

Mission Report

Activity 1.1 "Assessment, follow-up and analysis of key factors for functional organisation and training"

- Food Safety -

**within the CARDS Twinning Project BA05 IB AG 01
Sarajevo, 13th to 16th November 2006**

Benno Ewert and Franz Arand

13th November 2006

From 9 a.m. onwards on the 13th November 2006 a meeting was held with representatives from all levels of the Veterinary Administration in Bosnia and Herzegovina (BiH) and the Short Time Experts (STE) Barbara Meentzen, Norbert Rehm and Ansgar Aschfalk (Administrational Organization and Legislation) as well as Benno Ewert and Franz Arand (Food Safety) in the building of the Parliament in Sarajevo. For the program see the Agendas of the two STE groups. The aim of this meeting was to present both the structures and working methods in a comprehensive way as well as the level of the set legislation in BiH in the Administrational Organization and Legislation and Food Safety sectors.

Unfortunately the "*Presentation of the tasks of the Food Safety Agency and the institutional framework regarding food safety and veterinary public health in BiH*" did not take place.

At the meeting the colleagues from BiH put forward thoroughly critical comments which were followed up by the STE. Listed in the following are some salient weak points which were also confirmed in the course of the following few days:

- No continuous harmonisation of the legislation set within the BiH and
- No continuous harmonisation of the BiH legislation with the EU legislation (only given in some parts)
- No clear regulation of the responsibilities on all administrative levels.
- No regular and consistent specialist guidance and instruction for the respective authorities, local authorities work very isolated and are left on their own
- No or only to some extent sporadic communication between the various authorities and institutes - solely on a personal level
- No established regular reporting
- No clear separation between national and private commercial operations
- No chain of command to be seen
- Apart from the veterinary inspectors there are no experts comparable with the food, meat or feed inspectors in Germany

In their lectures at the end of the event the STE Dr. Ewert and Dr. Arand explained the working methods at the respective level in the Federal German States represented by them.

The event was officially closed at 5.30 p.m. by the deputy CVO in BiH, Slaviša Kreštalica, DVM (Secretary in the State Veterinary Office of Bosnia and Herzegovina– SVO BiH)

14th November 2006

Based on the preparations made for this mission and the knowledge gained by the STE and the results of the meeting on the previous day, the STE visited on 14th and 15th November two establishments and the Republic Administration for Inspection Activities of the Republic of Srpska. They were accompanied by Mr. Slaviša Kreštalica, DVM, Mr. Sanin Tanković, DVM (both SVO BiH), Mr. Željko Kovač, DVM (SVAB&H) of the BiH Ministry of Foreign Trade and Economic Relations (MoFTER) and Mr. Edin Lendo, DVM (RTA Assistant and interpreter).

A visit was first paid to an establishment in the canton Sarajevo under the surveillance of the Cantonal Veterinary Inspection headed by Dr. Hasan Džinić.

A few random key features about this establishment:

- The plant is part of the **AKOVA** Group which also owns a few other poultry farms, an egg hatchery, a poultry slaughterhouse with a capacity of 4000 animals/hour, a cold storage depot, own feed production as well as a trout farm; AKOVA employs a total 700 persons
- The plant has been working for 7 years after being destroyed in the war
- The plant processes beef and poultry meat in one building
- At present 3 shifts are being worked by 115 female and male employees; some 30 to 40 tonnes beef and poultry meat is being processed
- As far as poultry meat is concerned, the initial material is self produced, and beef meat comes from Bosnian farms but since this is not adequate on its own and at present presents a problem as far as quality is concerned, beef is also bought in from Argentina
- Range of products: raw sausage, smoked in conventional smoke houses, boiled sausages, conserves
- The plant has own veterinary personnel, two veterinary inspectors being in attendance each shift.
- During the day shift there is a veterinary inspector from the responsible cantonal Veterinary Inspection permanently present, and a standby on call during the rest of the time
- A HACCP concept was established at the plant with Danish assistance 6 years ago since an EU inspection came to the conclusion that no adequate control system was given.
- The complete production process is controlled by the cantonal veterinary inspector who passes by means of certificate both the raw material for processing as well as the products after presentation of the operational as well as own examination results.
- The tests are carried out by the Veterinary Medical Faculty in Sarajevo. Time taken: Microbiology 3 days, Botulism (conserves) 1 week
- Problems when carrying out the examinations:
 - No uniform standards and no accredited examination institutes in BiH
 - To some extent the tests are made outside the country, for example E. Coli, O157 H7; Listeria, Campylobacter, Yersinia; tests made in the country are Clostridia, Proteus, Salmonella (but deviating from EU legislation 25 g specimen)
 - No definition of standards in the veterinary and food legislation
- There is a residue control program, the specimens are tested to some extent outside the country, the costs are born by the State
- The costs of the factory tests are paid by the works
- Close intermeshing of works own and state control, in the case of havyary common decision on the further procedure (approval of products or destruction)
- The works has not been audited by any external organisation in recent timesy
- A Jewish and a Muslim institute come regularly to check whether the meat complies with the respective regulations according to their beliefs
- The factory produces only for the national market

After the final discussions the journey continued to Banja Luka at 3 p.m.

15th November 2006

A meeting was held at 9 a.m. with the Director of the Republic Administration for Inspection Activities of the Republic of Srpska (R.S.) in Bosnia and Herzegovina, Mr. Slavko Subotić, as well as the Director of the Veterinary Inspection, Mr. Ćedo Borić.

A few random key features about this Inspectorate:

- It was founded on 1st March, 2006, and comprises 10 Inspections with 270 employees; one of these 10 inspections (for example, environment, health) is the Veterinary Inspection
- The Director considered that by setting up this inspectorate the decentral structures have been eliminated by bundling to some extent and by means of synergies
- The inspectorate works together with USAID on many projects, for example, at present on the installation of a uniform database at all local levels (municipalities) in R.S. (i.e. list of companies, etc.); moreover existing databases are being taken over, each company and each facility will only be administrated through own intrinsic number in the new system
- The working concept of this facility is being also supported at political level in R.S.
- Considered to be very important is good, regular and honest public relations work to improve the acceptance of the inspectorate
- Very important and at present very difficult is the regular and permanent qualification of the inspectors on the long term. Responsible is the Ministry of Education
- Since the authorities also comprise 10 different special inspections, many different ministries are responsible and involved in the administration of same; as a consequence one office in the inspectorate only deals with the co-ordination of the co-operation of these ministries
- The heads of the 10 inspections meet once a week in the central office in Banja Luka to co-ordinate the common work and to bring the respective measures to be taken in line with the actual given situations
- The main task of the inspections is to enforce and implement consistent legislation in R.S. and indeed independent of the local situations and dependencies
- For this reason the inspectors have far reaching enforcement competencies
- This also applies for the veterinary inspection; there are 4 inspectors working here at the present point in time but there are 8 inspectors planned at the end of the year 2006
 - they have the expert supervision over the 35 inspectors in the municipalities, and are also authorised to control these and introduce possible corrective measures
 - in the case of too strong dependency of local inspectors these inspectors can also make inspections instead of the local authorities
 - the number of inspectors in the municipalities varies from region to region and depends on the respective economic structure: regions with too few inspectors are asked by the inspectorate to bring the number of inspections in line with the local given situation
- The system of risk-orientated controls is to be introduced in 2007 and each inspector is to be equipped with own Laptop and printer in 2008 to make data exchange possible with the central server at any time
- To conclude the Director considered that the present main problem of the authorities is the internal co-ordination and communication which is still not optimal, neither with the ministries nor the municipalities in R.S. or the other authorities in BiH (here there are often differences in the level of development)

A visit to an establishment in the Municipality of Banja Luka followed after this meeting.

A few random key features about this establishment:

- The plant is called **LIJANOVIC** and belongs to the **Mi-MO** Company Group in Mostar
- The Mi - MO Group has been in existence since the end of the nineteen eighties
- Altogether there are 3 production plants at 3 locations with some 900 employees
- The major proportion of the employees (approx. 600) work in Mostar
- Working in 3 shifts at the plant visited in Lijanovic are 90 employees
- Every day 20 tonnes of beef and pork are processed into raw meat (with priority) and boiled sausage (conventionally smoked)
- The company has own cattle and pig farms as well as own slaughterhouse
- However, the raw material is not sufficient and the quality is also a problem to some extent and, as a consequence, deep frozen products are bought in from EU approved establishments in the Netherlands, Hungary, Poland, France and Italy
- Different products are being produced in each of the 3 plants in the company group, altogether 150 products
- An EU inspection was made in the year 2000 and the control system was considered not to be conform with the EU regulations
- One half of the produce is made for the national market and the other half is exported to non-EU member states (for example Turkey and countries in the former Yugoslavia)
- As is also the case in the plant visited on the 14th November 2006, the employees undergo a health check every six months including faeces and sputum tests
- The plant, as was also the case with the first plant visited, had just been connected up to the local mains drink water network
- No HACCP concept established in the plant
- Three veterinary inspectors are employed at the plant, one each shift
- Organoleptic tests, pH-measurements and simple chemical tests are carried out in own plant laboratory
- The working clothes for the employees are made available and cleaned by the plant
- The overall production process is controlled by one municipality veterinary inspector who passes by means of certificate both the raw material as well as the products after presentation of both the plant and own test results
- The local veterinary authorities are committed to report once a week and immediately in the case of special occurrences to the inspectors in the inspectorate and, in turn the Veterinary inspection reports twice a year to the responsible ministry in R. S.
- Otherwise the findings were the same as those established in the case of the first plant visited

After the final discussions the journey back to Sarajewo started at 3 p.m.

16th November 2006

At 9.0 a.m. on the 16th November 2006 a second meeting was held with the Veterinary Administration representatives at all levels in Bosnia and Herzegovina (BiH) and at which the STE made a first assessment of their mission in the building of the Parliament in Sarajewo.

By means of a PPT the STE presented their impressions and what they had found and left adequate room for discussions where the respective salient points came up. The numerous representatives of the authorities took advantage of the given opportunity for intensive discussions.

The STE gave first recommendations based on their overall experience made over the last days. They announced that an extended and detailed Mission Report containing these recommendations would follow.

Recommendations

1. The State Veterinary Office (SVO) *and* The Food Safety Agency (FSA, which is at present committed to report directly to the Prime Minister) and their services should be accommodated in one ministry at ministry BiH level – ideally at the Ministry of Agriculture:

- here the necessary factual knowledge and understanding are available
- here the full legislation for the entire food chain is to be formulated and implemented
- Basis for the legislation should be solely EU law;
The following EU Regulations should form the basis for food safety:

178/2002/EC Regulation of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
amended by: 1642/2003

852/2004 REGULATION (EC) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 29 April 2004 on the hygiene of foodstuffs'
corrigendum in OJ L 226 (25.06.2004, p. 3)

853/2004 REGULATION (EC) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 29 April 2004 laying down specific hygiene rules for food of animal origin
corrigendum in OJ L 226 (25.06.2004, p. 22)
amended by: 2074/2005, 2076/2005

854/2004 REGULATION (EC) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 29 April 2004 laying down specific rules for the organisation of official controls on products of animal origin intended for human consumption
amended by: 882/2004, 2074/2005, 2076/2005
corrigendum in OJ L 226 (25.06.2004, p. 83)

2073/2005 Commission Regulation of 15 November 2005 on microbiological criteria for foodstuffs
corrigendum by: OJ No. L, 278, 10.10.2006, p. 32, OJ No. L 283, 14.10.2006, p. 62

2074/2005 Commission Regulation of 5 December 2005 laying down implementing measures for certain products under Regulation (EC) No 853/2004 of the European Parliament and of the Council and for the organisation of official controls under Regulation (EC) No 854/2004 of the European Parliament and of the Council and Regulation (EC) No 882/2004 of the European Parliament and of the Council, derogating from Regulation (EC) No 852/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004

2075/2005 Commission Regulation of 5 December 2005 laying down specific rules on official controls for *Trichinella* in meat

2076/2005 Commission Regulation of 5 December 2005 laying down transitional arrangements for the implementation of Regulations (EC) No 853/2004, (EC) No 854/2004 and (EC) No 882/2004 of the European Parliament and of the Council and amending Regulations (EC) No 853/2004 and (EC) No 854/2004

882/2004 Regulation (EC) of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
corrigendum in OJ L 191 28.5.2004, p. 1
amended by: 776/2006

- On this basis legislation adapted to the situation and pertinent conditions in BiH is to lay down the responsibility for all administration levels and for the laboratories (state or private) and possibly for private persons acting on the orders of the state. The individual juristic and or natural persons shall be given concrete tasks to be implemented at their own responsibilities. This guide line shall have legislation character and should always to be updated to fall in line with the given situation.

2. Both authorities The State Veterinary Office (SVO) and The Food Safety Agency (FSA) should have the same rights.

The SVO should be responsible for combating infectious diseases, animal welfare, border inspections, veterinary drugs control and supervision, the disposal of animal cadavers and feed control including provision of the necessary laboratory capacities.

The FSA should process all questions of the safety of food of both animal and not animal origin and be responsible for ensuring the necessary laboratory capacities.

Both authorities should work close together in the case of overlapping questions and matters and determine their respective areas of responsibility together. Should it not be possible to reach agreement the Ministry of Agriculture can decide the given areas of responsibility that fall under expert and service supervision.

Both authorities should be committed to report regularly to the Ministry of Agriculture. Both authorities should be incorporated together in the future since the EU legislation (VO (EC) 178/2002) does not provide for such a separation.

3. Both the SVO as well as the FSA are to exercise expert supervision over the administration in FederationBiH, Republic of Srpska and District Brčko (FBiH, RS and DB). The service subordination is to remain initially in FBiH, RS and DB. Both authorities are to be responsible in respect of expert supervision that the same consistent rights are applied everywhere. FBiH, RS and DB cannot have the right to create own expert rights. They are only to determine the execution of expert rights within the framework of their structures since the service supervision shall remain with the responsible ministries of FBiH, RS and DB.

SVO and FSA shall instruct the responsible expert authorities by regular consultancy and written (computer supported) communications and in individual cases by expert support in the case of difficult matters and questions. SVO and FSA are to ensure the uniform implementation of the legislation in FBiH, RS and DB by

- a) regular reporting,
- b) on location control by monitoring the responsible authorities.

FBiH, RS and DB also have the responsibility for safeguarding material for the fulfilment of tasks. To this end the budget to be made available by the BiH government (Ministry of Agriculture) which is to be adjusted to the respective structures. The FBiH, RS and DB shall give full account of the proper use of this budget every calendar year to the government (Ministry of Agriculture). Moreover, the budget is to always include own financial participation by FBiH, RS and DB.

SVO and FSA shall have the right in the case of infringement of the respective responsible authorities in FBiH, RS and DB to replace the respective head of the authority temporarily by an appropriate SVO or FSA employee.

Over and above this SVO and FSA shall have the expert supervision of the state laboratories within their area of responsibilities.

4. Parallel to the adaptation of the EU legislation and administration the establishments which are comparable with those visited by STE shall be given comprehensive support to obtain EU approval. These establishments are to be examples of standard establishments which clearly make apparent to other establishments that the efforts made to achieve high hygienic standards pay off.
5. In the mean term conditions are to be created for the training of expert personnel - comparable with food, meat or feed inspectors in Germany - to support the activities of veterinary personnel.
6. The laboratories responsible for food examination must carry out examinations according to uniform standards and are to aim at becoming accredited as quickly as possible.

Summary

Altogether the two STE considered the mission to be a success for both parties. Both in the lectures as well as in the numerous discussions the STE had many opportunities to pass on their knowledge in connection with concrete suggestions and matters.

As it very quickly became apparent in the discussions with BiH colleagues, these meetings also took place for the first time with own colleagues.

Everyone was grateful for suggestions, assistance and directions as given by the STE.

The STE hope that with this mission they have contributed to promoting an atmosphere of constructive co-operation at expert level far beyond the political borders.

Dr. B. Ewert

Dr. F. Arand