

Low-Acid Foods Regulations & Requirements in Greece

Low-acid foods (pH > 4.6, water activity > 0.85) packaged in hermetically sealed containers are regulated in Greece to protect consumers from pathogenic organisms—most notably *Clostridium botulinum*. This guide summarizes the key EU and Greek requirements that processors must meet to ensure commercial sterility and market compliance.

1. Regulatory Framework & Competent Authority

- EU Regulations (EC) No 852/2004 & 853/2004 on food hygiene require a documented, HACCP-based food safety management system for all food businesses.
- EFET (Hellenic Food Authority) is the competent authority for enforcing EU food regulations in Greece, supported by regional public health departments.

2. Thermal Process Validation

- Products must undergo a validated thermal or aseptic process (e.g., retorting, canning, UHT) to achieve commercial sterility.
- Validation must follow Codex Alimentarius or equivalent EU guidelines.
- A recognised food process authority (e.g., certified food technologist or thermal process expert) must establish or review the scheduled process.
- Critical processing factors (temperature, time, pressure) must be monitored and recorded for each batch.

3. Facility & HACCP Compliance

- Implement and maintain a documented HACCP plan covering all processing steps.
- Ensure hygienic design of facilities and equipment with effective sanitation programs and GMPs.
- Identify, validate, and continuously monitor Critical Control Points (CCPs).
- Maintain ingredient and product traceability systems (one step back, one step forward).

4. Documentation & Recordkeeping

- Keep thermal process validation reports and scheduled process filings on site.
- Maintain batch production records and CCP monitoring logs.
- Retain records for a minimum of 2–5 years, depending on regulatory requirements.
- Document deviations and corrective actions, including product disposition decisions.

5. Microbiological Criteria & Testing

- Comply with Regulation (EC) No 2073/2005 for microbiological criteria applicable to low-acid foods.
- Conduct periodic product testing for *C. botulinum* and indicators of spoilage.
- Implement environmental monitoring in high-risk processing areas (aseptic zones).

6. Labeling Requirements (Reg. EU 1169/2011)

- Complete ingredient list and quantitative ingredient declarations (where applicable).
- Highlight allergens in accordance with Annex II of the regulation.
- Clearly display an expiration or 'best before' date.
- Provide nutritional information per 100 g/ml and per serving.
- Print lot/batch identification codes for traceability.
- Labels for the Greek market must be in Greek; bilingual labels may be required for export.

7. Training & Internal Audits

- Provide initial and refresher food hygiene training for all personnel handling food.
- Schedule and conduct internal audits at least annually to verify HACCP effectiveness.
- Document audit findings and implement corrective actions promptly.

8. EFET Oversight & Inspection Readiness

- EFET and regional inspectors review HACCP documentation, thermal processing records, traceability systems, and labeling compliance.
- Ensure all records are readily accessible and demonstrate knowledge of CCP monitoring.

9. Bonus Tips for Compliance

- Maintain both digital and hard-copy backups of all critical records.
- Review and update HACCP plan whenever products, processes, or regulations change.
- Engage a qualified process authority early when developing new low-acid products.

For expert assistance with HACCP design, validation, or regulatory review:

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