



Executive Summary
Annual Report (2015) on the Hungarian MANCP



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Termőföldtől az asztalig

Introduction

This document is an executive summary of the annual report of the Hungarian MANCP for 2014.

The vision conceived by the Food Chain Safety Strategy is that food chain products will be always healthy, high quality and safe as well as that people and the society show a high level of awareness and responsibility in food production, in trade and in consuming behaviour. Therefore, all stakeholders in the food chain have a strong responsibility to act with utmost care in their own competency with regard to food safety; furthermore all stakeholders have to focus on the protection of consumers as the most important actors.

In accordance with the goals of the Strategy the National Food Chain Safety Office (NÉBIH) aims to create partnership between the stakeholders of the food chain in other words it does not implement official controls only but helps to producers and food business operators (FBOs) via training and consultancy. A good example of this activity is that all FBOs who were prepared by the NÉBIH complied with the requirements of third country export, what were investigated during 66 audits. As a result of this FBOs gained the opportunity to export beef and bovine offal to third countries.

Consumer awareness has a key role in reducing risks related to food safety. NÉBIH aspires to draw public attention on its own role in the food chain by its campaigns aiming to raise social awareness and active media presence, and it aims to prepare society for the avoidance of hazards by sharing knowledge and information.

In 2015 NÉBIH and the competent administration bodies of county government offices supervised and controlled activities and establishments of FBOs throughout the entire food chain, namely from soil conservation through plant and animal health to catering, etc.

Several significant achievements are attributed to the authority in the year 2015. One of these is that the spread of bluetongue disease was limited. Another notable result was the launching of a project on quality-driven mass catering, and 723 catering establishments, what are serving 400 000 people, were rated based on food safety and quality aspects.

We hope that this summary is detailed enough to represent the main observations of our official control work in the year 2015.

1 Overall effectiveness of controls

1.1 Results of main performance indicators

The main strategic objectives of the MANCP can be grouped around the following five fields: appropriate legislation, appropriate technical background, well trained and prepared staff, effective management and modern methods.

The majority of controls were carried out on risk basis, however in several periods, depending on the activity of FBOs and consumers' habits, special controls were carried out as well. The number of controls shows a slight decrease compared to the results of previous years. Although, control numbers remained at the same level in each sector. The number of sectors included in the report has been extended in 2014, which caused an increase in the number of controls.

Trend analysis of the effectiveness of controls is presented below by sectors.

Food chain supervision fee

In 2015 the amount of 10 524 million HUF was collected as supervision fee and 10% of that could be allocated for development by NÉBIH. Partners not having supervision fee declaration were controlled in 2015 also, and during thematic controls milk and milk product distributors were investigated. A total of 110 investigations were initiated and 162 ongoing controls were continued in 2015. Partners completing declaration but not paying supervision fee were controlled as well. As a result of consequent and regular controls the number of declarations submitted increased and law-abiding behaviour of FBOs improved.

Soil conservation

In 2015 255 non-compliances were identified during 839 controls on soil conservation. The number of obligations and sanctions was 93 and 61, respectively.

The amount of 30 million HUF fine was imposed thereof the amount of more than 20 million HUF was soil conservational fine. 1 558 lots of yield enhancing substances and EC fertilizers were inspected and thereof 350 samples were investigated in laboratory. According to the results of laboratory examinations infringements and problems with chemical content of 71 EC fertilizers and yield enhancing substances were identified.

The fulfilment of labelling and storage requirements and the existence of licence of issuing and utilisation were also inspected in the case of 1 558 and 120 products did not meet the requirements. Moreover 43 examinations were carried out and 5 shortcomings were identified regarding microbiological products and soil and plant conditioners.

Plant health

In 2015 there were three contamination cases caused by *Ralstonia solonacearum*, *Clavibacter michiganensis ssp. sepeidonicus* and *Flavescence dorée*, and the affected food chain products were destructed.

In the last year 7 525 visual investigations were conducted by the application of pest specific examinations, furthermore in reasonable cases laboratory tests were carried out as well. A total of 7 infringements were revealed and the amount of 290 000 HUF fine was imposed.

Plant protection

In 2015 2 450 official controls were carried out at producers and further 1 460 controls were implemented related to cross compliance. Non-compliances were identified in 182 cases.

320 on-site investigations related to 201 complaints were carried out, what were generally related to the drifting of plant protection products (PPPs) as well as probably related to bee mortality. 38 infringements were revealed and the amount of 3.8 million HUF fine was imposed. In PPPs producing and packaging establishments 14 controls were carried out and no infringement was discovered.

Visual investigation of 39 855 PPP lots were carried out and the amount of 3 million HUF plant protection fine was imposed.

1 209 out of the 1 797 PPP retailers and wholesalers were investigated that is lower than the 85% of the planned controls. Although in several cases one retailer was controlled more times a year. A total of 1 464 controls were carried out and 33 infringements were identified and the amount of 1.7 million HUF plant protection fine was imposed.

In the frame of controls on PPP residues, 1 980 official samples of fresh fruit, vegetables and grain were analysed. 60% of the official samples contained PPP residues at detectable level, but any of them exceeded the maximum residue levels. The proportion of 1.2% of the samples was exceeded the maximum residue level thus they were disapproved. Regarding ragweed control activity 1 748 ragweed contaminated spots were discovered in the periphery. In respect of these controls warning is not applicable but fines should be imposed in case of infringements. A total of 1 376 fines were imposed at the amount of 76.4 million HUF.

Control of products of plant origin

10 960 lots were inspected during the control of fresh fruits and vegetables. 1045 lots were disapproved and the total amount of 69.2 million HUF fine was imposed. The control of domestic distributors was performed according to the plan. In the frame of contaminant monitoring 169 lots were inspected. During the enhanced official controls on imports of certain food products of non-animal origin 1 278 items were inspected, non-compliant batches were not identified.

Control of plant propagation materials

In 2014 953 screenings were carried out for GMOs and 32 lots of seed were identified to be positive. All of the soy lots registered for variety trials was investigated that caused the increment of the number of detected positive lots. As in the previous three years, GMO contaminated seed lots among lots marked out for trade was not planted. Controls (131) related to vegetable planting materials at producers and retailers did not revealed any serious infringements.

Veterinary medicinal products

1 224 lots were inspected in 2015. Laboratory examination of 571 lots was carried out. The number of procedures connected to the authorization of veterinary medicinal products (VMPs) was 2 061. The total amount of fines imposed during controls on the trade of VMPs at wholesalers was approximately 5 million HUF, while during controls of VMP production the amount of 4.5 million HUF was imposed.

The authority received 5 notifications through the rapid alert system of the EU. The products concerned (quality defects or fraud) were not traded in Hungary, thus action was not taken either. Hungary did not initiate any RAS notification in 2015.

Animal health and welfare

In 2014 animal health diagnostic laboratories of NÉBIH received 1 056 150 samples and 2 114 223 examinations were carried out.

Hungary is still officially free of bovine tuberculosis, *Brucella melitensis*, pest of small ruminants, African horse sickness, classical and African swine fever and Aujeszky's disease. In 2015 Hungary became free of avian flu again.

Bluetongue disease is still present in Hungary. In 2015 37 outbreaks were identified and because of their spatial distribution as well as in order to facilitate the domestic trade of susceptible animals, a protection zone covering the whole country was established.

PRRS eradication program was continued and it resulted in that 5 counties (Vas, Zala, Nógrád, Heves, Borsod-Abaúj-Zemplén) earned the PRRS-free status by the end of the year. On the common border with Ukraine disease control measures are applied continuously to reduce the risk of introducing African swine fever to Hungary.

In 2015 scrapie was identified in 9 cases related to ovine stocks.

Food and feed safety

More than 56 868 establishment controls were carried out in the frame of food chain safety supervision. During the implementation of the monitoring plan and other official controls 138 439 lots were investigated whereof 5 381 lots were withdrawn. The total amount of 460.8 million HUF fines was imposed in 2 518 cases.

The total number of 5 417 lots of feeding staff was investigated. Infringements were identified in case of 87 lots. The overall amount of 2.4 million HUF fine was imposed in 14 cases. Suspected cases of foodborn diseases were reported in 77 cases with 2 255 affected consumers. According to the results 47 cases were related to foodstuff and 1 416 consumers were affected. Via the RASFF system 86 notifications were received and out of that 72 were related to foodstuffs, 10 were related to food contact materials and 4 were related to feedstuffs. Out of the total number of notifications, 29 informations, 3 news, 5 border rejections, and 8 bilateral requests were received. Hungary initiated alerts in 9 cases.

Winery products and other alcoholic drinks

Throughout 3 639 inspections of winery products and other alcoholic drinks 2 183 official samples were collected. 15 643 laboratory samples were investigated. According to the results of laboratory tests 602 unissued products were non-compliant and public proceedings were initiated only in case of 252 issued lots. The overall amount of 2.6 million HUF administrative fee was imposed as examination fee because of inappropriate quality, packaging, or trade and distribution of wine products without preliminary qualification.

269 administrative inspections were connected to the release or modification of operating licenses of winery plants. 389 inspections were carried out during the special controls of imported wines.

Priority Cases

703 inspections were carried out in 2015, whereof 303 inspections identified non-compliances and entailed public proceedings that meant 2 075 tons of food. The amount of 332 million HUF fine was imposed during the initiated procedures.

Controls on activities of animal by-product processing plants as well as the activity of establishments producing and distributing foodstuffs related to new health-conscious nutritional trends were introduced as new control subjects.

During controls related to yield enhancing products revealed 609 lots (more than 11 tons) were withdrawn and seized by NÉBIH, and 4 distributors were involved. 70 tons of paleo products were withdrawn because of unhygienic storage conditions and lack of traceability.

Furthermore 20 tons of meat intended to be used for gyros preparation were seized and destructed because of unhygienic conditions as well.

Ecological production

The control of ecological production, processing and distribution is carried out by two certifying bodies, namely Biokontroll Hungária Nonprofit Kft. and Hungária Öko Garancia Kft. In 2015 2 515 inspections were carried out during the control of ecological production and 741 controls were planned based on risk analysis. The number of sanctions was 121.

2 Key data on controls

2.1 Significant developments in relation to main priorities

The *Food Chain Safety Strategy* that was accepted in 2013 determines the most important targets and duties connected to food chain safety as well as it provides guidance on the achievement of these desired goals for the next ten years. Risk reduction has two main options which also present the two base concepts of the strategy: in the first one, the government will be responsible for organizing and coordinating the knowledge management in the food chain, and in the other one, we have to strengthen and increase the effectiveness of the government's traditional law enforcement function. The *Strategy* defines 4 strategic objectives and 11 programs to achieve the main goal – increasing food chain safety.

The National Food Chain Safety Office has a substantial role in the implementation of the above detailed goals. The objectives of the Strategy and the NFCSO can only be achieved by the systematic share of information within the organization, as well as by the unambiguous definition of tasks and responsibilities.

Goals that are going far beyond the daily tasks related to administration can be fulfilled effectively in the frame of projects.

Among projects launched in 2014 there were three that are closely related to MANCP. These two projects are as follows:

- Reconstruction of the risk assessment system
- Food product testing – Safety, quality and consumer acceptance aspects.

Initiation of the above mentioned two projects does not exclude the launching and implementation of new projects in the future. Strategic objectives will be broken down and detailed in the new MANCP.

2.2 Significant developments in relation to risk assessment criteria

Reconstruction of the risk assessment system is closely related to the product sampling and control system that has a main goal of improvement of the quality of life of the society and the reduction of potential economic damages along with the Strategy. Besides, the improvement of the acceptance of NÉBIH by consumers and the reduction risks related to policy of occur as separate objectives. Consequently, both short and long term objectives can be identified. The two target systems cannot be merged, they have to be operated separately to enhance each.

Implementation of food safety objectives is possible as projects, derived from the 8th Strategic objective, namely the 'Extensive risk reduction'

Although for the determination of measurable objectives and the estimation of intervention costs the introduction of new methodologies that are able to handle all the necessary aspects is needed. Methodologies applied in the field of Health Technology Assessment (HTA) can be suitable for

the mentioned complex analysis. The development and introduction of this approach has been started in 2014.

2.3 Main trends in intensity and type of controls

Controls are mostly carried out on risk basis, but the authority also has performed special controls in certain periods of the year, characterized by the FBO activities and food consumption trends. Data of controls compared to the previous years' results are shown in [Annex 1](#).

The overall number of controls slightly decreased compared to the previous years' results. Control data showed a notable increase in 2014 because of the inclusion of new sectors in the report (e.g. control of plant propagation materials). Differences in the annual data related to some professional fields are due to the changes in the data structure.

3 Trend analysis of non-compliance

3.1 Statement of overall trends in compliance

The non-compliance rate has decreased compared to the previous years' results. The number of non-compliances related on-site investigations has decreased. The number of non-compliances detected by laboratory tests has not changed. In the case of laboratory tests, product lots or samples are tested for different contaminants thus the number of lots investigated in laboratory cannot be summarized.

3.2 Main types of non-compliance

Non-compliances are commonly of administrative nature, but also structural, technological and general hygiene shortcomings were detected. Product controls and analyses showed quality (analytical problems including food additives), microbiological and organoleptical failures and non-compliances in the first place. Furthermore infringements regarding both use-by and best before dates, as well as labelling are still common.

3.3 Identified causes

The main reason of non-compliance was the financial status of the FBOs. In most cases the staff is inadequate and FBOs' resources are insufficient for maintenance or technological development. Ensuring traceability is compulsory for FBOs in the whole food chain. Main cause of the high number of warnings is still inappropriate administrative discipline and restricted knowledge of administrative and functional requirements. Hygienic shortcomings are usual in several sectors.

It is difficult to analyse control results covering the whole food chain since the legal background of controls, the costs of FBOs and their law-abiding behaviour, as well as the cooperation with authorities differ from sector to sector. Thus trend analysis of non-compliances is presented below by action fields of the NÉBIH.

Soil conservation

In 2015 the number of soil conservational inspections has slightly decreased compared to the previous year, at the same time the number of inspections connecting to yield enhancing substances and EC fertilizers has increased. However, the number of non-compliances stayed approximately at the same level as in the previous year. Based on the laboratory test results,

problems related to composition/chemical content and low macro-, meso- and microelement concentration were mostly identified in 2015.

It can be concluded that in 2015 the amount of fines imposed decreased compared to the data from 2014 (47 million HUF fine was imposed in 2014, and 30 million HUF fine was imposed in 2015). The composition of fines has changed, the amount of soil conservational fines decreased (from the amount of 38 million HUF to the amount of 20 million HUF), on the contrary the amount of fines regarding to yield enhancing substances and EC fertilizers increased.

Plant health

The number of inspections related to both exported and imported products decreased by 18% and 16%, respectively, while the number of inspections conducted at retailers and wholesalers, decreased by 27%. The number of laboratory diagnostic tests decreased but the amount of infected samples was 2.5 times higher in 2015. The number of non-compliances and the number of suspensions increased. Although the number of fines imposed showed a notable increment compared to 2014, it differs slightly from the average of previous years.

Plant protection

The number of inspections carried out at producers decreased but the number of related infringements increased, accordingly the amount of fines imposed also increased as compared to the previous year. The higher number of infringements revealed can be attributed to controls based on previous years' experience.

The number of inspections initiated by complaints and fines imposed was substantially lower than in 2014, because of the high rate of bee mortality caused by a fipronil contaminated fungicide in the previous year. At the same time the amount of plant protection fines has not changed.

PPP producer and packaging plants complied with legal requirements in both years since only a few infringements were discovered. However, their activity is not covered completely by the legislation.

The number of controls and infringements revealed related to PPP distributors decreased, thus the number of fines imposed decreased as well.

In 2015 the number of visual controls of PPPs decreased however the number of identified infringements thus the number of lots seized also increased, because of distributing ineligibly labelled products of small quantity (3-10 ml vials). It was discovered that products of small quantities were not registered before trade by several producers and distributors.

Regarding the experience of the inspections, the size of ragweed contaminated fields shows decrease year by year. The number of violations decreased, the low-abiding attitude shows improvement, thus the amount of plant protection fines has decreased by 11 million HUF compared to the previous year.

Controls of products of plant origin

The number of lots investigated during fruit and vegetable controls has been at same level for years, however the number of non-compliant lots increased because of the enhanced control of traceability and origin in addition to quality checks. The amount of fines imposed increased also by reason of more target controls that resulted in the involvement of bigger product lots products. Infringements were mainly related to unlabelled products and the lack of certificate of origin.

Control of plant propagation materials

The number of controls and non-compliances increased slightly in 2015. It can be concluded generally that the rate of non-compliances did not increase notably and the actors still show law-abiding behaviour. An increase can be detected in the number of GMO contaminated lots because all of the soy lots registered for field trials was investigated.

Veterinary medicinal products

Regarding comparison of control results of the previous years it can be concluded that the increased number of non-compliances related to production and distribution of VMPs as well as the severity of infringements and their reoccurrence resulted in the increase of the amount of fines imposed. The main non-compliances were related to distribution not meeting the legal requirements as well as to illegal production and marketing activity, furthermore high percent of these infringements were related to internet commerce. 3 cases of illegal production and distribution were handed over to the police for further investigation (according to the Act on Criminal Code 186 §).

Animal health and welfare

Although the number of infringements related to animal welfare increased, in average they were not serious thus sanctions imposed were not severe either. Animal health control numbers decreased, however the rate of non-compliance was at the same level as in 2014 (0.3%). In 2015 China and Japan occurred as new export destinations. Fines were not imposed related to controls and audits regarding export activities to EU Member States and third countries, what shows a great improvement in comparison to 2014 (fines were imposed in 6 cases). In case of imports both from EU MSs and third countries sanctions were not applied. The number of controls related to animal by-products increased by 10%, however the number of non-compliances and fines imposed decreased.

Food and feed safety

The number of food chain safety inspections slightly decreased. The number of infringements, warnings and fines decreased by the same extent. The disapproval rate of food and feed lots decreased (2014: 6.5%; 2015:3,8%).

The most common non-compliances related to establishment controls were hygienic shortcomings. Traceability is compulsory for FBOs in the whole food chain, related deficiencies are mostly detectable at wholesalers, markets and fairs, however the number of non-compliances has been decreasing, and traceability is improving. Problems related to the documentation of qualification and medical fitness of the staff is rare, and mainly occur at retail level. Infringements related to establishments functioning without registration or approval are discovered infrequently.

According to product controls the most common infringement was the trade of expired goods (regarding both use-by and best before dates). It was followed by labelling and traceability failures. Product controls and analyses showed quality (analytical problems including food additives), microbiological and organoleptical failures and non-compliances in the first place. Non-compliance to food safety requirements were identified as well (e.g. chemical contaminants, residues of VMPs, etc.), however the number of infringements were low.

The number of non-compliances revealed during establishment controls related to feedstuffs decreased. The non-compliances revealed by laboratory examinations of feedstuffs were typically quality issues. The security and quality parameters of feedstuffs have not changed on

the whole. The infringements identified in small numbers were related to contamination by undesirable substances (*Ambrosia sp.*).

Winery products and other alcoholic drinks

2 183 samples were taken during the inspection of winery products and other alcoholic drinks, what show a slight decrease compared to 2014. The disapproval rate (11.5%) increased, the number of issued licenses increased by 1.3% compared to the previous year. The number of licence related disapproves increased because of the adverse weather conditions in 2014, what had an influence on the issued quality certificates as well (4% decrement).

Priority Cases

The most common non-compliances were still shortcomings related to traceability and food-hygiene. Several notifications were related to the operation of illegal slaughterhouses and meat processing plants. Investigations of traceability at small producers were carried out in several cases in virtue of notifications. According to these investigations it can be concluded that small producers often exceed the limitations of the producing volume and often overstep the territorial marketing limits.

Food producing FBOs often produce from expired commodities and it is common that food producers do not take into account the durability date of commodities, so a longer minimum durability date is determined for the finished product than the commodities' durability dates.

The number of inspections was increased by 32%, as a result of this the number of infringements and fines increased by 40%. However, the average amount of fines imposed decreased by 14%.

Ecological production/farming

According to the control results of Biokontroll Hungária Nonprofit Kft. the number of infringements increased by 40% compared to the previous years. The most common infringements were the usage of prohibited PPPs and treated seeds, the rude violation of rules of crop rotation and the violation of rules of parallel farming.

In the case of controls carried out by Hungária Öko Garancia Kft. number of sanctions changed in comparison to the results of 2014 regarding all kind of activities. The most frequent sanctions were the requests for missing documents that was applied in 186 cases (283 in 2014).

4 Enforcement trends: Actions taken in cases of non-compliance

The data compared to them of the previous years are presented in [Annex 2](#). Generally, the number of warnings, fines slightly decreased but any of them showed changes in the order of magnitude, compared to the results of 2014.

5 The National Audit System

5.1 Number of audits and sectors covered

Audits are carried out on two levels:

- 'Audits' carried out by the NÉBIH System Management and Supervision Directorate (SMSD) Supervision Unit (SU) covering all the sectors and all the activities performed by the central and counties competent authorities; this is rule compliance and process audit.

- 'Technical audits' carried out by the NÉBIH Directorates concerning all the specific areas and covering the audits over the County Directorate for Food Chain Safety and Animal Health activities; this is only rule compliance audit

Since 9th December 2013 the audit system of NÉBIH is certified to ISO 9001:2009 2013 – with respect to ISO 19011:2011 Guideline.

Audits and technical audits

In 2015 out of the 87 planned investigations (audit and technical audit) 70 were realized, 23 were cancelled and 6 new were added during the year.

Type of investigation	Number of investigations	Executive bodies
Audit	11	System Management and Supervision Directorate
Technical audit	59	7 Animal Health and Animal Welfare Directorate
		4 Directorate of Animal Breeding
		5 Directorate of Veterinary Medicinal Products
		3 Directorate of Oenology and Alcoholic Beverages
		13 Food and Feed Safety Directorate
		5 Directorate of Agriculture
		0 Directorate of Forestry
		5 Directorate of Plant Production and Horticulture
		17 Directorate of Plant, Soil and Agri-environmental Protection
Total	70	

Table 1. The summary of audits by executive bodies in 2014

5.2 Results

Technical audits

During the evaluation, the documentation belonging to 59 technical audits were examined. Scoring was applied for all technical audits regarding the plan and the report or the plan, the report and the evaluation form.

The technical audits were carried out mostly in accordance with the audit procedures. However, in some cases the preparation of the reports was delayed. Sometimes the changes of the reporting templates were not followed properly and occasionally the conclusions of the observations regarding more counties were not summarized. Based on the technical audits it can be stated that the official controls of establishments and products were carried out according to the annual standardized risk based establishment control and monitoring plan prepared by the NÉBIH. The central training system and the professional guidelines provide uniform professional knowledge to the inspectors. However, there were some improper practices in handling the documentation and the procedures following that did not comply with the legal requirements. There were several deficiencies in filling out of the reports. Furthermore, in some cases the inspectors did not identified the non-compliances or though the non-compliances were revealed, but the necessary actions were not taken (written warning, the absence of mentioning the deficiency in the report, the application of non-permitted equity).

System analysis for the mapping of the degree of digitalization in the case of administrative procedures initiated by partners

In 2015 6 audits were conducted by the Supervision Unit of NÉBIH DSMS for the determination of the degree of digitalization of administrative procedures determined by legislation in 6 fields (soil protection, biofuel production, animal by-products, food, feed, epidemiology). During the 6 audits 227 administrative procedures were examined.

The evaluation of the administrative procedures was conducted on a six-degree scale depending on the procedure's level of digitalization. It was appointed that the level of digitalization of the public administration is extremely low as a general rule. The audits did not find any procedures standing on the 0. or on the 5. level. At present, only one system complies with the requirements of digitalization on the client-side.

Cross-compliance

In 2015 during the annual audit the following inspections were carried out at 3 CGOs:

- investigation of the protection of water against nitrates pollution from agriculture;
- investigation of the handling and use of plant protection products

The control system is well-organised and well-structured in the counties investigated. The implementation of the tasks is coordinated suitably. The number of the inspectors is sufficient, their professional qualification is adequate, the trainings connected to the performance of the tasks are ensured. The vehicles provided by the authority and the equipment needed for the inspections are available except for one county where the conditions for colour printing are not met.

The audit found non-compliances in two fields. On the one hand the inspector did not fulfil completely his/her obligation to visit of the parcels during the on-site control, on the other hand the assignment of the alternate on-site inspectors was not carried out.

In general it can be stated that the regulation of cross-compliance system is sufficiently detailed and the regulations are fulfilled by the CGOs.

Audit of certifying bodies for organic production

An audit on the implementation of sampling procedures of the 2 certifying bodies was performed. The certifying bodies perform their samplings according to the Sampling Guideline issued by NÉBIH and to the procedural documents of their own quality management systems. The interpretation and the adherence of the Sampling Guideline raise some difficulties; hence the review of the Guideline by the NÉBIH is to be expected. The numbers of samples taken by the certifying bodies comply with the regulations, but they are insufficient to the acquisition of proper practice by the inspectors.

The audit found non-compliances regarding the competence of the person appointed to the sampling and the missing sampling practice. A sampling device was not always available for the sampling whether it was based on suspicion or on the risk based plan. Once the sampling was not carried out in accordance with the requirements.

In some cases, the inspectors were not prepared for the sampling according to the risk based plan or suspicion. The insufficient level of education does not permit the identification of (the) possibly illegitimate practices, the performance of the necessary measurements and it also can influence the effectiveness of the sampling.

The non-routine audit of the Hungária Öko Garancia Kft.

As a result of the audit carried out in 2014 the NÉBIH suspended the control and certifying activities of the certifying body connected to retailers for 60 days because of inappropriate control of organic products' traceability. At the same time NÉBIH obliged the certifying body to correct the non-compliances. After the expiration of the suspension period NÉBIH performed an audit out of turn in order to determine whether the certifying body performed all the corrective actions that were required or not.

The review concluded that the certifying body has implemented the corrective actions; hence it is capable to fulfil the control and certifying activities of their retailer partners.

The follow-up audit of the audit performed in 2012 (Nr. 2012-113.) at the Directorate for Oenology and Alcoholic Beverages

After the system audit of the authority of oenology performed in 2012, we conducted a follow-up audit in 2015 in order to determine what actions have been taken by the directorate to correct the non-compliances and deficiencies identified during the audit in 2012, related to 18 subjects.

It can be stated that the necessary actions were taken regarding 6 topics. There have been improvements in 7 other topics, but further measurements are necessary. The directorate has only partial influence on some measurements. There is a further need to revise the legal instruments of regulation and to IT development. There have not been any actions taken regarding 2 subjects.

In summary: after the audit in 2012 the Directorate for Oenology (and Alcoholic Beverages) prepared an action plan, however there is no visible process that follows systematically and calls to account the implementation of the measures included in the action plan. Nevertheless, out of the 18 subjects there are only 2 in which there have not been any improvements.

5.3 Main actions taken

After each audit or technical audit the inspected authority prepared an action plan which was to be reconsidered by the auditing body. The realization of the action plan was controlled.

The SMSD SU prepared annual audit report; conclusions of this report are basis of future development of NÉBIH.

6 Resources

6.1 Funding for programmes

In 2012 the Act XLVI of 2008 on food chain and its official control (henceforth Act XLVI.) 47/B. § introduced the food chain supervision fee and the preparation of an annual report on the utilization of the food chain supervision fee was ordered. The amendment of the Act XLVI, which is in force since January 1st 2015 introduced a so-called progressive supervision fee in relation with the retail sector trading daily consumer goods for final consumers. Later on the application of the progressive part was suspended, hence all food chain actor had to declare and pay in uniformly a 0,1% supervision fee, which is equal to the formerly determined rate. The deadline of the payment was extended to January 31st 2016. The change caused liquidity problems both at the CGO's and the NÉBIH's own competence. In order to solve these problems governmental support was required in Autumn 2015.

In 2015 the amount of 10 524 million HUF was collected as supervision fee and 10% of that, 1052 million HUF could be allocated for development by NÉBIH. The collected amount is 4,5% less than the amount of 2014, because though the retail stores made their corrective declarations at the end of the year, some of them fulfilled their payments only by the additional deadline of January 31st 2016. The whole amount of the supervision fee was used for the financing of the food chain control activities. The development budget was used to finance acquisition of assets and developments.

In 2015 6600 million HUF was transferred as shared public revenue to the CGOs, from which 1 380 million HUF was a carry-over from 2014. The remaining 4 840 million HUF was utilized by the NÉBIH. 460 million HUF out of the CGOs' revenue was transferred only in 2016, following the year-end accounting closure, due to the new deadlines declared by the legislation.

6.2 Staff

The staff of NÉBIH and the competent administration bodies of the CGOs for 2015 is given in the following table. At the NÉBIH only staffing of directorates responsible for task regulated by 882/2004/EC is presented.

	Authority	Laboratory
Central level	283	685
County level	1 898	
Total	2 181	685

6.3 Laboratories network & NRLs

The NÉBIH Food and Feed Safety Directorate operates 6 central reference laboratories and 9 regional laboratories, the Directorate for Plant Protection, Soil Conservation and Agri-environment operates 1 central and 11 county laboratories. The Directorate for Veterinary Diagnostics operates 1 central and 2 regional laboratories, both the Directorate for Veterinary Medicinal Products and Directorate for Animal Breeding operate 2, and both of the Directorate for Oenology and Alcoholic Drinks and the Directorate for Plant Production and Horticulture operate also 1 laboratory. The laboratories are all accredited according to ISO 17025.

7 Actions taken to improve performance of control authorities

7.1 Proposed changes to MANCP

As a strategic document the MANCP covered the development of the food chain (safety) control bodies for the period 2010-2014 as well. The most important change related to the MANCP was the ratification of the Food Chain Safety Strategy and the reform of the product control system in 2013. As a result of the cooperative preliminary work of the Ministry of Rural Development and the National Food Chain Safety Office the Food Chain Safety Strategy 2013-2022 has been accepted by the Government Decision 1703/2013. (X.8.). The Strategy determines the most important targets and duties connected to food chain safety and it provides guidance on the achievement of these desired goals for the next ten years. NÉBIH has a substantial role in the implementation of the above detailed goals. The objectives of the Strategy and the NÉBIH can only be achieved by the systematic share of information

within the organization, as well as by the unambiguous definition of tasks and responsibilities. Goals that are going far beyond the daily tasks related to administration can be fulfilled effectively in the frame of projects.

Numerous project ideas have emerged during the process of breaking down the strategic objectives. Taking into consideration the food chain risks, the available resources as well as the societal and executive expectations, a wide group of projects has been selected for implementation. The realization of the chosen projects is a priority.

These projects together with other projects linked to the Strategy will constitute the target system of the MANCP. As a result of these (changes) the target system of the MANCP will consist of mainly professional objectives derived from the Strategy. The new MANCP for the period starting in 2015 has not been prepared yet because of the changes that occurred between 2010 and 2014 and also in 2015.

7.2 Changes in legislation

In 2015 40 sectorial decrees were published and 13 new directives and orders regulate the activity of authorities.

7.3 Organisation

Since the 1st April 2015 significant changes have been introduced in the field of food chain supervision tasks that also influenced the roles and tasks of the competent authorities at local, regional and central level.

Since 2015 previously independent agricultural administration bodies (called Directorate for Food Chain Safety and Animal Health and Directorate of Plant Protection and Soil Conservation) have been merged into one department within the government offices. This department is called Department for Food Chain Safety, Plant Protection and Soil Conservation or Department for Food Chain Safety and Agriculture where there is no (separate) Unit for Forestry. The Prime Minister's Office is responsible for the direction of county government offices; the Minister of Agriculture is responsible for the professional direction of the units responsible for food chain control.

Seeing that the government has announced in 2015 that the structure of public administration will be re-organised, the Government Decision 1312/2016. Annex 1. 2 e) point states that the Minister of Agriculture and the Minister of Prime Minister's office will finalise the tasks and organizations of the competent authorities responsible for food chain supervision. For all these reasons the current organisational structure and management system are expected to be changed in the near future.

7.4 Procedures

Altogether 101 documented procedures and circulars regulate official actions in different sectors.

Sector	Number of procedures	Sector	Number of procedures
Soil conservation	2	Animal health	28
Plant protection	10	Animal welfare	7
Plant health	8	Winery and alcoholic beverages	7
Food safety	12	Other	26
Feed safety	1		

Table 3. Number of procedures in 2015

7.5 Information system

According to the Act XLVI of 2008 38/A§ (1) NÉBIH established and operates a new IT system, namely the FELIR system that provides a uniform IT background for the authority.

In 2015 further IT development tasks were planned in the frame of the 'Intelligent Food Chain Safety Analysis System' (INTEL) project that will be based on FELIR and which was listed in the annual development budget of the Public Administration and Civil Service Development OP. In September 2015, the preparation of the project's application for support and the public procurement procedure were initiated. The aim of the project is the development and application of a modern risk analysis system that coherently covers the whole food chain. Through the optimisation, modernisation, and further development of the existing IT systems more data can be included into the assessment system. At the same time the further simplification of the administrative procedures and the enhancement of the digitalization of the client-side procedures will be also implemented.

7.6 Training

To take appropriate action to improve the knowledge of the staff, the NÉBIH is responsible for organizing professional trainings, and uses the "training the trainers" principle accompanied by the e-learning system reaching all the staff. The trainings are coordinated centrally (in the framework of annual objectives breakdown) at national level. The training needs are assessed / monitored through several tools: the usual audit process, during the live trainings, as well as with the help of the dedicated e-learning system (evaluation of test results, discussion groups, etc.).

The effectiveness of the trainings is assessed through tests (obligatory in the e-learning system) and questionnaires (satisfaction evaluation) at the end of the trainings (live trainings as well as electronic ones), and of course the regular audit process gives feed-back on this issue as well.

8 Actions taken to improve performance of food business operators

8.1 Training Programmes

NÉBIH organized different training programs for FBOs, the most important areas were proper law enforcement practices, changes in regulation, soil conservation issues, control of veterinary medical products, infectious diseases and eradication programmes, Act XLVI of 2008, procedures regarding emergency situations, control of food chain contaminants, wine faults, control of small farmers' activities etc.

8.2 Information campaigns

Every summer information campaign is held for FBOs about regulations concerning food distribution and catering, NÉBIH organizes those together with other authorities (consumer protection, public health service, tax- and customs authority).

8.3 Guides to Good Practices

New hygiene guideline was not published in 2015.

Annex 1.

Control data 2012-2015.¹

Sector	Number of inspections				Non compliances			
	2012	2013	2014	2015	2012	2013	2014	2015
Soil protection	1 757	1 163	1 521	1317	307	457	433	375
Plant health	29 883	39 608	29 780	23885	285	378	66	79
Plant protection	16 456	13 566	13 650	8246	2 708	2 777	3 015	2044
Vegetable & Fruit control	16 584	17 643	12 706	16744	981	1 551	1 103	1105
Plant propagation materials	-	25 407	77 243	80116	-	64	72	84
Feed safety	1 787	1 830	1 671	1304	182	202	163	94
Veterinary medical products	86	74	88	72	*	19	13	36
Animal health	13 158	16 751	38 250	28670	538	1 261	112	48
Animal welfare	40 106	33 323	27 131	19964	324	392	145	169
Animal by-products	1 023	1 348	1 244	1862	27	25	20	11
Food production	17 507	17 475	16 680	16533	2 203	2 394	1 007	960
Food distribution	26 418	22 512	26 078	24 466	3 580	3 283	2011	1 623
Catering	25 844	22 351	22 213	21 278	3 750	3 553	1 891	1 675
First place of storage	0	4 224	3 254	4198	-	77	22	22
Food products	-	-	-	-	-	-	-	0
Winery and Alcoholic beverages	4 685	4 769	3 901	3639	590	438	278	252
Imported plant products	67	65	87	1278	0	0	0	0
Imported livestock	5 203	5 710	6 670	6562	143	58	12	18
Priority controls	54**	388	531	703	-	130	210	303
Total	200 618	228 207	284 181^a	260 837	15 618	17 059	10 573	8 898

* Non-compliance to some extent

** Data related to priority controls are incomplete, because the Directorate has started its control activity in 2012.

^a The number of sectors included in the report has been extended in 2014, which caused an increase in the number of controls.

¹ There are notable differences between data from 2014 and previous years' data due to the differences in data structure applied during the data collection. Furthermore, the listed sectors were supplemented with three additional professional fields compared to the previous year.

Sector	Lots inspected on-site				Non-compliant lots				Lots inspected in laboratory				Non-compliant lots			
	2012	2013	2014	2015	2012	2013	2014	2015	2012	2013	2014	2015	2012	2013	2014	2015
Soil protection	1 012	1 783	1 680	1 558	41	101	86	49	410	408	464	350	46	65	45	71
Plant health	3 964	4 118	19 632	19 309	25	28	66	1 962	15 077	14 826	17 841	16 941	774	884	605	1 524
Plant protection	33 104	50 009	51 690	39 855	149	423	190	415	3 584	4 290	3 906	2 115	12	20	18	26
Vegetable & Fruit control	16 584	17 643	18 415	16 744	981	1 551	1 145	391	0	0	0	0	0	0	0	0
Plant propagation materials	-	7 622	7 660	31 602	-	53	26	32	-	24 500	25 969	26 024	-	23	18	32
Feed safety	4 100	4 057	3 593	2 732	57	59	11	10	2 695	2 149	3 008	2 685	95	100	68	77
Veterinary medical products	*	*	0	0	38	11	12	2	682	871	390	0	29	14	10	0
Animal health	32 000	31 267	0	0	8	0	0	0	911 308	37 917	0	0	63	76	0	0
Animal welfare	4 700	138	0	3 283	1	0	0	1	0	0	0	0	0	0	0	0
Animal by-products	111	836	0	249	0	0	0	0	38	35	0	0	0	0	0	0
Food	183 301	157 057	155 963	143 708	n. a.	10 684	10 148	5 518	54 405	-	-	-	n. a.	-	-	-
First place of storage	-	-	4 484	4 634	-	-	1 995	47	-	0	-	-	-	0	-	-
Food products	-	-	80 225	72 429	-	-	2 961	2 875	-	54 444	59 909	3 2728	-	0	0	0
Winery and Alcoholic beverages	623	713	0	0	115	111	-	-	2 569	2 675	2 773	2 183	475	438	278	252
Imported plant products	67	65	87	1 278	0	0	0	0	23	21	19	19	0	0	0	0
Imported livestock	659	984	-	1 181	3	-	-	9	24	52	-	159	0	0	0	0
Priority controls	0	0	0	0	0	0	0	0	0	18	47	43	0	0	0	0
Total	280 225	278 904	347 562	338 562	1 418	14 738	16 647	11 311	-	-	-	-	-	-	-	-

* During on-site controls the whole stock is investigated. Only non-compliant lots are included in the reports.

Annex 2.

Sanction data 2012-2015.

Sector	Warnings				Fines imposed				Businesses closed			
	2012	2013	2014	2015	2012	2013	2014	2015	2012	2013	2014	2015
Soil protection	128	104	87	107	143	159	148	80	117	184	88	84
Plant health	21	47	0	0	7	12	2	7	35	37	36	47
Plant protection	112	103	95	104	2 485	2 563	2 010	1 495	42	69	81	59
Vegetable & Fruit control	0	34	42	116	829	1 239	1 015	929	345	3	0	0
Plant propagation materials		4	3	0		1	2	0		31	26	0
Feed safety	59	44	43	34	37	33	31	14	11	16	30	18
Veterinary medical products	2	5	7	6	14	6	7	23	14	12	26	33
Animal health	229	315	56	27	198	232	43	11	115	380	51	2
Animal welfare	93	125	87	40	22	51	69	45	21	6	2	6
Animal by-products	16	8	3	8	7	4	11	1	1	21	15	0
Food production	410	305	336	397	682	590	575	481	61	85	96	82
Food distribution	844	637	600	446	1 395	1 201	1 309	1 077	231	128	102	100
Catering	723	603	666	527	997	833	1 088	998	202	112	137	150
First place of storage	-	5	9	4	-	27	11	16	-	15	2	2
Food products	-	0	0	0	-	0	0	0	-	0	0	0
Winery and Alcoholic beverages	n. d.	-	-	n. d.	Imposed by CGO	Imposed by CGO	Imposed by CGO	-	Imposed by CGO	Imposed by CGO	2	3
Imported plant products	0	-	-	-	0	-		-	0	-		0
Imported livestock	127	19	8	6	4	0	4	0	4	1	1	3
Priority controls	-	10	2	0	-	120	208	303	-	27	6	78
Total	2 764	2 368	2 044	1 822	6 820	7 071	6 533	5 480	1 199	1 127	701	667

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