



Annual Report on the Hungarian MANCP

Executive Summary

nébih
termőföldről
az asztalig

2019.

Introduction

This document is an executive summary of the annual report of the Hungarian MANCP for 2019.

The Food Chain Safety Strategy determines the most important targets and duties connected to food chain safety until 2022. The *Strategy* defines 4 strategic objectives and 11 programs to achieve the main goals. The Ministry of Agriculture is responsible for the implementation of the Strategy in the first place, in cooperation with the National Food Chain Safety Office (Nébih) and the county government offices.

With the establishment of Nébih the Hungarian Government adapted such a modern approach that is exemplary not only in Europe but most likely in the world as well. As a result of the persistent work carried out in the last 12 years, Nébih is now a well identifiable central authority. The awareness of Nébih – mostly the due to the active communication activities – is also confirmed by the results of consumer surveys. In several respects the Hungarian food chain safety supervision is at the forefront at EU level.

In 2019, African Swine Fever (ASF) was identified in Hungary in wild boar that constrained the market opportunities of the establishments exporting to the Far East. Because of this the NÉBIH's advisory and control system to support the success of third country exports of food business operators (FBO) producing food of animal origin has an even greater economic importance. In July 2019, Hungary published a new African swine fever eradication plan aimed at increasing the effectiveness of the control of ASF and the conservation of the domestic pig population. It details the actions of the actors concerned, information on the different risk classification areas and the specifications for each task by area type.

Since 2015, Nébih has been contributing to improving the delivery and situation of local products under the Quality-Driven Public Catering Programme in order to improve the quality and safety of public catering. From the second half of 2017, qualified auditors will carry out inspections prior to the compulsory certification processes of food safety and hygiene in public catering establishments, under the professional direction of the competent department of Nébih. In 2018, a professional guide titled "Guide to good hygiene practices in hospitality and catering" has been completed, which presents best practice experiences taking into account legislation and its changes. For the sixth time in 2019, the "Public Catering Cooking Competition" was held, with the aim of modernizing dishes in line with the expectations of the present era, while preserving traditional flavours, as well as promoting the use of domestic fresh ingredients. It also offers the opportunity for professional development for those who enter the competition. Tried-and-tested recipes and technologies are published, which also contribute to the promotion and improvement of the quality of public catering.

It is important to emphasise that the food chain players can achieve food safety only through joint efforts. Conscious consumers, responsible FBOs, credible authority and conscientious media – they all interact. In order to increase the knowledge of the public, Nébih operates several social awareness campaigns in different topics. The advocating role of Nébih is still evolving but there are remarkable results already. The purpose of Good Hygiene Practices is to collect the risk-proportionate, feasible measures based on rationality and industrial practice. The guidelines help the FBOs in the interpretation of regulations, in the establishment of rules directly linked to their activities and they can serve as reference in disputes.

We hope that this summary is detailed enough to represent the main observations of our official control work in the year 2019.

1 Overall effectiveness of controls

1.1 Results of main performance indicators

The Food Chain Safety Strategy, accepted in 2013, determines the most important targets and duties connected to food chain safety for the next 10 years and it establishes the new, modern basis of the relationships between food chain safety stakeholders.

The main priority of the food chain control is the protection of human health, plant and animal health and national economy. The primal principle of control activities is minimizing food chain risk by using human resources in the most efficient and effective way. The main purpose of the product sampling and control system is the improvement of the quality of life of the society and the reduction of potential economic damages along with the Strategy.

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. In the course of risk-based planning we differentiate 2 types of control: the intertwined system of the control of establishments (procedure control) and product samplings (product control).

The number of controls slightly increased compared to the previous year. Trend analysis of the effectiveness of controls is presented below by sectors.

Food chain supervision fee

In 2019 the amount of 14.15 billion HUF was collected as supervision fee and out of that 10%, 1.42 billion HUF could be allocated for development by NÉBIH.

Partners not having supervision fee declaration were controlled also in this year, and during thematic controls milk and milk product distributors were investigated. A total of 259 investigations were initiated. Some of the partners misinterpreted the legislation when calculating the supervision fee and applied the discount for small businesses, thus completed their declaration and paying obligations inadequately. As a result of the controls the inspectors uncovered 408 million HUF as supervision fee discrepancy and imposed about 18.7 million HUF as fine, surcharge and procedural costs.

Soil conservation

In 2019, during certification to the 955 Soil Protection Authority work, the appropriate authority was found in 62 cases, which took further action. The number of warnings in 2019 was 11, the number of penalties was 49.

1,563 lots of yield enhancing substances and EC fertilizers were inspected during 1,563 on-site visits and in 220 cases infringements were found. Altogether 220 non-compliances were detected during the controls. 265 samples were investigated in laboratory and in 36 cases non-compliances were identified.

The amount of 8 million HUF fine was imposed thereof the amount of more than 1.65 million HUF was soil conservational fine.

Plant health

There are altogether 309 plant health control tasks: investigations are carried out in 15 types of objects (including closed cultivation plants, open-air crops, forests, parks, warehouses, crossing points), for 11 cultures (e.g. open-air, grapes, vegetables, ornamentals, forestry), for 15 activities (e.g. production of goods, production of propagating materials, distribution, wood processing), and in relation to 75 pests.

The Flavescence dorée disease in grapes did not spread notably in 2019 but it also appeared in the autumn of 2019 in the Hajós-Baja wine region. The disease occurred sporadically in the western and middle parts of the country.

In 2019 17,966 plant health and pest detection investigations were conducted. In relation to imports 6,547 lots were investigated and in 101 cases the consignment failed. The non-compliant items were rejected or destroyed. In relation to export 18,847 lots were investigated; non-compliance was not detected.

In summary, regarding the whole sector, the number of non-compliances detected during plant health controls increased. The total amount of the fines was 1,030,000 HUF.

Plant protection

Out of them 3,362 official controls were carried out at producers and further controls were implemented in relation to cross compliance. Non-compliances were identified in 134 cases.

100 notification were received from the general public, which revealed the irregularity based on 25 cases. Most infringements were related to bee mortality (40 cases) and drifting of plant protection products (44 cases).

In PPPs producing and packaging establishments 14 controls were carried out and no infringement was discovered in 2019.

1,014 out of the 1,758 PPP retailers and wholesalers were investigated in 2019. A total of 1,014 controls were carried out; 1 infringement was identified. The most common error was the non-keeping of records and the violation of warehousing and storage regulations, as well as the failure to inspect purchasing rights.

14,233 items in total control of pesticide occurred in 2019. During inspections, inspectors most often encountered expired plant protection products, but in many cases there were problems with packaging or labelling.

Regarding pesticide residue testing, in 2019, Nébih performed an analysis of 1,965 samples of fresh vegetables, fruits and cereals as part of the sampling program. The inspections also covered inspections of production sites, markets, logistics centers, border posts, as well as producers participating in the agri-environmental and school fruit schemes. Domestic test samples were sampled at harvest at the place of production, at market outlets, and import test samples were taken at border posts and wholesale chains. 53.3% of the tested samples contained detectable but not objectionable amounts of pesticide residues. Due to the residue content measured above the limit value, 0.9% (19 pieces) of the samples were considered objectionable (apples, cucumbers, walnuts, lettuce, kohlrabi, kale, tomatoes, strawberries). In the case of 19 samples of domestic origin, the presence of plant protection products not authorized in each culture was detected in Hungary, which is 0.8% of the samples.

In 2019, the experts identified 3,644 patches infected with ragweed on the outskirts and ordered public interest protection on 2,496 ha in 2,962 cases. Helicopter-related exploration of ragweed areas took place in a total of 9 counties. A total of 487 ha of the sites inspected by aerial reconnaissance were found to be infected with ragweed. The area inspected by ground reconnaissance was 5,216 ha, of which a total of 4,995 ha was the area infected with ragweed. A total of 4,207 fine decisions were made externally and internally, and the amount of the fine exceeds 89.5 million HUF.

Control of products of plant origin

10,212 lots were inspected during the control of fresh fruits and vegetables. 891 lots were disapproved and the total amount of 20 million HUF fine was imposed. The proportion of non-compliances (8.7%) is very similar as in the previous year. 40 lots (58 tons) were destroyed, in most cases because of the infringement of traceability or unknown origin.

During the enhanced official controls on imports of certain food products of non-animal origin 6,649 items were inspected and 1 non-compliant batch was identified.

Control of plant propagation materials

In 2018, 1,048 screenings were carried out for GMOs and 14 lots of seed were identified to be positive. As in the previous years, GMO contaminated seed lots marked out for trade were not planted in 2019.

Controls related to vegetable planting materials (89), seed potato (49), fruit (649) and grapevine propagation materials (798) at producers and retailers did not revealed any serious infringements.

Veterinary medicinal products

During the production control of veterinary medicinal products, 27 inspections were carried out. The number of licenses issued following the inspection related to the manufacturing authorization was 42. Wholesalers of veterinary medicines were inspected in 17 cases. An application for the marketing of a formally defective veterinary medicinal product was issued for 37 products. Due to the illegal production, distribution and advertising of veterinary products, fines were imposed in 6 cases, and customers received warnings in another 10 cases. Activity (production, distribution) was restricted in 15 cases.

1,998 lots were inspected in 2019. Laboratory examination of 523 lots was carried out.

The authority received 9 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 initiated 1 RAS notification in 2019.

Animal health and welfare

In 2019, 18,085 controls were carried out in relation to animal welfare, 128 non-compliances were detected, and 34 million HUF fines were imposed.

In the frame of the annual disease control plan, risk-based controls were carried out on 18,377 holdings. During the controls 33 non-compliances were found.

In 2019 the Animal Health Diagnostic Laboratories of NÉBIH received 1,085,210 samples and 2,102,590 examinations were carried out.

Hungary is still officially free of *Brucella melitensis* and classical swine fever. No bluetongue outbreaks were identified in Hungary in 2019. If the monitoring results of the coming years will be satisfactory, Hungary can get back its officially free status of bluetongue in January 2021, at the earliest.

Bovine tuberculosis was detected in 2 bovine populations in 2019, but despite these cases Hungary still holds its official free status of bovine tuberculosis.

99.96% of Hungary's bovine populations are free of bovine brucellosis. No disease outbreak was identified in 2019.

Lumpy skin disease has not reached Hungary in 2019.

Classical scrapie and bovine BSE were not identified in any cases; thus, Hungary is still among the negligible BSE risk countries. In 2019 atypical scrapie was identified in 13 cases. Atypical scrapie was detected in sheep in 12 cases and in goats 1 case of classic scrapie.

In 2019 the PRRS eradication program was continued and since November 2017 the whole territory of the country counts as area declared for eradication. As a result, 151 districts out of the 174 (87%) earned the PRRS-free status by 31 of December 2019. Each small pig populations (more than 22.000 sows) are also free of PRRS in Hungary. In addition, 23,554 tests were performed by the veterinary laboratory in 2019.

In April 2018 African swine fever (ASF) was detected in Hungary in wild boars. In the frame of ASF surveillance programme the virological testing (PCR) of 53,812 wild boars were performed, whereof 2,350 were found to be positive. In the frame of the enhanced passive surveillance programme 9,369 PCR tests of domestic pigs were carried out in the Nébih's laboratories, all of them with negative results.

On the common border with Ukraine disease control measures were applied by the authority continuously to reduce the risk of introducing African swine fever to Hungary, including the disinfection of incoming vehicles and the confiscation and sampling of non-commercial foods of animal origin from personal luggage. 31 negative and one positive virological (PCR) tests were performed on pork confiscated at the Ukrainian border.

In 2019, samples of poultry and farmed wild birds, as well as wild birds, were received for the detection of avian influenza, during which 11,286 samples were serologically tested and 3,306 samples were virologically tested. Last year, the national reference laboratory did not detect highly or low pathogenic avian influenza strains.

Food and feed safety

In 2019, 45,384 establishment controls were carried out in the frame of food chain safety supervision. The total amount of 673,799,602 HUF fines was imposed in 2,496 cases.

The total number of 3,524 lots of feeding staff was investigated. Infringements were identified in case of 58 lots. During 724 controls 25 non-compliances were issued and 16 warnings applied. One business was closed.

Suspected cases of food-borne diseases were reported in 60 cases with 2,395 affected consumers. According to the results 35 cases were related to foodstuff and 2,030 consumers were affected, whereof 173 consumers were hospitalized, none of them died. The number of

food-borne illness events in 2019 is the first decade of declines. For recorded foodborne illnesses, 10 of the 35 events were mass events — related to more than 29 meetings at a time — another 20 groups (involving 5-29 people) or 5 individual meetings were recorded. There was a proportional decrease in the number of food poisonings and food infection events related to catering events.

In 2019 the project of “Quality driven mass catering” was continued in order to improve the quality and safety of mass catering. By the end of 2019, 5,410 public catering establishments (where the preparation of meal is also performed), and further 3,968 establishment (where the meal is only heated or kept at the right temperature) were rated based on uniform and publicly available food safety and quality aspects.

Via the RASFF system 126 notifications were received in 2019 and out of that 105 were related to foodstuffs, 15 were related to feedstuffs and 6 were related to food contact materials. Hungary initiated 18 alerts, 5 information and 3 border-rejections. Hungary was addressed by other Member States in 3 cases and initiated bilateral requests in 4 case.

Via the AAC system Hungary was involved in 59 notifications in relation to administrative assistance and in 17 notifications regarding counterfeiting issues in 2019. The reasons of non-compliances were: labelling infringements, microbiological non-compliances, non-authorized substances, illegal production and traceability issues, false documents, illegal distribution and quality problems.

Winery products and other alcoholic drinks

Nébih – together with the county government offices – performed 2,476 inspections of winery products and other alcoholic drinks and 1,799 official samples were collected. Altogether 17,476 laboratory samples were investigated.

According to the results of laboratory tests 676 unissued products were non-compliant (4.4%) and public proceedings were initiated in case of 93 issued winery and 22 other alcoholic drinks lots. During the controls altogether 115 lots were non-compliant.

Priority Cases

In 2019, Nébih employees performed a total of 582 key inspections. Based on their preliminary analysis methods, the detection rate is 95%. In 200 cases, official proceedings were initiated, and fines were imposed, involving 428.03 tonnes of food and 2,904 tonnes of live animals. During the initiated proceedings, a procedural difference of 14,212,704 HUF and a food chain supervision fee difference of 29,662,100 HUF were imposed.

Control activities of livestock holdings continued in 2019. In 94 holdings, 2,904 animals were subject to traffic restrictions, either because the holdings or the movements of animals were not reported.

The control activities on the retail of PPPs also continued in 2019.

As new activity, controls of dietary supplements were carried out, primarily focusing on potency-enhancing, fat burner, etc. products. Non-authorized and active substances were identified in 5 products. In several cases traceability and labelling infringements were found, that resulted in the withdrawal and recall of products.

Organic production

The control of organic production, processing and distribution and the issuance of certifications are carried out by two certifying bodies in Hungary, namely Biokontroll Hungária Nonprofit Kft. and Hungária Öko Garancia Kft.

In 2019, during the control of organic production 896 controls were planned based on risk analysis. The number of sanctions was 67.

2 Key data on controls

2.1 Significant developments in relation to main priorities

The *Food Chain Safety Strategy* that was accepted in 2013 by the Government decree 1703/2013 determines the most important targets and duties connected to food chain safety for the next ten years. There are two base concepts in 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 goals.

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 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.

The first projects connected to strategic goals were initiated in 2014, but their implementation does not exclude the launching and implementation of new projects in the future. In 2019 there were no significant changes regarding the main priorities of the strategy.

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.

Activities related to the reconstruction of the risk assessment system were continued in 2019. The most important one is the 'Intelligent Food Chain Safety Analysis System' (INTEL) project that aims for the further development of the existing IT systems. As part of the project a new data warehouse (DWH) will be developed as well. The DWH collects data from the IT systems of the different sectors and enables the combined analysis of these data, and therefore more data can be included in the risk assessment system.

In July 2016 the Centralized Product Sampling Project (CPSP) was launched in NÉBIH. To support the project a new electronic sampling system was developed that enables to change from paper-based to electronic sampling. As a result, data can get to the (online) database and via internet can be reached, searched and analysed immediately, administration is reduced, and the hand-written reports are replaced by printed, readable reports.

In the 2019 monitoring year the CPSP continued. The samplings of more than 18,000 products were planned, whereof 93% were also performed. 194 non-compliant products were found. The highest levels of non-compliances were identified in products taken in the frame of fight against honey counterfeiting, microbiological and quality sampling plans.

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.

The overall number of controls slightly increased compared to the previous year. Data of controls compared to the previous years' results are shown in [Annex 1](#).

3 Trend analysis of non-compliance

3.1 Statement of overall trends in compliance

The number and proportion of non-compliances were similar to the previous years'. Both the number of lots investigated on-site and the ratio of non-compliances have remained the same range.

The number of laboratory tests and the number of detected non-compliances have not changed notably. 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 detected by the authority are mostly traceability and general hygiene shortcomings. Infringements regarding expired goods (both use-by and best before dates), as well as the usage of unlabelled commodities or ingredients of unknown origin in high quantities are still the most frequent reasons of non-compliance among food producers.

Product controls and analyses showed microbiological, organoleptical and quality (analytical problems including food additives) failures and non-compliances in the first place.

3.3 Identified causes

The main reasons of non-compliance did not change significantly compared to 2017. As in previous years, traceability and hygienic shortcomings were identified most frequently. Main cause of a high number of warnings is still inappropriate administrative discipline and documentary shortages of FBOs.

Hygienic and quality management shortcomings, e.g. lack of cleaning, inadequate storing conditions, noncompliant HACCP systems or bad personal hygiene, are also usual in several sectors. In fewer cases, lack of required licenses or identifiers can be also a cause for non-compliance.

In mass catering most quality problems are due to the usage of unfit ingredients, shortcomings in kitchen technology and the long food delivery times between the places of cooking and serving.

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 2018 the number of soil conservational inspections decreased compared to the previous year. The number of inspections connecting to yield enhancing substances and EC fertilizers also increased remarkably. The number and proportion of non-compliances decreased compared to the previous year.

It can be concluded that regarding the whole sector in 2019 the number and proportion of warnings decreased; however, the number of fines did not change compared to 2018.

The amount of fines imposed decreased. (18 million HUF fine was imposed in 2018 and 8 million HUF fine was imposed in 2019).

Plant health

The number of inspections related to exported products did not change compared to 2017, while the number of inspections related to imported products slightly increased. The number of inspections conducted at retailers and wholesalers is somewhat less than in 2017.

The number of non-compliances related to imports decreased, non-compliant items were rejected. A warning or fine was also imposed in 2019. The number of businesses closed did not change compared to 2017. During the export inspections non-compliances were not detected.

The number of lots inspected on-site increased, but the number of laboratory diagnostic tests slightly decreased. The number of infected samples greatly increased mostly due to the producers of wood propagation materials compared to last year's results.

Plant protection

The number of inspections carried out at producers decreased and the number of related infringements did not change. The number of warnings and fines imposed did not change compared to the previous year, but less businesses were closed.

The number of inspections initiated by complaints increased, the number of non-compliances and warnings decreased, but the amount of plant protection fines have slightly decreased compared to 2018.

PPP producer and packaging plants complied with legal requirements in both years since only a few infringements were discovered.

The number of infringements and warnings related to controls of PPP distributors decreased. Although the number of fines imposed slightly increased, the total amount of fines is significantly less than in 2018 (in 2018: 2.7 million HUF, in 2019: 1.4 million HUF).

In 2019 the number of visual controls of PPPs and the number of noncompliant lots decreased.

Based on the results of the inspections of ragweed areas, the proportion of violations did not change, however, the number and the amount of plant protection fines have decreased compared to 2018.

Controls of products of plant origin

The number of lots investigated during fruit and vegetable controls has been at same level for years, but it slightly increased compared to 2018. In case of the lots inspected on-site the number of non-compliant lots slightly increased compared to 2018. Although the number of warnings and fines did not change, the amount of fines decreased compared to the previous year (in 2018 37 million HUF, in 2019 21 million HUF).

In 2019 infringements were mainly related to products of unknown origin and the violation of traceability.

Control of plant propagation materials

Regarding the whole sector it can be concluded that generally the actors still show law-abiding behaviour.

Veterinary medicinal products

In 2019 the number of controls related to production and distribution of VMPs decreased compared to 2018. However, the rate of non-compliances related to production and distribution of VMPs decreased in 2019.

The proportion of warnings did not change, but the number of fines imposed decreased and number of fines slightly increased. In 2019 more businesses were restricted than in 2018.

Animal health and welfare

The rate of infringements decreased, but the proportion of warnings and fines related to animal welfare increased compared to 2018. The amount of fines imposed increased compared to 2018.

The number of animal health controls, the proportion of related non-compliances and sanctions are similar than in the previous years. An increase can be detected in the number of controls related to the export of live animals.

The number of controls related to animal by-products shows a greater decrease, but the number of related non-compliances and warnings increased compared to the previous year.

Food and feed safety

The most common non-compliances related to establishment controls were hygienic or traceability shortcomings.

According to product controls the most common infringement was the trade of expired goods (regarding both use-by and best before dates) just as in 2018. It was followed by traceability and labelling failures.

Product controls and analyses showed organoleptical failures in the first place, followed by microbiological and quality failures (analytical problems including food additives). Non-compliances related to food safety requirements were identified as well (e.g. chemical contaminants, residues of VMPs, etc.), however the number of these infringements were much lower.

The number and rate of non-compliances revealed during establishment controls related to feedstuffs were smaller compared to previous year. The number of fines has not decreased and the amount of fines imposed has decreased significantly compared to last year. The non-compliances revealed by laboratory examinations of feedstuffs were typically quality issues. The rate of non-compliances decreased in case of the lots investigated on-site (in 2018: 7.3%, in 2019: 1%) and increased in case of laboratory investigations (in 2018: 1.5%, in 2019: 2.1%).

Winery products and other alcoholic drinks

1799 samples were taken during the inspection of winery products and other alcoholic drinks, that shows a slight decrease compared to 2018. The disapproval rate shows a continuous decrease compared to previous years (in 2017: 7.7%, in 2018: 6.5%, in 2019: 5.3%). The total number of samples investigated shows a minimal (0.3%) decrease compared to 2018.

The number of issued licenses continuously increases since 2012, in 2018 by 0.01% compared to the previous year.

The number of licences related disapproves affected 4.4% of the related samples that shows an increase of 0.8% compared to 2018.

Priority Cases

The number of inspections stayed at the same level as in 2018; and the rate of infringements also did not change notably. The amount of fines imposed increased compared to 2018.

The most common non-compliances were still shortcomings related to traceability and food-hygiene as in the previous years.

Food producing FBOs often use expired commodities or high quantity of substances of unmarked, unknown origin.

Investigations of traceability at small producers were carried out in several cases. According to these investigations it can be concluded that small producers often exceed the limitations of the producing volume and overstep the territorial marketing limits.

Organic production

According to the control results of Biokontroll Hungária Nonprofit Kft. the number of infringements decreased by one third compared to the previous years. In case of agricultural producers, the most common infringements were shortages in documentation that can influence the certification and violation of the rules of parallel farming.

In the case of controls carried out by Hungária Öko Garancia Kft. number of sanctions did not change compared to 2018. The most frequent sanctions were requests for replacement of documents.

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

Data compared to them of the previous years are presented in [Annex 2](#). Generally, in 2019 the number of warnings and the number of fines decreased, but businesses closed imposed increased.

5 The National Audit System

5.1 Number of audits and sectors covered

Inspections by the National Food Chain Safety Office

There are two ways to review the consistency and effectiveness of food chain inspection authority activities.

- Audits: independent audits of the activities of the food chain inspectorate, the intermediaries involved and the agricultural administrations in accordance with Article 4 (6) of Regulation (EC) No 882/2004 and audits of the tasks delegated in accordance with Article 5 (3)
- Professional reviews: review of the legality and professionalism of official activities under the professional management of the Minister of Professional Administration in cooperation with the Minister responsible for the organization of public administration.

Audits

In the framework of internal audits, Nébih reviews the activities of the entire food chain supervisory authority, for which it has established a separate organizational unit within its own organization. The independence and independent review of the audit system is ensured. It operates a quality management system based on the MSZ EN ISO 9001: 2015 standard - integrated with the MSZ EN ISO 19011: 2018 standard, which ensures the systematicity and transparency of the audit process. It examines the audit topics within its scope within the framework of a five-year audit program (effective: 2016-2020). In developing the annual audit program, it takes into account, among other things, legal requirements, the results of professional reviews, and the assessment of risks in the areas of the audit universe. Compliance of the audit universe and the audit program for 2021-2025 with Regulation (EC) No 2017/625 will be achieved by the end of the first half of the year. The competence of the audit system includes the review of Nébih, county government offices, district offices, and registered ecological inspection bodies. The staff performing the audits changed during 2019. One auditor left in April, two new auditors arrived in June whose training is ongoing. Currently 3 people can perform audits. New auditors have less than one year of experience per person.

Professional reviews

The Prime Minister's Office operates a system of reviewing the capital's and county government offices and district offices under its control, for which he prepares an annual Inspection Plan, which is approved by the Minister in charge of the Prime Minister's Office. In the case of government offices, in the fields of professional supervision of the Minister of Agriculture, the Departments of the Ministry of Agriculture and Nébih make thematic proposals for the Inspection Plan for the following year.

Type of inspections included in the Inspection Plan:

- Comprehensive inspections: The Prime Minister's Office conducts a full review of professionalism, efficiency, legality and management of the selected County Government Office. Experts from the background institutions of the professional

managing ministry are also involved in the review of professionalism and legality, who prepare a partial report. The inspection report is issued by the Minister in charge of the Prime Minister's Office.

- Professional reviews: The Departments of the Ministry of Agriculture and the professional directorates of Nébih carry out professional and legal reviews of the official activities of county and district offices in the areas under the professional management of the Minister of Agriculture, within the framework of professional topics, objectives and follow-up audits. Nébih decides independently on the topics to be examined next year, the review is carried out by the professional directorates without the participation of the Prime Minister's Office. A report on the inspections carried out by Nébih shall be issued by the President of Nébih.

The rules for conducting professional reviews are contained in the Government Decree on the government offices of the capital and counties, as well as the district (capital district) offices, and the Guidelines issued by the Minister responsible for the organization of public administration.

Audits and technical audits

The preparation of Nébih's annual audit programme is preceded by a one-month long planning procedure. During this planning process the relevant stakeholders and their requirements and other risk factors are identified that can have an effect on the audit process, programme or on the implementation of the audits and based on the risk analysis it can be decided for which factors risk management actions have to be introduced.

In 2019 out of the 58 planned investigations (audit and technical audit) 49 were realized, 9 were cancelled. 3 out of the 3 planned audits were performed, while 55 were realized out of the 46 planned technical audits.

During the technical audits, the entire territory of the country was covered apart from 2 counties. In the course of the 2019 audits, in addition to the annual review of the organizations performing the inspection and certification of organic farmers, the review of the effectiveness of official inspections of smallholders came to the fore, during which one district office in each of the three counties were reviewed. 18 days were spent outside the office during the on-site audits.

Type of investigation	Number of investigations	Investigated area	Executive bodies
Audits	3	-	System Management and Supervision Directorate
Technical audits (special, target and follow-up audits)	3	veterinary medicinal products	Directorate of Veterinary Medicinal Products
	16	animal breeding, seed corn, propagation materials	Agricultural Genetic Resources Directorate
	3	food	Directorate of Oenology and Alcoholic Beverages
	8	food, feed	Food and Feed Safety Directorate
	11	forestry	Directorate of Forestry*
	14	plant, soil	Directorate of Plant, Soil and Agri-environmental Protection;
Total number of technical audits	55	-	-
Total (audits + technical audits)	58	-	-

**On July 1, 2019, the Forestry Directorate of Nébih and its tasks were transferred to another authority, the audit reports of the second half of the year no longer include*

Table 1: The summary of audits by executive bodies in 2019

5.2 Results

Annual review of certification bodies carrying out inspections and certification of organic farmers

There are two inspection bodies in Hungary, which are audited annually by Nébih as the competent authority supervising organic production in accordance with Article 27 of Regulation (EC) No 834/2007. The reviews shall examine compliance with the requirements for the exercise of delegated tasks under Article 5 (3) of Regulation (EC) No 882/2004. The Independent Department of Nébih Audit annually examines the adequacy, efficiency and suitability of the inspections in a selected production branch (crop / livestock farmer, processor, etc.) by means of a witness audit, interview and documentation examination method. In 2019, the organizations responsible for the control and certification of organic farming were reviewed and the effectiveness of controls was audited at the processing operators. In 2019, two of the six OFIS notifications concerned the processing sector, and the procedure followed was appropriate.

Inspections of inspection bodies are carried out annually by the National Accreditation Authority, which revealed minor non-compliances. Both inspection bodies have valid

accreditation for the scope of the Organic Regulation. Complaints concerning the operation of inspection bodies are investigated by Nébih in the framework of official proceedings and, in the event of an infringement, measures are taken to put an end to the infringement. The authority may issue a warning against a control body that violates food chain safety legislation, impose fines and oblige it to act. If the operation of the inspection body does not comply with the ecological provisions, NÉBIH may suspend the activities of the inspection bodies or a part thereof for a maximum of 60 days, it shall revoke the approval of the inspection body in the absence of the required action. In 2019, no official action was taken against the inspection body.

The certification bodies carried out an annual full inspection of all their contracted partners, as well as additional inspections and sampling based on a risk assessment. Based on the results of the audit so far, it can be concluded that the certification bodies performing the delegated authority task meet the requirements of the delegation.

Review the effectiveness of official controls on smallholders

The audit assessed whether the regulatory actions required smallholder food production, preparation and distribution in respect of compliance with the requirements of the law and other prescriptive documents or are being carried out effectively. As part of the system audit, an office audit, a documentation examination and a witness audit were carried out with a review of the performance of tasks at the central, county and district levels.

The district offices (JH) and Nébih have the power to inspect smallholders at the first instance. The professional management of the official control of smallholders is the responsibility of the designated directorates of Nébih. The risk-based planning of the inspections is performed by Nébih, which in the small producer sector 2018-2019. in the audit year did not specify the companies to be audited, but a so-called established a compensatory control number taking into account county specificities. In addition to central risk-based audit planning, the district offices selected the smallholders to be audited based on a risk assessment. A uniform guide to official procedures is available, but no uniform guide to specialized inspections has been issued for the smallholder sector. The control plans do not focus on the control of the basic plant and animal product, so it is not known who should be inspected in the context of small-scale primary food production. smallholders are registered with the district office, which is based on previous guidance on the procedure, and needs to be updated to reflect current regulations. County and district bodies have developed unique solutions for registering smallholders. IT systems for recording inspection reports and collecting data on smallholders have been introduced, but their use is limited.

For the years 2019-2020, only the so-called compensation inspections have been allocated. The inspections were carried out. The general lack of specialists in the system of official organizations is also typical in the inspections of the smallholder sector, they cannot ensure the rotation of inspectors, which is why inspection blindness occurs. The examined official inspections did not cover all areas of activity of smallholders, e.g. for the production and storage of the primary plant product. The task of the different levels of authorities for the control of the basic plant product, the basic product of animal origin and the food made from it, the joint planning of the inspections, and the coordination between the units are realized only to a small extent at the territorial bodies. In the absence of control planning, professional system

use, communication gaps, and a lack of uniform guidance and review by first-degree officials, smallholder violations may remain hidden. The efficiency of official controls in the smallholder sector is an area for improvement, and uniform procedures need to be introduced.

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.

In 2019 the amount of 14.15 billion HUF was collected as supervision fee and 10% of that, 1.42 billion HUF could be allocated for development by Nébih. The collected amount is 5% more than the amount of 2018. 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 2019, 7.64 billion HUF was transferred as shared public revenue to the CGOs. The remaining 6.51 billion HUF was utilized by the Nébih. 198 million HUF out of the CGOs' revenue was transferred only in 2020, following the year-end accounting closure, due to the new deadlines declared by the legislation.

6.2 Staff

The staff of Nébih for 2019 is given in the following table. At the Nébih only staffing of directorates responsible for tasks regulated by 882/2004/EC is presented.

Nébih - Directorates involved in food chain supervision	Systems Organization and Supervision Directorate	65
	Risk Management Directorate	37
	Directorate for Priority Cases	27
	Directorate of Veterinary and Animal Welfare	23
	Veterinary Diagnostic Directorate	137
	Food and Feed Safety Directorate	43
	Veterinary Products Directorate	22
	Directorate of Wine and Alcoholic Beverages	32
	Plant, Soil and Agri-Environment Directorate	41
	Directorate of Genetic Resources for Agriculture	82
	Food Chain Safety Laboratory Directorate	173
	Internal Audit and Audit Directorate	4
Food Chain Safety Center Nonprofit Ltd.	Laboratory activities	195
	Other supporting activities	54

Table 2: Number of staff by operational level and organizational unit

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.

The current professional objectives are presented in the Food Chain Safety Strategy, in which there were not any changes in 2019.

7.2 Changes in legislation

In 2019 32 sectorial decrees were published and 20 new directives and orders regulate the activity of authorities.

7.3 Organisation

In December 2019, the Minister of Agriculture issued the 9/2019 Ministerial ordinance on the Organisational and Operational Rules of Nébih that regulates the operation of the authority along with its organisational structure and tasks. This Organisational and Operational Policy contains provisions relating to the personnel, managers, departmentstructure of the National Food Chain Safety Office, the duties and operations of Nébih, and the professional cooperation of Nébih and ÉLBC Kft.

The new organizational structure of Nébih is shown in the figure below.

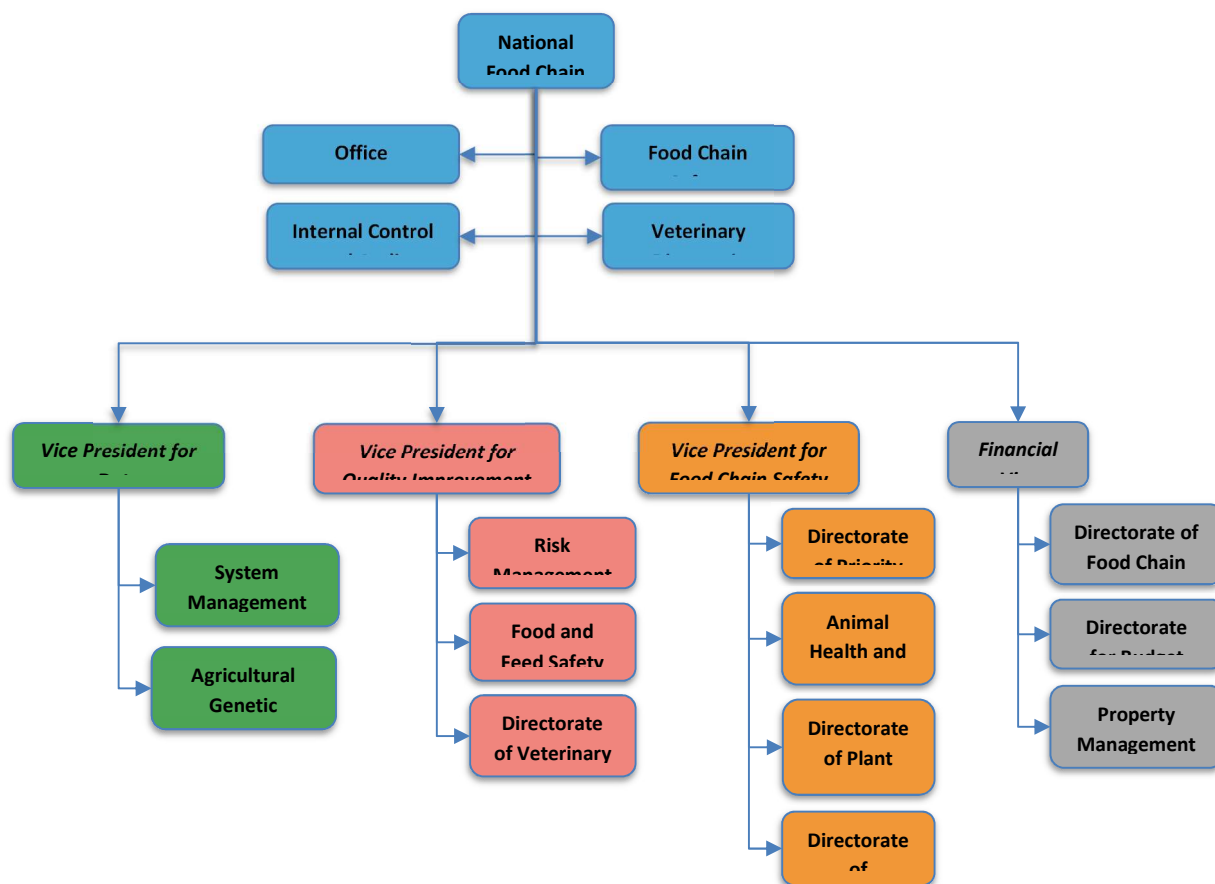


Chart 1: Nébih's new organisational structure

7.4 Procedures

Altogether about 106 documented procedures and circulars regulate official actions in different sectors.

Sector	Number of procedures	Sector	Number of procedures
Soil conservation	2	Animal health	9
Plant protection, plant health	12	Animal welfare	6
Plant propagation materials	13	Winery and alcoholic beverages	3
Food safety	26	Other	38

Table 2: Number of procedures in 2019

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.

The 'Intelligent Food Chain Safety Analysis System' (INTEL) project started in 2017 and closed on 28 February 2019. One of the priority objectives of the INTEL project was to optimise and modernise the authority's existing data analysis systems and to make a major contribution to the simplification of the administrative tasks. This system development was another important step towards faster and more effective management of the risks and current problems in the domestic food chain.

In 2019 the implementation of the Priority Project on the Control of Aquaculture Activities in the frame of the Hungarian Fisheries Operational Programme continued, including the launch of IT developments. The aim of the project is to strengthen the capabilities of NÉBIH in the fight against FBOs engaging in criminal activities.

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.

In 2019, e-learning training was carried out by 14,508 people, including online African swine fever (ASF) epidemiological training and basic forestry staff training.

NÉBIH also organizes so-called regional trainings for the co-workers of the regional competent authorities carrying out official controls and for law enforcement personnel. During these trainings NÉBIH draw their attention to the current food chain safety tasks and problems by providing detailed technical information on them.

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, food chain safety and traceability issues, food and plant protection product frauds, the legal requirements and control of indoor big game farming, the official control of food producing establishments with US export license, etc.

8.2 Guides to Good Practices

In 2019, the guides "Guide to good hygiene practices in retail food distribution" and "Infographic: good hygiene practices for retail food distribution" were completed, and three previous guides have been updated, the "Guide to Good Hygiene Practices in the Bakery Industry" in 2008 and two more in 2009, the "Guide to good hygiene practices in the manufacture of meat products" and "Guide to good hygiene practices in the production of milk and milk products".

Annex 1.**Control data 2016-2019.**

Sector	Number of inspections			Non compliances		
	2016	2017	2018	2016	2017	2018
Soil protection	2 057	4 087	2 778	298	739	395
Plant health	24 106	25 838	26 570	47	98	146
Plant protection	9 367	9 078	11 154	2 610	3 118	4 029
Vegetable & Fruit control	19 509	21 549	21 796	1 147	1 389	1 085
Plant propagation materials*	-*	12 610*	11 444*	-*	266*	311*
Feed safety	1 171	1 120	893	64	68	46
Veterinary medical products	67	44	48	25	18	25
Animal health	71 633	48 454	69 649	103	354	122
Animal welfare	18 078	15 706	19 787	186	210	142
Animal by-products	1 941	1 869**	2 834	17	8	7
Food production	13 728	13 419	12 874	1 179	870	887
Food distribution	26 046	26 279	23 276	2 371	2 633	2 246
Catering	20 323	20 813	18 741	1 859	1 636	1 601
First place of storage	4 174	4 523	3 745	101	231	137
Food products	-	-	-	-	-	-
Winery and Alcoholic beverages	4 187	3 940	2 892	368	342	216
Imported plant products	4 950	5 341	5 861	1	1	1
Imported livestock	8 369	6 934	8 707	22	7	17
Priority controls	705	597	581	316	233	218
Total	230 411***	222 201***	243 630	10 714***	12 221***	11 631

* Due to a new reporting structure, data reported on 2018 were significantly different from the data on previous years. Data on 2016 - 2017 were modified according to the new reporting structure.

** Data revised and corrected in 2019.

*** Due to the modified data on Plant propagation materials, the Total numbers have changed as well.

Sector	Lots inspected on-site			Non-compliant lots			Lots inspected in laboratory			Non-compliant lots		
	2016	2017	2018	2016	2017	2018	2016	2017	2018	2016	2017	2018
Soil protection	1 795	1 253	982	65	103	85	297	289	262	55	37	39
Plant health	19 573	15 735	19 638	233	1 145	473	16 290	20 192	19 019	581	929	1 900
Plant protection	55 178	50 276	41 688	850	880	663	2 286	2 630	2 906	32	28	55
Vegetable & Fruit control	19 386	21 549	21 796	1 014	711	300	0	0	0	0	0	0
Plant propagation materials*	-*	15 798*	14 047*	-*	266*	311*	-*	10 890*	9 650*	-*	14*	11*
Feed safety	2 447	2 548	2 029	97	231	149	2 820	2 891	3 232	147	85	49
Veterinary medical products	0	0	0	13	11	14	0	0	0	0	0	0
Animal health	0	-	-	0	-	-	0	0	0	0	0	0
Animal welfare	-	-	-	-	-	-	0	0	0	0	0	0
Animal by-products	221	206	-	-	-	-	0	0	0	0	0	0
Food	134 785	116 759	116 038	5 887	6 212	8 671	-	-	-	-	-	-
First place of storage	3 910	4 096	4 817	14	27	48	-	-	-	-	-	-
Food products	71 937	45 852	53 751	3 209	2 772	2 896	53 994	51 892	50 429	0	0	-
Winery and Alcoholic beverages	4 187**	3 940**	2 892	358**	342**	216	2 852	2 519	2 437	368	194	158
Imported plant products	4 950	5 341	5 861	1	1	1	354	368	389	1	1	1
Imported livestock	6 176	421	-	0	0	0	13	0	0	0	0	0
Priority controls	0	0	0	0	0	0	44	37	40	0	0	0
Total	324 545**	283 774**	283 539	11 741**	12 701**	13 827	-	-	-	-	-	-

* Due to a new reporting structure, data reported on 2018 were significantly different from the data on previous years. Data on 2016 - 2017 were modified according to the new reporting structure.

** Data was revised and modified in 2019.

Annex 2.**Sanction data 2017-2019.**

Sector	Warnings			Fines imposed			Businesses closed		
	2017	2018	2019	2017	2018	2019	2017	2018	2019
Soil protection	451	205	143	162	164	145	82	54	50
Plant health	6	0	0	1	0	2	82	71	111
Plant protection	81	66	44	2 907	4123	4338	53	8	0
Vegetable & Fruit control	343	364	397	684	661	498	0	0	0
Plant propagation materials*	0*	0*	45	0*	0*	5	0*	0*	6
Feed safety	25	29	16	40	16	8	3	1	1
Veterinary medical products	11	13	10	7	12	6	12	9	15
Animal health	50	21	32	6	10	15	0	2	46
Animal welfare	70	99	38	40	52	78	0	0	0
Animal by-products	4	2	6	2	1	3	-	1	1
Food production	345	381	355	449	427	488	76	79	91
Food distribution	597	565	580	1 864	1 463	1288	172	88	85
Catering	491	504	477	963	944	975	182	152	195
First place of storage	215	124	175	14	12	9	2	1	3
Food products	0	0		0	0		0	0	
Winery and Alcoholic beverages	113**	61	-	224**	211	-	9	3	4
Imported plant products	-	-		-	-		-	-	
Imported livestock	0	0		0	-		-	0	
Priority controls	0	0		233	218		21	45	
Total	2 802**	2 502	2318	7 596**	8 185	7858	694	514	608

* Due to a new reporting structure, data reported on 2018 were significantly different from the data on previous years. Data on 2016 - 2017 were modified according to the new reporting structure.

** Data was revised and modified in 2019.

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