

Twinning-Project Bosnia and Herzegovina

Project title: Support to the State Veterinary Office

EU-Project number: BA05 IB/AG/01

Short-Term Mission on

Activity 3.3 “Improve veterinary inspection organisations”

Food safety Part II

- Workshop -

Mission report

1. Names of experts

1. Dr. Lüppo Ellerbroek, Bundesinstitut für Risikobewertung, Berlin, Germany
2. Dr. Daniela Türnau, Veterinäramt Landkreis Rotenburg (Wümme), Germany
3. Dr. Jörg Pfeiffer, Veterinär- und Lebensmittelüberwachungsamt Landkreis Uelzen, Germany

2. Objective and task of the mission:

The objective of the activity is elaborate proposals for suitable organisation of the veterinary inspections. Furthermore, a workshop was initialized to inform about corner stones of food safety supervision including

1. the evaluation of HACCP-systems, checking of further necessary documentation including use and development of checklists for supervision of food and feed businesses,
2. traceability and structures of food safety legislation and law enforcement to avert dangers rising from unsafe products.

Date of visit: 14.04. – 18.04.2008

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“ and transparency of the manufacturing processes “from stable to table”. This principle includes measures on the whole food chain, beginning at the animal health status, including the hygiene of raw materials, staff, process und product, the production of foof and feed stuff.

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 list of participants

14^h of April 2008 (Monday)

VENUES:

*State Veterinary
Office; Sarajevo*

Meeting at SVO; preparation of workshop
Speaker: Dr. Jörg Pfeiffer, Dr. Lüppo Ellerbroek

End of day

15th of April 2008 (Tuesday)

VENUES:

*Privredna komora
Kantona Sarajevo,
Ul. La Benovalencije
8, Sarajevo*

Opening of the working session
Speaker: Mr. Slobodanka Ćekić
State Veterinary Office in BiH

Records keeping of food safety documentation in food
business

Speaker: Dr. Jörg Pfeiffer

Coffee break

Discussion about experiences and conclusions of use of
check-lists in Republica Srpska

BiH experts

Lunch break

Continuation of discussion of previous topic

Coffee break

Failure management procedures in food production;
process and return inspections

Speaker: Dr. Daniela Törnau

END OF DAY

16th of April 2008 (Wednesday)

VENUES:

*Privredna komora
Kantona Sarajevo,
Ul. La Benovalencije
8, Sarajevo*

Discussion about experiences and conclusions of use of
check-lists in Republika Srpska, Federation and Brčko
District **Speaker: BiH EXPERT**

Coffee break

General principles of HACCP-system

Speaker: Dr. Jörg Pfeiffer

Lunch break

Decision tree and risk analysis

Speaker: Dr. Lueppo Ellerbroek

Traceability: Tracing food through the production and
distribution chain to identify and address risks and protect
public health

Speaker: Dr. Daniela Törnau

Coffee break
Discussion and results
END OF WORKSHOP

17^h of April 2008 (Thursday)

VENUES:

*State Veterinary
Office; Sarajevo*

Meeting at SVO; discussion and conclusions
**Speaker: Dr. Jörg Pfeiffer, Dr. Daniela Türnau,
Dr. Lüppo Ellerbroek**

Lunch break

Preparation of mission report

End of day

18^h of April 2008 (Friday)

VENUES:

*State Veterinary
Office; Sarajevo*

Meeting at SVO; discussion and preparation of mission
report
Speaker: Dr. Jörg Pfeiffer, Dr. Daniela Türnau

End of day

4. Summary of the results of the mission

General conclusions/recommendations:

Legal base

1. Legal base for the whole food chain in equivalence to the EU-legislation especially with regard to traceability and HACCP is not complete. There are gaps according to the regulations (EC) 178/2002 (the basic regulation), 852/2004, 853/2004 and 882/2004. Regulations vary extremely between Republika Srpska, Federation and Brčko District.
2. The veterinary administration is not integrated in the process of law development.
3. Legislation development is carried out by too many different organisations.
4. The duties of the food business concerning the support of the local veterinary officer are not clearly defined.

Recommendations concerning the legal base:

1. A general food legislation should be implemented and valid in all parts of BiH.
2. The veterinary administration should be integrated in the process of legislation development concerning food safety and animal health and welfare.
3. One central organisation (e.g. SVO) should be responsible for legislation in veterinary matters and food safety.
4. The duties of the food business concerning the support of the local veterinary officer need to be clearly defined.

Administration/Organisation:

1. In Republika Srpska obligate checklists for all sorts of inspections have been implemented. These checklists can not be regarded as inspection supporting tools, but are strict working directions. They have not been formulated by veterinarians. Their use, though obligatory, restricts decisions and methods of evaluation for the specially trained veterinary staff. These checklists also have the great disadvantage of being generalised for all veterinary inspections. They have proved not to be useful.
2. Hygiene checks of gastronomy and smaller food businesses are carried out by staff that is not connected to the local veterinary services.
3. It was detected, that there is not sufficient administrative support of local veterinary services.
4. Information flow between different authorities e.g. entities, SVO, local veterinary services is not sufficient.

Recommendations concerning the administration and organisation:

1. Those checklists in Republika Srpska should be changed in status from obligatory strict working directions to facultative inspection supporting tools. It is recommended that sector/business specific checklists will be developed. It is further recommended, that uniform application of checklists created by the CVO for all parts of BiH are implemented.
2. Staff carrying out hygiene inspections in food businesses should be integrated into administrative structure of local veterinary services.
3. A sufficient number of specialised administrative personnel should be integrated in veterinary services.
4. Better exchange of information between the different authority levels is necessary.

Enforcement:

1. The competences of the local veterinary services are not clearly defined in all cases.

2. There are deficiencies in law enforcement possibilities for the local veterinary officers. The legal position of the local veterinary officer towards the food business is not strong enough. The support from other than veterinary administration is not sufficient (e.g. support by police in case of avert danger) in all cases.

Recommendations concerning the enforcement:

1. The competences of the local veterinary services need a clear definition. Measures to enforce the law must be clearly defined.
2. The legal position of the local state veterinary officers needs to be strengthened. In case of avert danger or refusal of access to production sites, police support to the veterinary officer must be available without administrative barriers.

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 – if implemented – are not as systematic as they should be. The plans existing are not sufficiently implemented and detailed. Documentation does not meet food safety standard of the Codex Alimentarius.

Recommendations concerning self-responsibility/self-control systems:

The major responsibilities for the safety of products and processing hygiene lies with the food business operator. The definition of this standard needs to be implemented in BiH food safety regulations.

The set-up of self-control plans and HACCP-documentation is the responsibility of the food business operator. HACCP plans have to be carefully followed and all measures need to be precisely documented.

18.04.2008

Dr. Lüppo Ellerbroek

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Dr. Jörg Pfeiffer