that businesses do not receive any information on changes in regulations, making it difficult to track them by themselves, whereas it has also been noted that in many cases there is a lack of information or knowledge by the civil servants within licencing authorities.

Last but not least, it has also been mentioned that the regulatory framework with regard to operating licences gets even more complicated with regards to the obligations set for renewals of operating licences.

- Number of authorities and respective documentation involved in the process of obtaining an operating licence

Although there are two licensing authorities in the case of businesses handling food products of animal origin and one in the case of businesses handling food products of non-animal origin, the business needs in reality to contact many different authorities in order to obtain the documentation required for its operation, and thus spend a lot of time and cost in acquiring this documentation. This is considered as an important burden by the interviewed businesses, causing a lot of delays along with the extra time and costs.

- Lack of possibility of electronic submission of documentation

The lack of possibility for electronic submission of the requested documentation has been pointed out by the interviewees, which results in much more time spent for on the spot communication with the responsible authorities and cost related to traveling, photocopies etc. It has also been noted that face to face communication with the authorities leaves room for corruption incidents.

At this point it should also be noted that there is also lack of an electronic file related to the licensing of each business that can be reached by the responsible authorities, resulting in the business having to resubmit documentation in cases of renewal or alterations of its operating licence.

- Delays in the issuance of licences

In general, delays by the responsible authorities in the issuance of the operating licences or the related documentation have been reported by the interviewees, which are enhanced by a lack of communication between the involved authorities in the whole procedure. This situation causes additional burden and irritation to the businesses which are obliged to spend extra time to facilitate the communication and the procedures.

- Lack of a ‘serving the business’ attitude by the responsible authorities.

Last but not least, a lack of a ‘serving the business’ attitude by the public authorities involved in the operation licensing procedure has been mentioned by the majority of the interviewees.

1.1.4. Analysis of measurement results - HRE

The measurement results show that if the segment Health Regulated Establishments of this IO is completely removed, both the administrative burden and the administrative cost for the Greek economy would be reduced by EUR 62 million.

The information obligation in scope, requiring time and costs for businesses, is perceived as of high importance since this application is the basis for the commencement of operation. It is important to mention that, as this application is entirely done for the purpose to obtain the operating licence, there are no Business-as-usual activities.

In general and with regard to all the steps of IO 29 related to health regulated establishments described above, it is seen that the most burdensome and time consuming activity concerns the gathering of information. This involves about 57% of the total time that the business spends in the IO. Within this activity should also be taken into consideration as an extra burden for the business other related costs, like consulting costs for the issuance of required documentation.

Another significant burden in terms of time and costs, and also reported by the majority of the interviewees, appears to be the attendance to seminars related to technical (and sanitary) safety. In terms of time, these constitute a mere 20.5% of the total time dedicated to the IO and include an out of pocket cost of EUR 250.

External meetings also appear to be burdensome (17% of total time), especially including meetings with authorities for the facilitation of the licensing procedure.

This IO does not present some differentiation points among the conducted interviews which could arise, as only the normal efficient business is described above. Differentiation points that may exist are caused due to:

- the level of experience of the people involved in the process. It has been stated through the interviews that a business that is less experienced with the licensing procedures will either have to outsource more activities, or will need to spend much more time in familiarising with the IO and establishing good relationships with the authorities in order to be able to facilitate the licensing procedure,
- the geographical position of the establishment. In the country side generally, travelling costs are higher than in the city due to the fact that not all authorities involved in the process are at close proximity
- the possession by the business operator of a degree relevant to the activity of the establishment, which exempts him from the extra cost and time needed for the seminars on technical safety.
- the need for special fire equipment to be installed in the establishment, where the autopsy by the fire brigade and the thus the time spent by the business for its facilitation can last longer than the 30 minutes reported for the normal efficient business.

- the different charges of licensing fees between municipal authorities, which however are not significant.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

○ Lack of codification and unclear processes

According to the interviewees, there is a certain lack of codification of the respective regulatory documents and the information published by the different authorities responsible for the issuance of the establishment licences. Such vagueness makes it difficult – especially for a business with no experience with the IO – to understand the process and the obligations stemming from the IO. This may result in extra time and cost with regard to familiarisation with the IO, the documentation to be submitted which has to be corrected often enough, etc.

This problem can also be seen with regard to regulation regarding sanitary requirements. Although interviewed businesses in general stated that they consider sanitary requirements a necessity, they stated that the regulation is not clear enough to guide them through the execution of their obligations, resulting in multiple amendments in their establishment plans, or in the establishments themselves. In addition, the lack of legislative clarity appears to have often led to subjective judgments by the responsible authorities.

In addition, it has been stated that fire protection requirements are not adjusted to the specificities of the businesses (businesses indicated that sometimes they often have to pay extra cost for equipment that is not actually needed, since criteria for fire protection are set according to the size of the establishment and not the type of the establishment).

○ Number of authorities and respective documentation involved in the process of obtaining an establishment licence

Although there is one single licensing authority – the Municipal Authority-, the applicant - business, in reality needs to contact many different authorities in order to obtain the documentation required for its operation, and spend a lot of time and cost in acquiring this documentation. This is considered as a major irritation by the interviewed businesses, causing a lot of delays along with the extra time and costs.

○ Lack of possibility of electronic submission of documentation

The lack of possibility of electronic submission of documentation has been pointed out by the interviewees, which results in much extra time spent for on the spot communication with the responsible authorities and cost related to transportations, photocopies etc. It has also been noted that face to face communication with the authorities leaves room for corruption incidents.

At this point it should also be noted that there is also lack of an electronic file related to the licensing of each business that can be reached by the responsible authorities, resulting in the business having to resubmit documentation in cases of alterations of its licence.

- Delays in the issuance of licences

In general, delays by the responsible authorities in the issuance of the licence or the related documentation have been reported by the interviewees, which are enhanced by the lack of communication between the involved authorities in the whole procedure. This situation causes additional burden and irritation to the businesses which are obliged to spend extra time to facilitate the communication and the procedures. Delays also eventually result in the business having to pay operating costs and/or rent, during the time of evaluation of the application and until the licence is issued.

- Time and cost of seminars on technical safety

It has been reported that the way the seminars for the certification on technical and food safety are performed does not serve the actual purpose of the training, since obtaining the certification is linked to the participation in the seminars, whereas the cost and time needed for their execution is an extra cost and does not ensure compliance with the requirements on food safety.

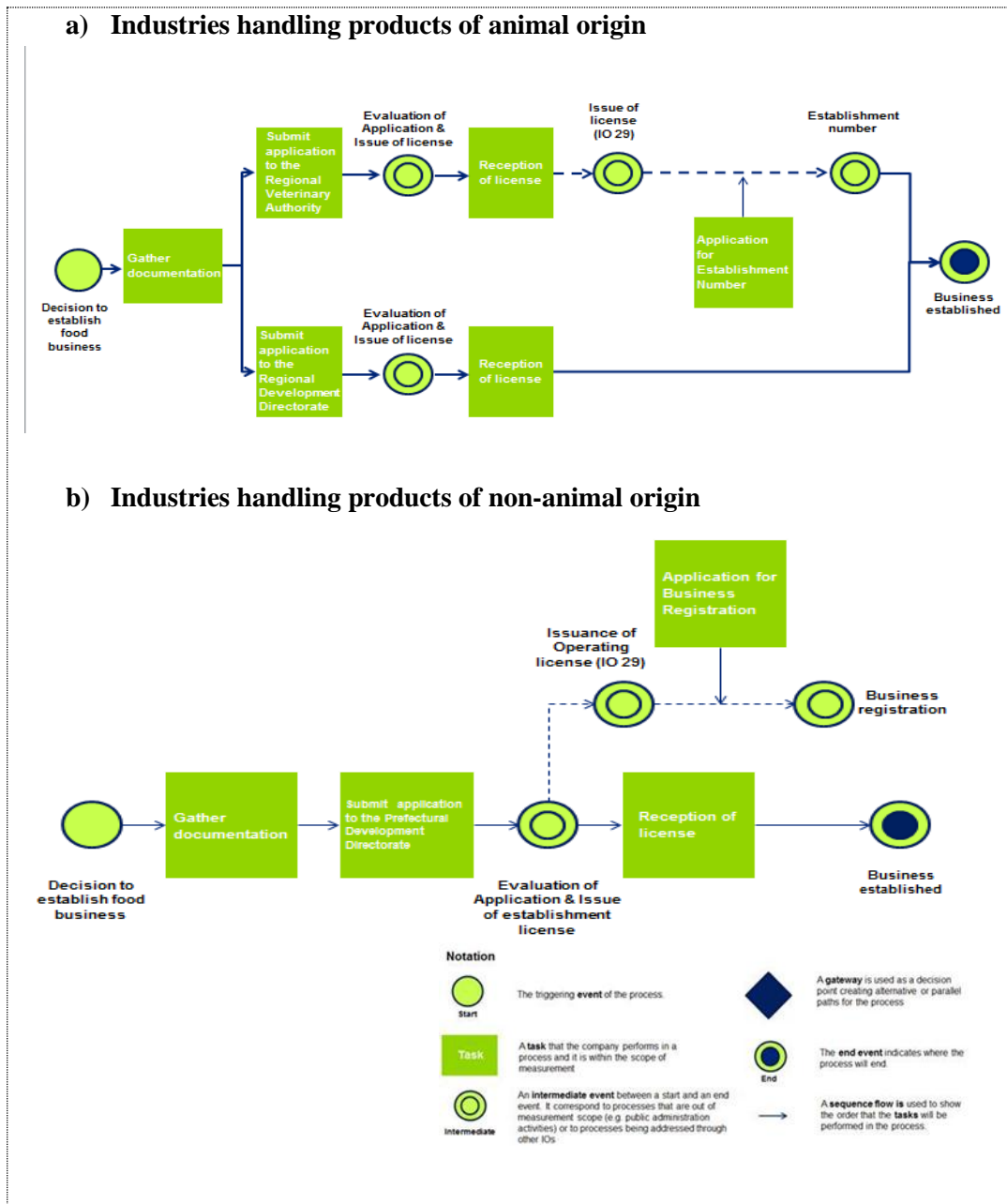
1.2. Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate – IO 30

1.2.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Industries and small production/manufacturing units

The process for complying with the IO of obtaining an establishment licence by a food industry or small production/manufacturing unit is shown in the Figure below. The process is distinguished between businesses handling products of animal origin and businesses handling products of non-animal origin.

Figure 1.3: Process for complying with the requirement “Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate”



The IO refers to the obligation of food product businesses to obtain a licence in order to be able to establish, which is prerequisite for obtaining an operating licence (IO.29).

The businesses under consideration include **industries** and **small production / manufacturing units** (establishment with equipment of no more than 22kW engine power and 50kW heat potential) of food products both of animal and non-animal origin. These businesses can be distinguished between those **handling food products of animal origin** and those **handling food products of non-animal origin**. The main regulation governing the establishment of industries and small production/manufacturing units is Law 3325/2005 (Gov. Gazette 68/A5), as well as Law N. 3982/2011 (Gov. Gazette 143/A), whereas for businesses involved in the production of food products of animal origin additional obligations

are set by Presidential Decree 79/2007 (Gov. Gazette 95/A) and Joint Ministerial Decision 15523/2006 (Gov. Gazette 1187/B).

NOTE 1: Businesses handling food products of animal origin (as described in Regulation (EC) 853/2004), in order to be established have to issue two establishment licences: a) an establishment licence regarding sanitary requirements by the Regional Veterinary Authorities, including an establishment approval number issued by the Ministry of Agricultural Development and Food and b) an establishment licence by the Regional Development Directorates.

NOTE 2: With regard to the establishment licence issued by the Regional Development Authorities, documentation required by the business in order to apply varies according to the type of business – business of low, medium and high nuisance. Law 3982/2011 provides for simplified procedures with regard to low and medium nuisance businesses, which are mainly small/medium manufacturing units. In this respect the following analysis focuses on industries and the provisions governing the establishment licences of these businesses.

The process to obtain the establishment licence(s) includes the following steps:

Step 1: Gathering of documentation

a) Businesses handling food products of animal origin

The interested party has to collect the following documentation in order to apply to the **Regional Veterinary Authorities** for an establishment licence regarding sanitary requirements:

- Questionnaire - Application
- Environmental impact assessment and environmental study
- Approval for the use of land by the Urban Planning Authority
- Topographic diagram of the establishment area 1:1500 and plan of the establishment with detailed description of establishment spaces
- List and description of the technical equipment that is going to be used with a diagram picturing the equipment's placement in the establishment
- Technical description of operating unit with reference to the daily capacity, the type of raw materials that are going to be used and the final products.

With regard to applying for an establishment licence by the **Regional Development Authorities** the interested party has to collect the following documentation:

- Questionnaire - Application
- Environmental impact assessment and environmental study
- Approval for the use of land by the Urban Planning Authority

Where required, additional documents, such as:

- Establishment study

- Architectural diagrams (establishment plan, topographic diagrams etc.)
- Description of the technical equipment
- Certificates of conformity with special requirements by respective Responsible Authorities (including conformity with sanitary requirements)
- Solemn declaration of a certified electrician regarding electrical installations.
- Risk assessment
- Solemn declaration of mechanical engineer on case of existing buildings
- Approved study for treatment and disposal of liquid and solid waste

Fees for establishment licences are set by the respective regulations.

b) Businesses handling food products of non-animal origin

The interested party has to collect the documentation mentioned above only with regard to the application to the Regional Development Authorities.

Step 2: Submission of application to the respective authority

a) Businesses handling food products of animal origin

The interested party submits the required documentation to the Regional Veterinary Authority in order to apply for an establishment licence regarding sanitary requirements and also submits the required documentation to the Regional Development Authorities in order to apply for an establishment licence.

b) Businesses handling food products of non-animal origin

The interested party submits the required documentation to the Regional Development Authorities in order to apply for an establishment licence.

Step 3: Evaluation of the application

The applications are evaluated by the Committees of the Responsible Authorities.

Step 4: Issue of licence

Following a positive opinion-evaluation of the Responsible Authorities the respective licences are issued:

- a) Businesses handling food products of animal origin:** establishment licence for sanitary requirements by the Regional Veterinary Authorities and establishment licence by the Regional Development Authorities
- b) Businesses handling food products of non-animal origin:** establishment licence by the Regional Development Authorities

In order for the business to **register** or acquire an **establishment approval number**, the operating licence of the business has to be issued by the responsible authority first, according to the procedure described in IO 29. After the issuance of the operating licence the business

submits and application to the licensing authority, which forwards the business file and the application to the respective authority (EFET for businesses handling food products of non-animal origin, Ministry of Agricultural Development for businesses handling food products of animal origin as set in art. 4 of Regulation (EC) 853/2004) in order to register the business or issue an establishment approval number respectively.

1.2.2. Results from measurement and quantification

Table 1.2 Composition of Administrative Cost and Administrative Burden (IO 30)

PA: Food Safety	Price (P)				Nr of entities / occurrences (q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 30: Obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate									
Industries (animal origin)	7 200	10 000	2 500	15 978 ⁸	156	1	10	2.24	2.49
Industries (non-animal origin)	3 840	10 000	2 500	14 589 ⁹	153	1	10	2.01	2.23

Standardised description of the activities related to the IO 30

The IO refers to the obligation that businesses – and more specifically industries/small manufacturing units, handling food products have to obtain an establishment licence from the respective licensing authorities. There is segmentation within the IO resulting from the different licensing procedures that food businesses have. In this respect, there are different licensing procedures for:

- Industries/small manufacturing units handling products of animal origin and
- Industries/small manufacturing units handling products of non-animal origin

The Price (P) represents the administrative cost incurred by the normal efficient business in each segment in order to obtain an establishment licence. With respect to the number of occurrences, this refers to the number of applications for establishment licence submitted annually to the respective licensing authorities (average of period 2010-2012). The activities related to the IO are performed by business staff who are categorised as professionals.

As has been noted above, businesses – and more specifically industries of high nuisance-handling food products of animal origin, have to acquire two establishment licences:

- an establishment licence regarding sanitary requirements by the Regional Veterinary Authorities, including an establishment approval number issued by the Ministry of Agricultural Development and Food, and

⁸ P includes additional costs for acceleration of the process of EUR 500. These amount to total additional costs of EUR 78 000 in AC and AB

⁹ P, AC and AB include additional costs. P includes additional costs for acceleration of the process of EUR 500. These amount to total additional costs of EUR 76 500 in AC and AB

b) an establishment licence by the Regional Development Directorates.

The process to obtain the establishment licence(s) includes the following steps:

1. Gathering of documentation

The normal efficient business, before proceeding with the gathering of documentation spends some time in familiarising with the IO requirements. This time is about 150 minutes for the business handling food products of animal origin and 120 minutes for the business handling food products of non-animal origin.

Business professionals in a normal efficient business involved in the procedure of the establishment licence are usually an in-house mechanical engineer, the business owner or general manager and at least one other professional. Some of the activities are also outsourced as described below.

In this respect, **the business handling food products of animal origin**, in order to apply for an establishment licence regarding sanitary requirements,

- completes an application form,
- obtains the permit regarding environmental impact assessment, after submitting an environmental study to the respective authority, which however is not included in time calculations in this IO, since it is examined under a different IO in the current study,
- obtains a certificate for land use and topographic diagram of the establishment area by the respective Urban Planning Authority,
- draws a general plan of the establishment with detailed description of its spaces,
- draws a detailed list of the equipment along with the plans of the equipment placement in the establishment, as well as a technical description of the unit with detailed description regarding the capacity, the raw materials that are going to be used and the products that are going to be produced.

The normal efficient business handling food products of animal origin spends 1,830 minutes (3.8 days) to gather the required documentation including time spent on checking the information and time for internal and external meetings.

With regard to applying for an establishment licence by the Regional Development Authorities, **both businesses handling food products of animal origin and non-animal origin** do the following:

- complete a questionnaire – application;
- obtain a permit regarding environmental impact assessment, after submitting an environmental study to the respective authority, which however is not included in this measurement, since it is examined under a different IO in the current study. For businesses handling food products of animal origin this is the same documentation required for the establishment licence regarding sanitary requirements;
- obtain a certificate for land use by the respective Urban Planning Authority. For businesses handling food products of animal origin this is the same documentation required for the establishment licence regarding sanitary requirements;

- draft a description of the equipment. For businesses handling food products of animal origin this is the same documentation required for the establishment licence regarding sanitary requirements;
- outsource to a civil engineer a study on passive fire protection ('pathitiki pyroprostasia') and start the in-house (or outsourced) drafting of the study on active fire protection to be completed during the operating licensing procedure;
- provide a copy of architectural diagrams (establishment plan, topographic diagrams etc.) in case of a new building permit. The drafting of these has not been included in the measurement, since it is considered a very specific and separate IO by itself. However, it should be noted that, according to interviewees, this procedure can implicate at least 20 man-days by the business, whereas the building permit can take around 40 days to be issued;
- provide a Solemn declaration by the mechanical engineer with regard to the building statics in case of existing buildings, which needs to be verified with regard to the authenticity of the signature by a responsible authority – usually KEP;
- provide proof of payment of the related licensing fee;
- usually authorise a person to submit the documentation to the responsible authorities and perform any relevant actions.

This step, as described above, takes 3 450 minutes (7.2 days) for the normal efficient business handling non-animal origin food products to complete, including time for checking on the documentation and internal and external meetings. For a business handling products of animal origin this takes around 4 770 (10 days).

2. Submission of application to the respective authority

The business prepares the folders for submission and the person authorized by the business submits the aforementioned documentation to the respective authorities:

- for **businesses handling food products of animal origin** the respective Regional Veterinary Authority as well as the respective Regional Development Authority
- for **businesses handling food products of non-animal origin** the respective Regional Development Authority.

The time needed by the normal efficient business to submit the documentation in order to apply for the establishment licence(s) is 150 minutes for businesses handling food products of non-animal origin and 240 minutes for businesses handling food products of animal origin, since there are two authorities and applications involved in this case. Both submissions could however occur on the same day since both authorities belong in the Regional Authority and are in most cases situated at the same place.

3. Evaluation of the application

The applications are evaluated by the Committees of the Responsible Authorities. During evaluation the normal efficient business (both handling products of animal and non-animal origin) usually spends some time on communication with the responsible authorities with regard to the progress of the procedure, which has been estimated by the interviewees at 60 minutes.

4. Issuance and reception of licence

With regard to **businesses handling food products of animal origin**, following a positive evaluation of the responsible Regional Veterinary Authority the establishment licence regarding sanitary requirements is issued and received by the business.

Following a positive evaluation of the Regional Development authorities the establishment licence is issued and received by the business (**both businesses handling animal and non-animal origin food products**). For this step the normal efficient business has to spend usually 60 minutes for each licence needed to receive (i.e. 120 minutes total for businesses handling food products of animal origin).

5. Business registration / acquisition of establishment approval number

In order for the business to **register** or acquire an **establishment approval number**, the operating licence of the business has to be issued by the responsible authority at first, according to the procedure described in IO 29. After the issuance of the operating licence, the business submits an application to the licensing authority, which forwards the business file and the application to the respective authority (EFET for businesses handling food products of non-animal origin, or the Ministry of Agricultural Development for businesses handling food products of animal origin) in order to register the business or issue an establishment approval number respectively. For this procedure the business spends usually another 30 minutes to complete the application, often done when visiting the authority to receive its operating licence.

With regard to costs related to IO 30, as incurred by the normal efficient business (either handling food products of animal origin or of non-animal origin) there are:

- consulting costs, of total EUR 10 000 including:
 - a) the cost of Fire Protection Study ('Pathitiki Pyroprostasia') undertaken by a Civil Engineer with an average cost of EUR 2 500 and
 - b) the cost of an external engineer to conduct a study with regard to the Building Statics, with an average cost of EUR 15 000, applied however to the 50% of the cases requiring such a study (old buildings), thus resulting to a cost of EUR 7 500.
- out of pocket costs correspond to licensing fees, which vary according to the technical equipment of the business and to the corresponding size of its investment (mathematical equation applies). Average licensing fees amount to EUR 2 500. Equipment costs have not been reported.
- additional costs (such as bribes) of at least EUR 500 have been reported for the acceleration of the procedure. These costs are usually much higher as reported, but further specific data was not given during the interviews.
- 10% of the time and costs are considered as BAU, on the basis that a business will spend some time in obliging with requirements that are fundamental for its proper operations, such as ensuring the minimum environmental, safety, sanitary etc. conditions of its establishment.

1.2.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, the administrative burden for the Greek economy would be reduced by EUR 4 252 201. The administrative cost reduction if this IO is abolished completely would amount to EUR 4 724 668.

In general, and with regard to all the steps of IO 30 described above, the most burdensome and time consuming activity concerns the gathering of information. Collecting and checking all required documents as presented above involves about 68% of the total time that the normal efficient business spends in the case of businesses handling food products of animal origin, whereas another 23% of the total time is spent in internal meetings in order to facilitate the gathering of information. For the normal efficient business handling food products of non-animal origin these activities occupy 50% and 38% of total time respectively. In the case of businesses handling food products of animal origin additional time is actually needed to visit a different authority and apply for the operating licence regarding sanitary requirements. For that, the main document that they submit (final plans of the establishment) is also submitted to the Regional Development Authority for the issuance of the operating licence.

The activity of facilitating inspections is also time-consuming (about 17% for businesses handling food products of animal origin and about 15% for businesses handling food products of non-animal origin). External meetings have also a share of burden, which concern around 10-11% of the total time spent for both segments.

With regard to costs involved in the obligation, besides the various licensing fees (as stated above), consulting costs related to obtaining certifications for steam generators and gas tanks appear to be an extra burden for the business.

A main differentiation point, with regard to time spent by the business for responding to the IO requirements, seems to be the level of experience of the people involved in the process. It has been stated through the interviews that a business that is less experienced with licensing procedures will either have to outsource more activities, or will need to spend much more time in familiarising with the IO and establishing good relationships with the authorities in order to be able to facilitate the licensing procedure.

Another differentiation point has to do with the establishment of the business within a designated industrial zone. In this case, businesses do not need to obtain an establishment licence. This has not been studied in the current measurement, but it can be noted especially in relation to designation issues for industrial areas in the country.

With regard to differentiations between businesses (industries) handling food products of animal origin and businesses (industries) handling food products of non-animal origin, main differentiation point is the obligation of the former to obtain an extra licence regarding sanitary requirements. This is a process that requires the business handling food products of animal origin to spend extra time – estimated at 3 180 minutes - to gather the required documentation including external and internal meetings, as well as extra time to visit responsible authorities to submit documentation and receive the additional licence (extra time spent by the normal efficient business handling food products of animal origin amounts to 150 minutes).

It should be noted that the IO in scope is even more burdensome for businesses considering that time and costs related to the permits and certificates that have not been included within this measurement, yet are needed as documentation for obtaining an operating licence.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

- Two licensing procedures involved in the establishment licensing of industries handling food products of animal origin

Industries handling food products of animal origin are required to obtain two different licences for their establishment, an operating licence by the Regional Development Authorities and a separate one regarding sanitary requirements by the Regional Veterinary Authorities, whereas the latter one is pre-requisite for the obtaining the first one. This entails the submission of similar documentation to two different authorities, which is time consuming and thus an extra burden for the business, and additionally the licence regarding sanitary requirements has to be submitted to the Regional Development Authorities by the business itself.

- Extensive number of regulatory documents related to the IO, lack of codification and unclear processes

According to the interviewees, there is an extensive number of regulatory documents (laws, ministerial decisions, presidential decrees, circulars etc.) related to the process of obtaining an establishment licence for a food business-industry. Especially, for industries handling food products of animal origin there is extra regulation stemming from the respective sanitary requirements, which does not make clear how it is linked with the establishment licence issued by the Regional Development Authorities. The aforementioned, in combination with the lack of codification of the respective legislation and the information published by different authorities responsible for the issuance, have therefore a difficulty in understanding the process and the obligation stemming from this IO. This difficulty is greater in case of businesses with less experience with such obligations. This results in extra time and cost with regard to familiarization with the IO, the documentation to be submitted which has to be corrected often enough, etc.

This problem can also be seen with regard to regulation regarding sanitary requirements themselves. Although interviewed businesses in general stated that they consider sanitary requirements a necessity, however they stated that the regulation is not clear enough to guide them in the execution of their obligations resulting in having to do amendments in their establishment plans submitted to the authorities, or the establishments themselves. In addition, lack of clarity has often been the reason for subjective judgments by the responsible authorities.

Moreover, the businesses do not receive any information about changes in regulations and it is difficult to track these changes by themselves, whereas it has also been noted that in many cases there is a lack of information or knowledge by the public servants serving the businesses in the area of licensing procedures.

Last but not least, it should also be mentioned that the regulatory framework with regard to establishment licences gets even more complicated, if were also considered the obligations set for expansions.

- Number of authorities and respective documentation involved in the process of obtaining an establishment licence

Although the licensing authorities are two in the case of businesses handling food products of animal origin and one in the case of businesses handling food products of non-animal origin, in reality the business in order to obtain the documentation required

for its establishment, needs to contact many different authorities and spend a lot of time and cost in acquiring this documentation. This is considered as a significant burden by the interviewed businesses, causing a lot of delays along with the extra time and costs.

- Lack of possibility of electronic submission of documentation

The lack of possibility of electronic submission of documentation has been pointed out by the interviewees, a fact that results in much extra time spent for on the spot communication with the responsible authorities and cost related to transportations, photocopies etc. It has also been noted that face to face communication with the authorities leaves room for corruption incidents, since it entails communication in person.

At this point it should also be noted that there is also lack of an electronic file related to the licensing of each business that can be reached by the responsible authorities, resulting in the business having to resubmit documentation in cases of expansion or alterations of its establishment licence.

- Delays in the issuance of licences

In general, delays by the responsible authorities in the issuance of the establishment licences or the related documentation have been reported by the interviewees, which are enhanced by the poor communication between the involved authorities in the whole procedure. This situation causes additional burden and irritation to the businesses which are obliged to spend extra time to facilitate the communication and the procedures.

- Lacking behind in the designation of industrial zones

As has been stated above, businesses that are established within designated industrial zones are not obliged to obtain an establishment licence. Generally, the state has been lacking behind in the designation of industrial zones (though a number of those do exist), even in areas where there is already intense industrial activity. This fact creates costs for the industries that could be established within industrial zones without having the obligation to obtain an establishment licence.

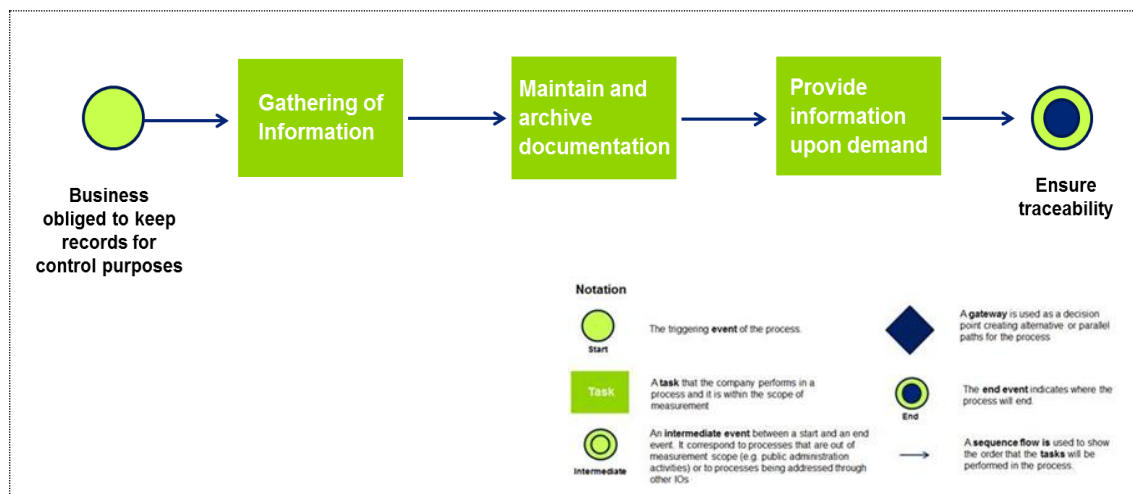
- Lack of a ‘serving the business’ attitude by the responsible authorities.

Last but not least, a lack of a ‘serving the business’ attitude by the public authorities involved in the establishment licensing procedure has been mentioned by the majority of the interviewees.

1.3. Obligation to keep records about suppliers and customers when trading in additives for use in animal nutrition (IO 31)

1.3.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.4: Process for complying with the requirement “Obligation to keep records about suppliers and customers when trading in additives for use in animal nutrition”



The IO refers to the obligation, as stated in the Joint Ministerial Decision 326385/2009 (Gov. Gazette 2103/2009) of feed business operators that trade additives to keep records for at least five (5) years with all the required documentation in order ensure traceability and be in position to prove that all of its suppliers and customers are approved or registered according to Regulation (EC) 183/2005. This is placed within the general framework set by the regulation for the protection of health of humans and animals and the protection of the environment.

Respective feed business operators include feed additives producers, as well as packers, importers, sellers or distributors established within the Community.

The process of complying with the IO includes the following steps:

Step 1: Gather information

The businesses under consideration are obliged to gather the following information with regard to traceability and according to Regulation (EC) 183/2005:

- For feed additives:
 - the nature and quantity of the additives produced, the respective dates of manufacture and, where appropriate, the number of the batch or of the specific portion of production, in the case of continuous manufacture,
 - the name and address of the establishment to which the additives were delivered, the nature and quantity of the additives delivered and, where appropriate, the number of the batch or of the specific portion of production, in the case of continuous manufacture.
- For premixes:

- the name and address of the manufacturers or suppliers of additives, the nature and quantity of the additives used and, where appropriate, the number of the batch or of the specific portion of production, in the case of continuous manufacture,
- the date of manufacture of the pre-mixture and the batch number where appropriate,
- the name and address of the establishment to which the pre-mixture is delivered, the delivery date, the nature and quantity of the pre-mixture delivered, and the batch number where appropriate.

Step 2: Maintain and archive documentation

The businesses under consideration are obliged to keep a record of the above documents for at least five (5) years.

Step 3: Provide documentation upon demand

The businesses under consideration are to make available all upon demand so as to prove that all their suppliers and customers are approved or registered according to Regulation (EC) 183/2005.

1.3.2. Results from measurement and quantification

Table 1.3 Composition of Administrative Cost and Administrative Burden (IO 31)

PA: Food Safety	Price (P)				Nr of entities / occurrences (Q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 31: Obligation to keep records about suppliers and customers when trading in additives for use in animal nutrition									
No segmentation	1 800	0	0	745	52	1	85	0.01	0.04

Standardised description of the activities related to the IO 31

This IO refers to the obligation of animal feed business operators that trade additives to keep records for at least five years, with all the required documentation, in order ensure traceability and to prove that all of its suppliers and customers are approved or registered according to Regulation (EC) 183/2005. Respective animal feed business operators include feed additives producers, as well as packers, importers, sellers or distributors established within the Community.

The Price (P) in the above table represents the administrative cost incurred by the normal efficient business in order to comply with the IO. With respect to the number of entities this refers to the total number of businesses obliged by regulation to comply with the IO (average number 2010-2012). The activities related to the IO are performed by business staff who are categorised as professionals¹⁰.

¹⁰ The standard hourly rates per employee type are in Annex 6

The process of complying with the IO, as executed by the normal efficient business, includes the following steps:

1. Gather information

In general, it should be noted that no time has been reported on familiarisation with the IO by the businesses. Furthermore, the interviewed businesses reported no actual communication of the obligation by the responsible authorities. In this respect no actual time on familiarization with the obligation has been dedicated.

The business gathers the required documentation/information as provided for by the European Regulation (EC) 183/2005, on a daily, weekly or monthly basis, according to the deliveries of additives they have.

According to the interviewees the normal efficient business spends around 720 minutes annually (60 minutes per month) to gather the required documentation and information, and another 360 minutes (30 minutes per month) for checks on the gathered documentation and information.

2. Maintain and archive documentation

The information is recorded either in an ERP that the business usually maintains for the purposes of its own operations or kept in hardcopy or both. The documents and information are maintained for at least five years.

The normal efficient business spends approximately 720 minutes annually (60 minutes per month) for this activity.

3. Provide documentation upon demand

Although, according to the regulation, concerned businesses are obliged to facilitate possible inspections by the responsible authorities by disposing the required documentation and information, none of them has reported an inspection regarding compliance with the IO and as such no time has been measured in this step.

The activity is considered to be highly business-as-usual and would be performed regardless of the obligation, since the required information is needed for the business operations. The activity is usually performed by one or more professionals, usually in charge of quality control.

With regard to **costs related to IO 31**, there is not any consulting, out of pocket, equipment or additional costs. 85% of the activities related to the IO are considered to be business-as-usual.

1.3.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, the administrative burden for the Greek economy would be reduced by EUR 5 808. The administrative cost reduction if this IO is abolished completely would amount to EUR 38 719.

The activities related to the IO are considered to be up to an 85% BAU, as discussed above, and to that extent they are actually not considered as burdensome. The allocation of the respective time is around 40% for the gathering of information, 40% for recording the information in the business systems and files and another 20% for cross-checking of data.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

- Lack of clarity in the regulation

It should be noted that there is no reference in the respective Ministerial Decision regarding the obligation on the exact information / documentation that businesses under consideration are obliged to record and keep; instead there is reference to the respective European Regulation.

- Lack of communication on the scope of the IO to the businesses involved

In general, it should also be noted that, the interviewed businesses reported no actual communication of the obligation to them by the responsible authorities. Focus has mainly been given on the obligation of businesses under consideration to submit bi-annual balances to the respective authorities, which has been reported as burdensome by some businesses interviewed, however this is part of a separate IO.

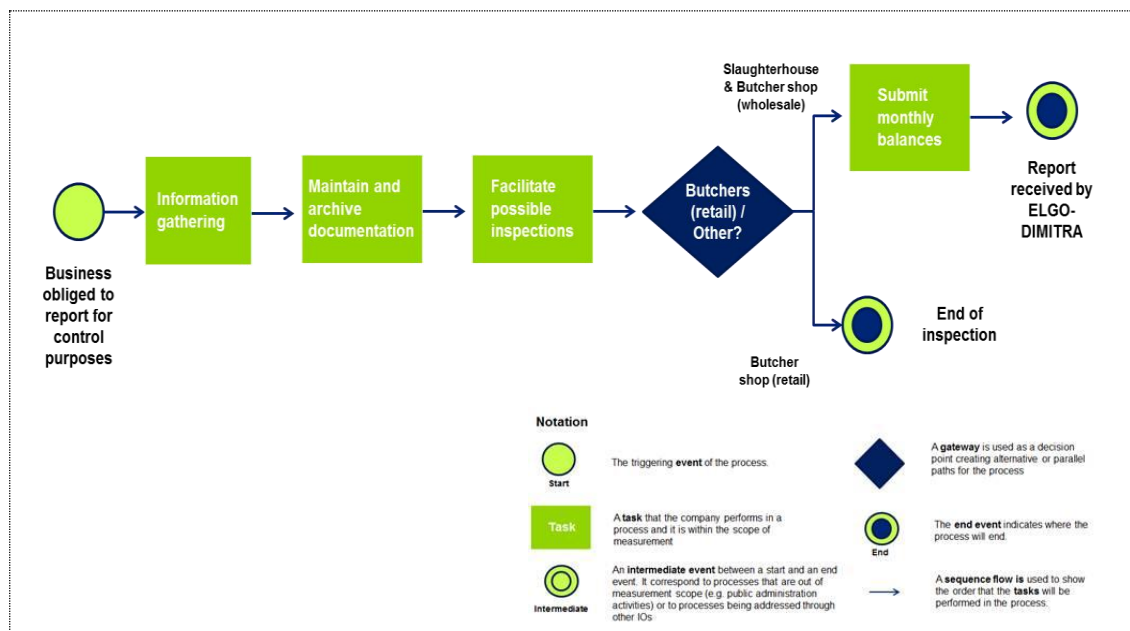
- Extended period of record keeping

The period of 5 years has been characterised as unjustified, and is generally perceived as long, causing some irritation to the businesses that have to maintain – either electronically or by hard copy - all of the documentation during this period. It should be mentioned that in Regulation (EC) 1831/2003 it is stated that “*Documentation relating to the raw materials used in final products must be kept by the manufacturer in order to ensure traceability. Such documentation must be available to the competent authorities for a period appropriate for the use to which the products are placed on the market*”. In this respect it should be noted that according to interviewees the average expiration period of animal feed products is 4 months.

1.4. Obligation to keep records, submit meat balances and related inspections (meat trade) (IO 32)

1.4.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.5: Process for complying with the requirement “Obligation to keep records, submit meat balances and related inspections (meat trade)”



The IO refers to the obligation, as stated in the Joint Ministerial Decision 412/8932 (Gov. Gazette 149/B/3.2.2012), that certain meat businesses have to keep records and have available documentation to possible audits as well as submit meat balances to responsible authorities, within the framework of monitoring the meat market and keeping consumers informed.

This IO refers to natural and legal persons engaged in the retail sale of meat and especially butchers and retail stores with a butcher section, as well as to natural and legal persons engaged in slaughtering of animals, marketing, distribution, slicing and standardisation of meat, and manufacturing of meat products.

The aforementioned businesses are obliged to keep records with documentation and have it disposable during inspections, as well as report to the Responsible Authorities.

Step 1: Gathering of information

All businesses are required to indicate the origin of meat handling to the commercial documents and all types of labelling their products.

Independent butchers and retail stores with a butcher section are required to collect the following information – documentation

1. The monthly print out of "Z" by the weigh machine.
2. Information indicating the type, amount and origin of meat bought and sold as recorded in the business's warehouse book and where provided for by the tax legislation

3. Invoices of purchase - sale of meat and corresponding dispatch notes, archived separately by date (in case that keeping warehouse book is not provided by tax legislation)

4. Securing registration of the origin of animals/meat on dispatching documentation by the producers and those involved in the trafficking of animals and meat

Businesses other than butchers and retail stores with a butcher section are required to gather all commercial documentation regarding meat handling and obtain a monthly balance of meat purchases and sales. Slaughterhouses are obliged to maintain slaughter book which indicates the animals' origin and their code.

Step 2: Maintain and archive documentation

All businesses under consideration are obliged to keep the above documents for six (6) months from the date of sale of meat.

Step 3: Facilitate possible inspections

All businesses under consideration are obliged to make available all documentation in case of inspection by the competent control authorities.

Step 4: Submit monthly balances

Businesses, other than butchers involved in retail and retail stores with a butcher section, are obliged to submit electronically monthly balances of purchase and sale of meat to the responsible authority ELGO-DIMITRA. Butchers involved in wholesale are also obliged to submit monthly meat balances, whereas businesses excluded from this obligation include:

- a) Slaughterhouses that keep slaughter books, which they are obliged to submit to ELGO-DIMITRA electronically within 10 days after slaughter or submit report of non-slaughtering
- b) Butcher shops that sell by invoice directly to businesses-consumers such as restaurants and hotels.

1.4.2. Results from measurement and quantification

Table 1.4 Composition of Administrative Cost and Administrative Burden (IO 32)

PA: Food Safety	Price (P)				Nr of entities / occurrences (q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 32: Obligation to keep records, submit meat balances and related inspections (meat trade)									
No segmentation	5 985	0	100	2 576	5 818	1	50	7.49	14.99

Standardised description of the activities related to the IO 32

This IO refers to the obligation of certain meat handling businesses to keep records and have available documentation for eventual audits, as well as to submit meat balances to the responsible authorities, within the framework of monitoring the meat market and keeping consumers informed.

It concerns individuals and legal persons engaged in the retail sale of meat and especially butchers and retail stores with a butcher section, as well as to individuals and legal persons engaged in slaughtering of animals, marketing, distribution, slicing and standardisation of meat, and manufacturing of meat products.

The Price (P) in the above table represents the administrative cost incurred by the normal efficient business in order to comply with the IO. With respect to the number of entities this refers to the total annual number of businesses obliged by regulation to comply with the IO (year 2012 data). The activities related to the IO are performed by business staff who are categorised as professionals¹¹.

During the measurement it became clear that the burden differs for butchers, slaughterhouses and other business involved in meat trade. The differences relate mainly to the frequencies for submitting balances and are explained in the sections below.

The steps that a business concerned by this IO follows are the following:

1. Gathering of information

Before analysing the time spent by the business to gather the required information in order to respond to the IO requirements, it should be mentioned that a small portion of the total time is spent in familiarising with the IO, depending also on the type of business:

- For butchers, familiarisation with the IO has mostly to do with the exchange of information on obligations between professionals, rather than going through the respective regulations.
- Slaughter houses and other meat businesses are more aware of the respective regulations and are being informed mostly due to the communication channels they have developed with ELGO-DIMITRA, since they have to submit documentation to the authority.

In general and according to the responses gathered by the interviewees, it has been estimated that the normal efficient business spends 15 minutes annually to familiarise itself with the IO requirements, taking into consideration that there have been few changes in the obligation since its initial implementation in 2006.

a) Butchers

A butcher business initially buys an electronic weighing machine, which is an obligation set by the regulation. Its purpose and particularity is the recording of information of meat bought and sold, with special focus on the country of origin of the meat and the printing of respective tags placed on the meat sold to consumers (in order for them to be fully aware of the origin and meat data), as well as the printing of the monthly “Z”. On a daily basis butchers gather documentation with regard to the supply and selling of meat: Information indicating

¹¹ The standard hourly rates per employee type are in Annex 6

the type, amount and origin of meat bought and sold, invoices of purchase - sale of meat and corresponding dispatch notes.

On a monthly basis, and for some on a weekly basis, they print out the "Z" from their weighing machine and archive it. It is important however to note that an important amount of butchers are not compliant with this obligation at all.

b) Slaughter houses

Slaughterhouses maintain a slaughter book which indicates the animals' origin and their code, along with various data accompanying the animals. The documentation regarding slaughters is gathered on a daily basis in order to be recorded in the slaughter book, which is usually kept in an electronic and a hard copy form, to serve different audit purposes by responsible authorities as well as the daily business operations. The book may be kept by the slaughter house manager or any other indicated person, according also to the size of the business. The electronic form of the slaughter book is usually developed by the business itself, in a way though to also serve audit purposes.

For poultry slaughter houses the activity is conducted on a monthly basis since poultry houses are obliged to submit relevant information on a monthly basis (see Step 4 below).

c) Other businesses involved in meat trade

Other businesses, involved in meat trade, production etc. gather all commercial documentation regarding meat handling, and usually input relevant information into their systems. This is done on a daily basis according to business operations. Large businesses usually have an ERP system where they record information with regard to their operations. As reported by the interviewees, most businesses have an ERP system to serve all business operations and this is used for the purposes of the IO as well. According to the size of the business operations and the relevant information required to be gathered, the business may adapt the system to serve the requirements of the IO.

For this kind of business, the gathering of documentation through the information system or with hard copies is usually performed by the accounting department, since it regards commercial documentation.

2. Maintain and archive documentation

All businesses under consideration keep the above documentation and information at least for six (6) months from the date of sale of meat, in order to comply with the IO.

Butchers usually outsource the activity to an accountant, since keeping of the relevant documentation is directly related to their tax obligations and, as reported by interviewees, this is entirely a business as usual activity.

All the other businesses maintain their information in their electronic systems and in hard copy forms where appropriate. Maintenance of this information is considered as up to point business as usual activity.

According to the interviewees the normal efficient business – butcher, slaughter house or other business involved in meat trade – spends about 2,370 minutes annually for gathering, checking and maintaining of information and documentation.

3. Facilitate possible inspections

All businesses under consideration are obliged to make available all documentation in case of an inspection by the competent control authorities. However, none of the businesses interviewed reported any inspections by the respective authorities with regard to the IO. Only slaughterhouses report inspections by the Veterinary Authorities, which are performed even on a daily basis but do not fall under the specific IO.

In this respect no time has been measured for this step.

4. Submit monthly balances

- a) **Butchers** do not submit any monthly balances, since they are exempted from this obligation by the regulation.
- b) **Slaughterhouses** are distinguished between meat and poultry ones: meat slaughter houses submit electronically their slaughter book to ELGO-DIMITRA on a daily basis, whereas poultry slaughter houses submit their slaughter books electronically to ELGO-DIMITRA on a monthly basis and also prepare a monthly balance which they also submit electronically every month.
- c) **Other businesses** obliged to submit meat balances usually retrieve information on a monthly basis from their information systems, spend some time to input the info in electronic forms they have developed for the processing of the information (usually adjusted forms of the standard ELGO-DIMITRA template for meat balances, according to the size of the business operation and the respective requirements for information submission).

The normal efficient business, according to the interviewees, spends annually 3 300 minutes (6.9 days) on the preparation of monthly balances and another 300 minutes for their submission.

With regard to **costs related to IO 32**, there are only equipment costs, which for the normal efficient business reach 100EUR and represent costs of the weighing machine or the electronic equipment for the preparation and submission of documentation (according to the type of business), depreciated over the life expectancy of the equipment.

The percentage of BAU has been estimated at 50% for the normal efficient business.

1.4.3. Analysis of measurement results

Although there is differentiation with regard to the process according to the type of the business – butcher, slaughter house, other meat business – as described above, there is no significant difference with regard to the total time spent by the business in order to respond to the IO requirements.

The normal efficient business spends 5 985 minutes (12.4 man-days) on an annual basis to respond to the IO requirements. Out of this time, the preparation of information for submission to the authorities corresponds to 55% of the total time spent by the business, followed by the gathering of information for which the normal efficient business spends around 35% of the total time. These two activities constitute the most burdensome activities.

It should be mentioned that for businesses other than butchers and slaughterhouses an additional burden which has been included in the total time spent for the preparation of the monthly balances is the time spent to adjust the business information to recent changes in regulation regarding the required information for submission.

With regard to differentiations between the categories of businesses under IO 32 it is estimated that butchers spend around 10% less in total than the total time spent by the normal efficient business, slaughterhouses spend around 10% more than the normal efficient business, whereas other businesses involved in meat trade spend time almost according to the normal efficient business. Butchers are estimated to spend twice the time in gathering of information in relation to the NEB, whereas slaughter houses are estimated to spend up to 20% more in the preparation of reports and their submission (especially where meat slaughterhouses are involved which submit their slaughter books on a daily basis). For the other businesses involved in meat trade, small differentiations may exist due to the size of the business (in terms of volume of traded products and variety of products on which they have to report).

The percentage of BAU has been estimated at 50% for the normal efficient business, taking into consideration that for butchers this percentage is higher since their most burdensome activities are mostly business as usual (85%), whereas for other businesses it is lower (20%-30%), since the most burdensome activity – that of preparation of balances – is mostly linked to the IO requirements.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

Irritation points appear to differentiate according to the type of business under consideration – butcher, slaughter house, other meat business.

- Cost of weighing machine

For **butchers**, it has been reported that the main irritation point is the cost of buying the weighing machine for the print out of the monthly “Z”, which has a double price than that of a regular weighing machine. According to the interviewees it does not necessarily ensure full compliance of the business with the main scope of the IO, which is the control of the traded meat with regard of its origin.

- Reporting to different authorities

With regard to **slaughterhouses**, the main irritation point reported is more general and regards the obligation to submit similar data to different authorities. Meat slaughterhouses are required to report the submission of similar information to the Veterinary Authorities and the General Secretariat of Commerce, which is actually done in written form. It has also been mentioned that the submission of the information to the authorities in hard copy is a greater burden and that the electronic submissions to ELGO-DIMITRA are the least burdensome.

Poultry houses also report that they are required to submit similar information (either send or submit on the spot during regular inspections) to the Veterinary Authorities, and thus find it irritating that information kept by these public authorities cannot be retrieved by ELGO-DIMITRA, for which they have to spend extra time in preparation of the respective documentation.

- Detailed reporting and difficulties in adjusting changes of the information requirements

With regard to **other meat businesses**, the main irritation point reported has been the time needed by the businesses to adjust their systems in order to be able to retrieve the information required for submission to ELGO-DIMITRA, especially for businesses handling many different codes of meat and needing to report in more detail. In addition it has been reported that the time given to the businesses for the adjustments was limited.

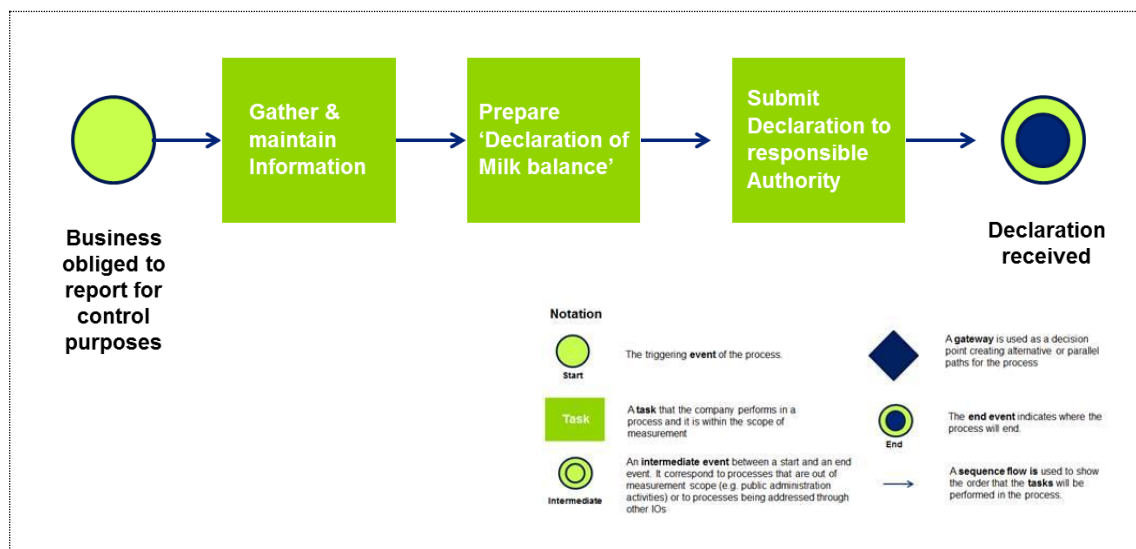
No understanding of the scope of the obligation

Generally, there is some confusion by the businesses with regard to the scope of the obligation, which depicts also a gap in the communication of the scope by the responsible authorities. Particularly, for other meat businesses, a certain level of confusion has been depicted, other stating that it has to do mainly with statistical purposes, other with control purposes and other with relevant payments to ELGO-DIMITRA. Especially with regard to the payments to ELGO-DIMITRA, which constitute an extra burden in terms of cost (not examined under this IO), businesses are very sceptical on their scope and their relation to the submission of the meat balances. For instance, some consider that in the case of abolishment of the payments there would also be no reason for the obligation to submit meat balances.

1.5. Obligation to keep records, submit milk balances (dairy farmers and producers) (IO 33)

1.5.1. Origins and process of the information obligation (brief assessment of purposes of IO)

Figure 1.6: Process for complying with the requirement “Obligation to keep records, submit milk balances (dairy farmers and producers)”



The IO refers to the obligation, as stated in the Joint Ministerial Decision 175180/2011 (Gov. Gazette 1721/B/2011), of milk/dairy product businesses to gather relevant information and documentation and submit a Declaration of Milk Balances to the responsible control authority (Hellenic Agricultural Association - Dimitra), within the framework of monitoring the production and trade of milk, dairy products and sub-products.

This IO refers to milk purchasers, business units that process and/ or sells milk, dairy products standardisation/ packing business units, producers/ farmers who process their own milk. The process of complying with the IO in question includes the following steps:

Step 1: Gather and maintain information

Businesses are required to collect and maintain the following information - documentation

1. Amount of milk received from producers or other companies or from other European or Third Countries with detailed description of raw material (raw milk, pasteurized, condensed, cream, curd, dust, etc.) of its composition, country of origin etc.

2. Detailed analysis by category and quantity of all milk processed products produced during the month in conjunction with the business's stock book or the business's daily production record. Sufficient documentation proving relation between raw material and final products is also necessary.

3. All quantities of raw materials or semi-finished products with the exact name and composition that are supplied to third parties.

4. All quantities of sub-products produced or received by others or supplied to third parties.

Step 2: Prepare 'Declaration of Milk Balance'

Businesses in scope use the information-documentation described above in order to prepare the so called 'Declaration of Milk Balance' according to the official forms provided by the respective authorities.

Step 3: Submit declaration

Businesses in scope submit every month – the latest by the end of each month – the aforementioned Declaration to the responsible authority - Hellenic Agricultural Association - Dimitra. The submission is done electronically, and only in the case of inability is it done in hard copy.

1.5.2. Results from measurement and quantification

Table 1.5 Composition of Administrative Cost and Administrative Burden (IO 33)

PA: Food Safety	Price (P)				Nr of entities / occurrences (Q)	frequency (f)	BAU (%)	Total AB (in EUR million)	Total AC (in EUR million)
	Time (in minutes)	Consulting costs (in EUR)	Out of pocket / Equipment Costs (in EUR)	P (in EUR)					
IO 33: Obligation to keep records, submit milk balances (dairy farmers and producers)									
No segmentation	27 495	0	50	11 424	760	1	50	4.34	8.68

Standardised description of the activities related to the IO 33

The IO refers to the obligation of milk/dairy product businesses to gather relevant information and documentation and submit a declaration of milk balances to the responsible control authority ELGO-DIMITRA, within the framework of monitoring the production and trade of milk, dairy products and sub-products.

The Price (P) in the above table represents the administrative cost incurred by the normal efficient business in order to comply with the IO. With respect to the number of entities this refers to the total annual number of businesses obliged by regulation to comply with the IO (average number for the period 2010-2012). The activities related to the IO are performed by business staff who are categorised as professionals.

This IO refers to milk purchasers, business units that process and/or sell milk, dairy products standardisation/packing business units, producers/farmers who process their own milk. It should be mentioned that as concluded by the interviews, it appears that farmers do not gather the required information for submission to the responsible authority; they submit this information to the Milk Producers/Farmers Associations, which are the ones preparing and submitting the monthly milk balances to ELGO-DIMITRA, as described below.

The process of complying with the IO in question includes the following steps as performed by the normal efficient business:

1. Gather and maintain information

Before analysing the time spent by the business to gather the required information in order to respond to the IO requirements, it should be mentioned that a small portion of the total time is spent in familiarising with the IO. Businesses are aware of the respective regulations and are being informed mostly through the communication channels they have developed with ELGO-DIMITRA, because of the submission of documentation to the authority. In general and according to the responses gathered by the interviewees, it has been estimated that the normal efficient business spends 15 minutes annually to familiarise with the IO requirements, taking into consideration that there have been few changes in the obligation since 2006 that it was introduced.

In order for the business to respond to the requirements of the IO, first it has to gather the required information regarding the amounts of milk received according to the country of origin and detailed description of raw material, composition, detailed analysis by category and quantity of all milk processed products produced during the month, analysis of all quantities of raw materials or semi-finished products with the exact name and composition that are supplied to third parties, as well as quantities of sub-products produced or received by others or supplied to third parties.

Farmers associations gather the information on a monthly basis from farmers in order to process it and then submit the monthly declarations, with the use of electronic systems that they already have. Other dairy producing businesses, like dairy industries and manufacturing/producing units usually maintain an information system, gather the business information on a daily basis and input it in their electronic systems, for the purposes of the business operations. Apart from the electronic systems, businesses also maintain hard-copy files with the documentation needed to support the requested information. With regard to the information on products produced, the business keeps (usually as part of the electronic system) a daily inventory book and/or book of daily production (obligatory according to the JMD 175180/2011) as well as all documentation for the traceability of products labelled with specific origin.

According to the responses of interviewees, it is estimated that the normal efficient business spends 1 440 minutes (3 man-days) per month, i.e. 17 280 minutes annually, to gather the required information needed in order to prepare the monthly milk balances. Usually, it is a professional from the accounting department or a food technologist that is assigned by the business to perform the obligation.

2. Prepare ‘Declaration of Milk Balance’

Businesses in scope, after gathering the required documentation start preparing the monthly declaration of milk balances. In order to perform this activity, they use the ELGO-DIMITRA templates, which they usually adopt to the specificities of their operations. Large businesses, in particular, which use different raw materials and produce a variety of dairy products, have reported to have spent significant time in adjusting the templates and creating tools (usually excel sheets) in order to be able to process the information retrieved from their systems to produce the requested information – prepare the monthly ‘Milk Balance’.

This activity, according to the interviewees, takes up to 840 minutes (1.75 man-days) per month, i.e. 10 080 minutes annually, for the normal efficient business to be performed, with about 40% of this time - i.e. 5 760 minutes on an annual basis - dedicated in cross-checking the gathered information.

3. Submit declaration

Businesses in scope submit every month the aforementioned declaration to the responsible authority ELGO-DIMITRA. The submission is done electronically – via e-mail- and it takes usually 10 minutes per month to be performed, which makes 120 minutes per year for a normal efficient business.

With regard to **costs related to IO 33**, there is only an equipment cost of EUR 50, which represents the costs of the electronic equipment (hardware/software) for the preparation and submission of milk declarations, depreciated over the life expectancy of the equipment.

The percentage of BAU has been estimated at 50% for the normal efficient business, taking into consideration that most of the information/documentation, would be maintained by businesses under consideration, regardless of the obligation.

1.5.3. Analysis of measurement results

The measurement results show that if this IO is completely removed, the administrative burden for the Greek economy would be reduced by EUR 4 341 031. The administrative cost reduction if this IO is abolished completely would amount to EUR 8 682 061.

Gathering of the required information appears to be the most burdensome activity for businesses obliged to submit monthly declarations of milk balances. This activity engages more than 60% of the total dedicated time by the business for the obligation, where another 20% of the total time is needed for cross-checking the gathered information.

The main differentiation point turns out to be the size of the business activity in terms of the variety of the materials used and the products produced. The more complex the business operation according to these terms, the more detailed the information provided in the declaration and thus more time is required by the business to dedicate to the process.

For farmers’ associations, it appears that the time for gathering the required information is less, since they get the information already processed up to a point, by the farmers.

Main irritation points

The suggestions presented below represent the views of businesses collected through the interviews conducted. They do not take into account the views of the OECD, the Greek authorities or the consultants' assessment.

- Detailed reporting

In general, it appears that the obligation is a very time-consuming and thus burdensome process for businesses. The more complex the operation of the business in terms of production, the more detailed the declaration needs to be, thus resulting in extra burden for the business. According to the interviewees some of the requested information or the extent of detail to be submitted is considered unnecessary, like for example the information on whey or detailed information on intermediary suppliers.

- Confusion regarding the scope of the obligation

Generally, there is some confusion by the businesses with regard to the scope of the obligation, which depicts also a gap in the communication of the scope by the responsible authorities. Businesses report that, apart from the obligation as it appears in the respective regulation, they have not been informed about the scope of the obligation, whether it is for statistical purposes, control purposes or related to the contribution payments to ELGO-DIMITRA, a fact that makes some of them question the necessity of the obligation.

- Frequency of submissions

The monthly frequency of submission of milk balance declarations has been questioned by some of the interviewees, as causing extra burden to the business in terms of time needed for preparation. However, it should be mentioned that this opinion has not been supported by all businesses and it has been stated that a change in the frequency towards less submissions within the year could result in the same or even more time for preparation of the declaration for the business, as long as the length of detail needed remains the same.

Annex 2: Forms: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (IO 29) and obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (IO30) - (Industries/small manufacturing units)

a) Questionnaire regarding the issuance of establishment and operating licence (MD 483/35/Φ.15, Gov. Gazette 158/03-02-2012)

ΕΡΩΤΗΜΑΤΟΛΟΓΙΟ ΠΡΟΣ ΤΗΝ ΑΔΕΙΟΔΟΤΟΥΣΑ ΑΡΧΗ

Για τον προσδιορισμό της κατηγορίας και των δικαιολογητικών που απαιτούνται για απαλλαγή/έκδοση Αδειών Εγκατάστασης και Λειτουργίας μεταποιητικών μονάδων

Γενικές οδηγίες συμπλήρωσης προς τον ενδιαφερόμενο επενδυτή

1. Όλα τα πεδία του Ερωτηματολογίου που άπτονται της δραστηριότητάς σας, πρέπει να συμπληρωθούν πλήρως και με ακρίβεια.
2. Τα πεδία με (*) συμπληρώνονται από την Υπηρεσία στην οποία κατατίθεται το παρόν Ερωτηματολόγιο.
3. Όπου υπάρχουν τετραγωνάκια, οι απαντήσεις θα πρέπει να δίνονται με την προσθήκη ενός X στο αντίστοιχο τετραγωνάκι.
4. Το Ερωτηματολόγιο συμπληρώνεται και υπογράφεται με αποκλειστική σας ευθύνη. Η ανακριβής, ή αναληθής συμπλήρωση του Ερωτηματολογίου συνεπάγεται αυτομάτως την ακύρωση της απαλλαγής, ή της Άδειας που θα έχει αντίστοιχα εκδοθεί.



Προς:	(*) Αρ. Πρωτοκόλλου
<i>(Συμπληρώνεται το αντίστοιχο κέντρο υποδοχής της αίτησης)</i>	
(*) Κοινοποίηση:	(*) Ημερομηνία

A. ΓΕΝΙΚΕΣ ΠΛΗΡΟΦΟΡΙΕΣ

A1. Στοιχεία νόμιμου εκπροσώπου			
Όνομα		Επώνυμο	
Όνομ/μο πατέρα			
Όνομ/μο μητέρας			
Αριθμός Δελτίου Ταυτότητας (ΑΔΤ)		Εκδούσα Αρχή	
ΑΦΜ		ΔΥΟ	
Ημερομηνία γέννησης		Τόπος γέννησης	
Διεύθυνση (Νομός, Δήμος, Οδός, Αριθμός, ΤΚ)			
Τηλέφωνα			
e-mail		Φαξ	

Α2. Στοιχεία εξουσιοδοτημένου εκπροσώπου			
Όνομα		Επώνυμο	
Όνομ/μο πατέρα			
Όνομ/μο μητέρας			
Αριθμός Δελτίου Ταυτότητας (ΑΔΤ)		Εκδούσα Αρχή	
ΑΦΜ		ΔΥΟ	
Ημερομηνία γέννησης		Τόπος γέννησης	
Διεύθυνση (Νομός, Δήμος, Οδός, Αριθμός, ΤΚ)			
Τηλέφωνα			
e-mail		Φαξ	

Α3. Πληροφορίες για τη μεταποιητική μονάδα	
Α3.1 Στοιχεία μονάδας	
Επωνυμία:	
ΑΦΜ:	ΔΟΥ:
Έτος ίδρυσης:	
Διεύθυνση/Θέση: Οδός:..... Αριθμός..... Θέση: Τ.Κ.: Δήμος: Νομός:..... ... Περιφερειακή Ενότητα: Γεωγραφική Συντεταγμένη για εκτός σχεδίου περιοχές βάσει GOOGLE MAP : <input type="checkbox"/> βάσει ΕΓΣΑ: <input type="checkbox"/> __ο / __' __ / __" Β __ο / __' __ / __" Ε	
Α3.2 Χαρακτηριστικά δραστηριότητας	

A3. Πληροφορίες για τη μεταποιητική μονάδα	
1. Είδος δραστηριότητας (σύντομη περιγραφή):	
2. Κωδικός δραστηριότητας κατά ΚΑΔ:	
3. Η μονάδα πρόκειται να εγκατασταθεί ή είναι εγκατεστημένη σε οργανωμένο υποδοχέα μεταποιητικών και επιχειρηματικών δραστηριοτήτων του άρθρου 41 §4, του Ν. 3982/2011	
NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
4. Συνολική αξία μηχανολογικού εξοπλισμού€
5. Συνολική αποθηκευτική ικανότητα (σε περίπτωση που η μονάδα αφορά σε αποθήκη)κ.μ.
6. Χρησιμοποιούμενες πρώτες & δευτερεύουσες ύλες	
7. Διαδικασία παραγωγής	
8. Παραγόμενα προϊόντα	

Τα νομιμοποιητικά έγγραφα του φορέα και του νόμιμου εκπροσώπου της υπάρχουν στο Γενικό Εμπορικό Μητρώο και επιτρέπω την αναζήτησή τους	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
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A4. Αιτούμενη Άδεια			
Απαλλαγή από την υποχρέωση έκδοσης Άδειας Εγκατάστασης και Λειτουργίας	<input type="checkbox"/>	Έκδοση Άδειας Λειτουργίας	<input type="checkbox"/>
Άδεια Εγκατάστασης σε υφιστάμενο κτίριο	<input type="checkbox"/>	Μεταβίβαση	<input type="checkbox"/>

Άδεια Εγκατάστασης σε υπό ανέγερση κτίριο	<input type="checkbox"/>	Ανανέωση Άδειας Λειτουργίας	<input type="checkbox"/>
Άδεια Εγκατάστασης εκ μεταφοράς	<input type="checkbox"/>	Τεχνική Ανασυγκρότηση ή προθεσμία προς μεταφορά	<input type="checkbox"/>
Άδεια Εγκατάστασης για Επέκταση ή Εκσυγχρονισμό μηχανολογικό ή/και δραστηριότητας	<input type="checkbox"/>	Εκσυγχρονισμός επαγγελματικού εργαστηρίου που ιδρύθηκε πριν το Π.Δ. 84/84 (αφορά μόνο την Περιφέρεια Αττικής)	<input type="checkbox"/>
Άδεια Εγκατάστασης για Επέκταση ή Εκσυγχρονισμό κτιριακό	<input type="checkbox"/>		
Παράταση Άδειας Εγκατάστασης	<input type="checkbox"/>		

B. ΕΙΔΙΚΑ ΣΤΟΙΧΕΙΑ

B1. Κατάταξη δραστηριότητας			
B1.1 Ισχύς μηχανολογικού εξοπλισμού			
1. Συνολική κινητήρια ισχύς των μηχανημάτων, που σχετίζονται άμεσα με την παραγωγική διαδικασία, και πρόκειται να εγκατασταθούν ή είναι εγκατεστημένα:KW			
2. Συνολική θερμική ισχύς των μηχανημάτων, που σχετίζονται άμεσα με την παραγωγική διαδικασία, και πρόκειται να εγκατασταθούν ή είναι εγκατεστημένα:KW			
3. Συνολική κινητήρια και θερμική ισχύς των μηχανημάτων προστασίας περιβάλλοντος που πρόκειται να εγκατασταθούν ή είναι εγκατεστημένα:KW			
4. Συνολική κινητήρια & θερμική ισχύς των μηχανημάτων που δε σχετίζονται άμεσα με την παραγωγική διαδικασία (π.χ. μηχανήματα πυρόσβεσης, εξυπηρέτησης κτιρίων, κλιματισμού κ.λπ.) τα οποία πρόκειται να εγκατασταθούν ή είναι εγκατεστημένα:KW			
5. Θα γίνει χρήση ηλεκτροπαραγωγού ζεύγους εφεδρικού / παραγωγού ισχύος (κατά περίπτωση)	ΝΑΙ	<input type="checkbox"/>	<input type="checkbox"/>
ποσότητα αντίστοιχα		<input type="checkbox"/>	<input type="checkbox"/>
KVA	MW.
B1.2 Εξαιρέσεις από την παρ. 1 του άρθρου 19 του Ν. 3982/2011			
1. Μονάδα επεξεργασίας εύφλεκτων, εκρηκτικών, διαβρωτικών, οξειδωτικών, τοξικών ή άλλων επικίνδυνων ουσιών και αερίων υπό πίεση	ΝΑΙ	<input type="checkbox"/>	ΟΧΙ <input type="checkbox"/>
2. Αποθήκη όπου φυλάσσεται ποσότητα ανώτερη των 100 κιλών εύφλεκτων, διαβρωτικών, οξειδωτικών, τοξικών ή άλλων επικίνδυνων ουσιών	ΝΑΙ	<input type="checkbox"/>	ΟΧΙ <input type="checkbox"/>
3. Αποθήκη εκρηκτικών που υπερβαίνουν τα όρια της παρ. 2δ του άρθρου 1 της ΚΥΑ 3329/15.2.89 (ΦΕΚ 132Β), όπως εκάστοτε ισχύει	ΝΑΙ	<input type="checkbox"/>	ΟΧΙ <input type="checkbox"/>

4. Αποθήκη, όπου φυλάσσεται ποσότητα αερίων υπό πίεση ανώτερη των 200 κιλών.	ΝΑΙ <input type="checkbox"/>	ΟΧΙ <input type="checkbox"/>
5. Εάν η δραστηριότητα εμπίπτει σε μία από τις παραπάνω:		
Συνολική προβλεπόμενη ημερήσια παραγωγή	kg
Συνολική προβλεπόμενη αποθηκευτική ικανότητα των αποθηκών	kg

B2. Κατάταξη δραστηριότητας σε κατηγορίες όχλησης και περιβαλλοντικών επιπτώσεων		
B2.1 Κριτήρια/μεγέθη όχλησης της μονάδας βάσει της ΥΑ 13727/724 (ΦΕΚ Β' 1087, 5/8/2003), όπως εκάστοτε ισχύει και κριτήρια/μεγέθη περιβαλλοντικών επιπτώσεων της μονάδας βάσει της ΥΑ 15393/2332, (ΦΕΚ Β' 1022, 5/8/2002), όπως εκάστοτε ισχύει		
1. KW	
2. Τόνοι/ημέρα	
3. Τόνοι/έτος	
4. Άλλο	
B2.2 Κριτήρια/μεγέθη όχλησης της μονάδας βάσει της ΥΑ 13727/724 (ΦΕΚ Β' 1087, 5/8/2003), όπως εκάστοτε ισχύει και κριτήρια/μεγέθη περιβαλλοντικών επιπτώσεων της μονάδας βάσει της ΥΑ 15393/2332, (ΦΕΚ Β' 1022, 5/8/2002), όπως εκάστοτε ισχύει ΜΕΤΑ ΤΟΝ ΕΚΣΥΓΧΡΟΝΙΣΜΟ Ή ΤΗΝ ΕΠΕΚΤΑΣΗ		
1. Με τον εκσυγχρονισμό επέρχεται αλλαγή στα κριτήρια/μεγέθη σχετικά με την όχληση της μονάδας	ΝΑΙ <input type="checkbox"/>	ΟΧΙ <input type="checkbox"/>
2. Με τον εκσυγχρονισμό επέρχεται αλλαγή στα κριτήρια/μεγέθη σχετικά με τις περιβαλλοντικές επιπτώσεις της μονάδας	ΝΑΙ <input type="checkbox"/>	ΟΧΙ <input type="checkbox"/>
3. Κριτήρια / Μεγέθη	Υφιστάμενη κατάσταση	Μετά τον εκσυγχρονισμό
1. KW
2. Τόνοι/ημέρα
3. Τόνοι/έτος
4. Άλλο
3. Ενεργειακή Κατανάλωση συμπληρώνεται μόνο στην Περιφέρεια Αττικής σύμφωνα με το Ν.3325/2005 (ΦΕΚ 68Α') και την ΚΥΑ (ΦΕΚ 589Β'/2005) και ΚΥΑ(ΦΕΚ 1526Β'/1999)		
1 ^ο έτος	2 ^ο έτος	3 ^ο έτος
<input style="width: 40px; height: 20px;" type="text"/>	<input style="width: 40px; height: 20px;" type="text"/>	<input style="width: 40px; height: 20px;" type="text"/>
4 ^ο έτος	5 ^ο έτος	KWH
<input style="width: 40px; height: 20px;" type="text"/>	<input style="width: 40px; height: 20px;" type="text"/>	
Ελεγχόμενο έτος : KWH		

B2.3 Απόβλητα		
1. Από την παραγωγική διαδικασία δημιουργούνται		
Υγρά Απόβλητα	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Αέρια Απόβλητα	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Στερεά απόβλητα	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Επικίνδυνα Απόβλητα	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Αν ναι, θα γίνεται διαχείριση των επικίνδυνων αποβλήτων		
από τον φορέα ;	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
2. Η διάθεση των υγρών αποβλήτων στην περίπτωση που υπάρχουν γίνεται : α. μετά από επεξεργασία με προγραμματισμένη επαναχρησιμοποίηση σύμφωνα με την ΚΥΑ 145116 (ΦΕΚ 354 Β 8-3-2011) και την ΚΥΑ 5673/400/97 (ΦΕΚ 192 /Β'/14.3.1997) <input type="checkbox"/> β. ή/και με άλλο τρόπο: (περιγραφή)		
3. Με τον εκσυγχρονισμό ή την επέκταση, θα επέλθει αύξηση των αποβλήτων (περιλαμβάνονται τα υγρά απόβλητα και τα επικίνδυνα και στερεά μη επικίνδυνα απόβλητα)	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
B.2.4 Λύματα		
1. Τα λύματα από τους χώρους υγιεινής θα διοχετεύονται σε		
Δίκτυο	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Σηπτική ή απορροφητική δεξαμενή	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>

B3. Κτίριο		
1. Η εγκατάσταση /εκσυγχρονισμός της μονάδας θα γίνει σε κτίσματα που ήδη υπάρχουν	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Εάν ναι, τα κτίσματα αυτά καλύπτονται με οικοδομική άδεια	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
2. Η εγκατάσταση /εκσυγχρονισμός της μονάδας θα γίνει σε κτίσματα που θα ανεγερθούν	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Εάν ναι, τα κτίσματα αυτά θα κατασκευαστούν με έναν από τους δύο παρακάτω τρόπους		

B3. Κτίριο			
Σύμφωνα με τις πολεοδομικές διατάξεις που ισχύουν χωρίς παρεκκλίσεις		<input type="checkbox"/>	
Κατά παρέκκλιση των πολεοδομικών διατάξεων που ισχύουν		<input type="checkbox"/>	
3. Η εγκατάσταση /εκσυγχρονισμός της δραστηριότητας θα γίνει σε πολώροφο κτίριο	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>	
4. Επιτρέπεται η εγκατάσταση της δραστηριότητας σύμφωνα με τις διατάξεις του άρθρου 4 του ν. 3741/1929 (ΦΕΚ 4 Α') «Περί ιδιοκτησίας κατ' ορόφους», όπως εκάστοτε ισχύει	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>	
5. Η εγκατάσταση θα γίνει σε χώρο κύριας χρήσης	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>	
6. Ιδιοκτησιακό καθεστώς			
7. Εμβαδόν στεγασμένης επιφάνειας της δραστηριότηταςτ.μ.			
8. Συνθήκες γειτνιάσεως			
Η γύρω από την εγκατάσταση περιοχή περιλαμβάνει:			
Κατοικίες	<input type="checkbox"/>	Καταστήματα	<input type="checkbox"/>
Εργαστήρια	<input type="checkbox"/>	Αποθήκες	<input type="checkbox"/>
Οικόπεδα	<input type="checkbox"/>	Ακάλυπτους	<input type="checkbox"/>
Συνεργεία	<input type="checkbox"/>	Δρόμους	<input type="checkbox"/>
Το γήπεδο της εγκατάστασης συνορεύει με			
Κτίρια κατοικιών	<input type="checkbox"/>	Δρόμο/ους	<input type="checkbox"/>
Οικόπεδα	<input type="checkbox"/>	<input type="checkbox"/>
9. Για την περιοχή εγκατάστασης/εκσυγχρονισμού της μονάδας υπάρχουν διατάξεις (υγειονομικές, πολεοδομικές κ.λπ.) από τις οποίες προκύπτουν περιορισμοί ή απαγορεύσεις σχετικά με την εγκατάσταση/ εκσυγχρονισμό της μονάδας.		NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Αν ΝΑΙ αναφέρατε ποιες γνωρίζετε		

B4. Άδεια χρήσης νερού, στην περίπτωση χρήσης νερού από γεώτρηση για βιοτεχνική χρήση	
1. Προβλέπεται η εκτέλεση έργου αξιοποίησης υδατικών πόρων και χρήσης νερού (πχ. Γεώτρηση)	NAI <input type="checkbox"/> OXI <input type="checkbox"/>
2. Κατανάλωση νερούκ.μ.

B5. Άδεια κατασκευής λιμενικού έργου και χρήσης αιγιαλού και παραλίας

B5. Άδεια κατασκευής λιμενικού έργου και χρήσης αιγιαλού και παραλίας		
1. Το γήπεδο εντός του οποίου θα εγκατασταθεί η μονάδα έχει πρόσβαση στον αιγιαλό:	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Εάν ναι, προβλέπεται να γίνουν τεχνικά έργα στον αιγιαλό και την παραλία	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
Εάν πρόκειται να γίνουν έργα στον αιγιαλό και την παραλία στη θέση αυτή, επιτρέπεται η κατασκευή τους	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>

B6. Λοιπά θέματα		
B6.1 Κατασκευή κυκλοφοριακής σύνδεσης		
1. Το γήπεδο εντός του οποίου θα εγκατασταθεί η μονάδα έχει είσοδο ή έξοδο σε εθνική οδό.	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
B6.2 Χρήση υγραερίου		
1. Θα γίνει χρήση υγραερίου	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>
B6.3 Ατμολέβητες / Ατμογεννήτριες / Δεξαμενές / Φιάλες		
<p>1. Γίνεται χρήση ατμολεβήτων / ατμογεννητριών : NAI <input type="checkbox"/> OXI <input type="checkbox"/></p> <p>Κατηγορία A <input type="checkbox"/> B <input type="checkbox"/> Γ <input type="checkbox"/></p> <p>Πιστοποιητικό υδραυλικής δοκιμασίας : (αναγράφεται αριθμός, ημερομηνία, διάρκεια)</p> <p>Πιστοποιητικό Παραλαβής : (αναγράφεται αριθμός, ημερομηνία)</p> <p>2. Υπάρχουν δεξαμενές / φιάλες : NAI <input type="checkbox"/> OXI <input type="checkbox"/></p> <p>Είδος και ποσότητα φορητές <input type="checkbox"/> σταθερές <input type="checkbox"/></p> <p>Χωρητικότητα για κάθε μία :</p> <p>Περιεχόμενο για κάθε μία :</p> <p>3. Θα γίνει χρήση φυσικού αερίου: NAI <input type="checkbox"/> OXI <input type="checkbox"/></p>		

B7. SEVESO		
1. Η δραστηριότητα περιλαμβάνει επικίνδυνες ουσίες που αναφέρονται στο Παράρτημα Ι της ΚΥΑ 12044/613 (ΦΕΚ Β' 376/19-3-2007) για την αντιμετώπιση κινδύνων από ατυχήματα μεγάλης έκτασης, όπως εκάστοτε ισχύει.	NAI <input type="checkbox"/>	OXI <input type="checkbox"/>

2. Η δραστηριότητα περιλαμβάνει επικίνδυνες ουσίες που αναφέρονται στο Παράρτημα Ι της ΚΥΑ 12044/613 (ΦΕΚ Β' 376/19-3-2007), στήλες 1 και 3 , για την αντιμετώπιση κινδύνων από ατυχήματα μεγάλης έκτασης, όπως εκάστοτε ισχύει.	ΝΑΙ <input type="checkbox"/>	ΟΧΙ <input type="checkbox"/>
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Γ. ΛΟΙΠΕΣ ΠΛΗΡΟΦΟΡΙΕΣ

Γ1. Στατιστικά Στοιχεία	
1. Συνολικό ύψος επένδυσης κατ' εκτίμηση (μηχανολογικός εξοπλισμός, κτίρια, οικόπεδο κ.λπ.)€
2. Συνολικός αριθμός των ατόμων που πρόκειται να απασχοληθούν/απασχολούνται στη μονάδα	
Τεχνικό προσωπικό
Διοικητικό προσωπικό
Εργατοτεχνικό προσωπικό
Λοιπό προσωπικό

Δ. ΕΠΙΚΟΙΝΩΝΙΑ

Δ1. Επιλογή τρόπων επικοινωνίας	
Ταχυδρομείο	<input type="checkbox"/>
Ηλεκτρονικό Ταχυδρομείο (e-mail)	<input type="checkbox"/>
Φαξ	<input type="checkbox"/>
Ταχυμεταφορά (Courier)	<input type="checkbox"/>
Τηλεφωνικώς (πρόσκληση του αιτούντα για να προσέλθει στην Υπηρεσία)	<input type="checkbox"/>

Ημερομηνία:

.....
(Υπογραφή αιτούντα)

(*) Ε. ΠΑΡΑΤΗΡΗΣΕΙΣ

Παρατηρήσεις Υπηρεσίας

Ημερομηνία:

.....

(Υπογραφή παραλαβόντα)

- b) Solemn declaration regarding commencement of operation of small unit ('epaggelmatiko ergastirio' or 'warehouse')



ΥΠΕΥΘΥΝΗ ΔΗΛΩΣΗ ΕΝΑΡΞΗΣ ΛΕΙΤΟΥΡΓΙΑΣ
ΕΠΑΓΓΕΛΜΑΤΙΚΟΥ ΕΡΓΑΣΤΗΡΙΟΥ / ΑΠΟΘΗΚΗΣ του άρθρου 19
παρ. 1 του Ν.3982/2011

Γενικές οδηγίες συμπλήρωσης

1. Όλα τα πεδία της Υπεύθυνης Δήλωσης, πρέπει να συμπληρωθούν πλήρως και με ακρίβεια, από τον ενδιαφερόμενο επενδυτή.
2. Τα συνημμένα έγγραφα/δικαιολογητικά αποτελούν αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης και απαραίτητη προϋπόθεση για τη θεώρηση της παρούσης από την αρμόδια Υπηρεσία.
3. Τα πεδία με (*) συμπληρώνονται από την αρμόδια Υπηρεσία στην οποία κατατίθεται η Υπεύθυνη Δήλωση.
4. Σε περίπτωση ανεπάρκειας χώρου, η Υπεύθυνη Δήλωση συνεχίζεται σε ξεχωριστό φύλλο, το οποίο φέρει την υπογραφή του/της δηλούντα/ούσης καθώς και του/της παραλαβόντα/ούσης. Στο ξεχωριστό φύλλο προστίθεται από την Υπηρεσία ο αριθμός Πρωτοκόλλου και η ημερομηνία κατάθεσης της Υπεύθυνης Δήλωσης.

Προς:	(*) Αρ. Πρωτοκόλλου
(*) Κοινοποίηση:	(*) Ημερομηνία

Ο/Η Όνομα				Επώνυμο			
Όνομ/μο πατέρα							
Όνομ/μο μητέρας							
Αριθμός Δελτίου Ταυτότητας (ΑΔΤ)				Εκδούσα Αρχή			
ΑΦΜ				ΔΟΥ			
Ημερομηνία γέννησης				Τόπος γέννησης			
Διεύθυνση (Νομός, Δήμος, Οδός, Αριθμός, ΤΚ)							
Τηλέφωνα							
e-mail				Φαξ			

Δηλώνω υπεύθυνα ότι

- Τα στοιχεία του επαγγελματικού εργαστηρίου ή αποθήκης με την επωνυμία «.....» όπως έχουν πλήρως δηλωθεί και περιγραφεί στο από ____/____/____ [ημερομηνία] υπ' αριθ. _____ [Αριθμός Πρωτοκόλλου] θεωρημένο Ερωτηματολόγιο προς την Υπηρεσία σας, το οποίο και αποτελεί αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης, είναι ακριβή και αληθή.

- Το ως άνω επαγγελματικό εργαστήριο ή αποθήκη :
 - Δεν εντάσσεται στις περιπτώσεις της παρ. 2 του άρθρου 19 του Ν. 3982/2011,
 - Τηρεί, εφόσον προβλέπονται, τις Πρότυπες Περιβαλλοντικές Δεσμεύσεις της Υ.Α. και ειδικότερα τις ακόλουθες:

.....

.....

.....,
 - Τηρεί όλα τα προβλεπόμενα από τις επιμέρους άδειες/εγκρίσεις και πιστοποιητικά, τα οποία επισυνάπτονται και αποτελούν αναπόσπαστο μέρος της παρούσης και όλα τα προβλεπόμενα στις Υ.Δ. που συνυποβάλλονται με την παρούσα.

○ _____

○ _____
- Αναφορικά με το επαγγελματικό εργαστήριο ή την αποθήκη που περιγράφεται ανωτέρω δεν έχω καταθέσει σε άλλη Αδειοδοτούσα Αρχή άλλη Υπεύθυνη Δήλωση για έναρξη λειτουργίας κατά τα οριζόμενα στο άρθρο 19 παρ1 Ν. 3982/2011.

Ως εκ τούτου και σε συνέχεια των ανωτέρω καταθέτω την παρούσα Υπεύθυνη Δήλωση για την έναρξη λειτουργίας του ως άνω περιγραφόμενου επαγγελματικού εργαστηρίου ή αποθήκης, σύμφωνα με τις ισχύουσες διατάξεις του Ν. 3982/2011, και της λοιπής ισχύουσας νομοθεσίας.

Συνημμένα έγγραφα / δικαιολογητικά:

1. Παράβολο
2. Απάντηση της Υπηρεσίας στο Ερωτηματολόγιο
3. Βεβαίωση χρήσης γης
4. ΑΕΠΟ (εφόσον δεν υφίστανται Πρότυπες Περιβαλλοντικές Δεσμεύσεις)
5. _____
6. _____
7. _____
8. _____

Με ατομική μου ευθύνη και γνωρίζοντας τις κυρώσεις που προβλέπονται από τον Νόμο 1599/1986, όπως εκάστοτε ισχύει, δηλώνω υπεύθυνα ότι η ως άνω Δήλωση στηρίζεται σε αληθή και ακριβή γεγονότα.

Η ακρίβεια των στοιχείων που υποβάλλονται με αυτή τη Δήλωση μπορεί να ελεγχθεί με βάση το αρχείο άλλων υπηρεσιών, σύμφωνα με το άρθρο 8 παράγραφο 4 του Νόμου 1599/1986, όπως εκάστοτε ισχύει.

Με τη συμπλήρωση της παρούσας Υπεύθυνης Δήλωσης, ο δηλών/ούσα δηλώνει ότι αναλαμβάνει ατομική ευθύνη και ότι επίσης γνωρίζει τις κυρώσεις που προβλέπονται από τις διατάξεις της παραγράφου 6 του άρθρου 22 του Νόμου 1599/1986, σύμφωνα με τις οποίες «όποιος εν γνώσει του δηλώνει ψευδή γεγονότα ή αρνείται ή αποκρύπτει τα αληθινά με έγγραφη Υπεύθυνη Δήλωση του άρθρου 8 τιμωρείται με φυλάκιση τουλάχιστον τριών (3) μηνών. Εάν ο υπαίτιος αυτών των πράξεων σκόπευε να προσπορίσει στον εαυτόν του ή σε άλλον περιουσιακό όφελος βλάπτοντας τρίτον ή σκόπευε να βλάψει άλλον, τιμωρείται με κάθειρξη μέχρι δέκα (10) ετών».

Τέλος, σε περίπτωση υποβολής λανθασμένων, αναληθών, ή ανακριβών στοιχείων, ο/η υπαίτιος θα υποβάλλεται σε ολική ή μερική, προσωρινή ή οριστική, διακοπή της λειτουργίας της δραστηριότητάς του, καθώς και στις λοιπές κυρώσεις του άρθρου 29 του Ν. 3982/2011. Η διακοπή λειτουργίας της εν

λόγω δραστηριότητας θα πραγματοποιείται από τα όργανα της Περιφέρειας, με τη συνδρομή των αστυνομικών αρχών, σύμφωνα άλλωστε και με το ως άνω άρθρο.

Από την κατάθεση της παρούσης Υπεύθυνης Δήλωσης στην αρμόδια Υπηρεσία, καθίσταται δυνατή η έναρξη λειτουργίας του ως άνω περιγραφόμενου επαγγελματικού εργαστηρίου ή αποθήκης.

Η παρούσα ισχύει για αόριστο χρονικό διάστημα.

Η παρούσα δύναται να χρησιμοποιηθεί και για την έκδοση οικοδομικής άδειας, όπου αυτή απαιτείται, κοινοποιούμενη αντιστοίχως στην αρμόδια πολεοδομική αρχή.

Ο / Η δηλών/ούσα

**Θεωρήθηκε για το γνήσιο της
υπογραφής**

(Ημερομηνία & Υπογραφή)

- c) Solemn declaration regarding commencement of operation of a small manufacturing unit (low nuisance)



**ΥΠΕΥΘΥΝΗ ΔΗΛΩΣΗ ΕΝΑΡΞΗΣ ΛΕΙΤΟΥΡΓΙΑΣ
ΜΕΤΑΠΟΙΗΤΙΚΗΣ ΜΟΝΑΔΑΣ ΧΑΜΗΛΗΣ ΟΧΛΗΣΗΣ**

Γενικές οδηγίες συμπλήρωσης

1. Όλα τα πεδία της Υπεύθυνης Δήλωσης, πρέπει να συμπληρωθούν πλήρως και με ακρίβεια από τον ενδιαφερόμενο επενδυτή.
2. Τα συνημμένα έγγραφα/δικαιολογητικά αποτελούν αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης και συνιστούν απαραίτητη προϋπόθεση για τη θεώρηση της παρούσης από την αρμόδια Υπηρεσία.
3. Τα πεδία με (*) συμπληρώνονται από την αρμόδια Υπηρεσία στην οποία κατατίθεται η Υπεύθυνη Δήλωση.
4. Σε περίπτωση ανεπάρκειας χώρου, η Υπεύθυνη Δήλωση συνεχίζεται σε ξεχωριστό φύλλο, το οποίο φέρει την υπογραφή του/της δηλούντα/ούσης καθώς και του/της παραλαβόντα/ούσης. Στο ξεχωριστό φύλλο προστίθεται από την Υπηρεσία ο αριθμός Πρωτοκόλλου και η ημερομηνία κατάθεσης της Υπεύθυνης Δήλωσης.

Προς:	(*) Αρ. Πρωτοκόλλου
(*) Κοινοποίηση:	(*) Ημερομηνία

Ο/Η Όνομα		Επώνυμο	
Όνομ/μο πατέρα			
Όνομ/μο μητέρας			
Αριθμός Δελτίου Ταυτότητας (ΑΔΤ)		Εκδούσα Αρχή	
ΑΦΜ		ΔΟΥ	
Ημερομηνία γέννησης		Τόπος γέννησης	
Διεύθυνση (Νομός, Δήμος, Οδός, Αριθμός, ΤΚ)			
Τηλέφωνα			
e-mail		Φαξ	

Δηλώνω υπεύθυνα ότι:

- Τα στοιχεία της μονάδας με την επωνυμία «.....» όπως έχουν πλήρως δηλωθεί και περιγραφεί στο από ____/____/____ [ημερομηνία] υπ' αριθ. _____ [Αριθμός Πρωτοκόλλου] θεωρημένο Ερωτηματολόγιο προς την Υπηρεσία σας, το οποίο και αποτελεί αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης, είναι ακριβή και αληθή. Η έναρξη λειτουργίας της παραπάνω μονάδας, η οποία και δηλώνεται με την παρούσα Υπεύθυνη Δήλωση, λαμβάνει χώρα σύμφωνα με τους όρους της από

___/___/___ [ημερομηνία] υπ' αριθ. _____ [Αριθμός Πρωτοκόλλου]
Άδειας Εγκατάστασης.

- Τηρούνται όλοι οι προβλεπόμενοι όροι και προϋποθέσεις από τις επιμέρους άδειες, εγκρίσεις και πιστοποιητικά, όπως αυτά προβλέπονται και ορίζονται στην ως άνω περιγραφείσα Άδεια Εγκατάστασης και τα οποία επισυνάπτονται και αποτελούν αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης, καθώς και οι Πρότυπες Περιβαλλοντικές Δεσμεύσεις / όροι της ΑΕΠΟ.
- Αναφορικά με τη μονάδα που περιγράφεται ανωτέρω δεν έχω καταθέσει σε άλλη Αδειοδοτούσα Αρχή άλλη Υπεύθυνη Δήλωση για έναρξη λειτουργίας κατά τα οριζόμενα στο άρθρο 19 παρ.3 Ν.3982/2011.

Ως εκ τούτου και σε συνέχεια των ανωτέρω καταθέτω την παρούσα Υπεύθυνη Δήλωση για την έναρξη λειτουργίας της ως άνω περιγραφόμενης δραστηριότητας, σύμφωνα με τις ισχύουσες διατάξεις του Ν. 3982/2011, και της λοιπής ισχύουσας νομοθεσίας.

Συνημμένα έγγραφα / δικαιολογητικά (αναγράφονται τα δικαιολογητικά/έγγραφα τα οποία ορίζονται στην εκδοθείσα Άδεια Εγκατάστασης):

1. Παράβολο
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

Με ατομική μου ευθύνη και γνωρίζοντας τις κυρώσεις που προβλέπονται από τον Νόμο 1599/1986, όπως εκάστοτε ισχύει, δηλώνω υπεύθυνα ότι η ως άνω Δήλωση στηρίζεται σε αληθή και ακριβή γεγονότα.

Η ακρίβεια των στοιχείων που υποβάλλονται με αυτή τη Δήλωση μπορεί να ελεγχθεί με βάση το αρχείο άλλων υπηρεσιών, σύμφωνα με το άρθρο 8 παράγραφο 4 του Νόμου 1599/1986, όπως εκάστοτε ισχύει.

Με τη συμπλήρωση της παρούσας Υπεύθυνης Δήλωσης, ο δηλών/ούσα δηλώνει ότι αναλαμβάνει ατομική ευθύνη και ότι επίσης γνωρίζει τις κυρώσεις που προβλέπονται από τις διατάξεις της παραγράφου 6 του άρθρου 22 του Νόμου 1599/1986, σύμφωνα με τις οποίες «όποιος εν γνώσει του δηλώνει ψευδή γεγονότα ή αρνείται ή αποκρύπτει τα αληθινά με έγγραφη Υπεύθυνη Δήλωση του άρθρου 8 τιμωρείται με φυλάκιση τουλάχιστον τριών (3) μηνών. Εάν ο υπαίτιος αυτών των πράξεων σκόπευε να προσπορίσει στον εαυτόν του ή σε άλλον περιουσιακό όφελος βλάπτοντας τρίτον ή σκόπευε να βλάψει άλλον, τιμωρείται με κάθειρξη μέχρι δέκα (10) ετών».

Τέλος, σε περίπτωση υποβολής λανθασμένων, αναληθών, ή ανακριβών στοιχείων, ο/η υπαίτιος θα υποβάλλεται σε ολική ή μερική, προσωρινή ή οριστική, διακοπή της λειτουργίας της δραστηριότητάς του, καθώς και στις λοιπές κυρώσεις του άρθρου 29 του Ν.3982/2011. Η διακοπή λειτουργίας της εν λόγω δραστηριότητας θα πραγματοποιείται από τα όργανα της Περιφέρειας, με τη συνδρομή των αστυνομικών αρχών, σύμφωνα άλλωστε και με το ως άνω άρθρο.

Από την κατάθεση της παρούσης Υπεύθυνης Δήλωσης στην αρμόδια Υπηρεσία, καθίσταται δυνατή η έναρξη λειτουργίας της ως άνω περιγραφόμενης δραστηριότητας.
Η παρούσα ισχύει για αόριστο χρονικό διάστημα.

Ο / Η δηλών/ούσα

Θεωρήθηκε για το γνήσιο της

υπογραφή

(Ημερομηνία & Υπογραφή)

- d) Solemn declaration regarding commencement of operation of a small manufacturing unit (medium nuisance)



**ΥΠΕΥΘΥΝΗ ΔΗΛΩΣΗ ΕΝΑΡΞΗΣ ΛΕΙΤΟΥΡΓΙΑΣ
ΜΕΤΑΠΟΙΗΤΙΚΗΣ ΜΟΝΑΔΑΣ ΜΕΣΗΣ ΟΧΛΗΣΗΣ**

Γενικές οδηγίες συμπλήρωσης

1. Όλα τα πεδία της Υπεύθυνης Δήλωσης, πρέπει να συμπληρωθούν πλήρως και με ακρίβεια από τον ενδιαφερόμενο επενδυτή.
2. Τα συνημμένα έγγραφα/δικαιολογητικά αποτελούν αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης και συνιστούν απαραίτητη προϋπόθεση για τη θεώρηση της παρούσης από την αρμόδια Υπηρεσία.
3. Τα πεδία με (*) συμπληρώνονται από την αρμόδια Υπηρεσία στην οποία κατατίθεται η Υπεύθυνη Δήλωση.
4. Σε περίπτωση ανεπάρκειας χώρου, η Υπεύθυνη Δήλωση συνεχίζεται σε ξεχωριστό φύλλο, το οποίο φέρει την υπογραφή του/της δηλούντα/ούσης καθώς και του/της παραλαβόντα/ούσης. Στο ξεχωριστό φύλλο προστίθεται από την Υπηρεσία ο αριθμός Πρωτοκόλλου και η ημερομηνία κατάθεσης της Υπεύθυνης Δήλωσης.

Προς:	(*) Αρ. Πρωτοκόλλου
(*) Κοινοποίηση:	(*) Ημερομηνία

Ο/Η Όνομα		Επώνυμο	
Όνομ/μο πατέρα			
Όνομ/μο μητέρας			
Αριθμός Δελτίου Ταυτότητας (ΑΔΤ)		Εκδούσα Αρχή	
ΑΦΜ		ΔΟΥ	
Ημερομηνία γέννησης		Τόπος γέννησης	
Διεύθυνση (Νομός, Δήμος, Οδός, Αριθμός, ΤΚ)			
Τηλέφωνα			
e-mail		Φαξ	

Δηλώνω υπεύθυνα ότι:

- Τα στοιχεία της μονάδας με την επωνυμία «.....» όπως έχουν πλήρως δηλωθεί και περιγραφεί στο από ____/____/____ [ημερομηνία] υπ' αριθ. _____ [Αριθμός Πρωτοκόλλου] θεωρημένο Ερωτηματολόγιο προς την Υπηρεσία σας, το οποίο και αποτελεί αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης, είναι ακριβή και αληθή. Η έναρξη λειτουργίας της παραπάνω μονάδος, η οποία και δηλώνεται με την παρούσα Υπεύθυνη Δήλωση, λαμβάνει χώρα σύμφωνα με τους όρους της από

___/___/___ [ημερομηνία] υπ' αριθ. _____ [Αριθμός Πρωτοκόλλου]
Άδειας Εγκατάστασης.

- Τηρούνται όλοι οι προβλεπόμενοι όροι και προϋποθέσεις από τις επιμέρους άδειες, εγκρίσεις και πιστοποιητικά, όπως αυτά προβλέπονται και ορίζονται στην ως άνω περιγραφείσα Άδεια Εγκατάστασης και τα οποία επισυνάπτονται και αποτελούν αναπόσπαστο μέρος της παρούσης Υπεύθυνης Δήλωσης, καθώς και οι Πρότυπες Περιβαλλοντικές Δεσμεύσεις / όροι της ΑΕΠΟ.
- Αναφορικά με τη μονάδα που περιγράφεται ανωτέρω δεν έχω καταθέσει σε άλλη Αδειοδοτούσα Αρχή άλλη Υπεύθυνη Δήλωση για έναρξη λειτουργίας κατά τα οριζόμενα στο άρθρο 19παρ.4 Ν. 3982/2011.

Ως εκ τούτου και σε συνέχεια των ανωτέρω καταθέτω την παρούσα Υπεύθυνη Δήλωση για την έναρξη λειτουργίας της ως άνω περιγραφόμενης δραστηριότητας, σύμφωνα με τις ισχύουσες διατάξεις του Ν. 3982/2011, και της λοιπής ισχύουσας νομοθεσίας.

Συνημμένα έγγραφα / δικαιολογητικά (αναγράφονται τα δικαιολογητικά/έγγραφα τα οποία ορίζονται στην εκδοθείσα Άδεια Εγκατάστασης):

1. Παράβολο
2. Εγγυητική Επιστολή
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____
11. _____
12. _____

Με ατομική μου ευθύνη και γνωρίζοντας τις κυρώσεις που προβλέπονται από τον Νόμο 1599/1986, όπως εκάστοτε ισχύει, δηλώνω υπεύθυνα ότι η ως άνω Δήλωση στηρίζεται σε αληθή και ακριβή γεγονότα.

Η ακρίβεια των στοιχείων που υποβάλλονται με αυτή τη Δήλωση μπορεί να ελεγχθεί με βάση το αρχείο άλλων υπηρεσιών, σύμφωνα με το άρθρο 8 παράγραφο 4 του Νόμου 1599/1986, όπως εκάστοτε ισχύει.

Με τη συμπλήρωση της παρούσας Υπεύθυνης Δήλωσης, ο δηλών/ούσα δηλώνει ότι αναλαμβάνει ατομική ευθύνη και ότι επίσης γνωρίζει τις κυρώσεις που προβλέπονται από τις διατάξεις της παραγράφου 6 του άρθρου 22 του Νόμου 1599/1986, σύμφωνα με τις οποίες «όποιος εν γνώσει του δηλώνει ψευδή γεγονότα ή αρνείται ή αποκρύπτει τα αληθινά με έγγραφη Υπεύθυνη Δήλωση του άρθρου 8 τιμωρείται με φυλάκιση τουλάχιστον τριών (3) μηνών. Εάν ο υπαίτιος αυτών των πράξεων σκόπευε να προσπορίσει στον εαυτόν του ή σε άλλον περιουσιακό όφελος βλάπτοντας τρίτον ή σκόπευε να βλάψει άλλον, τιμωρείται με κάθειρξη μέχρι δέκα (10) ετών».

Τέλος, σε περίπτωση υποβολής λανθασμένων, αναληθών, ή ανακριβών στοιχείων, ο/η υπαίτιος θα υποβάλλεται σε ολική ή μερική, προσωρινή ή οριστική, διακοπή της λειτουργίας της δραστηριότητάς του, καθώς και στις λοιπές κυρώσεις του άρθρου 29 του Ν.3982/2011. Η διακοπή λειτουργίας της εν λόγω δραστηριότητας θα πραγματοποιείται από τα όργανα της Περιφέρειας, με τη συνδρομή των αστυνομικών αρχών, σύμφωνα άλλωστε και με το ως άνω άρθρο.

Από την κατάθεση της παρούσης Υπεύθυνης Δήλωσης στην αρμόδια Υπηρεσία, καθίσταται δυνατή η έναρξη λειτουργίας της ως άνω περιγραφόμενης δραστηριότητας.

Η παρούσα ισχύει για αόριστο χρονικό διάστημα.

Ο / Η δηλών/ούσα

Θεωρήθηκε για το γνήσιο της
υπογραφής

(Ημερομηνία & Υπογραφή)

e) Application for registration of business (MD 15523/2006)

ΑΙΤΗΣΗ ΓΙΑ ΤΗΝ ΚΑΤΑΧΩΡΗΣΗ ΕΓΚΑΤΑΣΤΑΣΗΣ ΤΡΟΦΙΜΩΝ

(Κανονισμός (ΕΚ) αριθ. 852/2004 για την υγιεινή των τροφίμων, Άρθρο 6(2))

Αυτό το έντυπο αιτήσεως συμπληρώνεται από τους υπεύθυνους των επιχειρήσεων τροφίμων και υποβάλλεται στην αρμόδια αρχή 30 ημέρες πριν από την έναρξη των εργασιών της επιχείρησης. Με βάση τις ασκούμενες δραστηριότητες από την επιχείρηση, ορισμένες επιχειρήσεις τροφίμων απαιτείται έγκριση και όχι καταχώριση. Εάν δεν είστε βέβαιοι κατά πόσο κάποιος από τις δραστηριότητες τις επιχείρησής σας απαιτεί έγκριση, συμβουλευτείτε την Αρμόδια Αρχή για ούτηγες.

1. Διεύθυνση Εγκατάστασης _____
(ή μόνιμη διεύθυνση προκειμένου για κινητή εγκατάσταση – καντίνα – πλανόδιο εμπόριο)

Ταχ. Κωδικός

2. Επωνυμία της Επιχείρησης _____ Τηλέφωνο _____
(εμπορική)

Α.Φ.Μ. _____ Δ.Ο.Υ. _____

3. Ονοματεπώνυμο του Υπευθύνου της επιχείρησης _____

4. Διεύθυνση του Υπευθύνου της επιχείρησης _____

Ταχ. Κωδικός

Τηλέφωνο: _____ Α.Φ.Μ. _____ Δ.Ο.Υ. _____ E-mail _____

5. Είδος Επιχείρησης Τροφίμων (Παρακαλούμε επιλέξετε ΟΛΕΣ τις περιπτώσεις που ισχύουν):

Πώληση στην εκτροφή/αγρό
Βιομηχανία επεξεργασίας τροφίμων
Συσκευαστής
Εισαγωγέας
Χονδρικό εμπόριο / cash and carry
Διανομή / Αποθήκευση
Λιανική Πώληση
Εστιατόριο/καφέ/γρήγορο φαγητό
Υπεραγορά / παντοπωλείο / πρατήριο
Εστιακό σφαγείο

☐ Εστιατόριο/καντίνα/κουζίνα προσωπικού
☐ Μαζική Εστίαση – Ετοίμα Γεύματα
☐ Νοσοκομεία/κατοικίες /σχολεία
☐ Κινητή καντίνα
☐ Πάγκοι ή περίπτερα πώλησης
☐ Μεσίτης τροφίμων
☐ Ετοίμα γεύματα για κατανάλωση εκτός επιχείρησης
☐ Άλλο (περιγράψτε λεπτομερώς):

6. Εταιρική Μορφή

☐ Ατομική Επιχείρηση
☐ Ομόρρυθμος Εταιρία
☐ Ετερόρρυθμος Εταιρία
☐ Ε.Π.Ε.
☐ Α.Ε.
☐ Άλλη (περιγράψτε)

8. Αριθμός οχημάτων της επιχείρησης που χρησιμοποιούνται για προετοιμασία, πώληση ή μεταφορά τροφίμων:

Έως 5 ☐ 6-10 ☐ 11-50 ☐ 51 και άνω ☐

9. Παροχή Νερού στην εγκατάσταση: Δημόσια (δημοτική) ☐ Ιδιωτική παροχή – γεώτρηση ☐

10. Ονοματεπώνυμο υπευθύνου (αν είναι άλλος από τον ιδιοκτήτη) _____

11. Για νέα επιχείρηση _____ 12. Για εποχιακή λειτουργία _____
Ημερομηνία έναρξης δραστηριότητας Χρονική περίοδος λειτουργίας μέσα στο έτος

12. Αριθμός απασχολούμενων ατόμων 0-10 ☐ 11-50 ☐ 51 και άνω ☐
(Υπολογίστε τους εργαζόμενους για λιγότερες από 25 ώρες την εβδομάδα στο %)

Υπογραφή του ιδιοκτήτη _____

Ημερομηνία _____

Ονοματεπώνυμο _____
(με ΚΕΦΑΛΑΙΑ)

ΜΕΤΑ ΤΗΝ ΑΠΟΣΤΟΛΗ ΤΗΣ
ΑΙΤΗΣΗΣ, ΟΙ ΙΔΙΟΚΤΗΤΕΣ ΤΗΣ
ΕΠΙΧΕΙΡΗΣΗΣ ΤΡΟΦΙΜΩΝ ΠΡΕΠΕΙ
ΝΑ ΓΝΩΣΤΟΠΟΙΟΥΝ ΚΑΘΕ
ΑΛΛΑΓΗ ΣΤΙΣ ΔΡΑΣΤΗΡΙΟΤΗΤΕΣ
ΤΗΣ ΕΠΙΧΕΙΡΗΣΗΣ ΣΤΗΝ
ΑΡΜΟΔΙΑ ΑΡΧΗ

f) Application for establishment approval number of a business (MD 15523/2006)

ΕΝΤΥΠΟ ΑΙΤΗΣΗΣ για την έγκριση εγκατάστασης επεξεργασίας τροφίμων που υπόκειται σε έγκριση σύμφωνα με τον Κανονισμό (ΕΚ) αριθ. 853/2004			
Μέρος 1 – Στοιχεία εγκατάστασης			
Εμπορικό όνομα			
Ταχυδρομική διεύθυνση			
Ταχ. Κωδ.			
Τηλέφωνο			
Fax			
Ηλεκτρονική διεύθυνση			
Μέρος 2 – Είδος των προϊόντων ζωικής προέλευσης για τα οποία ζητείται έγκριση			
Δείξτε τα προϊόντα ζωικής προέλευσης για τα οποία αιτείται η έγκριση και για τα οποία θα χρησιμοποιηθεί η εγκατάσταση			
<input type="checkbox"/> Κιμάς <input type="checkbox"/> Κρεατοσκευάσματα <input type="checkbox"/> Μηχανικά διαχωρισμένο κρέας <input type="checkbox"/> Προϊόντα κρέατος <input type="checkbox"/> Ζύμνα θύρα μαλάκια <input type="checkbox"/> Προϊόντα αλιείας <input type="checkbox"/> Γαλακτοκομικά προϊόντα <input type="checkbox"/> Αυγά (όχι πρωτογενής παραγωγή) / Προϊόντα Αυγών <input type="checkbox"/> Βατραχοπόδαρα / Σαλιγκάρια <input type="checkbox"/> Ζωικά λίπη <input type="checkbox"/> Επεξεργασμένα στομάχια, ουροδόχο κύστης και έντερα <input type="checkbox"/> Ζελατίνη <input type="checkbox"/> Κολлагόνο <input type="checkbox"/> Πρώτες ύλες για την παραγωγή ζελατίνης ή κολλαγόνου που προορίζονται για ανθρώπινη κατανάλωση <input type="checkbox"/> Κρέας (Ψυκτικοί Θάλαμοι)			
Μέρος 3 – Ιδιοκτήτης και Διαχειριστής της εγκατάστασης			
Ονοματεπώνυμο Ιδιοκτήτη			
Ταχυδρομική διεύθυνση			
Ταχ. Κωδ.			
Τηλέφωνο			
Fax			
Ονοματεπώνυμο Διευθύνοντος	1.	2.	
Μέρος 4 – Χρήση της εγκατάστασης			
Ποιες από τις παρακάτω δραστηριότητες θα πραγματοποιούνται στην εγκατάσταση (σημειώνονται όλες για τις οποίες ισχύει η αίτηση)			
<input type="checkbox"/> Ανεξάρτητος Ψυκτικός Θάλαμος (Αποθήκη) <input type="checkbox"/> Χονδρική αγορά <input type="checkbox"/> Επεξεργασία – Παραγωγή <input type="checkbox"/> Άλλου είδους επεξεργασία (παρακαλούμε διευκρινίστε) <input type="checkbox"/> Συσκευασία <input type="checkbox"/> Αποθήκευση <input type="checkbox"/> Μεταφορά <input type="checkbox"/> Cook and chill / Χονδρικό εμπόριο <input type="checkbox"/> Μαζική κατάρτιση (Catering) <input type="checkbox"/> Λιανικό εμπόριο (όμοια πώληση στους καταναλωτές ή άλλους πελάτες) <input type="checkbox"/> Πάγκοι ή περιττερα πώλησης ή κινητές κατίνες <input type="checkbox"/> Άλλα (αφαιρούστε)			
Μέρος 5 – Μεταφορά των προϊόντων από την εγκατάσταση			
Πως μεταφέρονται τα προϊόντα από την εγκατάσταση (σημειώστε την περίπτωση που σας αφορά)			
<input type="checkbox"/> Με δικό της οχήματα <input type="checkbox"/> Με σύμβαση με εταιρεία μεταφορών <input type="checkbox"/> Με τα οχήματα των πελατών <input type="checkbox"/> Άλλος τρόπος (αφαιρούστε)			
Μέρος 6 – Προμήθεια προϊόντων από την εγκατάσταση σε άλλες εγκαταστάσεις			
Ποια από τις παρακάτω κατηγορίες επιχειρήσεων προμηθεύονται προϊόντα από την εγκατάσταση σας (επισημαίνεται αναλόγως)			
<input type="checkbox"/> Άλλες επιχειρήσεις που παράγουν ή επεξεργάζονται τρόφιμα <input type="checkbox"/> Συσκευαστές Χονδρικής <input type="checkbox"/> Ψυκτικοί αποθήκες που δεν είναι μέρος της εγκατάστασης για την οποία γίνεται η αίτηση <input type="checkbox"/> Αποθήκες που δεν είναι μέρος της εγκατάστασης για την οποία γίνεται η αίτηση			

f) Application for establishment approval number of a business (MD 15523/2006) (continued)

- ☐ Εστιατόρια, ξενοδοχεία, καντίνες και παρόμοιες επιχειρήσεις μαζικής εστίασης
☐ Επιχειρήσεις που παρασκευάζουν έτοιμα γεύματα για κατανάλωση εκτός επιχείρησης
☐ Καταστήματα λιανικού εμπορίου, υπεραγορές, πάγκοι ή περίπτερα πώλησης, που ανήκουν στην επιχείρηση
☐ Καταστήματα λιανικού εμπορίου, υπεραγορές, πάγκοι ή περίπτερα πώλησης, που δεν ανήκουν στην επιχείρηση
☐ Άλλες περιπτώσεις (εξειδικεύστε)

Μέρος 7 – Άλλες δραστηριότητες στην ίδια εγκατάσταση

Πραγματοποιείται κάποια από τις ακόλουθες δραστηριότητες στον ίδιο χώρο ή στην ίδια εγκατάσταση στην οποία αναφέρεται η παρούσα αίτηση :

	ΝΑΙ	ΟΧΙ	ΚΩΔΙΚΟΣ ΑΡΙΘΜΟΣ ΕΓΚΡΙΣΗΣ
Σφαγή βοοειδών, χοίρων, αγροπρόβατων, πουλερικών, θηραμάτων	<input type="checkbox"/>	<input type="checkbox"/>	
Κοπή νωπού (συμπεριλαμβανομένου του ψυγμένου ή κατεψυγμένου) κρέατος θηλαστικών, πουλερικών ή θηραμάτων	<input type="checkbox"/>	<input type="checkbox"/>	
Αποθήκευση νωπού (συμπεριλαμβανομένου του ψυγμένου ή κατεψυγμένου) κρέατος θηλαστικών, πουλερικών ή θηραμάτων	<input type="checkbox"/>	<input type="checkbox"/>	

Μέρος 8 – Πληροφορίες και Τεκμηρίωση

Απαιτούνται τα παρακάτω στοιχεία προκειμένου να γίνει εξέταση της αίτησής σας και πρέπει να αποσταλούν συνημμένα, μαζί με την αίτηση αν είναι δυνατόν.
 Παρακαλούμε σημειώστε ποιες πληροφορίες στέλνεται με την παρούσα αίτηση
 (Τα στοιχεία που δεν αποστέλλονται τώρα, απαιτούνται οπωσδήποτε για να εξεταστεί η αίτησή σας).

- ☐ Πλήρης κάτοψη υπό κλίμακα της (προτεινόμενης) εγκατάστασης στην οποία πρέπει να φαίνεται η θέση των θαλάμων και των λοιπών χώρων που θα χρησιμοποιούνται για την αποθήκευση και την επεξεργασία των πρώτων υλών, των προϊόντων και των αποβλήτων και τη διάταξη των εγκαταστάσεων και του εξοπλισμού
☐ Περιγραφή του (προτεινόμενου) συστήματος ασφαλείας τροφίμων που βασίζεται στις αρχές του HACCP
☐ Περιγραφή του (προτεινόμενου) προγράμματος συντήρησης της εγκατάστασης και του εξοπλισμού
☐ Περιγραφή του (προτεινόμενου) προγράμματος καθαρισμού της εγκατάστασης, του εξοπλισμού και των οχημάτων
☐ Περιγραφή του (προτεινόμενου) συστήματος συλλογής και διάθεσης των αποβλήτων
☐ Περιγραφή του (προτεινόμενου) συστήματος παροχής νερού
☐ Περιγραφή του (προτεινόμενου) προγράμματος δειγματοληψίας και ελέγχου της παροχής νερού
☐ Περιγραφή του (προτεινόμενου) προγράμματος εργαστηριακών εξετάσεων των προϊόντων
☐ Περιγραφή του (προτεινόμενου) προγράμματος ελέγχου επιβλαβών οργανισμών (μυοκτονίας / εντομοκτονίας / πτηνών κλπ.)
☐ Περιγραφή του (προτεινόμενου) προγράμματος ελέγχου της υγείας του προσωπικού
☐ Περιγραφή του (προτεινόμενου) προγράμματος εκπαίδευσης του προσωπικού στην υγιεινή και

- ☐ ασφάλεια των τροφίμων
☐ Περιγραφή του (προτεινόμενου) συστήματος τήρησης αρχείων / τεκμηρίωσης
☐ Περιγραφή του (προτεινόμενου) συστήματος για την εφαρμογή του αναγνωριστικού σήματος στην πρώτη ή / και δεύτερη συσκευασία.

Μέρος 9 – Προϊόντα που θα υφίστανται επεξεργασία στην εγκατάσταση / δραστηριότητες

Ποιες από τις ακόλουθες δραστηριότητες θα πραγματοποιούνται στην εγκατάσταση:
 Αναφέρατε, αναγράφοντας την κατά προσέγγιση ποσότητα που θα υφίσταται επεξεργασία σε χιλιόγραμμα ή λίτρα εβδομαδιαίως (σημειώσατε όλα όσα ισχύουν).

Μέρος 9 (1) – Κιμάς και κρεατοσκευάσματα

- ☐ Χειρισμός κιμά
☐ Χειρισμός κρεατοσκευασμάτων

Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση

Πόσοι τόνοι κιμά θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως:

Πόσοι τόνοι παρασκευασμάτων κρέατος θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως:

Μέρος 9 (2) – Μηχανικά διαχωρισμένο κρέας

Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση

Πόσοι τόνοι μηχανικά διαχωρισμένου κρέατος θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως:

Μέρος 9 (3) – Προϊόντα Κρέατος

Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση

Πόσοι τόνοι προϊόντων κρέατος θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως:

f) Application for establishment approval number of a business (MD 15523/2006) (*continued*)

Μέρος 8 (4) – Ζώντα διθυρα μαλάκια / Προϊόντα Αλιείας	
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση	
Πόσοι τόνοι ζώντων διθυρων μαλάκων / προϊόντων αλιείας θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Μέρος 8 (5) – Γάλα - Γαλακτοκομικά	
<input type="checkbox"/> Νωπό Γάλα <input type="checkbox"/> Προϊόντα με βάση το γάλα	
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση	
Πόσα λίτρα νωπού γάλακτος (πρώτης αλής) θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Πόσα λίτρα / τόνοι προϊόντων με βάση το γάλα θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Μέρος 8 (6) – Αυγά (όχι πρωτογενής παραγωγή) Προϊόντα αυγών	
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση	
Πόσοι τόνοι αυγών θα συσκευάζονται κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Πόσα λίτρα προϊόντων αυγών θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Μέρος 8 (7) – Βατραχοπόδαρα και Σαλιγκάρια	
<input type="checkbox"/> Βατραχοπόδαρα <input type="checkbox"/> Σαλιγκάρια	
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση	

Πόσοι τόνοι βατραχοπόδαρων θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Πόσοι τόνοι σαλιγκαριών θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Μέρος 9 (8) – Επεξεργασμένα Ζωικά Λίπη	
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση	
Πόσοι τόνοι ζωικών λιπών θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Μέρος 9 (9) – Επεξεργασμένοι στομάχοι, ουροδόχοι κύστες και έντερα	
<input type="checkbox"/> Επεξεργασμένοι στομάχοι <input type="checkbox"/> Επεξεργασμένες ουροδόχοι κύστες <input type="checkbox"/> Επεξεργασμένα έντερα	
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση	
Πόσοι τόνοι επεξεργασμένων στομάχων θα παράγονται κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Πόσοι τόνοι επεξεργασμένων ουροδόχων κύστεων θα παράγονται κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Πόσοι τόνοι επεξεργασμένων εντέρων θα παράγονται κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;	
Μέρος 9 (10) – Ζυγατίνη	
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση	

f) Application for establishment approval number of a business (MD 15523/2006) (*continued*)

Πόσοι τόνοι ζυλάτινης θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;			
Μέρος 9 (11) – Καλλαιγόνιο			
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση			
Πόσοι τόνοι καλλαιγόνου θα υφίστανται επεξεργασία κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;			
Μέρος 9 (12) –Ανεξάρτητοι Ψυκτικοί Θάλαμοι (Αποθήκες)			
Πλήρης περιγραφή των δραστηριοτήτων και των συγκεκριμένων προϊόντων που υφίστανται επεξεργασία στην εγκατάσταση			
Πόσοι τόνοι προϊόντων θα διακινούνται κατά μέσο όρο στην εγκατάσταση, εβδομαδιαίως;			
Μέρος 10 – Αίτηση			
<p>Με την παρούσα αιτούμαι, υπό την ιδιότητά μου ως υπευθύνου της επιχείρησης τροφίμων που αναφέρεται λεπτομερώς στο μέρος 1, έγκριση για τη χρήση της εγκατάστασης για χειρισμό και επεξεργασία προϊόντων ζωικής προέλευσης που εμπίπτουν στο πεδίο εφαρμογής του κανονισμού (ΕΚ) αριθ. 853/2004, και όπως καθορίζεται στα σχετικά μέρη της παρούσας.</p>			
Υπογραφή του υπευθύνου επιχείρησης τροφίμων	<div style="border: 1px solid black; height: 30px; width: 100%;"></div>	Ημερομηνία	<div style="border: 1px solid black; height: 30px; width: 100%;"></div>
Ονοματεπώνυμο (με ΚΕΦΑΛΑΙΑ) <div style="border: 1px solid black; height: 20px; width: 100%;"></div>			
Εάν επιθυμείτε βοήθεια ή συμβουλή για το πώς θα συμπληρώσετε αυτή την αίτηση, ή για τα προϊόντα στα οποία αναφέρεται ο Κανονισμός, είτε για τις συνθήκες υπό τις οποίες σύμφωνα με τον Κανονισμό απαιτείται η έγκριση, παρακαλούμε συμβουλευτείτε τον υπεύθυνο που αναφέρεται κατωτέρω.			
Μετά την συμπλήρωση της αίτησης και τη συλλογή κάθε απαιτούμενου στοιχείου και δικαιολογητικού, παρακαλούμε να την αποστείλετε προς:			
<div style="border: 1px solid black; height: 60px; width: 100%;"></div>	Υπεύθυνος: Τηλέφωνο: Fax: E-mail:	ΠΡΟΣΟΧΗ Παρακαλούμε να γνωστοποιείτε κάθε αλλαγή στα στοιχεία που δώσατε με αυτήν την αίτηση, στην Αρμόδια Αρχή στη διεύθυνση αυτή.	

- g) Application for establishment licence (businesses handling food products of animal origin) (MD 15523/2006) (*example template: source Attica Prefecture – Directorate for Agricultural and Veterinary Policy*)



Α Ι Τ Η Σ Η
(Χ Ο Ρ Η Γ Η Σ Η Α Δ Ε Ι Α Σ Ι Δ Ρ Υ Σ Η Σ
Ε Γ Κ Α Τ Α Σ Τ Α Σ Η Σ)

(βάσει του Π.Δ 79/2007)

Θέμα: Άδεια Ίδρυσης Εγκατάστασης

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ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ

ΕΠΩΝΥΜΟ					
ΟΝΟΜΑ					
Α.Δ.Τ.					
Α.Φ.Μ.					
ΤΗΛΕΦΩΝΟ (σταθ. / κιν.)					
FAX					
E-MAIL					
ΕΔΡΑ	ΟΔΟΣ	ΑΡΙΘΜΟΣ	Τ.Κ	ΔΗΜΟΣ	ΝΟΜΟΣ

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ *(Νομικά Πρόσωπα ή Ενώσεις Προσώπων)

ΕΠΩΝΥΜΙΑ	
-----------------	--

Α.Φ.Μ					
ΑΡ. ΚΑΤΑΣΤΑΤΙΚΟΥ					
ΗΜΕΡ. ΕΠΙΚΥΡΩΣΗΣ ΚΑΤΑΣΤΑΤΙΚΟΥ					
ΤΗΛΕΦΩΝΟ (σταθ. / κιν.)					
FAX	ΟΔΟΣ	ΑΡΙΘΜΟΣ	Τ.Κ	ΔΗΜΟΣ	ΝΟΜΟΣ

ΑΠΑΙΤΟΥΜΕΝΑ ΔΙΚΑΙΟΛΟΓΗΤΙΚΑ (βάσει της Κ.ΥΑ 15523/2006)

ΤΙΤΛΟΣ ΔΙΚΑΙΟΛΟΓΗΤΙΚΟΥ	ΚΑΤΑΤΕΘΗΚΕ ΜΕ ΤΗΝ ΑΙΤΗΣΗ	ΗΜΕΡ. ΚΑΤΑΘΕΣΗΣ
1. Γενικό σχεδιάγραμμα (κάτοψη) των εγκαταστάσεων με λεπτομερή απεικόνιση και περιγραφή των χώρων.	<input type="checkbox"/>	
2. Τοπογραφικό διάγραμμα οικοπέδου 1:500 και τοπογραφικό διάγραμμα της περιοχής υπό κλίμακα 1:10000.	<input type="checkbox"/>	
3. Τεχνική περιγραφή της λειτουργίας της εγκατάστασης, με μνεία στην δυναμικότητα της, στο είδος της α' ύλης και των τελικών προϊόντων, στις διαδικασίες παραγωγής, καθώς και την τυχόν ένταξη τους σε χρηματοδοτούμενα προγράμματα.	<input type="checkbox"/>	
4. Πίνακα απαρίθμησης και περιγραφής του τεχνικού εξοπλισμού των ειδικών συσκευών και οργάνων της εγκατάστασης με σχεδιάγραμμα τοποθέτησης τους στο χώρο.	<input type="checkbox"/>	
5. Προκαταρκτική περιβαλλοντική εκτίμηση και αξιολόγηση από τις υπηρεσίες του Υπ. Περιβάλλοντος και εγκεκριμένη μελέτη επεξεργασίας και διάθεσης στερεών και υγρών αποβλήτων από τις υπηρεσίες του Υπ. Υγείας, όπου απαιτείτε ή απαλλακτικό αυτής.	<input type="checkbox"/>	
6. Κάτοψη της εγκατάστασης και τοπογραφικό, θεωρημένα από το αρμόδιο τμήμα της πολεοδομίας ή Υπεύθυνη Δήλωση του αρμόδιου μηχανικού στην οποία βεβαιώνεται η νόμιμη χρήση του χώρου για τη συγκεκριμένη δραστηριότητα, όπως αυτός απεικονίζεται στις κατατεθειμένες κατόψεις.	<input type="checkbox"/>	

Παρατηρήσεις:

1. Η άδεια λειτουργίας χορηγείται μετά την κατάθεση των απαιτούμενων δικαιολογητικών και την επιτόπια επιθεώρηση και εφόσον πληρούνται οι απαιτήσεις της κείμενης νομοθεσίας.

2. Η άδεια λειτουργίας χορηγείται εντός χρονικού διαστήματος έως 50 ημερών από την κατάθεση της αίτησης και των απαραίτητων δικαιολογητικών.

Ημερομηνία /.....

/201.



**ΕΛΛΗΝΙΚΗ
ΔΗΜΟΚΡΑΤΙΑ**

Ο/Η ΑΙΤΩΝ/ΟΥΣΑ

- h) Application for operating licence (businesses handling food products of animal origin) (MD 15523/2006) (*example template: source Attica Prefecture – Directorate for Agricultural and Veterinary Policy*)

Α Ι Τ Η Σ Η
(Χ Ο Ρ Η Γ Η Σ Η Α Δ Ε Ι Α Σ Λ Ε Ι Τ Ο Υ Ρ Γ Ι Α Σ
Ε Γ Κ Α Τ Α Σ Τ Α Σ Η Σ)

(βάσει της Κ.ΥΑ 15523/2006)

Θέμα: Άδεια Λειτουργίας Εγκατάστασης

.....

.....

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ

ΕΠΩΝΥΜΟ					
ΟΝΟΜΑ					
Α.Δ.Τ.					
Α.Φ.Μ.					
ΤΗΛΕΦΩΝΟ (σταθ. / κιν.)					
FAX					
E-MAIL					
ΕΔΡΑ	ΟΔΟΣ	ΑΡΙΘΜΟΣ	Τ.Κ	ΔΗΜΟΣ	ΝΟΜΟΣ

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ *(Νομικά Πρόσωπα ή Ενώσεις Προσώπων)

ΕΠΩΝΥΜΙΑ			
Α.Φ.Μ			
ΤΙΤΛΟΣ ΔΙΚΑΙΟΛΟΓΗΤΙΚΟΥ		ΚΑΤΑΤΕΘΗΚΕ ΜΕ ΤΗΝ ΑΙΤΗΣΗ	ΗΜΕΡ. ΚΑΤΑΘΕΣΗΣ
ΚΑΤΑΣΤΑΤΙΚΟΥ			
ΗΜΕΡ. Γενικό σχεδιάγραμμα (κάτοψη) των εγκαταστάσεων ΕΠΙΚΥΡΩΣΗΣ περιή ΚΑΤΑΣΤΑΤΙΚΟΥ απεικόνιση και περιγραφή των χώρων.		<input type="checkbox"/>	
ΤΗΛΕΦΩΝΟ (σταθ. / κιν.)	2. Τοπογραφικό διάγραμμα οικοπέδου 1:500.	<input type="checkbox"/>	
ΕΛΛΗΝΙΚΗ Τεχνική περιγραφή της λειτουργίας της εγκατάστασης με μνεία στην ημερήσια Ε-ΜΑΙΛ αναμικτότητα, στο είδος της πρώτης ύλης και των τελικών προϊόντων και στις πηγές προμήθειας πρώτης ύλης. ΟΔΟΣ ΑΡΙΘΜΟΣ Τ.Κ		<input type="checkbox"/>	
ΕΔΡΑ Πίνακα απαρίθμησης και περιγραφής του τεχνικού εξοπλισμού των ειδικών συσκευών και οργάνων της εγκατάστασης με σχεδιάγραμμα τοποθέτησης τους στους χώρους.		<input type="checkbox"/>	
5. Προέγκριση χωροθέτησης της μονάδας και έγκριση περιβαλλοντικών όρων από τις αρμόδιες υπηρεσίες		<input type="checkbox"/>	
6. Κάτοψη της εγκατάστασης και τοπογραφικό, θεωρημένα από το αρμόδιο τμήμα της πολεοδομίας ή Υπεύθυνη Δήλωση του αρμόδιου μηχανικού στην οποία βεβαιώνεται η νόμιμη χρήση του χώρου για τη συγκεκριμένη δραστηριότητα, όπως αυτός απεικονίζεται στις κατατεθειμένες κατόψεις.		<input type="checkbox"/>	

ΑΠΑΙΤΟΥΜΕΝΑ ΔΙΚΑΙΟΛΟΓΗΤΙΚΑ (βάσει της Κ.ΥΑ 15523/2006)

Παρατηρήσεις:

1. Η άδεια λειτουργίας χορηγείται μετά την κατάθεση των απαιτούμενων δικαιολογητικών και την επιτόπια επιθεώρηση και εφόσον πληρούνται οι απαιτήσεις της κείμενης νομοθεσίας.
2. Η άδεια λειτουργίας χορηγείται εντός χρονικού διαστήματος έως 50 ημερών από την κατάθεση της αίτησης και των απαραίτητων δικαιολογητικών.

Ημερομηνία / /201.....

Ο/Η ΑΙΤΩΝ/ΟΥΣΑ

Annex 3: Forms: Obligation to obtain operating licence for a food business including relevant inspections and sanitary opinion (IO 29) and obligation to obtain an establishment licence for a food business, including relevant inspections and establishment approval number, where appropriate (IO30) - (health regulated establishments)

a) Application for pre-approval of a health regulated establishment

Α Ι Τ Η Σ Η – ΥΠΕΥΘΥΝΗ ΔΗΛΩΣΗ (άρθρο 8 Ν.1599/1986)

Η ακρίβεια των στοιχείων που υποβάλλονται με αυτή τη δήλωση μπορεί να ελεγχθεί με βάση το αρχείο άλλων υπηρεσιών (άρθρο 8 παρ. 4 Ν. 1599/1986)

Περιγραφή αιτήματος : «ΠΡΟΕΓΚΡΙΣΗ ΙΔΡΥΣΗΣ ΚΑΤΑΣΤΗΜΑΤΟΣ ΥΓΕΙΟΝΟΜΙΚΟΥ ΕΝΔΙΑΦΕΡΟΝΤΟΣ (είδος καταστήματος ή επιχείρησης)».

ΠΡΟΣ:	Το Δήμο:	ΑΡΙΘΜ. ΠΡΩΤΟΚΟΛΛΟΥ	ΗΜΕΡΟΜΗΝΙΑ
		<i>Συμπληρώνεται από την Υπηρεσία</i> <i>Συμπληρώνεται από την Υπηρεσία</i>	

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ

Ο – Η Όνομα:				Επώνυμο:			
Όνομα Πατέρα:				Επώνυμο Πατέρα:			
Όνομα Μητέρας:				Επώνυμο Μητέρας:			
Αριθ. Δελτ. Ταυτότητας:				Α.Φ.Μ.:			
Ημερομηνία γέννησης ⁽¹⁾ :				Τόπος Γέννησης:			
Τόπος Κατοικίας:			Οδός:			Αριθ:	ΤΚ:
Τηλ:			Fax:			E – mail:	

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ *(Νομικά Πρόσωπα ή Ενώσεις Προσώπων)

Α.Φ.Μ.:				ΕΠΩΝΥΜΙΑ:			
ΑΡ. ΚΑΤΑΣΤΑΤΙΚΟΥ:				ΗΜ. ΕΠΙΚΥΡ. ΚΑΤΑΣΤΑΤΙΚΟΥ:			
ΑΡ. & ΕΤΟΣ ΦΕΚ / ΤΑΠΕΤ:							
ΕΔΡΑ / ΟΔΟΣ:				ΑΡΙΘΜ.:		ΤΚ:	
ΔΗΜΟΣ/ΚΟΙΝΟΤΗΤΑ:				ΝΟΜΟΣ:			
ΤΗΛΕΦΩΝΟ:			FAX:			E – mail:	

ΟΡΙΣΜΟΣ / ΣΤΟΙΧΕΙΑ ΕΚΠΡΟΣΩΠΟΥ⁽⁴⁾ (για κατάθεση αίτησης ή παραλαβή τελικής διοικητικής πράξης) : Σε περίπτωση που δε συντάσσεται η εξουσιοδότηση στο παρόν έντυπο και ενώπιον του αρμόδιου υπαλλήλου, απαιτείται προσκόμιση εξουσιοδότησης με βεβαίωση του γνήσιου της υπογραφής από δημόσια υπηρεσία ή συμβολαιογραφικού πληρεξουσίου.

ΟΝΟΜΑ:				ΕΠΩΝΥΜΟ:			
ΟΝΟΜΑΤΕΠΩΝΥΜΟ ΠΑΤΕΡΑ:				ΑΔΤ:			
ΟΔΟΣ:				ΑΡΙΘ.:		Τ.Κ.:	
Τηλ:			Fax:			E – mail:	

a) Application for pre-approval of a health regulated establishment (*continued*)

ΠΛΗΡΟΦΟΡΙΑΚΑ ΣΤΟΙΧΕΙΑ

ΕΙΔΟΣ ΚΑΤΑΣΤΗΜΑΤΟΣ Ή ΕΠΙΧΕΙΡΗΣΗΣ

ΠΩΛΟΥΜΕΝΑ ΕΙΔΗ

ΠΑΡΕΧΟΜΕΝΕΣ ΥΠΗΡΕΣΙΕΣ

ΑΠΑΙΤΟΥΜΕΝΑ ΔΙΚΑΙΟΛΟΓΗΤΙΚΑ

ΤΙΤΛΟΣ ΔΙΚΑΙΟΛΟΓΗΤΙΚΟΥ:	ΚΑΤΑΤΕΘΗΚΕ ΜΕ ΤΗΝ ΑΙΤΗΣΗ	ΘΑ ΠΡΟΣΚΟΜΙΣΤΕΙ	ΝΑ ΑΝΑΖΗΤΗΘΕΙ ΥΠΗΡΕΣΙΑΚΑ ⁽³⁾
1. Διάγραμμα της περιοχής (απόσπασμα χάρτη ή σκαρίφημα από το οποίο να προκύπτει η ακριβής θέση της εγκατάστασης όπως-οικισμός, οδός, αριθμός ή οικοδομικό τετράγωνο)	<input type="checkbox"/>	<input type="checkbox"/>	
2. Υπεύθυνη δήλωση του διαχειριστή της πολυκατοικίας ή του ιδιοκτήτη του καταστήματος όταν δεν υπάρχει διαχειριστής ότι ο κανονισμός της πολυκατοικίας ή ελλείπει αυτού ή πλειοψηφία του αριθμού των ιδιοκτητών των στεγαζομένων στο ίδιο κτίριο διαμερισμάτων, μη συμπεριλαμβανομένων των λοιπών χώρων (καταστημάτων, βοηθητικών χώρων κλπ) δεν απαγορεύει τη χρήση του χώρου αυτού για τη λειτουργία του υπό ίδρυση καταστήματος ή εργαστηρίου (ενσωματώνεται στην παρούσα)	<input type="checkbox"/>	<input type="checkbox"/>	
ΠΑΡΑΤΗΡΗΣΕΙΣ: Για τη χορήγηση της άδειας ίδρυσης και λειτουργίας ο ενδιαφερόμενος υποβάλλει στον οικείο Δήμο, εντός τριών μηνών από τη χορήγηση της προέγκρισης, με δυνατότητα παράτασης για δύο ακόμη μήνες, κατόπιν αίτησης – γνωστοποίησης στο Δήμο, όλα τα δικαιολογητικά που απαιτούνται. Σε διαφορετική περίπτωση η προέγκριση ανακαλείται.			

Επιλέξτε με ποιο τρόπο θέλετε να παραλάβετε την απάντησή σας:

- ☐ 1. Να σας αποσταλεί με συστημένη επιστολή στη Διεύθυνση.....
- ☐ 2. Να την παραλάβετε ο ίδιος από την υπηρεσία μας
- ☐ 3. Να την παραλάβετε από άλλο σημείο.....
- ☐ 4 Να την παραλάβει εκπρόσωπός σας
- ☐ 5 Να σας αποσταλεί με fax στον αριθμό:.....

ΧΡΟΝΟΣ : Η προέγκριση χορηγείται από τα κατά νόμο αρμόδια όργανα σε προθεσμία δεκαπέντε (15) ημερών από την υποβολή της αίτησης. Σε περίπτωση παράτασης άπρακτης της προαναφερόμενης προθεσμίας, θεωρείται ότι η προέγκριση έχει χορηγηθεί σιωπηρά. Ο ενδιαφερόμενος μπορεί με αίτησή του να ζητήσει τη χορήγηση σχετικής βεβαίωσης από το Δήμο.

ΚΟΣΤΟΣ: 0 €

* ΤΑ ΤΑΥΤΟΠΟΙΗΤΙΚΑ ΣΤΟΙΧΕΙΑ ΤΟΥ ΦΥΣΙΚΟΥ ΠΡΟΣΩΠΟΥ (ΕΥΡΩΠΑΪΚΗΣ ΕΝΩΣΗΣ) ΠΡΟΚΥΠΤΟΥΝ ΑΠΟ ΤΗΝ ΑΣΤΥΝΟΜΙΚΗ ΤΑΥΤΟΤΗΤΑ, ΤΟ ΔΙΑΒΑΤΗΡΙΟ Ή ΑΛΛΟ ΙΣΟΔΥΝΑΜΟ ΕΓΓΡΑΦΟ ΚΑΙ ΓΙΑ ΤΑ ΦΥΣΙΚΑ ΠΡΟΣΩΠΑ ΤΡΙΤΩΝ ΧΩΡΩΝ ΑΠΟ ΤΗΝ ΑΔΕΙΑ ΔΙΑΜΟΝΗΣ.

* ΤΑ ΤΑΥΤΟΠΟΙΗΤΙΚΑ ΣΤΟΙΧΕΙΑ ΤΟΥ ΝΟΜΙΚΟΥ ΠΡΟΣΩΠΟΥ ΠΡΟΚΥΠΤΟΥΝ ΑΠΟ ΤΟ ΚΑΤΑΣΤΑΤΙΚΟ ΤΗΣ ΕΤΑΙΡΕΙΑΣ.

Με ατομική μου ευθύνη και γνωρίζοντας τις κυρώσεις⁽²⁾, που προβλέπονται από τις διατάξεις της παρ. 6 του άρθρου 22 του Ν. 1599/1986, δηλώνω ότι:

1. Ο κανονισμός της πολυκατοικίας ή πλειοψηφία του αριθμού των ιδιοκτητών των στεγαζομένων στο ίδιο κτίριο διαμερισμάτων, μη συμπεριλαμβανομένων των λοιπών χώρων (καταστημάτων, βοηθητικών χώρων κλπ) δεν απαγορεύει τη χρήση του χώρου αυτού για τη λειτουργία του υπό ίδρυση καταστήματος ή εργαστηρίου

(3) Εξουσιοδοτώ τα ΚΕΠ (άρθρο 31 Ν. 3013/2002) να προβεί σε όλες τις απαραίτητες ενέργειες (αναζήτηση δικαιολογητικών κλπ) για τη διεκπεραίωση της υπόθεσής μου.

(4) Εξουσιοδοτώ τον/την πιο πάνω αναφερόμενο/η να καταθέσει την αίτηση ή/και να παραλάβει την τελική πράξη. (Διαγράφεται όταν δεν ορίζεται εκπρόσωπος)

20.....

(Υπογραφή)

b) Application for establishment and operating licences of a health regulated establishment

ΑΙΤΗΣΗ – ΥΠΕΥΘΥΝΗ ΔΗΛΩΣΗ (άρθρο 8 Ν.1599/1986)

Η ακρίβεια των στοιχείων που υποβάλλονται με αυτή τη δήλωση μπορεί να ελεγχθεί με βάση το αρχείο άλλων υπηρεσιών (άρθρο 8 παρ. 4 Ν. 1599/1986)

Περιγραφή αιτήματος : «ΑΔΕΙΑ ΙΔΡΥΣΗΣ ΚΑΙ ΛΕΙΤΟΥΡΓΙΑΣ ΚΑΤΑΣΤΗΜΑΤΟΣ ΥΓΕΙΟΝΟΜΙΚΟΥ ΕΝΔΙΑΦΕΡΟΝΤΟΣ».

ΠΡΟΣ:	Το Δήμο:	ΑΡΙΘΜ. ΠΡΩΤΟΚΟΛΛΟΥ	ΗΜΕΡΟΜΗΝΙΑ
		<i>Συμπληρώνεται από την Υπηρεσία</i> <i>Συμπληρώνεται από την Υπηρεσία</i>	

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ

Ο – Η Όνομα:				Επώνυμο:			
Όνομα Πατέρα:				Επώνυμο Πατέρα:			
Όνομα Μητέρας:				Επώνυμο Μητέρας:			
Αριθ. Δελτ. Ταυτότητας:				Α.Φ.Μ.:			
Ημερομηνία γέννησης ⁽¹⁾ :				Τόπος Γέννησης:			
Τόπος Κατοικίας:			Οδός:			Αριθ:	ΤΚ:
Τηλ:			Fax:			E – mail:	

ΣΤΟΙΧΕΙΑ ΑΙΤΟΥΝΤΟΣ *(Νομικά Πρόσωπα ή Ενώσεις Προσώπων)

Α.Φ.Μ.:				ΕΠΩΝΥΜΙΑ:			
ΑΡ. ΚΑΤΑΣΤΑΤΙΚΟΥ:				ΗΜ. ΕΠΙΚΥΡ. ΚΑΤΑΣΤΑΤΙΚΟΥ:			
ΑΡ. & ΕΤΟΣ ΦΕΚ / ΤΑΠΕΤ:							
ΕΔΡΑ / ΟΔΟΣ:				ΑΡΙΘΜ:		ΤΚ:	
ΔΗΜΟΣ/ΚΟΙΝΟΤΗΤΑ:				ΝΟΜΟΣ:			
ΤΗΛΕΦΩΝΟ:			FAX:			E – mail:	

ΟΡΙΣΜΟΣ / ΣΤΟΙΧΕΙΑ ΕΚΠΡΟΣΩΠΟΥ⁽⁴⁾ (για κατάθεση αίτησης ή παραλαβή τελικής διοικητικής πράξης) : Σε περίπτωση που δε συντάσσεται η εξουσιοδότηση στο παρόν έντυπο και ενώπιον του αρμόδιου υπαλλήλου, απαιτείται προσκόμιση εξουσιοδότησης με βεβαίωση του γνήσιου της υπογραφής από δημόσια υπηρεσία ή συμβολαιογραφικού πληρεξουσίου.

ΟΝΟΜΑ:				ΕΠΩΝΥΜΟ:			
ΟΝΟΜΑΤΕΠΩΝΥΜΟ ΠΑΤΕΡΑ:				ΑΔΤ:			
ΟΔΟΣ:				ΑΡΙΘ:		Τ.Κ:	
Τηλ:			Fax:			E – mail:	

b) Application for establishment and operating licences of a health regulated establishment (*continued*)

ΠΛΗΡΟΦΟΡΙΑΚΑ ΣΤΟΙΧΕΙΑ
ΑΠΑΙΤΟΥΜΕΝΑ ΔΙΚΑΙΟΛΟΓΗΤΙΚΑ

ΤΙΤΛΟΣ ΔΙΚΑΙΟΛΟΓΗΤΙΚΟΥ:	ΚΑΤΑΤΕΘΗΚΕ ΜΕ ΤΗΝ ΑΙΤΗΣΗ	ΘΑ ΠΡΟΣΚΟΜΙΣΤΕΙ	ΝΑ ΑΝΑΖΗΤΗΘΕΙ ΥΠΗΡΕΣΙΑΚΑ ⁽³⁾
1. Φωτοαντίγραφο δελτίου ταυτότητας ή άλλου εγγράφου από τα προβλεπόμενα στην παρ. 4 του άρθρου 3 του Ν.2690/1999 όπως τροποποιήθηκε με το άρθρο 25 του Ν. 3731/2008 (ή τη σχετική προσωρινή βεβαίωση της αρμόδιας αρχής ή το διαβατήριό ή την άδεια οδήγησης ή το ατομικό βιβλιάριο υγείας όλων των ασφαλιστικών φορέων) *	<input type="checkbox"/>	<input type="checkbox"/>	
2. Αντίγραφο οικοδομικής άδειας και σχεδιαγράμματα του καταστήματος εις τριπλούν υπογεγραμμένα από Μηχανικό, από τα οποία να προκύπτει ότι ο χώρος είναι κύριας χρήσης προοριζόμενος για ΚΥΕ, σε κλίμακα που θα αναφέρεται ρητά επί του σχεδίου και στο οποίο θα αποτυπώνονται όλοι οι χώροι του Κ.Υ.Ε. περιλαμβανομένων και αυτών που προβλέπονται από ειδικές διατάξεις του ισχύοντος νομικού πλαισίου (π.χ. τουαλέτες για Α.Μ.Ε.Α.).	<input type="checkbox"/>	<input type="checkbox"/>	
3. Βεβαίωση καταλληλότητας ηλεκτρολογικού, μηχανολογικού εξοπλισμού και εγκαταστάσεων από τον κατά περίπτωση αρμόδιο εγκαταστάτη μηχανικό (αγωγοί μεταφοράς οσμών, αερίων, καπνών, συστημάτων Α.Π.Ε. κλπ).			
4. Δήλωση ορισμού του υγειονομικώς και αγορανομικώς υπευθύνου από τον εκπρόσωπο της εταιρείας και υπεύθυνη δήλωση αποδοχής από τον ορισθέντα.	<input type="checkbox"/>	<input type="checkbox"/>	
5. Υπεύθυνη Δήλωση του Ν.1599/1986 (αντί αποσπάσματος ποινικού μητρώου) στην οποία να δηλώνονται τα ακόλουθα: «Ο/Η κάτωθι υπογράφων/φουσα ... δεν έχω καταδικαστεί τελεσίδικα για κανένα από τα αδικήματα που αναφέρονται στις διατάξεις του άρθρου 1 παρ. 2 του π.δ. 180/1979, όπως αυτό ισχύει» (στην περίπτωση χορήγησης άδειας για καταστήματα στα οποία προσφέρονται οινόπνευμα/ποτά σε καταστήματα στα οποία προσφέρονται οινόπνευμα/ποτά) Στην περίπτωση όπου την αίτηση υποβάλλει εταιρεία, κατατίθενται υπεύθυνες δηλώσεις του Ν.1599/1986 (αντί αποσπάσματος ποινικού μητρώου) του εκπροσώπου της εταιρείας και του υγειονομικώς υπευθύνου, όλων των μελών προσωπικής εταιρείας (ΟΕ ή ΕΕ), όλων των μελών του Διοικητικού Συμβουλίου ΑΕ, όλων των διαχειριστών ΕΠΕ με το ίδιο περιεχόμενο.	<input type="checkbox"/>	<input type="checkbox"/>	
6. Πιστοποιητικό πυροπροστασίας, το οποίο μπορεί να αναζητηθεί και αυτεπαγγέλτως από τον οικείο δήμο με την υποβολή μελέτης πυροπροστασίας, ανάλογα με το είδος του καταστήματος, σύμφωνα με τις 3/1981 (Β 20) και 8/2007 (Β 12) Πυροσβεστικές Διατάξεις όταν η οικοδομική άδεια έχει εκδοθεί μέχρι 17/2/1989 ή σύμφωνα με το Π.Δ 71/1988 (Α 32) όταν η οικοδομική άδεια έχει εκδοθεί μετά τις 17/2/1989	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Παράβολο σύμφωνα με την ΚΥΑ 61167/17-12-2007 (ΦΕΚ 2438 Β).	<input type="checkbox"/>	<input type="checkbox"/>	
8. Άδεια ασκήσεως επαγγέλματος, για τις περιπτώσεις όπου απαιτείται, του προσώπου στο όνομα του οποίου εκδίδεται η άδεια ή προσώπου που δηλώνεται ότι θα απασχοληθεί στο κατάστημα και είναι κάτοχος	<input type="checkbox"/>	<input type="checkbox"/>	

b) Application for establishment and operating licences of a health regulated establishment (*continued*)

αντίστοιχης άδειας. Στην περίπτωση που η άσκηση του συγκεκριμένου επαγγέλματος διέπεται από τις διατάξεις των άρθρων 1, 2 και 3 του Ν. 3919/2011 (ΦΕΚ 32/Α/2-3-2011), αντί της άδειας άσκησης επαγγέλματος, δύναται να απαιτηθεί απλή βεβαίωση της αρμόδιας αρχής ότι ο ενδιαφερόμενος πληροί όλες τις νόμιμες προϋποθέσεις για την άσκηση του επαγγέλματος αυτού.			
Για την άδεια ίδρυσης και λειτουργίας Κέντρων Διασκέδασης απαιτούνται επιπλέον τα εξής δικαιολογητικά:			
1. Άδεια δημόσιας εκτέλεσης μουσικών συνθέσεων χορηγούμενη από αντίστοιχο οργανισμό συλλογικής διαχείρισης.	<input type="checkbox"/>	<input type="checkbox"/>	
2. Για κέντρα διασκέδασης που βρίσκονται στο Νομό Αττικής πλν νησιωτικών περιοχών του Νομού αυτού, στο Νομό Θεσσαλονίκης καθώς και σε πόλεις άνω των 10.000 κατοίκων, υπεύθυνη δήλωση ότι θα διαθέτει τον απαιτούμενο από τις διατάξεις του Π.Δ. 257/ 2001 χώρο στάθμευσης	<input type="checkbox"/>	<input type="checkbox"/>	
3. Τεχνική έκθεση μηχανικού για τα μέτρα ηχομόνωσης που έχουν ληφθεί και βάσει των οποίων θα αποδεικνύεται η αποτελεσματικότητα της σύμφωνα με την προβλεπόμενη ηχοπροστασία. Η τεχνική έκθεση θα συνοδεύεται με κάτοψη των χώρων που θα αποτυπώνεται η θέση των ηχείων. Για τα υπαίθρια Κέντρα Διασκέδασης η μελέτη θα αναφέρει και την απόσταση από σημεία ηχοπροστασίας σύμφωνα με την ΥΔ Α5/3010/1985.	<input type="checkbox"/>	<input type="checkbox"/>	
Για την άδεια ίδρυσης και λειτουργίας Κέντρων Διασκέδασης άνω των 200 καθισμάτων απαιτούνται επιπλέον τα εξής δικαιολογητικά:			
1. Σχέδιο εις τριπλούν, υπογεγραμμένο από μηχανικό, στο οποίο θα εμφανίζεται η ηλεκτρομηχανολογική εγκατάσταση, ο αερισμός – εξασρισμός και η ηχομόνωση του χώρου.	<input type="checkbox"/>	<input type="checkbox"/>	
Για τη λειτουργία ορισμένων εγκαταστάσεων (άρθρο 24 του ΒΔ 465/1970), απαιτείται επιπλέον:			
1. Βεβαίωση της αρμόδιας για την οδό υπηρεσίας, ότι οι εργασίες κυκλοφοριακής συνδέσεως εκτελέστηκαν σύμφωνα με τα εγκεκριμένα σχέδια (άρθρο 32 παρ. 1 Β.Δ. 465/1970 και άρθρο 21 παρ. 2 του ΠΔ 118/2006)	<input type="checkbox"/>	<input type="checkbox"/>	
ΠΑΡΑΤΗΡΗΣΕΙΣ: * εάν ο αιτών είναι αλλοδαπός - υπήκοος κράτους μη μέλους της Ευρωπαϊκής Ένωσης φωτοαντίγραφο ισχύουσας άδειας διαμονής που του επιτρέπει την άσκηση ανεξάρτητης οικονομικής δραστηριότητας. Αν ο ενδιαφερόμενος είναι ομογενής υποβάλλει ειδική ταυτότητα ομογενούς ή προξενική θεώρηση για επανεισδοχή. Στην περίπτωση όπου την αίτηση υποβάλλει εταιρεία, κατατίθεται κωδικοποιημένο καταστατικό της εταιρείας σε Φ.Ε.Κ. για Α.Ε. ή Ε.Π.Ε. ή θεωρημένο από το Πρωτοδικείο για Ο.Ε. ή Ε.Ε. (υφίσταται δυνατότητα αυτεπάγγελτης αναζήτησης από το Δήμο). Επίσης υποβάλλεται, δήλωση ορισμού του υγειονομικού και αγορανομικού υπευθύνου από τον εκπρόσωπο της εταιρείας και υπεύθυνη δήλωση αποδοχής από τον ορισθέντα. Μετά τη συμπλήρωση του, ο φάκελος διαβιβάζεται στις συναρμόδιες υπηρεσίες (υγειονομική υπηρεσία για τον υγειονομικό έλεγχο του καταστήματος, πυροσβεστική υπηρεσία για χορήγηση βεβαίωσης πυρασφάλειας, πρωτοβάθμιο συμβούλιο θεάτρων – κινηματογράφων και λοιπών αιθουσών για γνωμοδότηση).			

Επιλέξτε με ποιο τρόπο θέλετε να παραλάβετε την απάντησή σας: 1. Να σας αποσταλεί με συστημένη επιστολή στη Διεύθυνση..... 2. Να την παραλάβετε ο ίδιος από την υπηρεσία μας..... 3. Να την παραλάβετε από άλλο σημείο..... 4. Να την παραλάβει εκπρόσωπός σας..... 5. Να σας αποσταλεί με fax στον αριθμό:.....
--

ΧΡΟΝΟΣ : Η άδεια ίδρυσης και λειτουργίας εκδίδεται εντός 30 ημερών. Αν παρέλθει άπρακτη η προθεσμία των τριάντα (30) ημερών, λογίζεται ότι η άδεια έχει εκδοθεί. Ο ενδιαφερόμενος μπορεί με αίτησή του να ζητήσει τη χορήγηση σχετικής βεβαίωσης από το Δήμο

ΚΟΣΤΟΣ: Παράβολο σύμφωνα με τα οριζόμενα στην Κ.Υ.Α. οικ. 61167/17-12-2007.

Με ατομική μου ευθύνη και γνωρίζοντας τις κυρώσεις ⁽²⁾, που προβλέπονται από τις διατάξεις της παρ. 6 του άρθρου 22 του Ν. 1599/1986, δηλώνω ότι:

(3) Εξουσιοδοτώ το ΚΕΠ (άρθρο 31 Ν. 3013/2002) να προβεί σε όλες τις απαραίτητες ενέργειες (αναζήτηση δικαιολογητικών κλπ) για τη διεκπεραίωση της υπόθεσής μου.
 (4) Εξουσιοδοτώ τον/την πιο πάνω αναφερόμενο/η να καταθέσει την αίτηση ή/και να παραλάβει την τελική πράξη. (Διαγράφεται όταν δεν ορίζεται εκπρόσωπος)

.....20.....
 (Υπογραφή)

Annex 4: Forms: Obligation to keep records, submit meat balances and related inspection – IO 32

a) Monthly Meat Balance Form for online submission to ELGO-DIMITRA

Αγοραστής	Προϊόν	ΑΡΧΙΚΑ ΑΠΟΘΕΜΑΤΑ			ΑΓΟΡΕΣ			ΠΩΛΗΣΕΙΣ			ΤΕΛΙΚΑ ΑΠΟΘΕΜΑΤΑ			ΥΠΟΠΡΟΪΟΝΤΑ
		ΕΛΛΗΝ	ΕΥ.ΡΕΝ	Τ.Χ	ΕΛΛΗΝ	ΕΥ.ΡΕΝ	Τ.Χ	ΕΛΛΗΝ	ΕΥ.ΡΕΝ	Τ.Χ	ΕΛΛΗΝ	ΕΥ.ΡΕΝ	Τ.Χ	
1	0101001	12			56			44			36			
2	0101001	12	100			200			50			500		
1	0101002	12		60			80			40			100	
2	0101002	10	20	30	10	20	30	10	20	30	10	20	30	
1	0101003	12			100									
2	0101003	12		50			50			150				
1	0102005	1						2			3			

b) Monthly balance for poultry slaughter houses



ΜΗΝΙΑΙΟ ΠΡΟΓΡΑΜΜΑ ΠΤΗΝΟΣΦΑΓΕΙΟΥ

ΕΠΩΝΥΜΙΑ

.....

ΚΩΔΙΚΟΣ

ΕΛΟΓΑΚ.....

ΚΩΔΙΚΟΣ

ΣΦΑΓΕΙΟΥ.....

ΗΜΕΡΟΜΗΝΙΑ /
/20

Α/ Α	ΣΤΟΙΧΕΙΑ ΠΑΡΑΓΩΓΟΥ							ΠΡΟΕΛΕΥΣΗ ΚΑΙ ΒΑΡΟΣ kg			ΣΤΟΙΧΕΙΑ ΑΓΟΡΑΣΤΗ (μετά τη σφαγή)				
	ΟΝΟΜΑΤΕΠΩ ΝΥΜΟ ΠΑΡΑΓΩΓΟΥ	ΑΦΜ	ΚΩΔΙΚΟΣ ΕΚΤΡΟΦΗΣ	ΕΙΔΟΣ ΠΤΗΝΟΥ	ΔΥΠ	Α/Α- ΗΜ/Ν ΙΑ Δ.Π.Π / Δ.Α.	ΑΡΙΘΜ ΟΣ ΠΤΗΝΩ Ν	ΕΛΛ ΑΣ	Ε.Ε.	ΤΡΙΤΩ Ν ΧΩΡΩ Ν	ΠΑΡΑΛΗΠ ΤΗΣ - ΠΕΛΑΤΗΣ	ΑΦΜ ΠΕΛΑ ΤΗ	ΑΡΙΘΜ ΟΣ ΤΙΜ/ΑΠ Υ	ΒΑΡ ΟΣ ΚΙΛΑ	ΠΑΡΑΤΗΡΗ ΣΕΙΣ
ΣΥΝΟΛΑ															

Annex 5: Forms: Obligation to keep records, submit milk balances (dairy farmers and producers) – IO 33

a) Monthly milk balance template

ΜΗΝΙΑΙΑ ΔΗΛΩΣΗ ΙΣΟΖΥΓΙΟΥ ΓΑΛΑΚΤΟΣ

ΚΩΔΙΚΟΣ ΕΛΟΓ :

.....

ΕΠΩΝΥΜΙΑ ΑΓΟΡΑΣΤΗ- ΜΕΤΑΠΟΙΗΤΗ :

.....

ΜΗΝΑΣ

.....

ΕΤΟΣ

.....

ΠΙΝΑΚΑΣ Α

		ΕΙΣΡΟΕΣ ΠΡΩΤΩΝ ΥΛΩΝ (ΣΕ ΚΙΛΑ)																										
		ΓΑΛΑ ΑΓΕΛΑΔΟΣ (κιλά)						ΓΑΛΑ ΠΡΟΒΕΙΟ (κιλά)			ΓΑΛΑ ΓΙΔΙΝΟ (κιλά)			ΟΡΟΣ ΓΑΛΑΚΤΟΣ (κιλά)	ΛΟΙΠΕΣ ΠΡΩΤΕΣ ΥΛΕΣ (κιλά)								ΗΜΙΕΤΟΙΜΑ ΠΡΟΙΟΝΤΑ	ΕΤΟΙΜΑ ΠΡΟΙΟΝΤΑ				
		ΝΩΠΟ			ΣΥΜΠΥΚΝΩΜΕΝΟ										ΚΡΕΜΑ ΓΑΛΑΚΤΟΣ - ΒΟΥΤΥΡΟ		ΜΠΑΣΚΙ		ΣΚΟΝΗ ΓΑΛΑΚΤΟΣ			ΠΡΩΤΕΙΝΕΣ ΚΑΖΕΙΝΕΣ			ΟΡΟΣ ΓΑΛΑΚΤΟΣ		ΦΥΤΙΚΑ ΛΙΠΗ	
ΕΙΔΗ ΠΡΩΤΩΝ ΥΛΩΝ		ΕΛΛΑΔΑ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	ΕΛΛΑΔΑ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	ΕΛΛΑΔΑ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	ΕΛΛΑΔΑ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	ΟΡΟΣ ΓΑΛΑΚΤΟΣ (κιλά)	ΕΛΛΑΔΑ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ	Ε.Ε.	ΤΡΙΤΕΣ ΧΩΡΕΣ			
ΑΡΧΙΚΑ ΑΠΟΘΕΜΑΤΑ																												
* ΑΓΟΡΕΣ ΑΠΟ ΠΑΡΑΓΩΓΟΥ Σ'Η ΑΠΕΥΘΕΙΑΣ ΕΙΣΑΓΩΓΕΣ																												
** ΑΓΟΡΕΣ ΑΠΟ																												

[illegible]

**ΠΑΡΑΓΟΜΕΝΑ ΠΡΟΪΟΝΤΑ (ΠΟΣΟΤΗΤΑ
ΣΕ ΚΙΛΑ ή ΤΕΜΑΧΙΑ Χ ΚΙΛΑ)**

[illegible]

[illegible]

ΟΔΕΚΤΕΣ ΟΡΟΥ ΤΥΡΟΓΑΛΑΚΤΟΣ

ΔΙΑΧΕΙΡΙΣΗ ΠΑΡΑΠΡΟΪΟΝΤΩΝ –ΥΠΟΠΡΟΪΟΝΤΩΝ

ΠΑΡΑΤΗΡΗΣΗ : ΘΑ ΠΡΕΠΕΙ ΤΑ ΣΤΟΙΧΕΙΑ ΤΟΥ ΠΡΩΤΟΥ ΠΙΝΑΚΑ ΤΗΣ ΑΝΤΙΣΤΟΙΧΗΣ ΣΤΗΛΗΣ ΝΑ ΣΧΕΤΙΖΟΝΤΑΙ ΜΕ ΤΑ ΣΤΟΙΧΕΙΑ ΤΟΥ ΔΕΥΤΕΡΟΥ ΠΙΝΑΚΑ ΤΗΣ ΑΝΤΙΣΤΟΙΧΗΣ ΣΤΗΛΗΣ

HMEPO
MHNIA :

* ΑΓΟΡΕΣ ΑΠΟ ΠΑΡΑΓΩΓΟΥΣ Ή ΑΠΕΥΘΕΙΑΣ ΕΙΣΑΓΩΓΕΣ	Συμπληρώνεται στην περίπτωση που παραλαμβάνετε γάλα από παραγωγούς ή εισάγετε απ'ευθείας γάλα
** ΑΓΟΡΕΣ ΑΠΟ ΒΙΟΜΗΧΑΝΙΑ-ΕΜΠΟΡΟ-ΕΙΣΑΓΩΓΕΑ	Συμπληρώνεται στην περίπτωση που είστε δεύτερος αγοραστής γάλακτος (δηλαδή αγοράζετε "Εισαγόμενο γάλα" με τιμολόγιο από έλληνα προμηθευτή ή ελληνικό γάλα από ευρωπαίους ή άλλο μεταποιητή)

**ΥΠΟΓΡΑΦΗ -
ΣΦΡΑΓΙΔΑ**

b) Milk balance template (simple form)

ΜΗΝΙΑΙΑ ΔΗΛΩΣΗ ΙΣΟΖΥΓΙΟΥ ΓΑΛΑΚΤΟΣ

ΚΩΔΙΚΟΣ ΒΙΟΜΗΧΑΝΙΑΣ.....

ΕΠΩΝΥΜΙΑ ΒΙΟΜΗΧΑΝΙΑΣ.....

ΕΤΟΣ

ΜΗΝΑΣ

ΠΡΩΤΕΣ ΥΛΕΣ

	ΓΑΛΑ ΑΓΕΛΑΔΟΣ (κιλά)		ΓΑΛΑ ΠΡΟΒΕΙΟ (κιλά)		ΓΑΛΑ ΓΙΔΙΝΟ (κιλά)		ΟΡΟΣ ΓΑΛΑΚΤΟΣ (κιλά)	ΛΟΙΠΕΣ ΠΡΩΤΕΣ ΥΛΕΣ (κιλά)	
ΕΙΔΗ ΠΡΩΤΩΝ ΥΛΩΝ	ΕΛΛΑΔΑ	Ε.Ε	ΕΛΛΑΔΑ	Ε.Ε	ΕΛΛΑΔΑ	Ε.Ε			
ΑΡΧΙΚΑ ΑΠΟΘΕΜΑΤΑ									
* ΑΓΟΡΕΣ ΑΠΟ ΠΑΡΑΓΩΓΟΥΣ Ή ΑΠΕΥΘΕΙΑΣ ΕΙΣΑΓΩΓΕΣ									
** ΑΓΟΡΕΣ ΑΠΟ ΒΙΟΜΗΧΑΝΙΑ- ΕΜΠΟΡΟ-ΕΙΣΑΓΩΓΕΑ									
ΙΔΙΟΠΑΡΑΓΩΓΗ									
ΠΩΛΗΣΕΙΣ									

ΠΙΝΑΚΑΣ Α

ΚΑΤΑΣΤΡΟΦΗ									
ΣΤΗΝ ΠΑΡΑΓΩΓΗ									
ΥΠΟΛΟΙΠΟ									

ΠΑΡΑΓΟΜΕΝΑ ΠΡΟΪΟΝΤΑ

ΕΙΔΟΣ	ΠΟΣΟΤΗΤΑ ΠΑΡΑΓΩΓΗΣ (κιλά)	ΠΟΣΟΤΗΤΑ ΠΡΩΤΗΣ ΥΛΗΣ ΠΟΥ ΧΡΗΣΙΜΟΠΟΙΗΘΗΚΕ (κιλά)							

ΠΙΝΑΚΑΣ Β

ΑΠΟΔΕΚΤΕΣ ΟΡΟΥ ΤΥΡΟΓΑΛΑΚΤΟΣ	ΔΙΑΧΕΙΡΙΣΗ ΠΑΡΑΠΡΟΪΟΝΤΩΝ -ΥΠΟΠΡΟΪΟΝΤΩΝ	

ΠΑΡΑΤΗΡΗΣΗ : ΘΑ ΠΡΕΠΕΙ ΤΑ ΣΤΟΙΧΕΙΑ ΤΟΥ ΠΡΩΤΟΥ ΠΙΝΑΚΑ ΤΗΣ ΑΝΤΙΣΤΟΙΧΗΣ ΣΤΗΛΗΣ ΝΑ ΣΧΕΤΙΖΟΝΤΑΙ ΜΕ ΤΑ ΣΤΟΙΧΕΙΑ ΤΟΥ ΔΕΥΤΕΡΟΥ ΠΙΝΑΚΑ ΤΗΣ ΑΝΤΙΣΤΟΙΧΗΣ ΣΤΗΛΗΣ

* ΑΓΟΡΕΣ ΑΠΟ ΠΑΡΑΓΩΓΟΥΣ Ή ΑΠΕΥΘΕΙΑΣ ΕΙΣΑΓΩΓΕΣ	Συμπληρώνεται στην περίπτωση που παραλαμβάνετε γάλα από παραγωγούς ή εισάγετε απ'ευθείας γάλα
** ΑΓΟΡΕΣ ΑΠΟ ΒΙΟΜΗΧΑΝΙΑ-ΕΜΠΟΡΟ-ΕΙΣΑΓΩΓΕΑ	Συμπληρώνεται στην περίπτωση που είστε δεύτερος αγοραστής γάλακτος (δηλαδή αγοράζετε "Εισαγόμενο γάλα" με τιμολόγιο από έλληνα προμηθευτή ή ελληνικό γάλα απο εμπόρους ή άλλο μεταποιητή)

ΥΠΟΓΡΑΦΗ - ΣΦΡΑΓΙΔΑ

c) Daily production book template

ΒΙΒΛΙΟ ΗΜΕΡΗΣΙΑΣ ΠΑΡΑΓΩΓΗΣ

ΗΜΕΡΟΜΗΝΙΑ

ΣΤΟΙΧΕΙΑ 1^{ης} ΥΛΗΣ ΠΟΥ ΧΡΗΣΙΜΟΠΟΙΗΘΗΚΑΝ

ΠΑΡΑΣΤΑΤΙΚΟ ΑΓΟΡΑΣ / ΤΙΜΟΛΟΓΙΟ ΔΕΛΤΙΟ ΑΠΟΣΤΟΛΗΣ	ΑΓΕΛΑΔΙΝΟ ΓΑΛΑ	ΠΡΟΒΕΙΟ ΓΑΛΑ	ΓΙΔΙΝΟ ΓΑΛΑ	<u>ΆΛΛΟ</u>
Σειρά Α /				
Σειρά Β /				
Σειρά Γ /				
ΠΑΡΑΓΩΓΟΣ				
ΠΑΡΑΓΩΓΟΣ				
ΆΛΛΗ ΒΙΟΜΗΧ.				
ΥΠΟΛΟΙΠΟ ΓΑΛΑ ΠΡΟΗΓΟΥΜΕΝΩΝ ΗΜΕΡΩΝ				
.../.../...				
.../.../...				
<u>ΣΥΝΟΛΟ ΓΑΛΑΚΤΟΣ</u>				

ΠΑΡΑΓΟΜΕΝΑ ΠΡΟΪΟΝΤΑ

ΠΟΣΟΤΗΤΑ ΠΡΩΤΗΣ ΗΜΕΡΑΣ							
	ΤΥΡΙ ΦΕΤΑ	ΛΕΥΚΟ ΤΥΡΙ	ΚΕΦΑΛΟΤΥΡ Ι	ΓΡΑΒΙΕΡΑ	ΑΝΘΟΤΥΡ Ο	ΜΥΖΗΘΡ Α	----- -
Σε κιλά							
ΠΟΣΟΤΗΤΑ ΩΡΙΜΟΥ ΤΥΡΙΟΥ							
Ημερομηνία συσκευασίαςΔΟΧΕΙ ΑκιλώνΔΟΧΕΙ Α κιλώνΚΕΦΑΛΙ Α ...κιλώνΚΕΦΑΛΙ Α κιλών		... ΚΕΦΑΛΙΑ ... κιλών	
.../.../.....ΒΑΡΕΛΙ Α ...κιλών	...ΒΑΡΕΛΙ Ακιλώ ν					

d) Monthly declaration of supplied dairy products from the EU and Third Countries

ΥΠΟΔΕΙΓΜΑ

ΜΗΝΙΑΙΑ ΔΗΛΩΣΗ ΠΡΟΜΗΘΕΙΑΣ ΕΙΔΩΝ ΓΑΛΑΚΤΟΣ και ΓΑΛΑΚΤΟΚΟΜΙΚΩΝ ΠΡΟΙΟΝΤΩΝ ΑΠΟ Ε.Ε και ΤΡΙΤΕΣ ΧΩΡΕΣ

ΚΩΔΙΚΟΣ ΜΕΤΑΠΟΙΗΤΗ : _____

ΕΤΟΣ
: _____

ΕΠΩΝΥΜΙΑ ΜΕΤΑΠΟΙΗΤΗ
: _____

ΜΗΝΑΣ
: _____

		ΜΗΝΙΑΙΑ ΠΟΣΟΤΗΤΑ (κιλά)		ΜΗΝΙΑΙΑ ΑΞΙΑ (ευρώ)	
ΑΓΟΡΑΣΤΗΣ * (Πρώτος =1 , Άλλο=2)	ΕΙΣΑΓΟΜΕΝΗ ΠΡΩΤΗ ΥΛΗ	Ε.Ε	ΤΡ.ΧΩΡΕΣ	Ε.Ε	ΤΡ.ΧΩΡΕΣ
ΣΥΝΟΛΑ					

* Στο πεδίο Αγοραστής συμπληρώνετε με ένα (1) όταν πρόκειται για τον πρώτο Αγοραστή και με δύο (2) όταν πρόκειται για τον δεύτερο, τρίτο κ.α

**ΣΦΡΑΓΙΔΑ ΚΑΙ ΥΠΟΓΡΑΦΗ
ΥΠΕΥΘΥΝΟΥ ΕΠΙΧΕΙΡΗΣΗΣ**

Annex 6: Hourly rate per employee type

Employee Type	Hourly Rates (per employee type)
1: Legislators, senior officials and managers	EUR 34.62
2: Professionals	EUR 24.82
3: Technicians and associate professionals	EUR 19.06
4: Clerks	EUR 16.73
5: Service workers and shop and market sales workers	EUR 13.46
6: Craft and related trades workers	EUR 18.03
7: Plant and machine operators and assemblers	EUR 17.19
8: Manual workers (agricultural and fisheries)	EUR 13.21
9: Elementary occupations	EUR 12.92

To calculate the total AC and AB, employee types are used. For every employee type a standardised hourly wage rate is used. The hourly rates presented above are based on employer costs and include a 25% overhead. They are used to calculate the administrative cost and burden for the different IOs in scope of this measurement