

Short-Term Mission: Border Inspection
Activity 3.5
(CARDS Twinning Project BA05 IB AG 01)
Sarajevo, 9th – 13th of June 2008

Mission Report

1. Dr. Michael Stede, Official Veterinarian

2. Objective and tasks of the mission:

Rules for import of fishery products to the EU: Gab analysis within the registration of establishments and control of HACCP to assist implementation of supervision and official controls concerning law of food safety.

3. Time schedule of mission:

Date	Activities / Meetings	Remarks: Met persons
08.06.08	Flight from Hamburg to Sarajevo	
09.06.08	<u>Sarajevo:</u> State Veterinary Office of BiH (SVO) 1. Preparation of the visit with RTA 2. Meeting with SVO representatives	Mrs. Dr. Schollmeyer, RTA; Mr. Edin Lendo, Ass. to RTA; Mr. Sanin Tankovic', SVO, Secretary; Mr. Slavisa Krestalica, BIP Inspector, Secretary; Mr. Zeljko Kovac, Veterinary Inspector; Faruk Mulabdic SVO repress;
	Departure and way to Mostar	Mr. Faruk Mulabdic,; Mr. Edin Lendo
10.06.08	<u>Blagaj (near Mostar):</u> Visit of "Norwegian Bosnian Fish Farm", "NORFISH": Visit of farm system and meeting for evaluation of the whole system of the establishment regarding findings during the first visit in the first week of April 08 at the processing establishment :	Mr. Dzevad Basic, Quality Manager; Mrs. Karmela Ivankovic, Veterinary Inspector of Kanton Hercegovacko- Neretvarski; Mr. Faruk Mulabdic; Mr. Edin Lendo
11.06.08	Visit of fish farm & establishment "LAKS" at Salacovac near Mostar. Visit and assessment of layout and construction of establishment; visit of fish cage system. Evaluation of GHP (PRP) and HACCP-system.	Manager, Quality Manager, Mr. Faruk Mulabdic Mr. Edin Lendo
11.06.08	Return to <u>Sarajevo, SVO:</u> Short information about recent findings and Departure to Banja Luka : .	
12.06.08	<u>In Banja Luka:</u> Visit of "TROPIC" RIBARSTVO, Fish	Mrs. Danijela Petrovic, General manager;

Date	Activities / Meetings	Remarks: Met persons
	Farm and establishment performing preparing and certain processing of cold smoked and minced fishery products. Same procedure as on 11.06.07	Mr. Vladimir Marjanovic, Production Manager; Mrs. Bozana Mandic Veterinary Inspector of Republika Srpska; Mr. Faruk Mulabdic; Mr. Edin Lendo
13.06.08	Return to Sarajevo & final discussion with SVO representatives: Summary of evaluations regarding preparations of establishments for application for approval regarding export to EU.	Mrs. Dr. Schollmeyer, RTA; Mr. Edin Lendo, Ass. to RTA; Mr. Sanin Tankovic, SVO, Secretary; Mr. Slavisa Krestalica, BIP Inspector, Secretary; Mr. Zeljko Kovac, Veterinary Inspector; Faruk Mulabdic SVO representative;
14.06.08	Return to Germany, Bremen/Cuxhaven	

3. Summary of the Results of the Mission :

3.1 Introduce

During the mission 3 important establishments were visited - NORFISH and LAKS in the Mostar region and TROPIC in Banja Luka - and two meetings were performed with the BiH SVO in Sarajevo.

The practical performance of the target of the mission was to evaluate the general situation of the 3 most important establishments regarding preparing and processing of fresh water fishes from own fish farms mostly Californian Trout of different sizes, different Carp species and other Salmon like species.

The STE was accompanied by a representative of BiH-SVO. At each establishment a veterinary inspector as the representative of the Competent Authority (CA) in charge was attending the visit.

The assistant of RTA attended the whole mission and has performed interpretation excellently. Many thanks for that!

A week before there was an audit of these establishments carried out by the Central Competent authority (CCA). The veterinary inspector in charge may compare the findings of that audit with these of the visit of STE. During the visit a report in English about the BiH mission to establishments was not finished. So the CA may assess to which point a "special eye" must be drawn concerning certain possible problems needed to identify or to solve for approval.

The STE likes to group issues identified which need special interest of CA: First STE points out the difference of inspection for approval by the certain appointed CA and the current inspections by the regional CA.

The inspection for approval is more or less an assessment whether according to structure, layout, construction, used materials, equipment and GHP (PRP) as well as HACCP programmes and documentation system allow safe fishery production from fish farm to table. Current hygiene inspections mean the assessments of hygiene before and during production as well as controls of current establishments own controls to verify operators responsibility for production of safe fishery products at all stages of production and distribution.

3.2 Method of assessment

The visits start with an introduction to the fish farm/establishment by the operator and quality control manager about scope of activity, handled fish species and technical data for general information of STE.

STE starts on the basis of this information an enquiry performed as a desk study asking at first for a blue print to follow the flows of staff, product, fish waste, other waste, wrapping/packaging materials, water supply and waste water disposal ways.

Furthermore the systems of cleaning and disinfection, pest- and insect controls, staff hygiene and health, traceability, temperature controls and establishments own process and product controls are requested, -all including the concerned documentations.

This desk study is followed by a survey of the farm and establishment following the ways of staff and product taking into account other mobile items which come together in the production and may lead to possibilities of cross contamination.

The visits of the farms are focused on food hygiene issues only which concerns the listing of BiH for export of fishery products to EU.

3.3 STE likes to draw attention to the following which may be of special interest to CA inspections:

3.3.1 Scope of activities of farms/establishments visited:

The 3 establishments prepared and processed fishes from own farm production, - in general California Trout and possibly other Trout like Salmonids and Carps.

The scope of activities covers beside breeding and fattening at the farm the steps of heading, gutting, filleting chilling and freezing. "TROPIC" performs in addition cold smoking and mincing for fishburger production.

3.3.2 Fish farming:

Fish farming belongs to the scope of primary production. The visit concerns the area of food safety which means residues of medicines, feed and water resources. All farms were covered by the scope of BiH residues monitoring plan. The feed is a certificated commercial one from EU countries. Water resources derive from own wells or natural waters from Neretva- or Buna River respectively. Some results of analysis are in place but it may be of interest to have some documented informations from late spring (snow melting) and from the period to the end of a dry summer season when raining starts again. During those seasons it is known that different sediments and others are mobilized by the extreme flow differences.

3.3.3 Layout and construction:

Layout and construction should allow the separation of black/grey side from white side of production. That needs certain space especially regarding cold smoking procedures and preparation of minced fish.

In the establishments visited may exist a narrow follow up of production steps which may be a source of cross contamination. Possibilities to avoid that danger are discussed including possibilities of upgrading like the following:

Produce of a controlled strong air flow from white area of production to black area in combination with plastic curtains for separation of steps. That includes separate surfaces/tables which do not allow water flowing from black side to white side.

In general different rooms for steps of product flow are needed. But concerning the actual limited output of final products it is according to STE opinion better to control the proposed airflow in combination with curtains than forming small separated rooms which lead to problems regarding air condition and condensations.

In the case of preparing (filleting/mincing) and processing (cold smoke) a strong time schedule is urgent at least to separate activities from each other because of possibilities of cross contamination. Salting and incubation in brine must not be performed in the room used for filleting. And Furthermore a strong cleaning and disinfection scheme is needed and the

effectiveness must be checked by operators own control system which needs verification by official controls as well.

The same difficulty may exist in cold stores. Exposed fishery products must not be stored beside containers with brine or packaged fishery products. A strong organisation of cold stores by separation of product groups would be necessary.

The angle between wall and floor is a standing point of concern regarding easy cleaning especially if walls are to be moved to adapt rooms to new production which may change depending on the need of the market. Caping does not give the wanted result. Dirt or insects possibly may hide behind. Sealing with certain type of glue may produce the same problem. A combination of capping and glue gives better but not satisfying results. This problem is not a special one of BiH but also under constant discussion in member States.

STE will put that into a special discussion within the Northern Fish Competence Centre of Germany (of which he is a member) and will give a short extra report about the conclusions and findings to this Twinning Project.

Separation of outside environment and inside of premises belong to the basic hygiene requirements. At unloading and dispatch areas separated loading bays with dogging station or a room for forwarding products closed by door to the outside is needed to minimise exposure to contamination and high temperatures. It is very questionable whether air curtains alone may solve the problem of possible inside contamination.

3.3.4 Waste water disposal system:

Water should be disposed at the place of activity as close as possible. It should not drain through openings in walls to other rooms or floors. The system should be easy to clean and in a good state of repair to reduce possibility of airborne contamination of rooms of higher hygiene levels in general. The same is with cleaning of these systems with high pressure devices which leads in every case to such contamination.

3.3.5 Water and ice supply for production

Water supply is performed by own well or from municipal sources. The quality of both has to fit the requirements of Directive 98/83. Taps has to be numbered and every water test has to be documented regarding the tap No. in question. In cases of own wells a basic assessment should be performed regarding season as outlined above and according to the results the frequency may be adapted to guarantee the safety of water.

Ice must be made out of such safe water naturally. For store and transport of fishery products in ice the hygiene requirements for equipment are valid and a special construction of containers and boxes is compulsory safeguarding that water of melting ice mixed up with blood, slime and scales must not contaminate the products nearby.

3.3.6 Personal hygiene

3.3.6.1 Hand washing belongs naturally to the most important points of personal hygiene because of possibility of contamination from hands to product. That includes reduction of intermediate decontamination by washing. To avoid cross contamination taps have to be not hand operated which means also not operated by elbows. Therefore surgical taps have to be excluded from production site. These requirements for taps are of special importance in lavatories.

Regarding sanitizers for hands,- dry gel procedures do not fit legal requirements for hand hygiene because of question of residues on skin and what about the "dry" remains during and after the "cleaning procedure".

3.3.6.2 Changing rooms: The function of those rooms is to separate outside environmental microbiology from the inside one of production. To find this target private and protective clothing has to be separated strictly. A strong organisation of changing rooms is appropriate to fit the hygiene target. Crossing ways of incoming and leaving staff should be avoided as much as it is possible,

3.3.7 Pest control

Pest controls should be performed in a way that pest will not be attracted to rooms or near by doors. Rodent poison bait boxes should be placed along edges away from doors and outside rooms. That is valid especially for stores for wrapping and packaging materials.

3.3.8 GHP/PRP

In the area of GHP and PRP a lot is undertaken. To make all activities and documentations in question available, easy to read and to understand as well as to control, operators should draw up compliance checklists with documented results including results of systematic own controls of cleaning and disinfection. These controls have to be performed at regular sampling points and frequencies according to the previous results. Satisfactory results may lead to reduction of sampling frequency. Process hygiene and food safety criteria of Regulation 2073/2005 should be taken into account.

3.3.9 HACCP

Operators are responsible to establish a HACCP based system because he only should know the steps of production and for solving special questions a multi disciplined working group or special expertise should be available. For approval such a system should be submitted to CA regarding production line of concern. CA will check it for plausibility and for possible (formal) shortcomings and to assist in one or another point. But it is not the task of CA to elaborate such a system especially concerning a lack of information about internals of production flows.

STE sees evidence that external consultants gave some wrong advice regarding set of CCPs. The use of working sheets taking into account every step of production to evaluate hazards and risks will make set of CCPs easier and enable operator to justify the decision for the set CCP towards CA.

Those working sheets are available for example on the US- FDA home page regarding the sector of fishery products.

The following opinion of STE may be helpful:

Regarding fresh chilled fishery products there seems to be the only possibility to set storing temperature in the cold store as CCP (all requirements to set a CCP are fulfilled). The same is with minced and deep frozen fishery products regarding storing temperature.

Concerning cold smoked products STE would set CCP respecting temperature and salt content of brine and incubation time as well as freezing for parasite control in the case that fattening is performed in natural waters. But all that have to be checked by operators taking into account his knowledge of the environment for example of the Neretva River where fishes are fattened under natural water conditions and invading invertebrate vectors for parasite forms can not be excluded sufficiently from outside.

3.3.10 Stunning of fishes before slaughtering:

It is performed by means of an electric device or by immediate immersion in chilled water. During visit of STE that was not performed. STE see a possibility of upgrading that procedure regarding animal welfare by adding Carbondioxyde to the water. *STE will discuss that issue with LAVES specialists .*

4. Final Summary of discussion with BiH-SVO and conclusion:

Approval and current official controls are performed on different levels of CA. CCA will finalise a list of approved establishments for presenting it to EU commission. Special areas of interest for approval are identified from the STE's point of view. During discussion it was clarified that listing of BiH by EU Commision and approval of establishments by BiH concerns food hygiene only even if approval number of establishments is identical with that of its fish farm. Export of live fish is not covered by this listing and approval procedure.

The 3 establishments visited are in general in an appropriate state for approval. A close cooperation between operator and CA would be helpful for upgrading the systems of documentations regarding PRP/GHP, operators own controls and check of production lines regarding HACCP principles. Blueprints with ways of staff, products, waste, water supply, waste water system and air flow would be helpful to get an easy to handle documentation of the establishments activities.

Finally STE supports the project with an electronic copy of 1st. ed. of a guideline for approval official controls procedures as introduced in the German Federal States Lower Saxony and Bremen by the CCA of these states. Parts without concern for BiH are deleted. This guideline may be helpful in organization of approval and official controls of fishery products establishments by CA.

Signed
Dr. Michael Stede