

Short-Term Mission on Support for requirement of importing countries
Activity 3.6
(CARDS Twinning Project BA0 IB AG 01)
Sarajevo, 8th – 9th of APRIL 2008

Mission Report

1. Dr. Michael Stede, Official Veterinarian

2. **Objective and tasks of the mission:**

Clarification regarding questions in the area of export of fishery products from BiH to European Union:

3. **Time schedule of mission:**

Date	Activities / Meetings	Remarks: Met persons
07.04.08 (15.00 – 18.00)	Flight from Hamburg to Sarajevo; informal meeting with RTA and preparation for the next day. Information about structure of the Competent Authority regarding official food control. Exchange of information material.	Dr. Karoline Schollmeyer
08.04.08 (07.00 – 16.30)	<u>Near Mostar:</u> Visit of "Norwegian Bosnian Fish Farm": "NORFISH" Meeting and evaluation of situation of this establishment regarding food safety with the CA representative in charge Mrs. Lenka Herceg.	Mrs. Lenka Herceg: Veterinary Inspector of Kanton Hercegovacko-Neretvarski; Mr. Sanel Saric , General Manager of NORFISH
	<u>In Sarajevo:</u> Meeting with SVO representatives: Discussion about relevant findings at the N-BiH – Fish farm. Discussion with SVO representatives about requirements for export and implementation of export procedure by BiH - SVO with special reference to approval procedure and EU – listing of establishments	Dr. Drago Nedic, Chief Vet. Officer; Dr. Darco Cobarov, Dep. Chief Vet. Off.; Dr. Sanin Tankovic , Secretary Vet. Off.
09.04.08	<u>In Sarajevo:</u> University of Sarajevo, Faculty of Veterinary Medicine: Dep. Food hygiene & Technology: Visit of laboratories and information about possibilities of assessment of fish hygiene issues according to Regulation 854/04. Continuing of discussion with SVO	Dr. Muhamed Smajlovic
10.04.08	Departure from Sarajevo to Germany (Hamburg/Cuxhaven)	
	Interpretation service carried out by	Elvis Kondzic

3. **Summary of the Results of the Mission :**

Since this year BiH is on the list of Third Countries for export of fishery products to the EU.

The undersigned was invited to give some support to veterinary services of BiH in the field of export of fishery products to EU. Prerequisites for this intention are of special interest regarding the activities towards the establishments of concern and to the procedure of export certification.

3.1 Visit of the establishment:

As a first step an establishment was visited producing deep frozen fishery products of Kalifornian Trout (*Oncorhynchus mycis*) from own aquaculture production.

The results of this visit should serve as an appropriate example for approval under existing practical conditions. The establishment has a long tradition in processing fishery products and the owner as well as quality management are well informed about the requirements for approval for export to EU.

The veterinary inspector in charge, Mrs. Lenka Herceg, responsible for official controls of the establishment, has appropriate knowledge of EU food safety issues. She and STE serve as good sparing partners during discussion about issues regarding the establishment visited.

During the visit the establishment was out of activities. The owner informed the visitors that as long as the establishment is not approved for export to EU the utilisation of the establishment is of about 30% of its possible capacity and therefore investments were postponed.

The establishment was in general of reasonable good state of repair but however some shortcomings were observed regarding layout and construction as well as personal hygiene facilities:

Area of incoming material (fish from the farm) and nearby fish waste disposal:

Fish waste will be disposed via a door direct to the outside with rough concrete floor. Remains and droplets of fish waste will attract insects under normal working conditions. An enclosing construction as a shelter with a second door would minimize that problem and prevent incoming of insects to establishments.

Area of dispatch of fishery products

In principle the same situation like that as above. A closed docking station would prevent incoming of insects and pests.

Personal hygiene:

Unstructured changing room; washing device of protective clothes inside changing room. Hand operated taps and a lack of basic equipment at hand washing stations.

Some construction and equipment shortcomings:

Capping of floor/wall joint at some areas insufficient.

Rusty parts at different points, unprotected cables in exposed areas, not easy to clean.

The possibility to assess hygiene situation of production is limited if no activities take place.

The establishment as visited was in a state of good house keeping in general. But however the visit has shown that the establishment does not fully comply with the Community requirements regarding production of fishery products for export to the Community.

The responsible inspector was aware of these shortcomings identified by STE but it seems that there was no procedure in place to request the operator for corrective measures.

3.2 Visit of Dep. of Food Hygiene & Technology of University of Sarajevo, Faculty of Veterinary Medicine:

The head, Dr. Muhamed Smajlovic, gave information regarding staff, design and equipment of the department. He explained that knowledge and experience is in place to perform all analysis needed to meet the required analysis as foreseen in Regulations 882/2004 and 854/2004 regarding laboratory controls of fishery products on a certain number of samples only. Regarding special analytical requirements in the field of analysis of residues of medicines used in aquaculture possibly it is foreseen to invest some hundred thousand EURO to meet

EU standards in monitoring of residues according to the plan reported every year to the EU Commission. However the STE got the impression that will, engagement and knowledge is in place in the Department to carry out the analysis but the available number of staff will not enough to run and to have analysis ready in the appropriate quantity. According to the STEs experience some more capacity regarding staff and equipment will be necessary to carry out product controls on samples of batches destined for export to EU beside controls of market samples for monitoring the establishments own control systems.

3.3 Meeting with representatives of State Veterinary Office (SVO) during the visit:

The contents of discussions and results of the meetings with SVO representatives in Sarajevo on the 8th and 9th of April :are as follows

- Remarks to general structure of BiH fishery products establishments:

Most of the establishments foreseen for approval are processing fresh water species from own aquaculture production and may be from wild catches as well. However fishery products of salt water species are imported from Croatia for further processing in BiH establishments. Those intended for EU export will take over only fishery products from other approved establishments of Third Countries.

- Structure of SVO regarding approval and controls of establishments:

The overall coordination of veterinary issues is performed by the Central SVO as Central Competent Authority (CCA) responsible for final publishing of lists of approved establishments.

On an intensity level approval and establishing of an approval number is performed.

The local official veterinarian is entitled and responsible for controls to verify compliance with legal requirements equivalent to EU Food Law especially the issues of GHP and HACCP

- Notification on EU level of establishments

The list of approved establishments drafted by SVO as CCA will be notified to the EU Commission for publishing in the Official Journal which gives these official information to EU Border Inspection Post responsible for import and transit checks of Third Countries goods of animal and plant origin.

- Prerequisite requirements before "EU-listing":

As mentioned above handling, preparing and processing must fit requirements equivalent as laid down in the relevant EU legislation especially regarding Reg. 178/2002; 852/2004 and 853/2004. According to procedures as put in place by Reg. 882/2004 and 854/2004 the CA in charge has to verify compliance with the Regulations named above and addressed to the operator. That needs good knowledge of why these are needed and how to set those into practice for both the operators and the officials side including food safety criteria and food hygiene criteria of Reg. 2073/2005 and those regarding Reg. 2074/2005 beside other legal requirements concerning contaminants, residues of medicines and additives.

There is now doubt that all theses are taken into account in BiH. But however the STE sees some questions regarding the set into practice. That means that the whole quality system which includes the prerequisites and HACCP-system has to be submitted by the establishment as part of its application to the CCA. The CCA has to check it concerning compliance with EU food hygiene requirements. The final check of these by CCA with positive result will be the basis for approval and listing of the establishment of concern by the CCA. The CA in charge will have a consolidated basis for monitoring and controls of the approved establishment.

It has to be stressed that prerequisite requirements which incorporates GHP issues, are the basis for an appropriate HACCP system and must be observed carefully.

According to the STEs experience good knowledge about GHP and HACCP principles is not enough to find the appropriate way to set these principles into practice taking into account the

large variety and special requirements of fishery products. These concerns the special fish physiology, biochemistry and microbiology as well as influences of the environment on safety of fishery products.

Fish species and production related hazards have to be identified, measures and limits have to be set to have hazards under control. Verification in the course of controls of establishments own control system is a tough duty for the CA in charge because there is in general no scientific steering group to his assistance on the spot available.

For export of EU the CA's officer in charge has to certify according to the general principles of certification (Directive 2002/99/EC, which is in general valid for every type of certification) that the consignment ready for export to EU is safe and produced under conditions and requirements equivalent to relevant EU food law. Certification is wanted on an official form foreseen according to Regulation 1664/2006/EC

This issued certificate has to follow the consignment directly to the European Border Inspection Post (BIP), where the first and final check will be carried out for consignments destined directly for EU import. For transit or storage in a costumes warehouse some special procedures are possible but that is not of so much interest because the prerequisite requirements are the same for all possible procedures at EU BIP's.

Possibilities for BiH authorities to use the TRACES –System would be useful for both sides.

The STE got the impression that there is an urgent need to give the CA in charge the needed legal power for enforcement of the actions foreseen in legal acts equivalent to European legal requirements for controls of fishery products (Reg. 854/04, 882/04).

This concerns especially monitoring and verification of establishments own :

- Prerequisite systems (GHP),
- Hazard and risk analysis,
- HACCP-system,
- Product controls regarding food safety and process hygiene criteria
- and documentation of all.

Monitoring incorporates not only the set CCPs but the whole prerequisite and HACCP – system. Microbiological sampling for check of effective cleaning and disinfection as well as of final product ready for marketing or export verifies the establishments food safety procedures.

And finally CA in charge must have the power for enforcement to order corrective action in cases of non compliances.

Closing summary:

In principle all requirements for export to EU of fishery products are in place on an individual basis. The CA in charge of controls and certification needs legal enforcements for monitoring, controls and certification of listed establishments intended for export of fishery products to EU.

The laboratory capacity regarding the qualitative side and the engagement of staff as observed in the visited institute is in place but the real possibility for carrying out the needed number of assessments is limited and needs investments especially regarding the quantity of highly educated staff. This is urgent in the field of veterinary medical residues regarding aquaculture fishery products which are important for exports. Those assessments are guaranteed by the submitted monitoring plan of aquaculture enterprises to EU.

4. General Remarks Concerning the Project: No remarks
(without direct relevance for the mission):

signed Dr. Michael Stede