

Short-Term Mission on

**Activity 3.1 “Analysis and support of veterinary inspections”
- Food Safety and Meat Inspection -**

Mission report

1. Names of experts

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2. Objective and task of the mission:

The objective of the activity is to carry out a gap analysis of the regulatory and institutional framework of Bosnia and Herzegovina (BiH) for acquis alignment in the veterinary sector regarding the analysis of present organisation, structure, capacity, implementation and enforcement of legal requirements of the food safety and meat inspection service.

Date of visit: **26.02. - 04.03.2007**

3. Identification and description of activities during the visit

Introduction

International/world wide trade with food and animals has a tendency for globalisation. All foodstuffs are available around the year world wide.

This trade attitude has a high potential for internationalisation of pathogens and a risk of spread for residues and contaminants.

Many international organisations like OIE, WHO, FAO, Codex Alimentarius work on security of global trade in animals and animal products together with surveillance and control of animal diseases and food safety. Harmonisation of health standards for international trade concerning animals and products can be found in the International Animal Health Code of the OIE to assist the development of health regulations in Member states.

The EU follows their principle „Safe food from healthy animals“. This principle includes measures on the whole food chain, beginning at the animal health status, including slaughter, processing and retail.

It can be summarised that Global trade increases tremendously and food safety aspects are of high concern (FAO, WHO, OIE). Regulations regarding the global trade and food safety aspects are implemented by WTO, Codex Alimentarius Commission, OIE.

- a) **Participants:** see lists of participants
- b) **Monday, 26.02.**

- 1.1. Meeting of resident twinning adviser (RTA), German short term experts (STEs) and Representatives of SVO in Sarajevo. Introduction into system of food surveillance and veterinary affairs by the representatives of SVO.

Themes of presentations:

- I. Organisation and structure of veterinary service of Bosnia i Herzegovina
- II. Premises registration procedure and issuing export certificates
- III. Decision on manner of completing veterinary and health examination of animals before slaughtering and products of animal origin.

- IV. Discussion

To evaluate the current situation concerning key factors for veterinary organisation and assuring quality for consumer safety, a meat processing plant and a slaughterhouse were visited:

Tuesday, 27.02.

- 1.2. Meeting with Representatives of SVO. Drive to Kresevo, visit of meat processing plant together with the local veterinary inspector.

After an introduction of the participants and in history of establishment and explanation of processing concepts and products the quality management adviser led the visitors through the plant and explained the process of producing and the implementation of self control system in accordance to national legislation.

The requirements and implementation of national law and EU-Hygienic- Package were compared and discussed.

Drive to Posusje.

Wednesday, 28.02

- 1.3. Meeting with representatives of SVO, the local veterinary inspector and STEs. Drive to Rakitno. Visit of a slaughterhouse.

After a short introduction of the participants and establishment the local veterinary inspector led the visitors through the plant and explained the process of slaughtering and the implementation of self control system as well as the inspection system in accordance to national legislation.

Taking the slaughterhouse in Rakitno as an example, the implementation of requirements in accordance to the EU-Hygienic-Package was discussed.

Thursday, 01.03

- 1.4 Meeting of STEs, data analysis, assessment of data and discussion of results.
The conclusions and recommendations were fixed in a presentation.

Friday, 02.03

- 1.5 Meeting of veterinary inspectors BiH, representatives of SVO BiH and STE in the
"Building of Council of ministers BiH"

The recommendations and conclusions of German experts were presented to veterinary inspectors BiH.

The recommendations and conclusions were discussed by the participants. Practical examples of implementation of EU-Hygiene- Package were given in dependence on the visited establishments.

At the afternoon a presentation about meat inspection and food safety according to EU hygienic package was given. Afterwards several points were discussed, especially the possibility of traditional producing in line with EU hygienic package.

4. Summary of the results of the mission

General conclusions/recommendations:

Legal basis

Legal base for the whole food chain in equivalence to the EU-legislation especially with regard to feed is not complete. There are gaps according to the regulations (EC) 1774/2002, 178/2002 and 999/2001. The competence of SVO in matters of food hygiene is not given. The Food Safety Agency (FSA), which was founded in 2006, is responsible for matters of food hygiene. There is no cooperation established between SVO and FSA.

Recommendations concerning the legal basis:

Legal base for the whole food chain has to be completed. Co-ordination between SVO, FSA and entities to determine tasks, resources and strategies seems to be necessary. One central organisation should be responsible for legislation in veterinary matters and food safety.

Administration/Organisation

Chain of command for enforcement in the food inspection service is not clear. The local veterinary officers are employed by the local administration. The SVO has no competence to discipline officers if there is a need to. The competences between SVO and FSA are not clarified. The number of employees seems to be not adequate to the tasks. A legal base for charging wasn't found.

Recommendations concerning the administration and organisation:

Personal structure of NRL should be visible in organigrams of the respective laboratories including introduction of the head of NRL and staff. Designation of further NRL in the field of food hygiene relevant hazards (e.g. Salmonella, Trichinella, TB) seems to be necessary.

Similar to the legislation the enforcement should be coordinated and executed by a central organisation. There are at least two ways to organize the enforcement: either the official veterinaries should be employed at a central organisation (i.e. for example the SVO) or establish a strict chain of command with transparent disciplinary measures.

It should be checked that the number of employees is sufficient relatively to the extent of tasks.

A regulation for charging with defined fees should be established.

Enforcement

There was information that only 25 % of the establishments of the food chain are registered. Possibly there is a big black market. Equivalent to the regulation (EC) 852/2004 there are defined rules for registration in the food safety law of BiH.

Further it is not clear if there are defined measures for those establishments or workers, which or who fail.

Recommendations concerning the enforcement:

Food business operators of all steps of the food chain must be informed that the registration of their establishments is their duty. The named rules must be enforced by the officials so that all establishments are registered.

Measures to enforce the law must be clearly defined.

Self-responsibility/self-control systems:

There are no rules laid down in the food hygiene law of BiH dealing with the self-responsibility of the food business operators according to those of the regulation (EC) 178/2002.

The self-control systems are not as systematic as they should be. The existing plans are not detailed and implemented exactly. There is a lack of documentation.

Recommendations concerning self-responsibility/self-control systems:

Food business operators are primary self responsible for the safety of their operations and products. Corresponding rules must be defined by law.

Food business operators must develop detailed plans for various areas of their self-control system. They have to follow those plans exactly and document their operations accurately.

Special remarks for the meat processing establishment and the slaughterhouse

a) meat processing establishment

Introduction

The firm was built in 1997. It was visited in operation. There was only a short look at the paper work.

The following deficiencies/deviations were noticed:

- lack in house-keeping (damage of the floor and of tiles; corrosion); no plan for systematic house-keeping
- lift transporting products between first floor and further processing is at the outside of the building
- the smoking room for traditional smoking has a wide opening to the outside; there is open fire in this room; the used wood is not standardised
- incomplete hygienic lock
- complete disorganization of the freezing room for incoming raw meat
- disorganization of the storage of spices and packing material (three rooms for the storage of spices and two rooms for the storage of packing material on various locations; in one room for the storage of spices labels and casings too)
- fork lift has parked in tumbling room

- packing material in contact with unpacked product, next to the ice machine
 - partially deficiencies in cleaning (f.e. lift, hoses, drains)
 - using of inappropriate materials (f.e. wooden material in Freezer, storage room, cutting room, packaging room, ladder, defrosting plastic containers with rough surface)
 - in the cooling room for smoked products the products are tied (with ropes); it is better to hang them up on metal hooks; the products have contact with the surface of the equipment
 - no fly nets in front of the windows in the social room; seats with cushions (cannot be cleaned and disinfected)
 - two possible cross-contamination points in the flow of material
 - unclear organization of internal removing of rubbish, especially of material not fit for human consumption
 - in some rooms high humidity/condensation (mould spots)
 - some rooms are too narrow for the operations (e.g. mincing room)
 - wrong hygienic behaviour of employees (e.g. cutting meat on packing material), need for hygienic education
 - dirty boots and aprons in the dressing room - no complete hygienic clothing for visitors and some cases for employees too; no removing of watches and jewelleryes
- HACCP: the scribe of the autoclave seems to be damaged (ink all over the paper slices)
if the room temperature is defined as a CCP, it should be monitored continuously

b) slaughterhouse

Introduction

The new slaughterhouse was built in 2004. While visiting there was no operation. There was only a short look at the paper work.

There seems to be no defined number of samples taken at each slaughterhouse nor for the national residue control plan either for the check of antibiotic treatment.
At each slaughterhouse such samples must be taken randomly.

The following deficiencies/deviations were noticed:

- there is no place for cleaning and disinfection of the animal transporters on the company grounds
- no hygienic lock
- incomplete hand washing equipment (missed garbages, sometimes no soap or no disinfectant etc.)
- at some places sewage is not drained in a closed system (run over the floor to a drain)
- condensation in the cooling room for beef
- the extractor of the scratching machine has an opening to the outside (no collar)
- disorganization in the freezing room for product (packaging, labelling)
- hygiene in the dressing rooms and in the lockers, dirty working clothes
- dirty cleaning tools
- no fly traps
- risk material is not coloured

Paper work seems to be very detailed (SSOP, HACCP). It was presented by the inspector in charge; but this is a part of the self-control system of the food business operation, so it should be presented by a responsible person of the establishment.

----- (Signature)
29.03.2007, Dr. Karljosef Graf

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