GREECE

NATIONAL TRADE FACILITATION STRATEGY

FETA CHEESE PROTECTED DESIGNATION OF ORIGIN (P.D.O.)



BUSINESS PROCESS ANALYSIS OF FETA CHEESE EXPORTS FROM GREECE TO RUSSIA

December 2012 – February 2013

Business Process Analysis Pilot Phase

ACKNOWLEDGEMENTS

This report summarizes the work performed within the framework of the first phase of the Business Process Analysis (BPA) project for the Export of Feta cheese from Greece to Russia. The BPA team was consisted of officials of the following ministries, as following:

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The following organizations provided input for describing the export processes under consideration.

- Hellenic Federation of Enterprises "SEV" (www.sev.gr)
- PanHellenic Exporters Association "PSE" (www.pse.gr)
- Hellenic Foreign Trade Board "HEPO" (http://www.hepo.gr)
- Greek international Business Association (ex. Northern Greece) "SEVE" (www.seve.gr)

- Hellenic Association of Milk & Dairy Products Industry "SEVGAP" (www. sevgap.gr)
- Association of International Freight Forwarder & Logistic Enterprises in Greece "IFFAG&L" (www.synddel.gr)
- Hellenic Logistics Company "EEL" (www.eel.gr)
- Greek Federation of Customs Brokers "OETE" (www.oete.gr)
- DHL Global Forwarding Hellas SA "DHL" (www. dhl.com)
- Piraeus Container Terminal S.A "PCT" (http://www.pct.com.gr)
- Vigla Olympus S.A.- Feta Cheese Producer, (www.proto.gr)
- Region of Attica Regional Division of Northern Athens Directorate of Rural Economy and Veterinary Medicine – Department of Veterinary Medicine
- 5th Customs Office of Piraeus

EXECUTIVE SUMMARY

With the objective of enhancing growth, the Greek Government presented in the 1st of November 2012 a comprehensive National Trade Facilitation Strategy, which sets out 25 actions, with the overall aim to reduce time to export by 50% and costs by 20% by 2015, thus leading to 10% increase in exports' value, 1.7% increase of the GDP and 80.000 new jobs.

A specialized Business Project Analysis Team was formed, consisting of officials from three major Ministries (Ministry of Finance, Ministry for Development, Competitiveness, Infrastructure, Transport and Networks and Ministry of Rural Development and Food) under the guidance and support from the TFGR and the technical assistance of UNECE as well as the consultancy and scientific guidance of the University of Athens. This BPA team will search, locate and record the exporting procedures in Greece, having as its ultimate goal the facilitation of exports in favor of the Greek exporters as well as the national development and growth.

In this direction, the BPA team chose to study feta cheese export procedures.

The flagship of our products, **Feta cheese**, is a real masterpiece of our cultural inheritance and one of the strong assets of our agricultural products, together with all other products of Protected Designation of Origin (PDO). Greece has two aces up in its sleeve: olive oil and feta cheese. According to Mc Kinsey's study "Greece 10 Years Ahead: Defining Greece's new growth model and strategy - Food Manufacturing, Athens, September 2011", even though Greece holds the exclusive feta PDO brand name, our country's international share of feta type of cheeses is only **28%!**

Positioned at the top of the Greek Mediterranean nutrition pyramid, feta cheese strangled to validate its Greek identity, as many countries systematically strove to usurp its name for their own benefit, misleading the consumers worldwide. After a lengthy litigation in the European Court to ensure the feta cheese as a traditional Greek product of Protected Designation of Origin (PDO), the court's decision (2005) marked a considerably positive evolution and since then it is a useful weapon in Greece's exports quiver. However, though the "war" has ended, many efforts are required in numerous countries by the Economic and Commercial Affairs Officers of the Greek Embassies with the aim to protect feta cheese against unfair competition, as the European Regulation for the protection of this product is systematically violated, damaging the product itself as well as the reputation of Greece.

INTERNATIONAL MARKET AND RUSSIA

Among all international markets, Russian market for feta cheese is at the top of our interest at this point, as it presents a minimum, though steady increase of a 0.26% yearly average since 2009. Bearing in mind that Russia is for Greece a target-country for most of its agricultural products, the BPA team's objective is to facilitate all relevant export procedures, in order for new agreements to emerge and new exporters to penetrate the Russian market, one of our most traditional national products, "feta cheese".

The promotion of feta cheese in the Russian market is of great importance for the Greek exporters, as they watch a near 80% increase of its export to the U.S.A. market, and since Russia is geographically nearer, they wish to open the Russian doors to this product as well.

The Russian consumers have proven that they can distinguish and positively evaluate a product of Protected Designated Origin in many Greek products. They also demonstrate an increased interest in products of high nutritional value and are getting sensitive to health nutrition issues. The

Mediterranean diet is the new trend in the Russians' gastronomical habits, especially for consumers belonging to upper social class and the Greek exporters are ready to take their place in the Russian market.

Nevertheless, the Greek authorities impose many bureaucratic obstacles, which definitely need to be raised. In addition, Russian authorities impose relevant impediments, in order to protect their imports, thus hindering feta cheese to reach the Russian consumer.

Basically, having the lead of the 212% feta cheese increase in Ukraine during the first semester of 2012 in comparison to 2011 (Data: Association of Greek Livestock), the enlarged Russian market seems to be a very interested upcoming market for feta cheese producers.

The BPA team is certain that all data collected and observations stated in this report related to feta cheese can be elaborated and developed into the simplification of bureaucratic procedures, ultimately leading to an export outbreak of feta cheese towards Russia, a vast market that has proven to welcome numerous Greek products of Protected Designation of Origin (PDO).

TABLE OF CONTENTS

| ACKNOWLEDGEMENTS | 2 |
|--|----|
| EXECUTIVE SUMMARY | 4 |
| TABLE OF CONTENTS | 6 |
| LIST OF TABLES | 7 |
| LIST OF FIGURES | |
| LIST OF ABBREVIATIONS AND ACRONYMS | 7 |
| A. Introduction | |
| A.1. FETA - General information & Historical data | 9 |
| A.2. PDO Greek cheeses | |
| A.3. Feta cheese production details | |
| A.4. The World Market for White Cheese | |
| A.5. Feta Cheese production in Greece | |
| A.6. Exports of EU milk and dairy products to Russia - Provisions | |
| A.7. Export of dairy products to Russia through another member state-Veterinary Cert | |
| B. Scope of the first phase of the pilot study and Methodology Used | |
| B.1. Defining the scope of the study | |
| B.2. Methodology Used | |
| C. Shipment business process area | |
| C.1. A. Obtain veterinary certificates and arrange the veterinary inspection | |
| C.2. Transport arrangement, collect an empty container from yard and stuff it | |
| C.3. Customs Declaration (via exporter or his representative) – Clearance at the Custor | |
| of Export | |
| C.4. Procedures at the customs office of exit | |
| C.5. Final customs formalities & Stow container on vessel – cargo manifest | |
| C.6. Business processes of feta cheese export a nutshell | |
| C.7. Cost Analysis | |
| D. Problems referred and Points of potential improvement | |
| D.1. Problems referred by interviewers | |
| D.2. Additional Considerations | |
| E. Conclusions and Next Steps | |
| F. REFERENCES | |
| Annex 1 - TRADE OF "FETA CHEESE" FROM GREECE TO OTHER MEMBER STATES – SANITA | |
| REQUIREMENTS | |
| Annex 2 – 5 th Piraeus Customs office (Ikonio – Piraeus) – Area places of Supervision | |
| Annex 3 – Legislation | |
| Annex 4 — Samples of Documents | 49 |

LIST OF TABLES

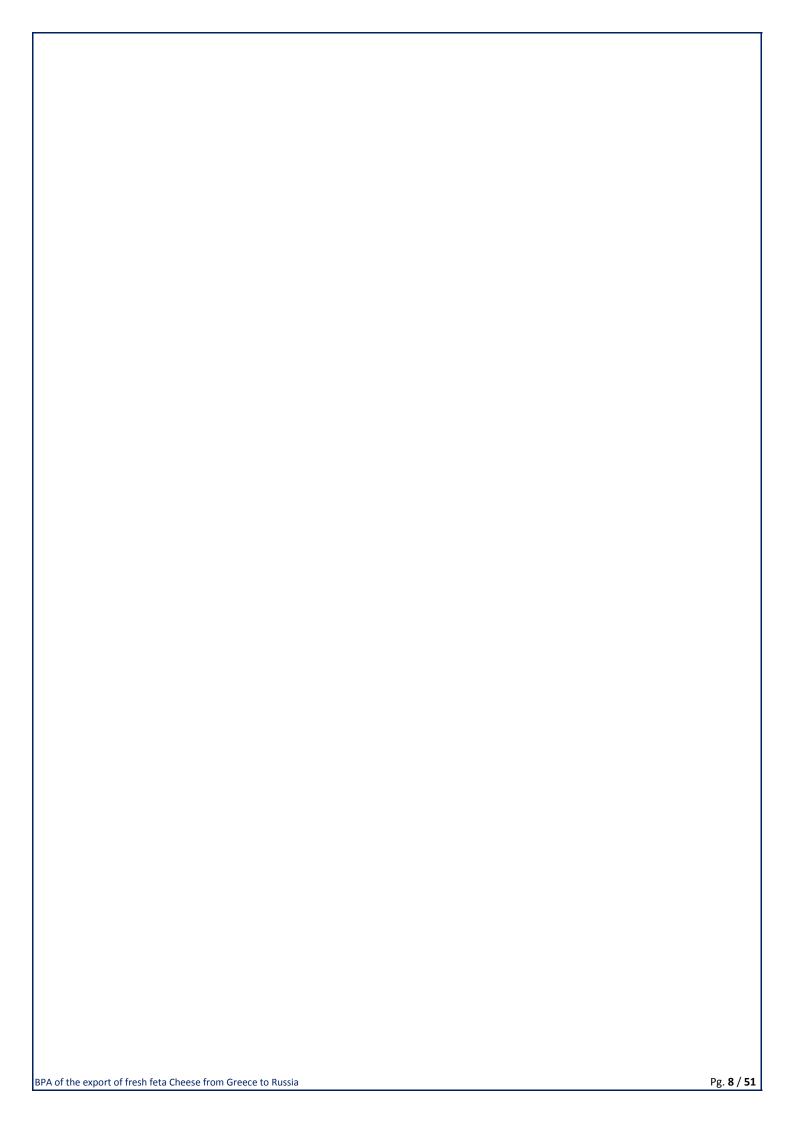
| Table A.1. Shares of world exporters of Cheese and curd, 2011 | 11 |
|---|----|
| Table A.2. – Greece's Feta cheese export 2008-2012 | 15 |
| Table C.1. Core business processes and stakeholders involved in Feta cheese export sh | |
| (decided to be examined during pilot phase) | 19 |
| Table C.2. Duration and dependencies among feta cheese export business processes | |

LIST OF FIGURES

| Fig. A.1. – 20 World main Cheese Exporters in 2011 | 11 |
|--|----|
| Fig. A.2. – World main Cheese Exporters in 2011 | 11 |
| Fig. A.3. – Main Feta Cheese production Areas in Greece | 12 |
| Fig. A.4. Exports of Feta in Thousands of tons | 13 |
| Fig. A.5. Kgs Exported in 2012* | 13 |
| Fig. A.6. EU main export destinations for Greek feta in 2012* | 14 |
| Fig. C.1. Use Case Diagram of Business Processes in Feta Cheese Exportation from Greece. | 19 |
| Fig. C.2. Business processes of Feta Cheese export in a nutshell | 38 |

LIST OF ABBREVIATIONS AND ACRONYMS

| 450 | |
|-----------|---|
| AEO | Authorized Economic Operator |
| BPA | Business Process Analysis |
| BPMN | Business Process Modeling Notification |
| CMR | Document according to the Convention on International Carriage of Goods |
| | by Road (Convention relative au contrat de transport des Marchandises par |
| | Route) |
| CONEX | The abbreviation being used for logistics method employing a standard |
| | intermodal container. The abbreviation stands for Container Express |
| | (ConEx) |
| DREVM | Directorate of Rural Economy and Veterinary Medicine of Regional Units |
| EAD | Export Accompanied Document |
| ELSTAT | Abbreviation for Hellenic Statistical Authority |
| EORI | Economic Operator Registration and Identification |
| ICISnet | Integrated Customs Information Systems network |
| MRDF | Ministry of Rural Development and Food of the Hellenic Republic |
| OLP | Abbreviation for Piraeus Port Authority S.A. |
| PCT | Piraeus Container Terminal S.A. |
| SAD | Single Administrative Document |
| UNECE | United Nations Economic Commission for Europe |
| ICT | Information and Communication Technologies |
| UML | Unified Modeling Language |
| UN/CEFACT | United Nations Center for Trade Facilitation and Electronic Business |



A. Introduction

This document presents the Business Process Analysis (BPA) performed within the framework of the first phase of the pilot project related to the simplification of trade procedures for exporting Feta cheese from Greece to Russia. The objective of the first phase of the BPA project was to provide a systematic mapping of the processes involved in the shipping phase of the UN/CEFACT International supply chain model (See "Business Process Analysis Guide to Simplify Trade Procedures" - Updated September 2012 in References section) in order to identify existing bottlenecks and propose improvements for the processes involved in exporting feta Cheese from Greece to Russia. The pilot phase of the project provided also the opportunity to train the project team to use the Business Process Analysis methodology in order to acquire the required BPA skills for performing the subsequent phases of the BPA project for the facilitation of Greek exports.

The work reported in this document was performed under an extremely tight schedule (actually during the period 27/11/2012/ - 10/1/2013) which involved both the training of the project team and the execution of the work.

The remainder of this document consists of five sections. Section A provides an overview of the world market for Feta cheese and highlights the importance of Feta cheese exports for the Greek Economy. Section B defines the scope of the first phase of the BPA pilot study and describes the methodology used. Section C presents the analysis of the processes and procedures involved in shipping Feta cheese from Greece to Russia. Section D summarizes the conclusions and provides preliminary policy recommendations and section E describes the next steps that should be taken in order to conclude the Pilot studies.

A.1. FETA - General information & Historical data

"Feta" cheese is the most consumed and widely exported Greek cheese. It belongs to the "family" of white cheeses, is a brined curd cheese exclusively produced primary by sheep (at least 70%) with the addition in some cases of a lower percentage of goat milk.

In Europe, cheese is generally consumed after the main dish. In France for example cheese is eaten as dessert. On the other hand in Italy cheese is served as an appetizer. Contrary to their European counterparts, Greeks consume cheese and especially feta cheese anytime. Feta cheese can be eaten for breakfast, lunch, dinner, alone or as a companion with other food.

Feta in Greek means slice, originating from the cutting of the curd into pieces after elaboration. Feta has been a favorite cheese in Greece for many centuries. Homer's "Odyssey" contains several references regarding the production of a cheese that resembles to Feta. In Greek mythology, Cyclop Polyphemus is considered as the first Feta cheese producer.

In 2005, after sixteen years of debate, the European Union's highest court decreed that feta cheese is a protected designation of origin (PDO) product, and that none of the other EU countries except for Greece can use this name. More precisely feta cheese can only be manufactured in a traditional way and under specific provisions in some areas of Greece (mainland and the island of Lesvos).

Similar white brined cheeses are produced in different areas in Mediterranean but also in other countries of Northern Europe, however they cannot be produced, named or traded as Feta cheese according to EU legislation (Regulation 510/2006/EC). These dairy products usually contain cow milk as their basic ingredient in combination or not with sheep and/or goat milk (http://www.agrocert.gr/pages/content.asp?cntID=74&catID=48#anchor10).

Moreover the Commission Regulation No 1383/2003 and the Council Regulation No 1891/2004 protects the exports of feta cheese by allowing the community customs authorities to act for one-year period after specific community demand for action made by the exporter.

Regarding the permission for using the identification PDO, the companies that trade, pack or produce dairy products, submit an application to the Agricultural Products Certification and Supervision Organization (AGROCERT, ELGO-DIMITRA):

(http://www.agrocert.gr/photos/kanonismoi%20euenosis/cfiles/aitisi%20POP%20PGE.pdf) and receive a 3-year approval for the use of PDO identification in specific dairy products. The approved companies are listed at the following link: http://www.agrocert.gr/pages/category.asp?catID=63.

A.2. PDO Greek cheeses

The following 21 Greek cheeses are recognized as PDO products: Metsovone (Μετσοβόνε), Graviera Agrafon (Γραβιέρα Αγράφων), Graviera Kritis (Γραβιέρα Κρήτης), Graviera Naxou (Γραβιέρα Νάξου), Anevato (Ανεβατό), Feta (Φέτα), Galotyri (Γαλοτύρι), Katiki Domokou (Κατίκι Δομοκού), Kefalograviera (Κεφαλογραβιέρα), Kopanisti (Κοπανιστή) from Mykonos Island and the surrounding Cyclades, Ladotyri Mytilinis (Λαδοτύρι Μυτιλήνης), Manouri (Μανούρι), Batzos (Μπάτζος), Xynomyzithra Kritis (Ξυνομυζήθρα Κρήτης), Pichtogalo Chanion (Πηχτόγαλο Χανίων), Sfela (Σφέλα) from Messenia, Peloponnese, Xygalo Sitεias (Ξύγαλο Σητείας), San Michali (Σαν Μιχάλη), Formaella Arachovas (Φορμαέλλα Αράχωβας), Kalathaki Limnou (Καλαθάκι Λήμνου), Kasseri (Κασέρι) (http://www.agrocert.gr/pages/content.asp?cntID=74&catID=48#anchor10).

A.3. Feta cheese production details

Feta cheese can be sold in individual prepackaged pieces, or can be bought directly from bulk packages. Tasty mature feta has the following chemical composition: humidity 52%, fat 25-26%, proteins 17%, and salt 1.8-2.75% (http://www1.american.edu/ted/feta.htm).

In Greece, Feta cheese is prepared either in small or in large scale dairy establishments respecting in both cases the traditional provisions required for Feta cheese production. As already mentioned, Feta contains a minimum of 70% sheep's milk with the addition, in some cases, of goat milk in a smaller percentage.

The technical description and requirements for the feta cheese production are described in the Article 83 of the Greek Food Code. In addition the hygienic requirements of the EU Regulation No 853/2004/EC, Annex 3, must be followed. The basic steps for feta cheese production include the addition of rennet in the milk, the placement of the curds in a special mould or cloth bag for the drainage and also the addition of salt. Then, the salted curds are transferred to metal or wooden barrels where they are allowed to infuse for several days. Finally, the stage of maturation or ageing follows which takes place in brine at first at room temperature (16-18°C for 10 days) and secondly for least at months in а refrigerated high-humidity (http://en.wikipedia.org/wiki/Feta, Antonios I. Mantis, Hygiene and Technology of Milk and Dairy Products, Kyriakidi Bros, 2000).

A.4. The World Market for White Cheese

Feta cheese belongs in the broader category of Cheese and curd (HS code 0406). Greece possesses the 18th place in the world's top exporters of cheese and curd for the year 2011, with a share of 1,14%. (Fig. A.1) Notably, more than 90% of the world exports are covered by the top 20 exporting countries while the vast majority of them are European. The dominance of European countries in this category is shown in the map (Fig. A.2) . The total value of world exports for 2011 was 41.793.084 EUR.

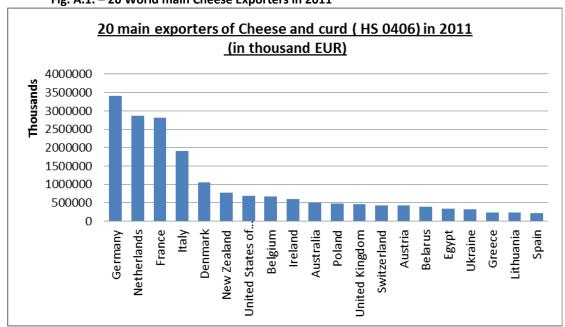


Fig. A.1. – 20 World main Cheese Exporters in 2011

Source: International Trade Centre (ITC)

Table A.1. Shares of world exporters of Cheese and curd, 2011

| Shares of world e | exporters of Cheese and curd, | 2011 | |
|-------------------|--|--|--|
| 16,27% | Poland | 2,31% | |
| 13,69% | United Kingdom | 2,21% | |
| 13,45% | Switzerland | 2,04% | |
| 9,13% | Austria | 2,02% | |
| 5,02% | Belarus | 1,91% | |
| 3,70% | Egypt | 1,66% | |
| of 3,32% | Ukraine | 1,53% | |
| | | | |
| 3,18% | Greece | 1,14% | |
| 2,92% | Lithuania | 1,13% | |
| 2,42% | Spain | 1,09% | |
| | | | |
| 90,14% | | | |
| | 16,27% 13,69% 13,45% 9,13% 5,02% 3,70% of 3,32% 3,18% 2,92% 2,42% | 16,27% Poland 13,69% United Kingdom 13,45% Switzerland 9,13% Austria 5,02% Belarus 3,70% Egypt of 3,32% Ukraine 3,18% Greece 2,92% Lithuania 2,42% Spain | 13,69% United Kingdom 2,21% 13,45% Switzerland 2,04% 9,13% Austria 2,02% 5,02% Belarus 1,91% 3,70% Egypt 1,66% of 3,32% Ukraine 1,53% 3,18% Greece 1,14% 2,92% Lithuania 1,13% 2,42% Spain 1,09% |

Source: International Trade Centre (ITC)

Fig. A.2. – World main Cheese Exporters in 2011



Source: International Trade Centre (ITC)

Feta Cheese production in Greece

Feta is a brined curd cheese traditionally produced in Greece. Its production is spread around various areas of the country. The mainly agricultural regions of Thessaly, Macedonia (Western, Eastern, and Central) and Epirus contribute in a percentage of 75% of the total feta production in Greece (Fig. A.3). It is worth saying that the regions of Epirus and Eastern Macedonia - Thrace, whose economies are based on animal husbandry and dairy products, are country's poorest with per capita GDP in 2009 of 14.495 EUR and 16.232 EUR, respectively (average GDP per capita of Greece in 2009 was 20.830 EUR).

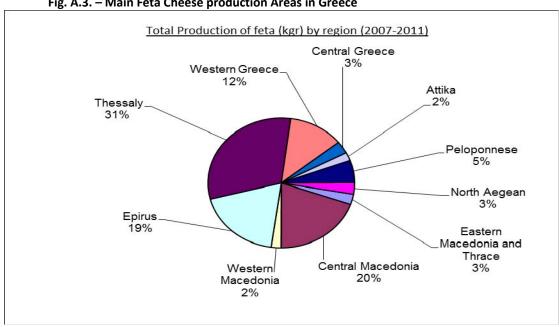


Fig. A.3. – Main Feta Cheese production Areas in Greece

Data from Hellenic Statistical Authority -ELSTAT

In 2011, approximately 73% of total Greek cheese exports corresponded to feta cheese exports (data by SEK, Greek Husbandry Association). The exports of feta for 2011 are estimated at about 48,000 tones and were distributed to 56 countries. The value of exported feta in 2011 reached 234 million EUR compared to 217 million EUR in 2010 (7,78% increase) while the three major destination markets were Germany (29,8%), UK (13,1%) and Italy (10,6%).

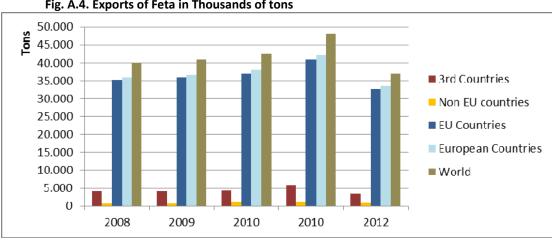


Fig. A.4. Exports of Feta in Thousands of tons

Source: Hellenic Statistical Authority -EL.STAT

Sweden, Cyprus, Austria, USA, Australia, Bulgaria, France, Switzerland, Belgium, Netherlands and Canada are the remaining main markets for feta cheese exports (Table A.2).

2012 seemed to be a quite successful year that showed a steady increase of exports value in the first eight months (20,5%), compared to the same period of January – August 2011.

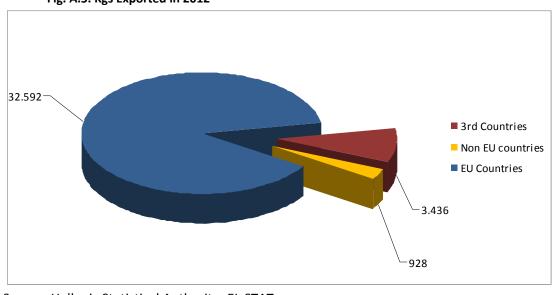


Fig. A.5. Kgs Exported in 2012*

Source: Hellenic Statistical Authority -EL.STAT

Noteworthy, the destinations with the highest exports increase during the same period of 2012 are the United Arab Emirates (173%), Japan (162,2%), USA (51%), Ireland (45,8%) and Australia (42%).

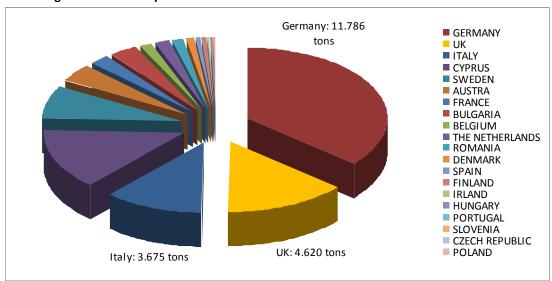


Fig. A.6. EU main export destinations for Greek feta in 2012*

Source: Hellenic Statistical Authority -EL.STAT

Table A.2. – Greece's Feta cheese export 2008-2012

| | 2008 200 | | 19 | 201 | LO | 2011 | | 2012 | | | |
|-----------|-------------------------|--------|----------------|-----------|--------------|--------------|----------------|----------|--------------|----------|--------------|
| | COUNTRIES/DESTINATIONS | tons | É (thousantds) | tons | (thousantds) | tons € | É (thousantds) | tons € | (thousantds) | tons € | (thousantds) |
| | | | | | | | | | | | |
| AM | USA | 2.001 | 12.113 | 2.238 ↑ | 13.706 ↑ | 2.251 ↑ | 13.960 ↑ | 3.762 ↑ | 12.184 ↓ | 1.807 ↓ | 11.283 |
| | CANADA | 437 | 2.665 | 534 ↑ | 3.428 ↑ | 584 ↑ | 3.860 ↑ | 472 ↓ | 3.151 ↓ | 360 ↓ | 2.509 |
| | | | | | | | | | | | |
| ΔU | AUSTRALIA | 1.491 | 9.536,72 | 1.197 ↓ | 7.922 ↓ | 1.378 ↑ | 9.386 ↑ | 1.321 ↓ | 9.121 ↓ | 1.001 ↓ | 6.999 |
| | | | | | | | | | | | |
| AF | SOUTH AFRICA | | | 2,46 | 21,12 | | | | | | |
| | | | | | | | | | | | |
| AS | SINGAPORE | 37 | 191 | 29 ↓ | 150 ↓ | 20 ↓ | 111 ↓ | 32 ↑ | 176 ↑ | 37 ↑ | 200 |
| | JAPAN | | | 7 1 | 50 | | | | | 26 | 171 |
| | INDIA | 5 | 31 | 10 ↑ | 63 ↑ | | | | | 13 | 87 |
| | CHINA | | | 5 1 | 39 | | | | | | |
| AR/ME | ISRAEL | | | | | 4 | 23 ↑ | 19 🔨 | 125 ↑ | 13 ↓ | 86 |
| - IN INIL | LEBANON | 49 | 285 | 153 ↑ | 801 ↑ | 95 ↓ | 542 🗸 | 160 ↑ | 840 ↑ | 107 ↓ | 586 |
| | EGYPT | | 205 | 21 | 100 | 35 🔻 | 372 V | 100 | 040 | 107 ψ | 500 |
| | SAUDI ARABIA | | | | 100 | 4 1 | 24 ↑ | 31 ↑ | 212 ↑ | 19 ↓ | 115 |
| | UAE | 34 | 218 | 18 ↓ | 132 ↓ | 21 ↑ | 136 ↑ | 21 ↑ | 145 ↑ | 30 ↑ | 202 |
| | SUDAN | | | • | | 19 ↑ | 116 ↑ | 41 ↑ | 230 ↑ | 22 ↓ | 119 |
| | KUWAIT | 18 | 100 | 18 🔨 | 87 ↓ | | | | | | |
| | | | | | | | | | | | |
| | TOTAL 3rd | 4.072 | 25.140 | 4.233 | 26.499 | 4.376 | 28.157 | 5.860 | 26.185 | 3.436 | 22.358 |
| E | SWITZERLAND | 458 | 2.820 | 559 ↑ | 3.642 ↑ | 650 ↑ | 4.232 ↑ | 652 ↑ | 4.336 ↑ | 579 ↓ | 3.727 |
| | RUSSIA | 84 | 516 | 21 ↓ | 124 ↓ | 47 ↑ | 274 ↑ | 96 ↑ | 498 ↑ | 83 ↓ | 490 |
| | NORWAY | 25 | 175 | 25 ↑ | 182 1 | 27 1 | 198 ↑ | 30 ↑ | 219 ↑ | 35 ↑ | 217 |
| | ALBANIA | 66 | 201 | 141 1 | 356 ↑ | 296 ↑ | 923 ↑ | 419 ↑ | 1.413 ↑ | 231 ↓ | 750 |
| | CROATIA | 30 | 185 | 1 | 330 | 230 | 323 1 | 115 | 1.110 | 201 🔻 | .50 |
| | | | | | | - | | | | - | |
| | TOTAL E | 663 | 3.897 | 746 | 4.304 | 1.021 | 5.626 | 1.197 | 6.466 | 928 | 5.190 |
| EU | GERMANY | 14.847 | 62.455 | 15.307 ↑ | 65.752 ↑ | 14.960 ↓ | 68.435 ↑ | 15.670 ↑ | 69.810 ↑ | 11.786 ↓ | 63.760 |
| | UK | 4.194 | 23.520 | 4.553 ↑ | 25.138 ↑ | 5.476 ↑ | 27.097 ↑ | 5.583 ↑ | 30.832 ↑ | 4.620 ↓ | 24.903 |
| | ITALY | 3.471 | 19.757 | 3.238 ↓ | 19.938 ↑ | 3.851 ↑ | 21.525 ↑ | 4.309 ↑ | 24.858 ↑ | 3.675 ↓ | 21.629 |
| | CYPRUS | 3.452 | 15.143 | 3.466 ↑ | 15.351 ↑ | 3.368 ↓ | 15.884 ↑ | 3.576 ↑ | 15.785 ↓ | 4.558 ↑ | 15.616 |
| | SWEDEN | 2.308 | 14.349 | 2.552 ↑ | 15.943 ↑ | 2.759 ↑ | 17.422 ↑ | 3.217 ↑ | 19.462 ↑ | 2.442 ↓ | 15.329 |
| | AUSTRA | 1.675 | 6.159 | 2.468 ↑ | 7.818 ↑ | 1.942 ↓ | 8.896 ↑ | 1.986 ↑ | 9.469 ↑ | 1.306 ↓ | 7.026 |
| | FRANCE | 590 | 3.488 | 901 ↑ | 3.773 ↑ | 715 ↓ | 4.366 ↑ | 927 🛧 | 5.041 ↑ | 718 ↓ | 4.195 |
| | BULGARIA | 1.014 | 2.270 | 799 ↓ | 2.775 ↑ | 792 ↓ | 1.889 🗸 | 1.724 ↑ | 5.047 ↑ | 1.134 ↓ | 3.624 |
| | BELGIUM | 755 | 3.458 | 590 ↓ | 3.636 ↑ | 648 ↑ | 4.174 ↑ | 695 ↑ | 4.528 ↑ | 476 ↓ | 3.061 |
| | THE NETHERLANDS | 436 | 2.481 | 372 ↓ | 2.236 ↓ | 486 ↑ | 2.790 ↑ | 547 ↑ | 3.343 ↑ | 476 ↓ | 2.898 |
| | ROMANIA | 1.370 | 4.000 | 813 ↓ | 2.578 🗸 | 698 ↓ | 2.302 ↓ | 865 ↑ | 3.092 ↑ | 531 ↓ | 2.048 |
| | DENMARK | 221 | 1.289 | 218 🗸 | 1.346 ↑ | 255 \uparrow | 1.532 ↑ | 270 ↑ | 1.554 ↑ | 260 ↓ | 1.41 |
| | SPAIN | 297 | 2.329 | 253 ↓ | 1.570 ↓ | 244 ↓ | 1.590 ↑ | 297 ↑ | 1.772 ↑ | 190 ↓ | 1.08 |
| | FINLAND | 203 | 451 | 85 ↓ | 545 ↑ | 150 ↑ | 1.009 ↑ | 164 ↑ | 1.034 ↑ | 134 ↓ | 88 |
| | IRLAND | 39 | 244 | 50 ↑ | 321 ↑ | 100 ↑ | 705 ↑ | 110 ↑ | 709 ↑ | 119 1 | 74. |
| | HUNGARY | 82 | 474 | 61 ↓ | 354 ↓ | 47 ↓ | 279 ↓ | 56 ↑ | 293 ↑ | 51 ↓ | 284 |
| | PORTUGAL | 74 | 383 | 45 ↓ | 312 ↓ | 51 ↑ | 364 ↑ | 59 ↑ | 430 ↑ | 36 ↓ | 26 |
| | SLOVENIA | 35 | 230 | 39 ↑ | 261 ↑ | 43 ↑ | 287 ↑ | 45 ↑ | 287 ↑ | 34 ↓ | 21 |
| | CZECH REPUBLIC | 26 | 121 | 25 ↓ | 154 ↑ | 47 ↑ | 255 ↑ | 38 ↓ | 243 ↓ | 28 ↓ | 17 |
| | POLAND LUXEMBURG | 102 | 353 | 51 ↓ 0 | 323 ↓ | 220 \land | 1 225 1 | 704 | 2 961 4 | 16 | 98 |
| | MALTA | 5 | 29 | 18 1 | 3 88 ↑ | 329 ↑ | 1.335 ↑ | 784 ↑ | 2.861 ↑ | | |
| | | | | 10 | | | | | | | |
| | TOTAL EU | 35.196 | 162.982 | 35.903 个 | 170.216 ↑ | 36.961 ↑ | 182.137 ↑ | 40.922 个 | 200.449 个 | 32.592 ↓ | 169.25 |
| | Total EU+E | 35.860 | 166.879 | 36.649 ↑ | 174.521 ↑ | 37.981 ↑ | 187.763 ↑ | 42.120 ↑ | 206.915 ↑ | 33.519 ↓ | 174.44 |
| | TOTAL REST destinations | 117 | 683 | 108 🗸 | 570 ↓ | 160 ↑ | 924 ↑ | 140 ↓ | 854 ↓ | 91 ↓ | 554 |
| | | | | | | | | | | | |
| | Grand TOTAL of Exports | 40.049 | 192.702 | 40.990 1 | 201.590 ↑ | 42.517 1 | 216.844 | 48.120 1 | 233.953 ↑ | 37.047 🗸 | 197.35 |

Source: Hellenic Statistical Authority - ELSTAT (Dec. 2012)

^{*} Data for 2012 are not final.

A.6. Exports of EU milk and dairy products to Russia - Provisions

The Russian authorities have set up a list, including all EU approved milk and dairy establishments which can export to Russia and, therefore, only these establishments are allowed to export. The above list, regarding the Greek establishments, is available at the following link:

http://fsvps.ru/fsvps/importExport/greece/enterprises.html?product=26&productType=5&_langua_ge=en

Veterinary-sanitary measures are regulated by the Agreement of the Customs Union on Veterinary-Sanitary Measures of December 11, 2009 and the Decision of the Customs Union Commission No. 317 of June 18, 2010. These hygienic requirements that must be met by the Greek (and other EU) dairy companies in order to export their products to Russia are documented in the Directorate-General for Health and Consumer Protection of the European Commission (DG SANCO) website: http://ec.europa.eu/food/international/trade/sps_requirements_en.htmhttp://ec.europa.eu/food/international/trade/eu-russia_spsissues_en.htm

When in force, Customs Union requirements supersede corresponding requirements listed in the Russian Federation's legislation displayed in the websites above. On the other hand, Russian Federation's requirements that are not contradicted by Customs Union requirements continue to apply.

If a new Greek dairy establishment is interested in exporting its products (including "Feta" cheese), to Russia, the procedure is the following:

- 1. The interested establishment, which must be approved according to EU legislation, applies a request to the competent Department of Veterinary Medicine of the Regional Unit where it belongs, regarding the export of dairy products to Russia, referring to the dairy products intended to be exported ("Feta" for example), giving details for their production and their composition and providing information about the Russian importers/traders that will buy the Greek products.
- 2. The Department of Veterinary Medicine of the Regional Unit forwards the establishment request to the Directorate General of Veterinary Services of the Ministry of Rural Development and Food (DGVS) with the confirmation that the interested establishment fulfills the requirements in order to export its products to Russia.
- 3. Finally, the Directorate General of Veterinary Services of the Ministry of Rural Development and Food prepares and sends to the Federal Veterinary and Phytosanitary Control Service of Russia (Rosselkhoznadzor) through the Greek Embassy in Moscow, an official request asking the approval of the new establishment in order to be able to export its products to Russia as it meets all the necessary requirements.

In 2009 a list of Greek dairy establishments authorized to export to Russia was approved by the Russian authorities:

(http://fsvps.ru/fsvps/importExport/greece/enterprises.html?product=26&productType=5&_language=en).

Since then, the Directorate General of Veterinary Services of the Ministry of Rural Development and Food has not received any response from the Russian authorities regarding the requests submitted for additional Greek establishments interested to export dairy products to Russia.

The veterinary certificates for the export of dairy products to Russia must be printed in watermarked paper under some specific provisions

A.7. Export of dairy products to Russia through another member state-Veterinary Certification

In some cases, for commercial/trade reasons, some dairy establishments choose to export their products to Russia via another EU member state.

In this case, and using an example of a Greek dairy company, a specific type of Pre-export certificate should be issued by the competent Department of Veterinary Medicine of the Regional Unit. The certification procedure is the same as in the case of direct export to Russia. The certificates are printed in watermarked paper and all the provisions are identical with the common procedure.

This filled Pre-export certificate accompanies the products till their arrival to the other member state. According to the information provided to this certificate, the official employees of the other member state issue the final certificate that will accompany, along with the Pre-export certificate, the products till their final destination to Russia.

B. Scope of the first phase of the pilot study and Methodology Used

B.1. Defining the scope of the study

The business process analysis of Feta cheese was carried out in 2012 as an early pilot phase of the Business Process Analysis (BPA) action, which is one of the actions among 25 others (Action Nr 5) included in the Roadmap of the National Trade Facilitation Strategy 2012-2015. The Roadmap which is the core framework of all actions should be carried out towards Single Window implementation by the end of 2015.

Single Window is an electronic – computerized system recommended and described by the UN/CEFACT recommendation Nr 33 in 2004 which will allow trade-related information to be submitted only once to fulfill all transit-related regulations with a single entry point. Single Window is, therefore, a practical application of trade facilitation concepts which can reduce trade barriers and deliver immediate benefits to all involved parties of the trading community. However a number of other actions and measures should be taken place prior the Single Window system implementation kick-off. Most of these prior actions are aimed to screen, analyze and simplify cross-trade procedures among all required organizational and structural changes that would be deemed as necessary.

In that sense, the Roadmap serves as the main action plan of all involved activities. It was published on 1st of November 2012 and is accepted by the political leadership of competent Ministries. It should also be mentioned that the BPA pilot phase constitutes also a clear commitment of the Greek government, which is clearly stated in the revised Memorandum of Understanding on Specific Economic Policy Conditionality between Greece and the "troika" of international creditors. ["iv. Reviews and streamlines pre-customs and customs procedures for selected pilot products (fresh vegetables fruits, feta cheese) according to EU regulations and best practices and presents an approach for extending the simplification process to a wider set of frequently exported / imported products. (December 2012].

The overall goal of the strategy is to establish an electronic Single Window for exports providing a single entry point for exporters for all products and destinations.

For the early Pilot Phase of the BPA analysis it was decided to use as a case study the export of feta cheese to Russia by maritime transportation, however during data collection contacting stakeholders, information regarding trade of kiwifruits <u>between Greece and other EU</u> countries is collected and it is presented in **Annex1** in the present document. The choice of the case study was

made by taking into account the following considerations: 1) the importance of Feta cheese for the Greek exports, ii) the current size and future potential of the Chinese market, and iii) the predominant transportation mode used for exporting Feta Cheese from Greece to Russia. The study was performed in close cooperation with all relevant public and private stakeholders including business' associations, exporters, third party logistics providers, port authorities, customs, agricultural ministry's regional services.. In addition to the above, the following criteria were used to define the case study under consideration:

- The exporting procedures of the chosen product should not be too complicated (eg. dual use products, etc)
- The chosen product reflects the nature of the Greek exports.
- In recent years the export figures for Feta cheese show an increasing trend and new markets seem to be emerging (Singapore, Middle East Countries, etc.)
- Feta Cheese was proposed as a pilot agricultural product by the SEVGAP

The business process analysis of Feta cheese export was included as a component of the pilot phase of the BPA action. The outputs of this study will serve as a basis for:

- The analysis of data requirements and data flow;
- The development of a standardized data;
- The identification of bottle-necks and inefficiencies of the current export processes
- The design of the future (streamlined) processes for exporting cheese and other similar agricultural products
- The identification of potential structural (legislative and organizational changes) governing the operation of International Supply Chains of Greek agricultural products.
- The design of the prototype for the rest of the BPA action

B.2. Methodology Used

Two preparatory (to BPA pilot phase) meetings took place in Athens in October 18th, 2012 and November 27th & 28th 2012 respectively, along with the participation of international experts. The meetings were organized by the Greek government in cooperation with TFGR and UNECE. The first one served as a BPA kick-off meeting and the aim was to bring together all major stakeholders who are involved and/or affected by the exports' supply chain. Furthermore these meetings provided the opportunity to establish contacts between public administrations and private sector representatives. These contacts are considered particularly important for the efficient implementation of the subsequent phases of the BPA study. The second of the aforementioned meetings was a technical workshop dedicated to a basic BPA training of the study team and aimed primarily to assist team members to obtain a basic knowledge of the methodologies and tools (UML, BPMN, etc.) used to perform the business process analysis. During the second workshop the basic business activities, to be studied during the pilot BPA phase, were defined and selected by the involved stakeholders.

The Unified Modeling Language (UML) that is used here shows the use case diagram providing a set of standard graphical notations for business process modeling. UML is internationally accepted and widely used not only among practitioners in business communities but also in information technology and software development. Similarly, the Business Process Modeling Notification (BPMN) is being used to depict the particular relationships, the flow of activities and information for each core business process (and/or sub-process) presented in this document.

The UN/CEFACT International Supply Chain Model identifies the following three process areas:

• Buy: the conclusion of trade terms and the establishment of sales contract

- Ship: the arrangement for cargo movement and the completion of necessary actions to meet regulatory requirements of both export and import countries
- Pay: the claim for the payment and the payment for the purchased cargo

Despite the fact that the UN/CEFACT International Supply Chain Model covers three process areas (Buy, Shipment and Payment), for the needs of the pilot phase it was decided to map and analyze only the processes related to "ship". The remaining two process areas, i.e buy and pay) will be studied in detail in the next stage of BPA study.

C. Shipment business process area

Table C.1. Core business processes and stakeholders involved in Feta cheese export shipment (decided to be examined during pilot phase)

| (accided to be examined during prior pridse) | | | | | | |
|---|--------------------------------------|-------------------------------------|----------------|---------|---------------|-------------------------------------|
| Party Core Business Processes | Department of Veterinary Medicine | Transporter's / Logistic Company | Customs Broker | Customs | Port Operator | Exporter (or his representative) |
| Obtain veterinary certificates and arrange the veterinary inspection | х | | | | | х |
| 2. Transport arrangement, collect an empty container from yard and Stuff it | | х | | | | х |
| 3. Electronic submission of customs declaration | | | Х | Х | | Х |
| 4. Container transfer to port of departure & Clear goods through customs | | х | | х | х | х |
| 5. Final customs formalities & Stow container on vessel – cargo manifest | | | | Х | х | Х |

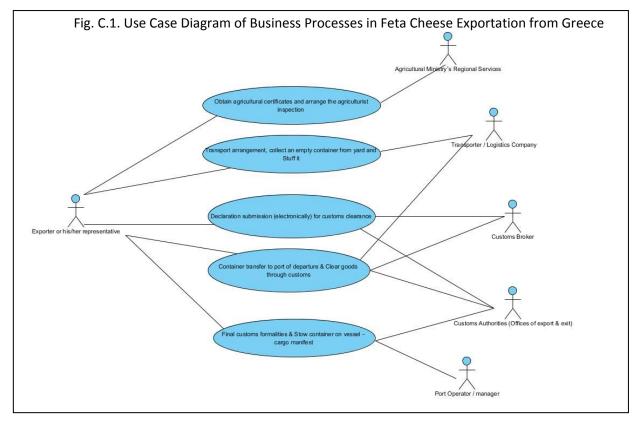


Figure C-1 illustrates the core business processes involved in exporting feta cheese from Greece to Russia using maritime transportation. In UML (REFERENCE) notation figure A2-1 depicts a use case diagram which presents the processes involved in the export of Feta cheese along with the participating stakeholders.

C.1. A. Obtain veterinary certificates and arrange the veterinary inspection

The process "Obtain Veterinary Certificate" requires:

- Directorate General of Veterinary Services, Ministry of Rural Development and Food
- Department of Veterinary Medicine of the Regional Unit (Directorate of Rural Economy and Veterinary Service)
- Exporter or his/her Representative

| Name of process area | Export of feta |
|--|---|
| Name of business process (use case) | Obtain Veterinary Certificate |
| Related laws, rules, and regulations | European Customs Regulation No 2913/1992 and No 2454/1993 European Regulations No 136/2004, No 282/2004, No 882/2004 European Directive No 96/93/EC Presidential Decree 344/1998 Joint Ministerial Decision 289667/B' 1158/24.06.2008 |
| Process participants | Exporter (or representative) Directorate General of Veterinary Services Department of Veterinary Medicine Transporter |
| Input and criteria to enter/begin the business process | Feta is registered as PDO Feta is being controlled at all stages of production by the exporter The establishment of production of feta cheese is approved according to EU legislation and included in the list of establishments that can export to Russia (as described above) |
| Activities and associated documentary requirements | 1.1.1 The exporter (or representative) has made all the sanitary/quality controls from the stage of raw milk till the production of feta cheese. 1.1.2 The exporter (or representative) applies to the local Department of Veterinary Medicine by phone/email 2 days usually before the export (or even the same day), in order to schedule the veterinary controls. 1.1.3. The Department of Veterinary Medicine gives protocol number to the request submitted by the exporter. 1.1.4 1.1.4a If the competent Department of Veterinary Medicine |
| | has available in the Service, printed watermarked veterinary |

certificates then the procedure is continued normally.

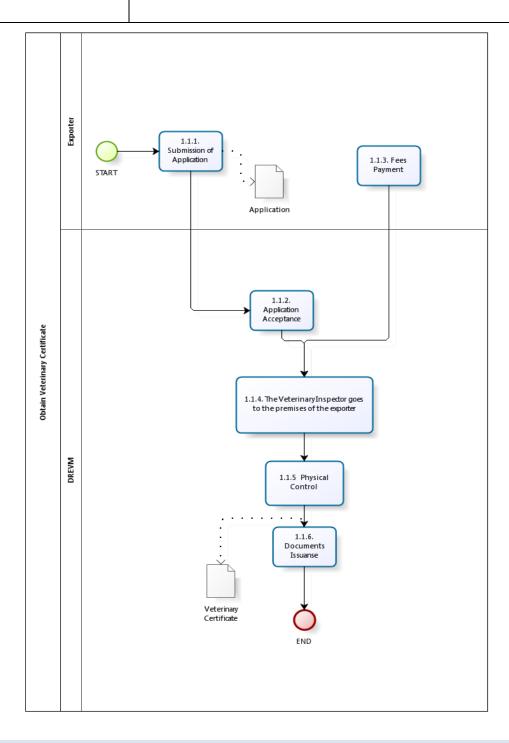
- 1.1.4b If the competent Department of Veterinary Medicine has not available printed veterinary certificates then the procedure is as follows:
- 1.1.4b1The Department of Veterinary Medicine informs the exporter relatively, who submits a request by fax to the Directorate General of Veterinary Services of the Ministry of Rural Development Food and asks for a number of printed veterinary certificates for the export of the products. A courier (after communication with the company) transfers the watermarked printed certificates from the Directorate General of Veterinary Services of the Ministry of Rural Development and Food to the competent, for the certification, Department of Veterinary Medicine
- 1.1.4b2In the case that printed veterinary certificates are not available in the Ministry of Rural Development and food, then there is a procedure that these certificates are printed as soon as the necessary costs are covered by the Public Sector. In some cases, and so as to avoid the delays, some companies choose to bear the cost for printing a number of certificates.
- 1.1.5 The official veterinarian (who works for the local Department of Veterinary Medicine) goes to the producing establishment. The exporter bears in some cases the expenses for the transport of the official veterinarian to the establishment (by taxi usually)
- 1.1.6 The official veterinarian performs the veterinary controls and sampling required (including laboratory tests if it is considered necessary waiting for the laboratory analytical results if it is needed), while inspecting the containers intended to transport the exported products (temperature, humidity conditions etc).
- 1.1.7 The official veterinarian which certifies the products checks all relative documents containing necessary information on the same day of the certification.
- 1.1.8 If all the above are considered satisfactory, the official veterinarians fill all the information required and officially sign and stamp the veterinary certificate that will accompany the products. One original certificate and two copies of this are issued for each export. The original one accompanies the products till the Russian customs, whereas the one copy is required by the Greek customs' procedure. The competent Department of Veterinary Medicine keeps at its files, the second copy of certificate.

Output and criteria to exit the business process

The exporter (or representative) obtains the veterinary certificate issued by the official veterinarian

Average time required to complete this business process

Usually 1 or 2 days maximum (depending on the availability of the already printed certificates and the type of laboratory tests that are performed if needed)



C.2. Transport arrangement, collect an empty container from yard and stuff it

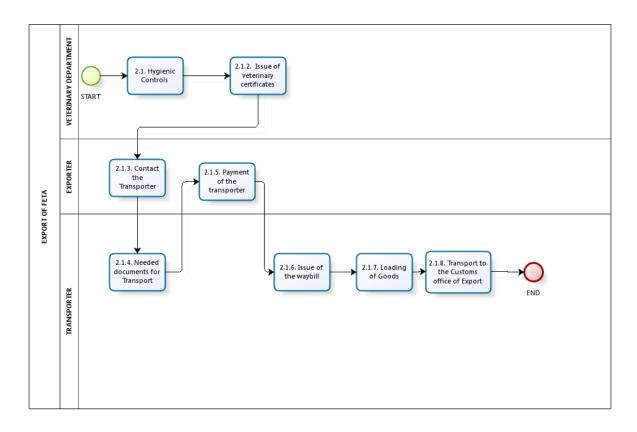
The way arrangements are made for the provision of domestic transportation services, i.e. from the premises of the exporter to the port, differ and depend on the involvement of intermediaries. In

case the exporter uses privately owned trucks the process for making arrangements for domestic transport is simpler comparing to the case when an intermediary is used.

The exporter arranges the container transport directly contacting a freight forwarder.

| Name of process area | Shipment of feta cheese to Russia |
|--|---|
| Name of business process | Transport arrangement |
| (use case) | |
| Related laws, rules, and | |
| regulations | • N/A |
| Process participants | Exporter (or representative) |
| | In land carrier |
| | Shipping line |
| Input and criteria to | The transportation procedure must have been |
| enter/begin the business | arranged. |
| process | The in land carrier must have refrigerated trucks. |
| Activities and associated documentary requirements | 2.2.1. Exporter contacts shipping lines to investigate and collect information about cargo space and vessel, appropriate refrigerated container, machines, prices etc. All contacts are done over the phone. |
| | 2.2.2. Exporter contacts the inland carrier to arrange inland transportation. Contact is done over the phone and export information is given. |
| | 2.2.3. Exporter confirms the transport details to the above parties. This can be done by phone or email. The exporter contacts the chosen Shipping Line to reserve cargo space and container. Booking request initially is done by phone and subsequently by email with all the details of the export. |
| | 2.2.4. Shipping line confirms the reservation, by email with all the details of the export. |
| | 2.2.5. The exporter reviews booking confirmation and checks if its content reflects what exporter needs. If it does not, the exporter informs shipping line that the arrangement requires further revision. |
| | 2.2.6. Once final booking with shipping line is made, the exporter contacts the inland carrier to schedule a pick-up of an empty container from shipping line's container yard, a delivery of that empty container to exporter's establishment and a return of stuffed container to the port for loading. The booking request is often done over phone. |
| | 2.2.7. Inland carrier confirms the reservation. |
| | 2.2.8. Exporter reviews booking confirmation and checks if its content reflects what the needs are. If it does not, exporter informs inland carrier that the arrangement requires further revision. |

| | 2.2.9. Exporter contacts inland carrier in order to pick-up the container. |
|---|---|
| | 2.2.10. Exporter prepares feta cheese to be stuffed according to the packing list. |
| | 2.2.11. Inland carrier picks-up an empty container from shipping line's container yard. |
| | 2.2.12. Inland carrier transfers the empty container to exporter's establishment. |
| | 2.2.13. Exporter stuffs feta cheese into container according to the packing list. |
| | 2.2.14. Inland carrier seals the container, on behalf of the shipping line. The container, accompanied by the packing list, is transferred to the port. |
| Output and criteria to exit the business process | The container is stuffed with goods and is ready to be transferred to the port of departure, accompanied by the packing list. |
| Average time required to complete this business process | 1 1/2 day |



C.3. Customs Declaration (via exporter or his representative) – Clearance at the Customs Office of Export

| Name of process area | Shipment of feta cheese to Russia |
|--|--|
| Name of a business process | 3. Customs declaration Submission (via exporter or his representative) – Clearance at the Customs Office of Export |
| | |
| Related laws, rules and regulations | Regulation (EU) 2913/92 (CCC), 2454/93 (CCCIP), with all amendments thereto, which provide guidance on the application by the competent offices of the country's export control system. |
| | Regulation 2658/87 (on the tariff and statistical nomenclature and on the Common Customs Tariff). |
| Process Participants | Exporter Customs Broker (if needed) Customs Office of Export |
| Input and criteria to enter/begin the business process | The operator should do research on the customs formalities, ie what formalities should be done at the Customs office, if it is required to submit declaration or not, what supporting documents are required, what is the customs procedure that has to be followed. In this study, we made the assumption that the normal procedure is applied. |
| | • A control has been done by DAOK and the required certificates have been issued (conformity and phytosanitary). |
| | In order to begin the customs procedures, the exporter must: |
| | -Has already found his client |
| | -Has agreed upon the details of the transfer with the transport company |
| | -Has found a container and |
| | -Goods be ready for transportation |
| | The exporter informs the customs broker about the export he intents to do and the date of loading. |
| | • Electronic authorization from the exporter to the customs broker. This step is skipped if all the required action has been done by the exporter himself. It is worth noting that more than 95% of exports are submitted by customs brokers. |
| | On the day of loading, the customs broker goes to the exporter premises and receives the certificates (conformity and phytosanitary) issued by the arborist DAOK. |
| | The exporter and the customs broker must be registered in EORI (Economic |

Operator Registration and Identification).

• The customs broker must be user of the ICISnet.

Activities and associated documentary requirements

- **3.1.** The user fills out the information of the SAD.
- **3.2.** During the day of the shipping, the exporter / customs broker starts submitting the declaration with the IE515 message, via their own server which communicates with the ICISNET Server (The two broker clubs in Athens and Thessaloniki, operate in this way).
- **3.3.** Then the customs information system performs message validation checks.
- **3.4.** In the case where there are errors, an error message IE516 is issued and a new IE515 must be submitted again.
- **3.5.** In the case where the submission has no errors, an IE528 message is issued which contains the number of export (MRN).
- **3.6.** After these, the customs broker prints both the IE515 and the IE528 and then goes to the customs Office.
- **3.7.** At the same time the shipping company issues the «pre-advice» document that describes the transport details.
- **3.8.** The shipping company informs the terminal operator.
- **3.9.** The terminal operator issues an electronic card that gives access to the port premises and hands it to the driver.
- **3.10.** The customs system performs a risk analysis
- **3.11.** The customs office supervisor examines the risk analysis results that are displayed on his screen and are related to the proposed export.
- **3.12.** The supervisor decides whether to control or not the goods.

Control is refused

- **3.12.1.** The export is scheduled, "upon the declaration", Both the movement released and the IE529 message are sent to the exporter / customs broker.
- **3.12.1.2.** At the same time an accompanied export document is issued, which is delivered to the exporter / customs broker.
- **3.12.1.3.** The exporter / customs broker hands the print out to the driver, and the driver along with the container pass the Customs Gate.
- **3.12.1.4.** The Customs officer, at the gate, seals the print out and then the goods enter the Customs' control area.
- **3.12.1.5.** The container enters a special canopy (auto gate) where pictures of the car, the driver and of the cargo are taken. A total of 16 shots, that are used for screening,

are taken..

3.12.1.6. The driver takes the container to the "red gates" where information about the position where the container will be placed is given..

Control is decided

- **3.12.2.** The control command is issued and the officer who will commit the control is declared.
- **3.12.3.** The exporter is informed via the message IE560.

Control of documents

- **3.12.3.1.** The exporter provides the relevant documents to the customs office of export.
- **3.12.3.1.1.** The Officer checks the documents.

Physical control

- **3.12.3.2.** A print out of the document that has to be checked is taken.
- **3.12.3.2.1.** Any charges for overtime are paid.
- **3.12.3.2.2.** The customs Officer goes to the site of inspection
- **3.12.3.2.3.** At the same time the transporter is notified to transfer the container in the area out of the premises of the Customs.
- **3.12.3.2.4.** At the gate, the driver hits his card and is routed in the area of control.
- **3.12.3.2.5.** The control is taken place.
- **3.13.** Upon completion of the control, the results are recorded.
- **3.14.** If the control result is "Not satisfactory / wrong", the process stops and the export is prohibited. An IE551 message is sent to the applicant.
- **3.15.** If the control result is satisfactory, the movement is released and the accompanying document is printed out. The IE529 document is sent to the exporter.

Form processing Description

The supporting documents required by the office of export dependent on national or EU, regulations, restrictions or prohibitions.

For the Export of feta cheese the required documents are: the Invoice, the customs broker authorization, the delivery note, the packing list, the phytosanitary certificate, the person who has to certify the goods.

The Chamber of Commerce issues the certificate of origin only when the exporter is financially aware. The certificate of origin is issued on the next day of shipping, so that the quantity that is declared on the document be the correct one. For this type of

| | certificate the physical presence of the customs broker is required. |
|---------------------|---|
| | Sometimes the issue of certificate euro-1 is required, but this does not delay the flow of work. It takes about 1 minute to issue the document upon the request. |
| | It must be noted that the exported goods must be accompanied by certificates in order the customer can use them in a third country. Certificates of origin are objects of mutual collaboration. |
| | The Importing countries usually require various licenses, depending on the product that is imported. |
| Information Flow | The information is exchanged electronically between exporter / representative and customs through the ICISnet information system. |
| Time Data | 1 - 2 days |
| | 1 day (the same day when the declaration is submitted) provided that it is a working day, If not, DETE must be paid for goods that are not subject to control or for those that are subject to document control. |
| | The time is undefined in the case of physical examination as may be required e.g. laboratory checks. Usually the release happens in the same day. In the case where chemical check is required the results are evaluated after the departure of the goods. |
| | Since the submission of the declaration, the time you get the accompanying export, is approximately 1 hour for the clients of Attica. In all the other cases, one day is needed. |
| | In the case of medium risk goods the control lasts on the average 5 minutes until the Officer checks and signs the relevant documents. |
| | In the case of high risk goods, the control lasts from about half an hour up to two hours, depending on the day, the weather, how much work there is in that area and if the distances are relatively small i.e. about 100 meters. |
| Cost Data | The cost of the certificate of origin is 15.36 EUR.[tbu] The cost at the Customs office is due to DETE fees (national, EU and international laws) and amounts at 0.15 up to 0.17% on the statistical value of exported goods with a higher ceiling to 100EUR. |
| | The customs broker completes the transaction with customs after the container has been loaded and sealed by the shipping company. If it is required, he pays both for the DETE fee for services delivered not in the working hours (7:30 to 15:30) and the costs for weekends. The cost of clearance along with the customs broker fee range between 120 to 140 EUR. If it is a planned export, the customs broker goes to the customs Office in the working hours. Previously, there was a charge 10-15 EUR. |
| | In the case of high risk goods, the goods must be checked physically, so they can be transferred to the premises of SEP in which case there is an extra charge of 20 EURplus VAT. The check lasts from about half an hour up to two hours, depending on the day, the weather and how much work there is in the area. |
| Barriers | Fallback procedure |
| | |

The fallback procedure is applied in the cases where for some reasons ICISnet is not working. In these cases the manual procedure is started, as following:

- The Submission of the Export Declaration Document (Single Administrative Document) is done by paper.
- The copy 3 of the document is handed to the exporter.
- In order to certify the exit of the Goods, copy 3 is sealed by the Customs Office of Exit.
- The risk analysis is performed manually.
- There is no exchange of electronic messages.

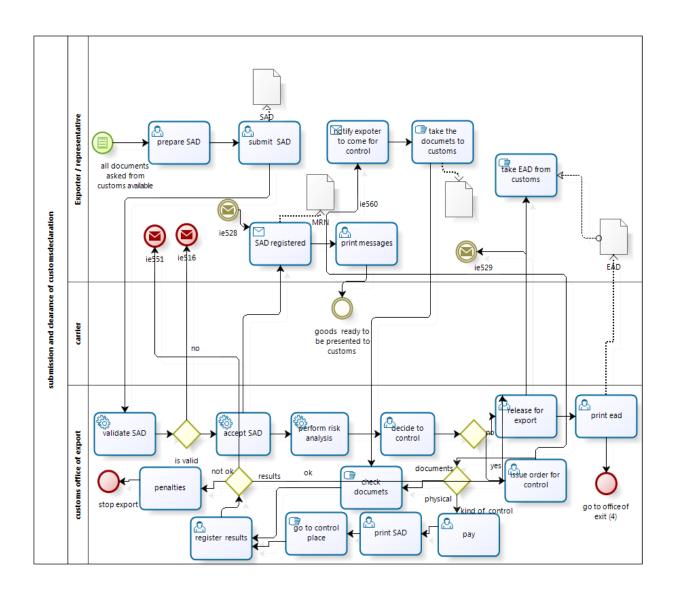
It is probable, that the above procedure will create some minimum delays which are assumed to be negligible. According to the European Community official data, the ICISnet unavailability is less that 1%

- Some laboratory tests should be performed before the arrival of the goods to the customs. The identification of the goods is not an easy task..
- For medium and high risk goods that have received the phytosanitary certificates, a second check should not be done.
- Should this extra check not performed; there will be a reduction in the cost (15% of the DETE fees).
- If there is a need for chemical analysis, the sample has to be transferred to the nearest laboratory resulting in a waste of time because no chemical laboratory is located in the area of the port.. The chemical services have been asked to be transferred within the area of the port.
- There is no communication between the information system of the SEP and the ICISnet.
- in the cases where there is a declaration of the goods, there is no reason for the customer to come to the customs office twice.. The accompanying documents can be printed out by the operator.

Suggestions for improvement

- All the flow should be implemented in an electronic way, paperless. In the Customs office of export there are only transport documents.
- In the case where there is a declaration of the goods, there is no reason for the trader to come to the customs office twice. The exchange of information can be implemented using messages only.
- There must be collaboration with the 33rd directorate of the Ministry of Finance so that the requirements of the other Ministries are included.
- The time spent on the customs procedure is already compressed. We need better coordination with other involving agencies.
- The site of the customs service should provide information in a more organized way.

• There must be an electronic Interface between the customs Office and the terminal operator; so that he is informed immediately upon the time the IE529 message is issued.



C.4. Procedures at the customs office of exit

| Name of | Shipment of feta cheese to Russia |
|---------------|--|
| process area | |
| Name of a | 4. Transfer to the Customs Office of exit - Customs Formalities at the customs office of |
| business | exit. |
| process | |
| | |
| Related laws, | |
| rules and | 1. Regulation (EU) 2913/92 (CCC.), |
| regulations | |

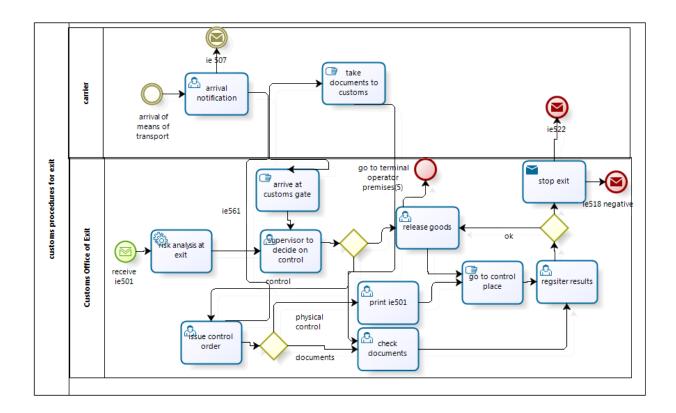
Pg. 30 / 51

2. 2454/93 (CCCIP.), with all amendments thereto, which provide guidance on the application by the competent offices of the country's export control system. 3. Regulation 2658/87 (on the tariff and statistical nomenclature and on the Common Customs Tariff). **Process** Exporter **Participants Customs Broker Customs Office of Exit** Transportation Company/Road Transporter Input and The consignment is at the customs office of exit criteria The message IE501 of the anticipated arrival has already received. enter/begin the business process **4.1.** Upon the arrival of the container at the Gate the IE507 is sent from the Activities and transporter/ Exporter to notify the arrival. associated documentary 4.2. At the Gate, the Customs Officer retrieves the expected arrivals from the IS and requirements also he realizes if IE507 has been submitted or not. **4.3.** The Customs supervisor is informed with telephone briefing. In the case where the message IE507 has not been sent, the submitting of the IE507 message to the exit is recorder by the Gate Official. 4.4. The customs office supervisor examines the risk analysis results that are displayed on his screen and are related to the proposed export. **4.5.** The supervisor decides whether to control or not the goods. **Control** is refused **4.5.1.** The supervisor schedules the exit upon declaration **4.5.1.2.** The Customs officer, at the gate, seals the print out and then the goods enter the Customs' control area. **4.5.13.** The container enters a special canopy (auto gate) where pictures of the car, the driver and of the cargo are taken. A total of 16 shots are taken that are used for screening. 4.5.14. The driver takes the container to the "red gates" where information about the position where the container will be placed, is given. **Control** is decided **4.5.2.** The control command is issued and the officer who will commit the control is

declared.

| | 4.5.3. The exporter is informed via the message IE561 . |
|-----------------------------|---|
| | Control of documents |
| | 4.5.3.1. The Officer checks the documents. |
| | Physical control |
| | 4.5.3.2 The customs Officer goes to the site of inspection |
| | 4.5.3.3 at the same time the transporter is notified to transfer the container in the area out of the premises of the Customs. |
| | 4.5.3.4 At the gate, the driver hits his card and is routed in the area of control. |
| | 4.5.3.5 The control is taken place. |
| | 4.6. Upon completion of the control, the results are recorded. |
| | 4.7. If the control result is "Not satisfactory / wrong", the process stops and the export is prohibited. An IE522 message is sent to the applicant and a negative IE518 is sent to the customs office of export (control results B1). |
| | 4.8. If the control result is satisfactory, it is entered to the system and the exporter is informed by the change of the status of the movement and by the message IE525 . |
| Form processing Description | |
| Information Flow | The information is exchanged electronically between exporter / representative and customs through the ICISnet information system. |
| Time Data | customs through the reishet information system. |
| Cost Data | In the case of high risk goods, they must be checked physically, so goods are transferred to the premises of SEP and there is an extra charge of 20 EUR plus VAT. The check lasts from about half an hour up to two hours, depending on the day, the weather, how much work is in the area. |
| Barriers | Fallback procedure The fallback procedure is applied in the cases where for some reasons ICISnet is not working. In these cases the manual procedure is started, as following: |
| | The Submission of the Export Declaration Document (Single Administrative Document) is done by paper. The copy 3 of the document is handed to the exporter. In order to certify the exit of the Goods, copy 3 is sealed by the Customs Office of Exit. The risk analysis is performed manually. There is no exchange of electronic messages. |
| | |
| | It is probable, that the above procedure will create some minimum delays which are |

| | assumed to be negligible. According to the European Community official data, the ICISnet unavailability is less that 1% |
|--------------------|---|
| Suggestions for | All the flow should be implemented in an electronic way, paperless. In the Customs office of export there are only transport documents. |
| improvement | The time spent on customs procedure is already compressed. We need better coordination with other agencies involved. |

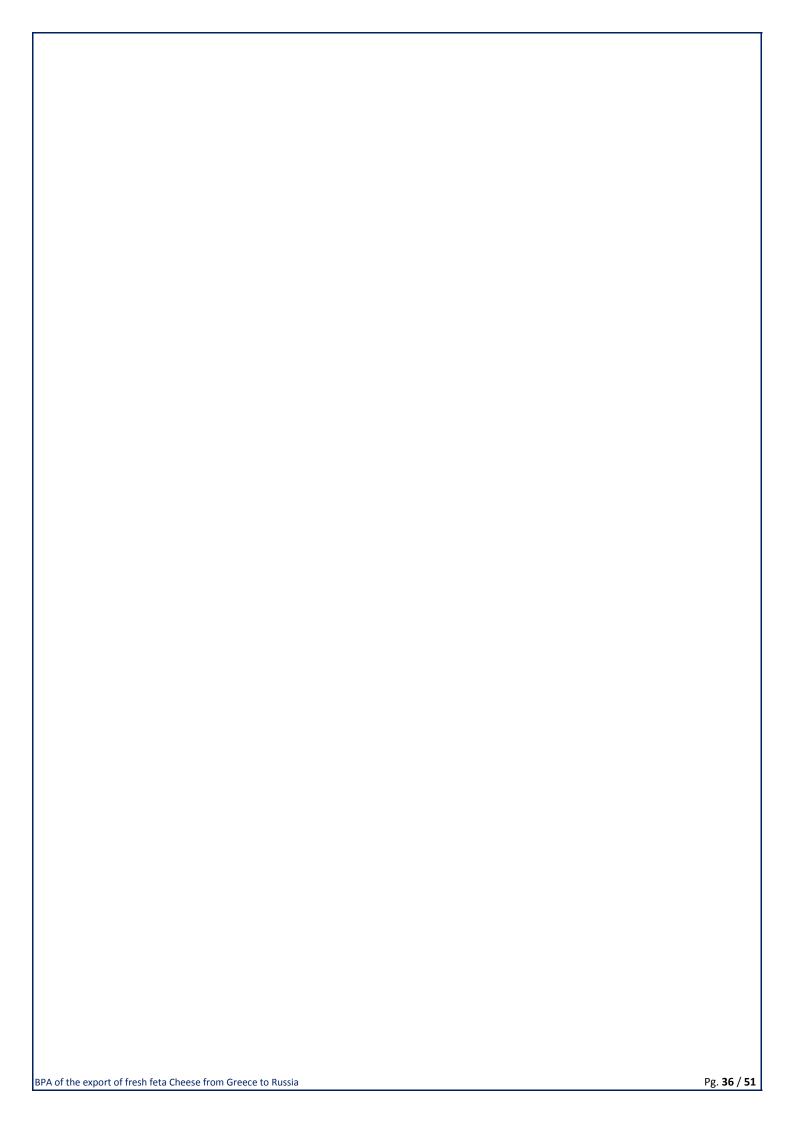


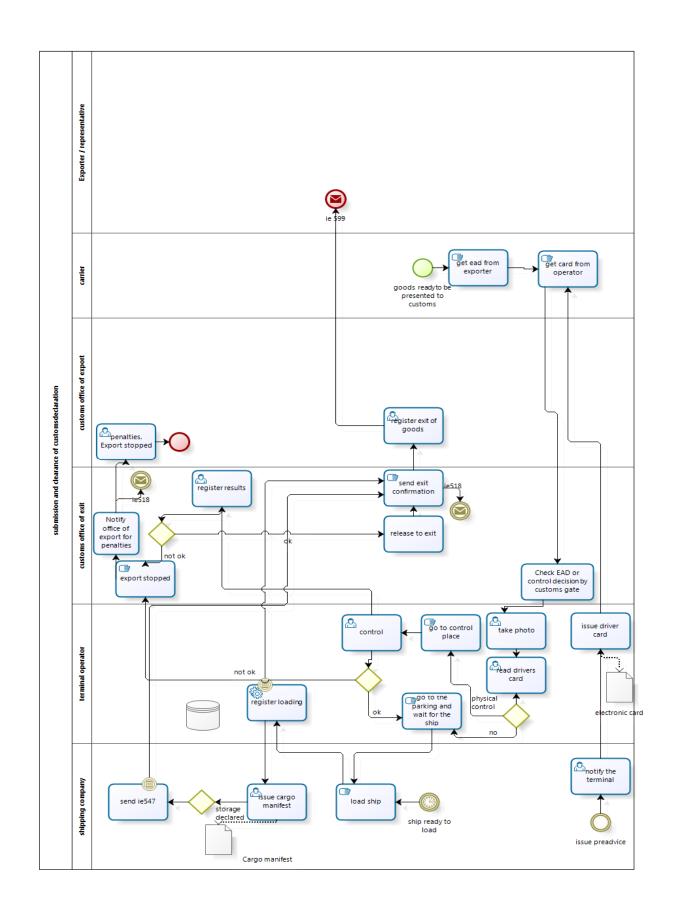
C.5. Final customs formalities & Stow container on vessel – cargo manifest

| Name of | Shipment of feta cheese to Russia |
|---|---|
| process area | |
| Name of a | 5. Final customs formalities & Stow container on vessel – cargo manifest |
| business | |
| process | |
| | Parking at the Terminal area – Loading to Ship – Verification of Exit – Finalization at the |
| | Customs Office of Export |
| Related laws, rules and regulations | 1. Regulation (EU) 2913/92 (CCC.), |
| | 2. 2454/93 (CCCIP), with all amendments thereto, which provide guidance on the application by the competent offices of the country's export control system. |
| | 3. Regulation 2658/87 (on the tariff and statistical nomenclature and on the |

| | Common Customs Tariff). |
|----------------|---|
| Process | Exporter |
| Participants | Customs Broker |
| | Customs Office of Export/Office of Exit |
| | Transportation Company/Road Transporter |
| | Port Administrator |
| | Shipping company |
| Input and | The supervisor at the customs office of exit has finalized the control of the |
| criteria to | consignment and has record the result. |
| enter/begin | The carrier has the EAD from the exporter |
| the business | The carrier has the card from the operator |
| process | |
| | 5.1. The Customs officer, at the gate, seals the print out of accompanied export |
| Activities and | document and then the container pass the Customs Gate and the goods enter the |
| associated | Customs' control area. |
| documentary | |
| requirements | 5.2. The container enters a special canopy (auto gate) where pictures of the car, the |
| | driver and of the cargo are taken. A total of 16 shots are taken that are used for |
| | screening. |
| | |
| | 5.3. The transporter is informed about the position where the container will be placed. |
| | 5.4. Presentation at the parking area: The position where the container will be placed is |
| | defined (all containers are placed on specific positions, which are electronically |
| | controlled.). |
| | · |
| | 5.5. The container is loaded when the ship is available for loading. |
| | |
| | 5.6. Upon completion of shipping the information system of the Port administrator is |
| | updated. |
| | 5.7. Two days later the shipping company is informed by the computer system of the |
| | SEP via the declaration of export. In the document, all the information about the ship |
| | and the container is given. |
| | |
| | 5.8. System Update: The electronic system of the port administrator is updated with |
| | the export manifest. This information is accessible by the Customs via terminals that |
| | are connected with SEP computer system. |
| | |
| | 5.9. Attach to the SAD Export: The Customs office of export attaches the cargo manifest |
| | to the declaration of export and identifies the data given. It checks if the container that is described in the export movement, is the same with that of the cargo manifest. |
| | is described in the export movement, is the same with that of the targo mannest. |
| | 5.10. The Customs officers at the office of export make final confirmations and await |
| | the sending of the message IE547 in order to close the clearance of export. |
| | |
| | 5.11. In the case where no information is stored, then the Customs Officer sends the |
| | confirmation message IE518. |
| | F 43 Thomas and a condition of the DEF 47 consequence belong for the China |
| | 5.12. Upon the sending of the IE547 message on behalf of the Shipping companies, the |

| | Officers at the Office of Exit implement the loading and they send the message IE518. |
|-----------------------------------|--|
| | 5.13. Upon the receiving of the message IE518, the message IE599 is sent to the exporter/ customs broker verifying the end of the export. |
| | 5.14. The exporter/Customs broker goes to the Customs of Export in order the container be sealed and finally confirmed by the message IE599. |
| Form processing Description | |
| Information Flow | The information is exchanged electronically between exporter / representative of shipping / transportation companies and customs through the ICISnet information system. There is no interface between ICISnet and the port administrator. The port administrator has it own information system. |
| Time Data | All the acts that confirm the exit are completed in the same day or in the next day as soon as the relevant documents are fetched to the customs office by the brokers. One week after the shipping and in same cases in one month after the shipping, the shipping companies provide the final information about the shipping. |
| Cost Data | |
| Barriers | Fallback procedure The fallback procedure is applied in the cases where for some reasons ICISnet is not working. In these cases the manual procedure is started, as following: The Submission of the Export Declaration Document (Single Administrative Document) is done by paper. The copy 3 of the document is handed to the exporter. In order to certify the exit of the Goods, copy 3 is sealed by the Customs Office of Exit. The risk analysis is performed manually. There is no exchange of electronic messages. |
| | It is probable, that the above procedure will create some minimum delays which are assumed to be negligible. According to the European Community official data, the ICISnet unavailability is less that 1% |
| Suggestions for improvement | The shipping companies do not know when they need to submit the IE547 message. A message of loading, similar to the IE547 message, must be created as soon as possible, so that there should be no need to collect so many papers. The message IE590 that is sent by the local authorities must be established as a message that will be submitted by the manager of the band. The time spent on customs procedure is already compressed. We need better coordination with other involving agencies. There must be an electronic Interface between the customs Office and the terminal operator; so that he is informed immediately upon the time the IE529 message is issued. |





C.6. Business processes of feta cheese export a nutshell

Fig. C.2. Business processes of Feta Cheese export in a nutshell

ΠΡΕΠΕΙ ΝΑ ΑΛΛΑΞΕΙ ΣΕ 4 ΜΕΡΕΣ???

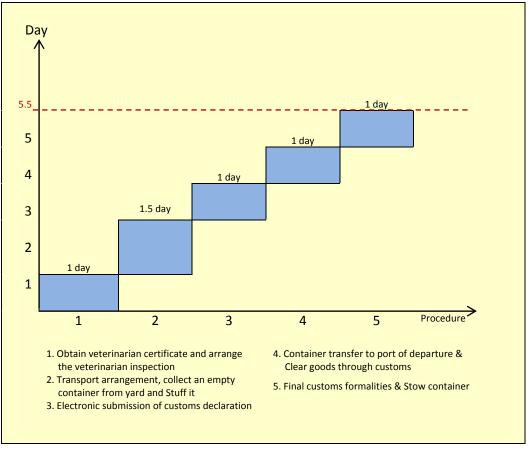


Table C.2. Duration and dependencies among feta cheese export business processes

| rable dia baration and dependences among reta uneese expert basiness processes | | | | | | | | |
|--|----------|-------------|--------------|--|--|--|--|--|
| Core business process (use case) | Duration | Preparatory | Simultaneous | | | | | |
| Core business process (use case) | | Processes | task | | | | | |
| 1. Obtain veterinary certificate and arrange the | 2 days | N/A | - | | | | | |
| veterinarian inspection | maximum | | | | | | | |
| 2. Transport arrangement, collect an empty | 1 + ½ | - | 1 | | | | | |
| container from yard and Stuff it | day(s) | | | | | | | |
| 3. Electronic submission of customs declaration | 1 day | 1 | 2 | | | | | |
| 4. Container transfer to port of departure & Clear | 1 day | 1,2,3 | 3 | | | | | |
| goods through customs | 3 | | | | | | | |
| 5. Final customs formalities & Stow container | 1 day | 1,2,3,4 | 4 | | | | | |

C.7. Cost Analysis



Obtain Certificates

Veterinary Certificate

- 30 EUR per veterinary certification

Certificate of origin

- 55 EUR Overtime: additional fees approximately for 4 hours and 100 km distance
- 0-4 [tbu]EUR Certificate of Origin (Certified Exporters have no fees)

Transportation

- 700-1.250 EUR Road transport to port of departure (Piraeus) depending the distance of place of production
- 1500 EUR sea freight fare from Piraeus to Russia
- (N.B. 7000 EUR road transport from Greece to Russia 3 times the sea freight cost)

Insurance

- 50 EUR approximately for cargo insurance (tbu) - 0,5% of the cargo value (total or partial loss, etc)

Customs procedures

- 130 EUR Customs clearance, including customs broker fees

Customs broker fees

- For each Export Customs Declaration, the customs brokers ask to the exporter to pay between 30 and 80 EUR.

More specifically:

- 1. For export GROUPAGE of the loading of the goods (part of CONEX), the cost is of 30 EUR.
- 2. For export CONEX (loading into the establishment of the exporter), the cost is 50 EUR.
- 3. For export CONEX (loading under the responsibility of the customs broker from the transporter's warehouse, the cost is between 60 and 70 EUR.
- 4. For two or more CONEX under the same export declaration document, the cost is 80 EUR.

Other annual fees

500 EUR Expenses for preparation and becoming AEO (e.g. local clearance procedures)

D. Problems referred and Points of potential improvement

An important characteristic of the Business Process Analysis is the involvement of the stakeholders in the: 1) mapping of the processes, 2) identification of problems associated with the execution of these processes, and 3) development of solutions leading to the improvement of processes. The objective of this section is to provide an inventory of problems identified and suggestions made by the various stakeholders during the course of this study. The information provided below constitutes a compilation of their views which will be used as an input for the subsequent steps of the pilot phase and for deriving preliminary conclusions.

D.1. Problems referred by interviewers

General Problems related to export of dairy products to Russia

As already mentioned, an exporter or a dairy company has the right to export "feta cheese" and other dairy products to Russia, only if the dairy establishment producing the cheese has received approval by the Russian authorities. In 2009, Russian authorities approved a number of Greek dairy establishments that have the possibility to export. Since then, if a new establishment is interested to export, the procedure for approval by the Russian authorities is time-consuming although official requests and all the documents required are forwarded without delays by the Ministry of Rural Development and Food to Russia through the Greek Embassy in Moscow.

Obtain veterinary certificates and arrange the veterinarian inspection

<u>Veterinary inspection/Veterinary certification for export to Russia, processes and their duration.</u>

The official veterinarians cannot in some cases go to the establishment and certify the products working overtime because they are not always receive a daily allowance when working overtime. This may cause delays to the export procedure.

Consequently, the exporters have in some cases to perform their transactions during weekday working hours only.

The exporter in some cases has to pay the taxi cost for the veterinary inspector to come at his premises to inspect the products to be exported.

Additionally, due to the temporary lack of laboratory reagents in some cases in the official laboratories, the official pre-export sampling and laboratory analysis cannot be always completed when required. However, the above difficulties usually do not cause disturbances in the export procedure. Independently of the official sampling and laboratory analysis, the companies perform laboratory analysis in their own laboratories as own checks.

According to feta exporters, there is a big number of documents need to be issued by multiple government agencies before the product export, causing some delays in the procedure.

Delays due to the requirement that the veterinary certificates have to be printed in specific watermarked paper.

Finally, the veterinary certificates for export to Russia must be printed in a watermarked paper under some specific provisions. The cost for printing of the certificates is covered under normal conditions from the Public Sector. However, in some cases, when the financial procedures for the printing of the certificates are retarded, some companies bear the cost for printing in order to avoid the delays in the export process.

<u>Lack of uniformity of procedures and certificates among third countries and relative delays-</u> <u>Problems related to Exports to other Third Countries</u>

This is present especially when dealing with big countries like China or Russia or Ukraine (which are asking for a vast number of documents) which have demanding prerequisite certificate standards which increase the cost for the exporter. THE EU competent Services could work towards a relative simplification of this process.

Furthermore, exporters are facing a lack of Community or National level database for certificates, stamps, sanitary requirements, competent bodies, etc. for the total of third countries, which would facilitate the job of the Inspectors - Veterinarians. Some certificates which have already been agreed between Greece and third countries, either they have been sent by administrative circular to all regional veterinarian bodies by the Directorate General of Veterinary Services of the Ministry of Rural Development and Food, or are posted on the official site of the Ministry of Rural Development and Food.

In most cases, the veterinary certificates required for the export to the third country are not specified by the third country of import. Big export companies have their own database with the veterinary certificates they use for the export of their products.

Each country of destination has specific requirements which are not known beforehand in some cases. So, when a product is being exported to a third country for the first time, and considering the lack of related experience as to which certificate has to be issued, the competent Department of Veterinary Medicine submits a written question to the Directorate General of Veterinary Services of the Ministry of Rural Development and Food which sends a written letter, in a few days usually, to the competent authorities of the third country, through the Greek Embassy in that country, asking for the veterinary requirements and the type of veterinary certificate required for this export. If there is an answer, this is given in a period of one month usually but this is not always the case. There are several cases where there is no answer at all.

Because the exporter cannot wait for this procedure to be done, he addresses in some occasions himself to his client/importer in the third country and receives the veterinary certificate required. In that case, there has to be a related written confirmation by the competent body of the third country. But, generally, such certificates are not rejected.

We should underline that sometimes, some interested exporters do not submit on time their request for export to the competent veterinary authorities and they choose to proceed without collecting all the data required regarding the export procedure. They consider that the procedure is simple and they expect that all the information is already available, however this is not the case always, as mentioned. In addition, in some cases, even though a bilateral agreement between Greece and a third country exists, the procedure for the Veterinary Certification agreement requires some time to be established.

Customs Procedures

Need for enlargement of working hours of local customs offices in major ports and airports of Greece.

Some exporters thought that this will improve their competitiveness in the global markets

Need for improvement of electronic customs system

Need for enlargement of working hours in major ports and airports

D.2. Additional Considerations

Appropriation of feta brand name

Beyond the scope of the business process analysis itself, the biggest problem Greek feta cheese exporters face in their everyday business, is definitely the unfair competition they are facing in destination countries where the domestic cheese producers appropriate the "PDO feta "brand making similar feta type cheese products which of course they are not the original product by any means.

Despite the European Court Decision in 2005, for protected designation of origin for "feta", Greece did not fully exploit this advantage by raising consumer awareness for the original product quality advantages it offers. As it was mentioned before, Greece holds only 28% share of the global feta type cheese market despite the cheese's Greek "brand". Also, many third country producers are proceeding within their own regulatory bodies to register and safeguard some kind of feta cheese brand name (eg Turkish authorities have approved the name "Anatolion feta cheese" while the same happened in China, India etc). The Greek government is trying to face this problem through European Union bodies and actions as well as through lawsuits against producers coming from major producing countries such as Turkey, India and Canada. Also, the price of such imitation products is of course much lower than the original one.

Despite that feta cheese exports have increased lately, Greece did not fully exploit the product's full potential in order to gain the global share it deserves in this market. For this reason there is a strong need of a unified strategy in all levels to promote and market feta by all stakeholders.

Some examples of actions that should be undertaken in this direction would be the following:

- a) After prioritizing key markets the key action is to increase consumer awareness and increasing product value proposition (globally recognizable Greek product identity etc) as well as to find ways to explain to consumers the nutritional and quality advantages of the original product through for example in-store promotions as well as participation and events in major commercial exhibitions. Also, cooperation with food promoting companies is essential.
- b) Secure strong commercial presence to priority markets through business relationships with wholesalers and retailers.
- c) Create greater product innovation (new product variations, packaging etc).
- d) Create a universally recognizable PDO mechanism for all Greek PDO products.
- e) There is a need for constant vigilance of all stakeholders for an early detection of each brand name appropriation where all those initiatives and actions should take place for the effective protection of the product.
- f) Promotion and protection of Feta in target countries with strong element of Diaspora (USA, Canada, Australia) and in countries like Japan, Russia, China, Korea, India, the Gulf countries. Other markets of interest are Denmark, Iraq and Iran.
- g) Need to work with the Commercial Section of the Embassy of each country focusing on market research and analysis of opportunities and risks for the distribution networks in target countries.

- h) Exploitation of all possibilities provided to us by the EU through subsidized promotion programs in third countries.
- I) Need for intensive controls for the protection of consumers and the rights of Greek farmers from imitation cheeses.
- j) Improvement of existing indigenous tribes and shaping modern types of Greek breeds of sheep and goats from their crossbred populations using the open stud books and develop a modern regulatory / legal framework on animal genetic resources.
- k) Increase the awareness of Greek producers exporters for informing EU services for unfair competition for other white cheese products using "Feta" logo, following already established procedures.

Need for market research

Search requirements of third countries for export where there is a big export interest, through the Economic Counselors of the Greek Embassies abroad and the Greek Chambers in Greece. There is need of preparation before the demand of a special establishment.

Creation of an electronic database in which this information could be registered and updated.

Need for better coordination between Greek Embassies throughout the world

Long time needed (a month or so) for getting an answer on a question concerning type of certificate needed, by the Greek Embassies throughout the world. However, this is in most cases due to delays in the answers of the competent authorities in the countries of destination. Sometimes, the answer is got by the client in the import country- by the importer of the products (2-3 days of delay).

E. Conclusions and Next Steps

This report summarizes the results of the first phase of the Pilot BPA analysis related to the export of Feta cheese from Greece to Russia. The first concrete outcome of the work performed within the framework of the first phase is the mapping of the current processes ("as is" situations) and the compilation of problems and potential solutions identified by the various stakeholders. The mapping of the existing processes led to the estimation of the time and costs associated with the shipping function of the export process. The average time required for the completion of the shipping process of Feta Cheese from Greece to Russia is approximately seven days (the estimated time relates only to the five sub-processes analyzed), while the cost incurred for shipping a 20 ton container amounts to 1,500 EUR, excluding annual fees for acquiring an export permit (500 EUR) and the fee of AEO permit (500 EUR). The shipping cost of feta Cheese per ton is [225 tbu] Euro which represents [15% tbu] of their selling price. The problems associated with the shipping process can be classified into the following four categories:

- 1) process operations,
- 2) broader operational issues of the public sector,
- 3) structural problems of the public sector, and
- 4) issues related to international (Greece-Russia) commercial agreements.

The identified problems affect negatively the time required and the costs incurred and therefore the redesign of the shipping process should aim to the alleviation of these problems.

The completion of the first phase of the pilot study requires the analysis of the existing processes, the identification of all problems and bottlenecks, and the re-design of the existing processes (should be situation) in order to increase the efficiency of the processes in terms of time and cost. The following steps are envisaged for completing the first phase of the pilot: 1) process mapping validation, 2) process analysis, 3) development of recommendations for process improvement, and 4) implementation of proposed changes.

F. REFERENCES

Roadmap of the National Trade Facilitation Strategy (September 2012) http://www.mindev.gov.gr/?p=8653

Business Process Analysis Guide to Simplify Trade Procedures - Updated September 2012 (UNITED NATIONS NETWORK OF EXPERTS FOR PAPERLESS TRADEIN ASIA AND THE PACIFIC, UNITED NATIONS ECONOMIC AND SOCIAL COMMISSION FOR ASIA AND THE PACIFIC, UNITED NATIONS ECONOMIC COMMISSION FOR EUROPE)

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Book: Antonios I. Mantis, Hygiene and Technology of Milk and Dairy Products, Kyriakidi Bros, 2000

http://www1.american.edu/ted/feta.htm

Greek Food Code, General State Chemical Laboratory

http://fsvps.ru/fsvps/importExport/greece/enterprises.html?product=26&productType=5&_langua_ge=en

http://ec.europa.eu/food/international/trade/sps requirements en.htm

http://ec.europa.eu/food/international/trade/eu-russia spsissues en.htm

Annex 1 - TRADE OF "FETA CHEESE" FROM GREECE TO OTHER MEMBER STATES — SANITARY REQUIREMENTS

The Regulation No 853/2004/EC sets out the general hygiene requirements for raw milk, heat-treated drinking milk and other milk products.

A Greek dairy establishment has the right to trade its products (including Feta cheese) to other Member States only if it is approved according to EU legislation. EFET (Hellenic Food Authority) is the Central Greek Competent Authority approving all dairy establishments. The approved dairy establishments are listed at the following link: http://www.efet.gr/portal/page/portal/efetnew/enterprises/facilities

The Council Directive No 89/662/EEC and the greek presidential decree 420/1993 are followed regarding the veterinary checks in intra-Community trade.

Because there are no border controls for movements between Member States, non-discriminatory spot checks are carried out at the point of origin and at the destination according to the Council Directive No 89/662/EEC to ensure that consignments are in compliance with the guarantees provided by the legislation in force.

There is no obligation for the products to be accompanied by a veterinary certificate for the trade between Member States. The traceability of the products is achieved through the proper identification of the products, the accompanying commercial documents and the invoice papers. Obligation of the importing companies: According to article 5 of the Council Directive No 89/662/EEC operators who have products delivered to them from another Member State (from Greece for example) must, if so requested by the competent authority of the Member State (of destination) report the arrival of these products.

Annex 2 - 5th Piraeus Customs office (Ikonio - Piraeus) - Area places of Supervision

A) Free Zone

It is a unified, fixed and fenced area. At the south part the border is the shoreline. At the east, north and west part there is a wall. Inside there is a fence in two (2) parts : one for each local supervisor. (PCT and OLP).

More specifically, the free zone is subdivided into two parts:

- a) The locals for the open storage of containers which are under the management of the PCT. Under these locals there are also the following:
- Entry at the free zone with three (3) entry strips for the trucks and three (3) strips for exit (north part) and separate outposts for the customs officers and for the manager of the PCT.
- Covered storage place for the management of the company PCDC.
- Half covered storage of physical control of the goods (ramp) and adjacent "prefabricated" offices of the customs controllers and for the officers of the Ministry of Agricultural Development and Food.
- b) The locals for the open storage of containers which are under the management of the OLP. Under these locals, there are also covered local place (C4 storage) which is divided into four (4) different parts:
- Part for storage of unclaimed goods
- Part for discharge of goods
- Part for archives of Customs
- Part for border inspection veterinary control ("SYKE")
- Entrance into the free zone with strips of entrance and exit and different outposts for the customs officers and for the manager of the OLP.

B) Outside the free zone

Outside the borders of the free zone, at the north part of the port, there is a unified building where there is located the manager of the PCT, the Customs office, the customs brokers' office, the maritime agents' office, etc.

Also, at the north-east part, closer to the entrance of the port, there is a building where is located the manager of the OLP.

Annex 3 - Legislation

• Regulation No 510/2006/EC:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2006R0510:20080529:EN:HT ML

• Regulation No 1383/2003/EC:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32003R1383:EN:HTML

• Regulation No 1891/2004/EC:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R1891:20071006:EN:HT ML

Regulation No 853/2004/EC:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0853:20120701:EN:HT ML

 Agreement of the Customs Union on Veterinary-Sanitary Measures of December 11, 2009 and Decision of the Customs Union Commission No. 317 of June 18, 2010:

http://ec.europa.eu/food/international/trade/sps_requirements_en.htm

• European Customs Regulation No 2913/1992:

http://eurlex.europa.eu/Result.do?T1=V1&T2=1992&T3=2913&RechType=RECH_naturel&Submit=Search

• European Customs Regulation No 2454/1993:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31993R2454:EN:HTML

• Regulation No 136/2004/EC:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0136:20090501:EN:HT ML

• Regulation 282/2004/EC:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0282:20040331:EN:HT MI

Regulation No 882/2004/EC:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0282:20040331:EN:HT ML

• European Directive No 93/1996:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0282:20040331:EN:HT ML

• Presidential Decree 344/1998:

http://www.et.gr/idocsnph/search/pdfViewerForm.html?args=5C7QrtC22wEeWRs27M2niXdt vSoClrL8Cqi_epRn1g95MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKl3nP8NxdnJ5r9cmWyJWelDvWS_18kAEhATUkJb0x1LldQ163nV9K--td6SluWK3NGEijE11nCAZhE-WrQ-8AXHtqLUfMFvXaq64tgqm

Joint Ministerial Decision 289667/B' 1158/24.06.2008:

http://www.et.gr/idocsnph/search/pdfViewerForm.html?args=5C7QrtC22wHtyK1ZYNhP8Hdtv SoClrL88VQbDIJsbtruFUDqazHcNeJInJ48 97uHrMts-

zFzeyCiBSQOpYnTy36MacmUFCx2ppFvBej56Mmc8Qdb8ZfRJqZnsIAdk8Lv_e6czmhEembNmZC MxLMtconXyepoUknqb0m6SbJ5 eaLZVwZGw3gUw0umXAVuA4

• Regulation 2658/87:

http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31987R2658:EN:HTML

Presidential Decree 420/1993:

http://www.et.gr/idocsnph/search/pdfViewerForm.html?args=5C7QrtC22wGldAs1HD7Xe3dtv SoClrL8tvmGnUriqnd5MXD0LzQTLWPU9yLzB8V68knBzLCmTXKaO6fpVZ6Lx3UnKl3nP8NxdnJ5r9cmWyJWelDvWS_18kAEhATUkJb0x1LldQ163nV9K--

td 6 Slue 1 Lxdb 4 l5 Pe 1 yWFWD dyJTB on 9 zadh HKTS 9 q8 l-qz 9 Nw

| • | Council Directive No 89/662/EEC: |
|---|--|
| | http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1989L0662:20040430:EL:HTM |
| | L |

Annex 4 – Samples of Documents

1. Veterinary Certificate

| | L / OPUTUI | НАЛ □ COPY / KOI of consignor / Название и аз | IPPE EDV300TEDagureng | of copies issued / Количество (1.5 Certificate / Сер | выданных копии | |
|---|--|---|---|--|---|--|
| | | or consignor / trasbanne n a | прес грузоотправителя. | 1.5 Certificate / Cep | тификат му | |
| | | | | 17 | GR | No 0507 |
| | | | | | _* * * <u>_</u> | |
| 2 Name | and address o | f consignee / Название и адр | ес грузополучателя : | | * EU * *** | |
| | | | | cattle and small Ветерина Европейског молочные пр | ificate for milk and milk , ruminants exported from Federation рный сертификат на эк о союза в Российскую Ф одукты, полученные от рогатого скота. | the EU into the Russic спортируемые из едерацию молоко и крупного и мелкого |
| | | | | 1.6 Country of o | rigin / Страна происхоз | кдения продукции: |
| | | т / Транспорт: | | 1.7 Certifying Memb | per State / Страна, выдавшая | сертификат: |
| the number of the railway carriage. ruck, container, flight-number, name of the ship № вагона, автомашины. онтейнера, рейс самолета, название судна.) | | | 1.8 Competent author | 1.8 Competent authority in the EU / Компетентное ведомство EC: | | |
| интешне | ра, реис сах | олета, название суона.) | | 1.9 Organisation in t выдавшее сертифи | he EU, issuing this certificate kam: | / Учреждение EC. |
| .4 Countr | y of transit / 0 | Страна транзита: | | 1.10 Point of crossi пересечения грани | ng the border of the Russian цы Российской Федерации | Federation / Пункт |
| | | n / Дата выработки продука / Упаковка : | уш: | | | |
| 2.4 Nun | nber of pack | ages / Количество мест : | | | | |
| 2.5 Net | weight (kg)/ | Вес нетто (кг) : | | | | |
| 2.6 Num | nber of seal / H | Номер пломбы: | | | | |
| | | ks / Маркировка: | | | | |
| 2.8 Con | ditions of sto | rage and transport / Условия | хранения и перевозки: | | | |
| 3.1 Nam | ne (No) and a | products / Происхой address of establishment, app рес предприятия, зарегист | roved by the Competent Ve | terinary Service in the EU: й ветеринарной службой ЕС д | ля экспорта: | |
| - cold st | ore / холоди | льника | | | | |
| 3.2 Adm | ninistrative-te | crritorial unit / Администрат | ивно-территориальная еді | іница: | | |
| - | | | | | | |
| - | | | | | | |
| Certif | ficate on s | uitability of products | in food / Chungrens | ство о пригодности про | STANDING B POWER | - |
| the unde нижепо ne certifi | rsigned state эдписавший cate is based | /official veterinarian certify в ся государственный/офици on the following pre-export | hat: альный ветеринарный вра certificates (see attached lis | 9 Hactorium Vioctorengio en | едующее: | |
| | | | | | эртных сертификатов прила | гается список): |
| Date: Дата | Number: Номер | Country of origin: Страна происхождения | Administrative territory: Административная территория: | Approval number of the Establishment: Регистрационный номер | Name and quantity (net weight) of the product Вид и количество (вее не | |
| | | | | предприятия: | продукции: | |
| _ | | | | | | |

Delete if not relevant and confirm by signature and stamp Если не нужно, зачеркнуть и подтвердить подписью и печатью

4.1 Milk and milk products were obtained from clinically healthy animals at the dairy farms which are officially free from contagious animal diseases and are manufactured in dairy establishments, approved by the Competent Veterinary Service in the EU for export and are under its constant supervision, Экспортируемые молоко и молочные продукты получены от здоровых животных из хозяйств, официально свободных от заразных болезней животных, и произведены на молокоперерабатывающих предприятиях, имеющих разрешение компетентной ветеринарной службы ЕС о поставке продукции на экспорт и находящихся под её постоянным контролем. Milk and milk products originate from in premises and/or administrative territory officially free from infectious animal diseases, including? Молоко и молочные продукты произведены и отгружены из хозяйств и/или административной территории, официально свободной от заразных болезней животных, в том числе foot-and-mouth disease, rinderpest, contagious bovine pleuropneumonia and vesicular stomatitis - during the last 12 months in the territory of the EU Member State: ящура, чумы крупного рогатого скота, контагиозной плевропневмонии крупного рогатого скота и везикулярного стоматита - в течение последних 12 месяцев на территории страны-члена ЕС; brucellosis (B.abortus and B melitensis) and tuberculosis - officially free region, officially free premises or from animals that do not show a positive reaction to tests for brucellosis and tuberculosis; бруцеллеза (B.abortus and B melitensis) и тубсркулеза – официально свободного региона, официально свободных хозяйств или от животных. не показавших положительную реакцию при исследовании на бруцеллез и туберкулез sheep pox and goat pox - during last 6 months in the premises' оспы овец и коз - в течение последних 6 месяцев в хозяйстве Milk (milk products) exported into the Russian Federation Экспортируемое в Российскую Федерацию молоко (молочные продукты): are not contaminated with salmonella or other bacterial disease agents; не обсеменены сальмонеллами или возбудителями других бактериальных инфекций; are not subjected to ionization radiation, ultra-violet rays and do not contain coloring substances which are not registered by the Russian Federation; не обработаны нонизирующим облучением, удьтрафиолетовыми лучами и не содержат красящих веществ, которые не зарегистрированы в Российской Федерации; do not contain natural or synthetic estrogenic and hormonal substances, thyreostatics, antibiotics, other drugs and pesticides не содержат натуральные или синтетические эстрогенные, гормональные вещества, тиреостатические препараты, антибиотики, пестициды, а также лекарственные средства. Milk, used in manufacture of milk products, passed adequate treatment enough to remove pathogenic micro organisms dangerous to animal and human health. Milk products were treated to ensure absence of live pathogenic organisms. Молоко, используемое для производства молочных продуктов, прошло обработку, достаточную для уничтожения патогенных микроорганизмов, представляющих опасность для здоровья человека и животных. Поставляемые молочные продукты подвергнуты процессу переработки, в результате которой гарантируется отсутствие жизнеспособной патогенной микрофлоры. Milk products are considered fit for human consumption and for unrestricted retail purposes by the state/official authority of the exporting EU Member State Молочные продукты признаны пригодными компетентной государственной/официальной службой экспортирующей страны-члена ЕС для употребления в пищу людям и свободной продажи без ограничений. Microbiological, chemical-toxicological and radiological characteristics of milk and milk products correspond to actual veterinary and sanitary rules and requirements of Russian Federation. Микробиологические, химико-токсикологические и радиологические показатели молока и молочных продуктов соответствуют действующим в Российской Федерации ветеринарным и санитарным правилам и требованиям Exported milk (milk products) have typical organoleptic characteristics and undamaged factory packaging. Экспортируемые молоко (молочные продукты) имеют характерные органолептические показатели и ненарушенную фабричную упаковку 4.8 Single-use containers and packaging material meet hygienic requirements. Тара и упаковочный материал одноразовые и соответствуют гигиеническим требованиям. Means of transport are treated and prepared in accordance with the rules approved in the EU. Транспортные средства обработаны и подготовлены в соответствии с принятыми в ЕС правилами. Official stamp: Date Place Meem Пата -----Печат

Signature of state/official veterinarian

Подпись государственного/официального ветеринарного врача

Name and position in capital letters

Ф.И.О. и должность

Signature and stamp must be in a different colour to that in the printed certificate / Подпись и печать должны отмичаться цветом от бланка

Е.А. Непоклонов

 И.о. Руководителя Федеральной службы по ветеринарному и фитосанитарному надзору

« » августа 2006 г.

² Administrative territories, zones and time periods may be modified with a mutual agreement on the basis of the Memorandum of 4 April 2006 on zoning and regionalisation / Административные территории, зоны и сроки могут быть изменены по взаимному согласию сторон на основе Меморандума по регионализации и зонированию от 4 апреля 2006 года

Not applicable for milk (milk products) of bovine origin / He относится к молоку (молочным продуктам), полученному от коров.