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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

BOSNIA AND HERZEGOVINA

FROM 31 JANUARY TO 08 FEBRUARY 2012

IN ORDER TO EVALUATE THE CONTROL SYSTEMS IN PLACE GOVERNING THE PRODUCTION OF POULTRY MEAT, POULTRY MEAT PRODUCTS AND TABLE EGGS INTENDED FOR EXPORT TO THE EUROPEAN UNION

Executive Summary

This report describes the outcome of an audit carried out by the Food and Veterinary Office in Bosnia and Herzegovina, from 31 January to 8 February 2012.

The objective of the audit was to evaluate whether the official control system for poultry meat, poultry meat products and table eggs destined for export to the EU can provide equivalent guarantees to those required by EU legislation.

The report concludes that there is an official control system in place which includes regular controls in poultry meat and poultry meat product establishments and table egg collection centres. However, this system cannot be deemed equivalent to the requirements of EU legislation, especially with regard to granting approval to establishments intending to export to the EU, ante-mortem and post-mortem inspections, sampling for microbiological criteria and the implementation of the Salmonella National Control Programme. A further problem encountered was the lack of knowledge of EU requirements among the staff of competent authorities, laboratories and food business operators.

Establishments do not fully meet standards equivalent to those of the EU and consequently the competent authorities cannot, at present, give the guarantees required in the model certificate for exporting poultry meat, poultry meat products and table eggs to the EU.

The report includes a number of recommendations addressed to the competent authorities of Bosnia and Herzegovina aimed at rectifying the identified shortcomings and enhancing the control system in place.

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Abbreviations and definitions used in this report

Abbreviation	Explanation
AMI	Ante-mortem Inspection
AV	Authorised Veterinarian
BD	Brčko District
BiH	Bosnia and Herzegovina
CA	Competent Authority
CCA	Central Competent Authority
CCP	Critical Control Point
DCFSA	Decision on the Conditions to be met by the Facilities for Slaughtering Animals, Treatment, Processing and Storing of Products of Animal Origin
EC	European Community
EU	European Union
FBiH	Federation of Bosnia and Herzegovina
FBO	Food Business Operator
FVO	Food and Veterinary Office
HACCP	Hazard Analysis and Critical Control Point
ISO	International Standards Organisation
MoAFWM	Ministry of Agriculture, Forestry and Water Management
OV	Official Veterinarian
PMI	Post-mortem Inspection
RS	Republika Srpska
SCP	*Salmonella* Control Programme
SNCP	*Salmonella* National Control Programme

1 Introduction

The audit took place in Bosnia and Herzegovina (BiH) from 31 January to 8 February 2012 and was undertaken as part of the Food and Veterinary Office's (FVO) planned audit programme.

The audit team comprised two inspectors from the FVO.

2 Objectives

The objective of the current audit was to evaluate whether the official control system for poultry meat, poultry meat products and table eggs destined for export to the EU can provide equivalent guarantees to those required by EU legislation and in particular Commission Regulation (EC) No 798/2008 and Commission Decision 2007/777/EC.

In pursuit of this objective, the audit team proceeded as follows:

- an opening meeting was held on 31 January 2012 with the competent authorities (CA). At this meeting the audit team confirmed the objective of, and itinerary for the audit, and requested additional information required for the satisfactory completion of the audit;
- the following sites were visited:

Competent authority visits		
Central Competent Authority (CCA)	1	Opening and closing meetings
Laboratory visits		
Laboratory in Sarajevo	1	
Laboratory in Banja Luka	1	
Primary production		
Farms	3	In one of which only a documentary check was carried out
Food processing facilities		
Slaughterhouses	2	
Cutting plants	2	Attached to the slaughterhouses visited
Meat products establishments	1	
Egg packing centres	2	In one of which only a documentary check was carried out

- representatives from the CCA accompanied the audit team throughout the audit.

3 Legal Basis

The audit was carried out in agreement with the BiH authorities and under the general provisions of EU legislation and in particular Article 46 of Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls in third countries performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

Full legal references are provided in Annex I. Legal acts quoted in this report refer, where applicable, to the last amended version.

4 Background

4.1 Historical background

Currently BiH does not export poultry meat, poultry meat products or table eggs to the EU. This was the first audit in this field in BiH and it took place after BiH requested to be listed for export to the EU of the above mentioned commodities.

5 Findings And Conclusions

5.1 Legislation and implementing measures

Legal requirements

Article 46 of Regulation (EC) No 882/2004 states that Commission experts may carry out official controls in third countries in order to verify the compliance or equivalence of third-country legislation and systems with the relevant EU legislation.

Findings

At central level, several laws and detailed implementing measures covering different areas within the scope of the audit and aiming to harmonise BiH legislation with the EU have been put in place in recent years, amongst others:

- Law on Food ("Official Gazette" of BiH No 50/04);
- Veterinary Law of BiH ("Official Gazette" of BiH No 34/02);
- Law on Animal Protection and Welfare ("Official Gazette" of BiH No 25/09);
- Book of Rules on Requirements for Use of Additives in Foodstuffs Intended for Human Consumption ("Official Gazette" of BiH No 83/08);
- Book of Rules on the Quality of Drinking Water ("Official Gazette" of BiH No 40/10);
- Book of Rules on General Declaration or Labelling of Packed Foodstuffs ("Official Gazette" of BiH No 87/08);
- Book of Rules on Protection of Animals during Slaughter or Killing ("Official Gazette" of BiH No 46/10);
- Book of Rules on Control of *Salmonella* and other Specified Zoonotic Agents Transmitted through Food ("Official Gazette" of BiH No 46/10);
- Book of Rules on the Testing Programme to Reduce the Presence of Certain Serotypes of *Salmonella* in Poultry of Gallus Gallus and Turkeys ("Official Gazette" of BiH No 85/10);
- Decision on the Conditions to be met by the Facilities for Slaughtering Animals, Treatment, Processing and Storing of Products of Animal Origin (hereafter DCFSA) ("Official Gazette" of BiH No 27/05);
- Decision on How to Carry out Veterinary and Health Examinations of Animals Before Slaughtering and of Products of Animal Origin ("Official Gazette" of BiH 82/06; 79/09);
- Book of Rules on Labelling Raw Materials and Products of Animal Origin and the Design, Shape and Content of Veterinary Labels ("Official Gazette" of BiH No 82/09).

According to the CCA, harmonisation of BiH legislation with that of the EU is an ongoing process and legal acts adopted in recent years should include the relevant EU provisions. The audit team noted in several instances that the existing national legislation cannot yet be considered as equivalent to EU requirements, e.g. as regards Ante-mortem Inspection (AMI) and Post-mortem Inspection (PMI) and microbiological criteria of poultry meat and poultry meat products (e.g. *Listeria monocytogenes* is not required to be tested for in poultry meat products).

Below central level there are three geographic units: two entities - the Federation of BiH (FBiH) and the Republika Srpska (RS), and the Brčko district (BD). The governing bodies of these units should, in theory, adopt these laws for their specific territories. The audit team noted that in some cases, laws and detailed implementing measures were adopted at entity level. It is unclear, and, there are conflicting views, as to whether this centrally adopted legislation is automatically in force across the entire territory of BiH or whether it has to be explicitly adopted by each units governing body.

The audit team noted that implementation of this new legislation has so far been limited (e.g. concerning the procedures based on the Hazard Analysis and Critical Control Point (HACCP) principles in egg packing centres and the *Salmonella* National Control Programme (SNCP) in layers; see chapters 5.3.3.(c) and 5.4. of this report).

Under Article 21 of the Law on Food, food for export from BiH should comply with the relevant provisions and requirements of the food laws of the importing country.

A single approval procedure for national market and export establishments is in force. However, no detailed instructions exist as to how EU requirements should be taken into account during official controls and during the approval process for establishments seeking to export to the EU.

Conclusions

BiH legislation is not, as yet fully, equivalent to that of the EU for the poultry meat/egg sector.

5.2 COMPETENT AUTHORITY

Legal requirements

Article 46 of Regulation (EC) No 882/2004 specifies that official controls carried out in third countries by Commission experts shall have particular regard to the organisation of the third country's competent authorities, their powers and independence. This article also refers to other issues such as the training of staff in the performance of official controls, the existence and operation of documented control procedures and control systems based on priorities.

Findings

In accordance with the constitution of BiH, agriculture falls under the jurisdiction of the entity Ministry of Agriculture, Forestry and Water Management (MoAFWM), within which the entity Veterinary Sector has been established. The audit team was informed by the CCA that in order to ensure integrity in the functioning of veterinary services in BiH, the Veterinary Office of BiH was created as a coordinating body at national level.

The BiH Veterinary Office, under the Ministry of Foreign Trade and Economic Relations, is the designated CCA for the areas covered by the scope of the audit. The audit team was informed by the CCA that its competence at state level mainly lies with animal health, safety of food of animal origin and feed.

As regards animal health, the CCA has amongst others a role in:

- coordinating the work of the Veterinary Sectors of the two entities and BD,

- drafting of legislation (including methods and procedures),
- implementing uniform disease control and prevention measures,
- establishing common import/export policies,
- coordinating activities of the network of diagnostic laboratories, and
- preparing uniform monthly reports on incidences of notifiable infectious diseases.

The audit team noted that the CCA functions concerning food of animal origin are limited mainly to policy making and coordination. At present, the CCA is neither involved in assessing/supervising establishments intending to export to the EU nor does it have the necessary information which would allow the CCA to provide the Commission with relevant guarantees that EU equivalent requirements have been implemented in such establishments.

The Veterinary Sectors at entity level and the Department of Agriculture, Forestry and Water Management of BD, as well as the cantonal ministries have amongst other responsibilities implementing legislation issued by the state level concerning veterinary and phyto-sanitary issues, including public health for products of animal origin. They also issue and implement their own legal documents in accordance with the specific characteristics of the areas they cover and organise implementation of control programmes (e.g. an annual residue control plan and a SNCP). These bodies are, inter alia, responsible for the approval of establishments producing products of animal origin.

The veterinary inspection authorities, namely the Veterinary Office of BiH (Border Veterinary Inspection and Department for Inspection Affairs), the Administration for Inspection Affairs of RS and the FBiH and the BD together with the cantonal inspectorates of FBiH and municipality inspectors in RS are responsible for official controls related to implementation of animal health surveillance measures, disease outbreak management, food safety, application of certain standards in the field of production and processing, including controls of animal movement and products of animal origin.

According to the CCA there are regular meetings between the CCA and the Veterinary Sectors of the entities and BD concerning adoption of national legislation and implementing measures. However, the audit team noted that there is no clear procedure on how to exchange data between the CCA, entities' veterinary sector and Administration for Inspection Affairs concerning the official controls of establishments intending to export to the EU.

Under the Veterinary Law of BiH, Law on Animal Protection and Welfare and Food Law, the entity CAs have the necessary powers to carry out official controls in establishments and farms, to enforce legislation and to take sanctions.

The audit team was provided with evidence of several training courses which were organised by the EU Technical Assistance and Information Exchange instrument in cooperation with the CAs in BiH. Some of the training sessions included elements of EU requirements, e.g. general principles of HACCP in food of animal origin, the EU hygiene package legislation, sampling and analysis for official controls, organisation of official controls and microbiological criteria for food. However the audit team saw no evidence that these training sessions were specifically targeted on EU requirements for the poultry meat sector. The audit team noted that Official Veterinarians (OV) and Authorised Veterinarians (AV) directly involved in the inspection of export establishments as well as CA staff at entity level were not familiar with EU requirements in particular for AMI and PMI, sampling and laboratory analyses including *Salmonella* in laying hen farms.

Conclusions

The CA has legal powers to perform official controls within the scope of this audit. At present, the

designated CCA has limited oversight of the sector and cannot ensure that potential export establishments would meet EU equivalent standards. Furthermore, the knowledge of CA staff at different levels on EU requirements is inadequate.

5.3 Official controls of production and placing on the market

5.3.1 Listing procedures

Legal requirements

Article 12(1) and 12(2) of Regulation (EC) No 854/2004 establish certain requirements for establishments involved in exports of products of animal origin into the EU, namely to appear on lists drawn up and updated by the CA in accordance with this Article.

Findings

The audit team was informed by the CCA that establishments wishing to export to the EU should be approved for the national market, should have general export approval and in addition must obtain specific approval for exports to the EU.

Approvals for the national market and for general export are issued by the Veterinary Sector of the entities and the BD. An approval decision is based on results of an on-site inspection carried out by a team of three experts. If an establishment meets the requirements of national legislation, approval is granted by assigning a veterinary control number. Establishment approval procedure is regulated by the Veterinary Law of BiH and by DCFSA.

In their response to the pre-audit questionnaire the CCA informed that the following procedure would apply to establishments wishing to export to the EU. Upon application by the Food Business Operator (FBO), the CA of the entities (Veterinary Sector) or BD submit an application to the Veterinary Office of BiH, requesting that the establishment be put on the list of establishments approved for export to the EU. After receipt of the application, the Veterinary Office of BiH, in cooperation with the CA of the entity/BD forms a joint expert commission that checks the facility on site and confirms that the nominated establishment meets all the statutory requirements regarding the site, construction, equipment, hygiene and own-check programmes, as well as other prescribed conditions. If the expert commission finds that the establishment does not meet all the prescribed conditions, a deadline is granted by which the FBO should rectify the shortcomings found. Once the shortcomings are eliminated, the FBO should submit to the Veterinary Office of BiH a written report on the corrections carried out. Following an assessment of this submission, the Veterinary Office of BiH decides, whether the establishment is to be listed for EU export or not. However, the audit team did not find any evidence that this specific procedure for EU export approval had been implemented in establishments visited. The CCA explained to the audit team that this procedure had been implemented initially for the fish sector, and in the future, a similar one would be implemented for the poultry sector.

Although the establishments visited by the audit team were considered by the CA as meeting EU equivalent requirements and general export approval had been granted to them, no specific inspection had been carried out to evaluate eligibility of these establishments for EU exports taking into account EU requirements. Furthermore, the audit team found that:

- one poultry slaughterhouse with a cutting department attached and one poultry meat products establishment visited were not fully in line with EU equivalent standards;
- one slaughterhouse with an attached cutting department presented major shortcomings (see chapter 5.3.3.(b) of this report).

According to provisions of DCFSA, an industrial establishment seeking approval should have in place procedures based on HACCP principles. When reviewing the approval documents in establishments visited the audit team noted that the HACCP plan was part of the establishments' approval exercise but, assessment of the HACCP plan was limited primarily to checking the existence of such a plan. The audit team found several deficiencies in the HACCP system in the poultry meat establishments visited (see chapter 5.3.3.(c) of this report). Furthermore, in two egg packing centres visited by the audit team, a system based on HACCP principles was not implemented despite the fact that these establishments were considered by the CA as meeting EU standards. This is in contravention of paragraph 2, Article 12 of Regulation (EC) No 854/2004. The FBOs of these packing centres both informed the audit team that they plan to introduce a system based on HACCP procedures in the near future.

The audit team noted that one egg packing centre and one egg products establishment located in the same building were approved under the same approval number. This situation may cause an unclear situation for future exports to the EU. The CCA informed the audit team that they will rectify this situation.

Conclusions

The set procedure for granting establishments a veterinary export number is currently not being implemented fully. Furthermore, the specific EU requirements including implementation of HACCP based procedures have not been taken into account in the process of selecting establishments for pre-listing.

5.3.2 Controls specific to farms and to slaughterhouses: Ante-mortem and post-mortem inspection. Animal welfare attestation.

Legal requirements

The poultry meat export certificate in Regulation (EC) No 798/2008 outlines requirements concerning ante and post-mortem inspections, which should be carried out in line with Chapter V of Section IV of Annex I to Regulation (EC) No 854/2004.

The poultry meat export certificate in Regulation (EC) No 798/2008 outlines requirements concerning animal welfare in the slaughterhouse that should be equivalent to requirements described in Directive 93/119/EC.

Findings

Controls at farm level

The audit team visited a broiler farm which supplied broilers to one of the slaughterhouses visited. The farm is registered as an agricultural holding by the MoAFWM. Although registration of farms by the CA including on-site visits started last year, this farm has not yet been visited and registered by the CA and is not yet included in their database.

The farm operator is contracted by an enterprise which provides the operator with day old chicks, feed and animal health care services. Disease prevention measures and treatment of birds are carried out by the AV who regularly reports on this activity to the CA.

Bio-security conditions in the farm were acceptable. Adequate flock records (e.g. number of animals, mortality, feed consumption and treatment) were kept. The audit team noted that own-check sampling for *Salmonella* is carried out two weeks before slaughter.

The audit team was informed by the CA that 10% of farms (including poultry) are subject to official controls annually. These controls cover mainly animal health issues and residues.

Ante-mortem inspection

The audit team visited two broiler slaughterhouses.

The audit team was informed by the CCA that under BiH requirements farmers are obliged to notify the veterinary inspector of the slaughterhouse of the intended slaughter 72 hours before slaughter. However, the audit team noted, that in practice notification is done 24 hours prior to birds being sent to the slaughterhouse.

The audit team was informed by the CA that at the farm of origin, before the birds are transported, the AV, after examining the birds, issues the animal health certificate which accompanies the birds to the slaughterhouse. The animal health certificate contains information on the animal health situation of the area of origin, the number of birds dispatched, vaccination and treatment applied (if any) including withdrawal period of veterinary medicines used. However, the animal health certificate did not contain the following information required by Chapter X, Part A, Section IV of Annex I to Regulation (EC) No 854/2004:-

- that the animals had been examined prior to transfer from the particular holding and found to be healthy;
- that the records and documentation concerning these animals satisfied the legal requirements and did not prohibit slaughter of the animals.

As a result the animal health certificate does not meet on-farm AMI requirements equivalent to those of EU legislation.

The following documents are also attached to the animal health certificate:-

- results of *Salmonella* analyses carried out on the flock;
- a commercial dispatch document (containing information on the origin and number of birds) and
- a certificate on disinfection of the transporting trucks and crates.

The audit team noted that a second AMI is carried out at the slaughterhouse. In one slaughterhouse visited in FBiH, the OV, when carrying out AMI, was assisted by a FBO veterinarian. AMI consisted amongst other of:-

- checks on accompanying documents;
- visual inspection of the birds;
- animal welfare aspects (number of birds per crate, unloading of live birds and handling by FBO staff and stunning).

In another slaughterhouse in RS, AMI was carried out by an OV. In addition to checks mentioned above, the audit team was informed that the OV would carry out a detailed autopsy of dead birds on arrival where the number of dead birds exceeded 100 per truck. Each truck usually contains between four and five thousand birds.

The audit team was informed by the OV in both slaughterhouses that AMI does not necessarily cover all trucks of birds originating from the same farm (normally only one truck is inspected). This practice is not in line with EU legal provisions which require that all animals (trucks) undergo AMI (see paragraph 1(a), Part B, Chapter II, Section I and paragraph 6, Part A, Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004).

Animal welfare conditions during unloading of birds and stunning in both slaughterhouses were satisfactory.

The audit team saw evidence in both slaughterhouses visited that records on AMI were kept. However, these records did not contain information on checks related to animal welfare.

Post-mortem inspection

Although the audit team was informed by the CCA that according to national legislation no slaughterhouse staff is involved in PMI, in one of the slaughterhouses visited the audit team noted that PMI was carried out by slaughterhouse veterinarians and assisted by FBO staff. In another slaughterhouse at the time of the audit team visit no PMI was carried out during slaughter. This practice is not equivalent to EU requirements (see Sections I and III of Annex I to Regulation (EC) No 854/2004 and Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004). The audit team was informed by the OV that PMI is normally carried out by FBO staff and the OV himself carries out checks on 10% of slaughtered birds only. No evidence was provided on education or training of the FBO staff for PMI task.

The audit team was informed that the role of the OV is to supervise the FBO staff carrying out PMI. However, no clear legislation/instruction exists on this supervisory task (e.g. to what extent). This cannot be considered as equivalent to EU requirements (Chapter III, Section III, Annex I to Regulation (EC) No 854/2004). No evidence was available on performance tests for the FBO staff carrying out PMI.

In both slaughterhouses visited the audit team noted that the FBO staff removed birds with incomplete bleeding or pathological changes after scalding and plucking before PMI point. The audit team was informed that these carcasses were subject to inspection by the OV. However, neither a designated place with adequate facilities nor inspection records of these birds were available.

Although PMI records were kept in both slaughterhouses visited, the value of these records was undermined by the fact that they were mainly based on PMI activities carried out by the FBO staff.

The PMI place was neither designated nor equipped with the necessary facilities (inadequate light, mirror, hand washing and knife sterilisation equipment) in both establishments thus preventing the OV from carrying out their PMI tasks properly which is not in line with EU requirements (paragraph 6, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004).

In one of the slaughterhouses visited carcasses were heavily washed after evisceration, before the PMI point, and there was no system to enable the OV to properly assess possible faecal contamination (paragraph 5, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004).

In both establishments visited the audit team noted that knowledge of the OV on EU requirements regarding AMI and PMI was inadequate (e.g. concerning OV task to carry out AMI on all trucks of birds, requirements for PMI of carcasses, accompanying offal and conditions of involvement of FBO staff in PMI).

Conclusions

Bio-security conditions and documentation kept on farm were adequate.

The current official system for AMI and PMI cannot be considered as equivalent to that of the EU.

5.3.3 Controls at establishment level

Legal requirements

The export health certificates for the relevant commodities contained in Regulation (EC) No 798/2008 and Decision 2007/777/EC requires the FBO to implement a programme based on

HACCP principles.

Annex II to Regulation (EC) No 852/2004.

Chapter II and III of Section II and Chapter I, Section X, of the Annex III to Regulation (EC) No 853/2004.

Articles 4 and 10 of Regulation (EC) No 852/2004.

Findings

a) General findings

There was permanent presence of an OV in both slaughterhouses and the meat products establishment visited. There were no official auxiliaries working in the facilities visited.

Official control in establishments intended for EU export is carried out at three different levels:-

- Entity (Veterinary Sector) – approval of establishments.
- Entity (Administration for Inspection Affairs) or cantonal/municipal level (joined always also by the local inspector) – regular inspection of establishments (at least once a year).
- Local – permanent supervision (responsible among other tasks also for AMI, PMI and in the future for issuing of export certificates).

b) Slaughterhouses, cutting plants and poultry meat products establishments

The audit team visited two slaughterhouses with a cutting section attached and one meat products establishment.

One slaughterhouse and the meat products establishment had easily rectifiable deficiencies related to structures, sanitary conditions and hygiene practices (not all the deficiencies were present in both establishments):-

- In the slaughterhouse with a cutting section attached, poultry meat cuts packed in cardboard boxes were systematically mislabelled by indicating production and packing date as the day following the real manufacturing and packing date. This practice undermines the reliability of traceability system and shelf life.
- Buildings were not fully pest-proof, e.g. gaps between doors (paragraph 2(c), Chapter I, Annex II to Regulation (EC) No 852/2004).
- In several instances equipment was rusty and dirty (paragraph 2, Chapter II, Annex II to Regulation (EC) No 852/2004).
- In the slaughterhouse poultry carcasses on occasions were touching structural elements of the establishment, e.g. supporting pillars (paragraph 2(d), Chapter II, Section II, Annex III to Regulation (EC) No 853/2004).
- Condensation on ceiling and on overhead structures and in some cases above exposed products (paragraph 1(c), Chapter II, Annex II to Regulation (EC) No 852/2004).
- Clean containers after washing were not adequately separated from dirty ones.
- The same personnel was handling cardboard boxes and exposed poultry meat without specific precaution thus causing potential contamination of poultry meat (paragraph 3, Chapter X, Annex II to Regulation (EC) No 852/2004).
- Poultry meat in cardboard boxes and unprotected poultry meat on wooden pallets were stored in close proximity to each other in a cold store.
- Water temperature in sterilisers was as low as 77°C instead of 82°C.

Furthermore, in the meat products establishment visited floors were not easy to clean and disinfect (paragraph 1(a), Chapter II, Annex II to Regulation (EC) No 852/2004) and there were inadequate conditions for storage of packing/wrapping material and additives (paragraph 3, Chapter X, Annex II to Regulation (EC) No 852/2004).

In another slaughterhouse where major shortcomings were found by the audit team, despite the fact that some parts of the establishment had already been renovated (e.g. packing room and cold stores), the other elements (e.g. slaughter hall and cutting department) did not meet EU requirements. For example:-

- Worn-out structure (surfaces) of establishment.
- Rusty ceiling with condensation above exposed meat (paragraph 1(c), Chapter II, Annex II to Regulation (EC) No 852/2004).
- Wall/floor surfaces not easy to clean (paragraphs 1(a) and (b), Chapter II, Annex II to Regulation (EC) No 852/2004).
- Overhead wires not easy to clean.
- Extensive and abundant use of water causing splashing and potential contamination of products (paragraph 3, Chapter IX, Annex II to Regulation (EC) No 852/2004).
- No hand washing facilities for employees removing remaining viscera from carcasses and at the same time separating livers from viscera causing spillage of digestive tract contents on carcasses (paragraph 4, Chapter I, Annex II to Regulation (EC) No 852/2004).
- Poultry meat in cardboard boxes and unprotected poultry meat were stored in close proximity to each other in a cold store.
- Condensation and accumulation of ice in cold store.
- Inadequately cleaned crates for delivering live birds (paragraph 3, Chapter I, Annex III to Regulation (EC) No 853/2004).

Although the audit team was informed that the OV was present in slaughterhouses on a daily basis and performs visual inspection of sanitary conditions, no records on these controls were available.

Regular inspections (at least once a year) in visited establishments were carried out by the Administration for Inspection Affairs of the entity. Records of these inspections were available in one slaughterhouse and in the poultry meat products establishment visited. When reviewing these inspection records the audit team noted that inspection amongst others covered the FBO's own-checks and HACCP records, establishment's sanitary conditions and in addition records kept by the OV. In one case reviewed by the audit team, when shortcomings were detected concerning sanitary conditions and parameters for stunning, corrective actions were requested and a deadline to rectify shortcomings was issued by the inspector. Adequate follow-up was carried out by the CA of these corrective actions. In another slaughterhouse, although the audit team was informed by the CA that regular inspections were carried out, no records were available.

Although two inspection visits were carried out in 2011 in the slaughterhouse with major shortcomings, only a very limited number of deficiencies currently present had been detected or reported. While regular and well documented inspections were carried out in the meat products establishment visited, in the majority of cases shortcomings found by the audit team had not been identified or reported by the CA. This calls into question the knowledge of CA staff of EU requirements.

Controls at egg packing centres

The audit team visited two egg packing centres (in one of them only documentation was checked).

The visited egg packing centre had adequate sanitary conditions. The audit team noted that official controls were regularly carried out (at least once a year) and covered amongst others temperature requirements, water sampling, raw materials, sanitary conditions of premises, pest controls and labelling. However, the records of these checks did not note the absence of HACCP procedures and inadequate traceability.

In another egg packing establishment visited the most recent official control report was dated 2007.

c) HACCP and own checks

In accordance with the Decision on How to Carry out Veterinary and Health Examinations of Animals Before Slaughtering and of Products of Animal**,** all registered facilities must have a programme based on HACCP procedures.

The audit team noted that the HACCP plans are checked by the CA during approval procedures. It turned out that these checks are limited to checking the presence or absence of such plans. During official controls, likewise, the HACCP plan check is also limited to its presence or absence, but with the addition of a check on record keeping.

Slaughterhouses with attached cutting sections and the meat products establishment had HACCP plans implemented whilst the two egg packing centres visited had no HACCP plans at the time of the visit.

When reviewing HACCP plans several deficiencies were noted by the audit team, amongst others:-

- Hazards were not correctly analysed out resulting in numerous Critical Control Points (CCPs) making their monitoring difficult if not impossible.
- Some production steps were not included in the hazard analyses.
- In some cases, when temperatures exceeded critical limits, corrective actions were not recorded.
- Verification procedures for CCPs were not described.
- Not all parameters of CCPs (temperature/time) were monitored.

This cannot be considered as meeting standards equivalent to EU requirements (Article 5 of Regulation (EC) No 852/2004).

In the slaughterhouses and the meat products establishment visited, in accordance with the national legislation, there were comprehensive sampling programmes for microbiological parameters (*Salmonella*, coagulase-positive *Staphylococci*, *Proteus* species, *E.coli*, sulphite-reducing *Clostridia* and Total Bacterial Count in the case of mechanically separated meat). However, only one sample unit was taken and tested for these pathogens, including *Salmonella,* which is not in line with Regulation (EC) No 2073/2005. Furthermore, no consideration was given by the FBO to testing poultry meat products for *Listeria monocytogenes* - a requirement of Regulation (EC) No 2073/2005.

The audit team noted that in one slaughterhouse visited the FBO took five poultry meat samples per farmer supplying live birds for slaughter. Since January 2012, sampling included neck skin samples. However, this practice is still not in line with paragraph 1.28, Chapter I and paragraphs 3.1. and 3.2., Chapter II, Annex I to Regulation (EC) No 2073/2005 which requires 15 carcasses per sampling session pooled to five pools and to be analysed separately.

In another slaughterhouse, a similar sampling scheme for microbiological parameters was applied. However, neck skin samples were not taken.

In the slaughterhouses visited the audit team was informed by the FBOs that, for the last few years,

no samples have tested positive for *Salmonella*. When reviewing results of laboratory analyses in one slaughterhouse visited, the audit team noted a positive case for *E.coli* in poultry meat. Although the audit team was informed by the FBO that corrective actions had been taken to improve sanitary conditions of production no documented evidence was available to support this statement.

Swab tests were regularly taken from food contact surfaces and from the hands of employees.

Water used in establishments was regularly tested for microbiological (twice a month) and chemical (twice a year) parameters in accordance with the requirements prescribed by the Book of Rules on the Quality of Drinking Water which, according to the CCA, is harmonised with Council Directive 98/83/EC. According to the FBO all results of laboratory analyses were compliant with national requirements. However, the audit team noted that not all EU specific requirements were taken into account (e.g. chemical parameters).

The audit team noted that FBOs are not familiar with EU requirements (e.g. microbiological sampling for poultry meat/poultry meat products and application of HACCP principles).

The audit team was informed by official inspectors in establishments visited that they supervise the FBO sampling, however, there is no clear instruction and/or description on this supervisory task.

d) Traceability

According to Article 28 of the Law on Food FBOs have to ensure the traceability, amongst others, of food, raw materials and any other substance intended to be incorporated into a food or feed at all stages of production, processing, treatment and distribution. Furthermore, the FBO should have in place recording systems allowing them at any time to be able to identify inter alia any natural or legal person from whom they have been supplied with a food or a food-producing animal.

The traceability systems in the slaughterhouse and the meat products establishment were in general acceptable with some deficiencies already mentioned in chapter 5.3.3.(b), whilst in one egg packing centre traceability was inadequate. In the latter case it was not possible to identify the egg laying date and trace the eggs back to the farm of origin. In this case, it would not be possible for the CA to guarantee that all requirements of the EU export certificate are met.

Conclusions

Regular controls in establishments are carried out by the CA. However, the majority of shortcomings found by the audit team in establishments visited had not previously been identified or reported. Poultry meat/poultry meat products establishments proposed by the CCA for EU exports did not meet EU standards.

HACCP based procedures are not implemented in establishments considered as being EU compliant by the CA (this is not in line with EU law), and even where implemented, several deficiencies were found. Although comprehensive product and water own-check sampling is carried out, the EU microbiological criteria for poultry meat/poultry meat products are not taken into account.

CA staff and FBOs are not familiar with EU requirements.

The traceability system has deficiencies in poultry meat establishments but was found to be inadequate in one egg packing centre visited.

5.3.4 Official sampling

Legal requirements

The statements contained in section II.1 of the poultry meat certificate included in Commission Regulation (EC) No 798/2008, in particular paragraphs (c), (e) and (f), and in sections II.2.6 and

II.2.7 of the certificate provided in Commission Decision 2007/777/EC, imply that the CA should take samples for laboratory analysis.

Findings

In accordance with Decision on How to Carry out Veterinary and Health Examinations of Animals Before Slaughtering and of Products of Animal Origin , the veterinary inspector can take samples amongst others for poultry meat/poultry meat products, eggs and water for microbiological examination.

According to the information provided by the CCA to the audit team before the audit, there are no official sampling plans but the veterinary inspector in charge of a particular establishment may take samples when she/he deems it necessary in accordance with the aforementioned national legislation.

In one slaughterhouse visited the CA explained to the audit team that random samples are taken for microbiological analyses of poultry meat and swab tests from hands of FBO staff and the environment. The audit team was provided with evidence that poultry meat samples for microbiological analyses had been taken on several occasions during 2011 and results were compliant.

In the other slaughterhouse visited no evidence was available that official samples were taken for poultry meat or water microbiological analyses.

In the poultry meat products establishment the audit team was provided with evidence of regular official sampling of products, water, additives and swabs for microbiological parameters. However, no evidence was provided that EU requirements (Regulation (EC) No 2073/2005) were taken into account (e.g. five samples taken for poultry meat products and tested for *Salmonella* separately).

The audit team noted many cases where own-check samples were taken by the FBOs and the sampling documents were signed and stamped by the OV as well. These samples were considered by the CA both as own-check and official ones. It was explained to the audit team that in all cases the costs for testing of poultry meat/poultry meat products samples for microbiological parameters were covered by the FBO. However, the fact that samples are not taken by official staff prevent the sample being considered as official.

Conclusions

Sampling considered official by the CA cannot always be regarded as official under EU legislation. Furthermore, the sampling did not take into account all EU requirements.

5.4 Salmonella National Control Programme for laying hens

Legal requirements

The eggs export certificate in Regulation (EC) No 798/2008 requires third countries to submit to the Commission guarantees equivalent to those provided for by Regulation (EC) No 2160/2003.

The eggs export certificate in Regulation (EC) No 798/2008 requires that:

(a) eggs shall not be imported from flocks of laying hens in which *Salmonella* spp. has been detected as a result of the epidemiological investigation of a food-borne outbreak or if no equivalent guarantees have been provided unless the eggs are marked as class B eggs;

(b) eggs shall not be imported from flocks of laying hens with unknown health status, that are suspected of being infected or from flocks infected by *Salmonella* Enteritidis and/or *Salmonella* Typhimurium for which a target for reduction has been set in EU legislation and on which monitoring equivalent to the monitoring laid down in the provisions in the Annex to Regulation

(EC) No 1168/2006 is not applied, or if no equivalent guarantees have been provided unless the eggs are marked as class B eggs.

Findings

The Veterinary Office of BiH adopted national legislation (the Book of Rules Concerning Testing Procedures Intended for Reduction of the Prevalence of Certain *Salmonella* Serotypes in Poultry of Gallus Gallus and Turkeys (Book of Rules for *Salmonella* Testing)) on *Salmonella* Control Programmes (SCP) in different poultry populations. Amongst others the responsibilities of the CA/private veterinarians/farmers as well as sampling protocol and sampling frequency are laid down in the Book of Rules on *Salmonella* Testing. The SCP has to be implemented in accordance with the annual order of the Veterinary Office of BiH. The SNCP in layers, which is relevant to the scope of this audit, had not, at the time of the audit, been sent to the EU Commission for approval.

The SCP is mandatory for all laying hen farms with more than 250 birds and for all farms that place eggs on the market. According to the CCA, an exact number of laying hen farms in BiH has not yet been established. Registration of farms is in progress. According to the CCA the implementation of the SNCP by FBOs started in 2011. However, the audit team was informed by the CCA, that mainly due to lack of funds, the full implementation of the SNCP (including official sampling) will only be achieved in 2012. According to existing procedure, SCP for individual FBO (one FBO could own several laying hen farms/houses), should be sent to the entity CA (Veterinary Sector) for approval. To date, the entity CAs have approved six SCP of different FBOs and two more programmes are in the process of approval.

The audit team noted that the CCA has limited information on the implementation of the SNCP. The CCA was not aware if EU equivalent requirements had been implemented in farms supplying table eggs to egg packing centres intended to export to EU.

In accordance with the authorisations issued by the entity CAs, five (three public and two private) laboratories are authorised to perform *Salmonella* testing. Two laboratories out of the five carry out *Salmonella* serotyping. However, none of them is, as yet, appointed as a National Reference Laboratory for *Salmonella*. The audit team was informed by the CCA that two laboratories out of five have accredited method ISO 6579:2002.

The audit team visited two laying hen farms (in one of them only documentation was checked). The laying hen farm visited was registered by the cantonal Ministry. The audit team was informed by the representative of the cantonal Ministry that they are in the process of registering farms and therefore the total number of laying hen farms is not yet available.

Bio-security conditions in the farm were acceptable. Adequate flock records (e.g. number of animals, mortality, feed consumption, treatment and daily egg production) were kept.

The audit team was informed by the CA that 10% of farms (including poultry) are subject to official controls annually. These controls cover mainly animal health issues and residues. The audit team saw evidence that one of the laying hen farms visited was inspected by entity inspectors in 2011 on general animal health issues including prevention of avian influenza, Newcastle disease and furthermore, the work of the AV was verified. However, in official reports reviewed by the audit team there was no reference to the implementation of bio-security requirements including pest control.

Both farms had approved SCP and in both cases the SCPs had been implemented as regards own-check sampling. Sampling was carried out by the AV. No official samples have been taken so far. The audit team was informed by the CCA that at present no funds are available to cover costs of official sampling. The audit team noted that own-check sampling consisted of day old chicks sampling and sampling of pullets two weeks before they move to laying unit or laying phase. Adult laying hen flocks were sampled every two weeks. The audit team was informed by the CCA that the

fortnightly own-check sampling for adult laying hen flocks will be reduced to every 15 weeks.

When reviewing own check sampling records, the audit team noted several deficiencies. Although the faecal samples were taken from several locations of conveyor belts they were pooled to one on the farm instead of the required two pools to be delivered to the laboratory where faecal samples shall be pooled and thoroughly mixed for further testing (paragraph 3.1.2., Annex to Commission Regulation (EU) No 517/2011).

In some cases from the sampling protocol it was not possible to identify from which farm or from which flock within the farm the samples had been taken. This could prevent the FBO and the CA from taking prompt action in the case of a positive result for *Salmonella* Enteritidis or Typhimurium. Additionally, the sampling protocols did not contain the details of sample properties (e.g. indication of type and weight of sample). In one case bedding was mentioned as a type of sample although faeces were taken. These deficiencies would make it difficult for the CA to ascertain that EU equivalent requirements had been respected.

In one farm visited the audit team was informed that although there are no official samples taken, the AV is always present and supervises when own check samples are taken by the FBO's veterinarian. However, no records on these controls were available.

When reviewing the SCP implementation records in one laying hen farm visited, the audit team noted a case, when a sample tested positive for *Salmonella* Enteritidis. Although, according to national legislation, both laboratories and farm operators were obliged to inform the entity CA on *Salmonella* positive results, neither of them did. According to the FBO the eggs were sent to an egg products processing plant.

According to the CCA, if an own-check sample result is positive for *Salmonella* Enteritidis or Typhimurium, official sampling has to be carried out. Until receipt of the test results, the flock is considered as suspect. It was explained to the audit team that official confirmatory sampling would be carried out automatically. If the official sample is positive, the inspector may retest samples, but there is no obligation to do so.

Neither farm operators nor the CA staff were aware of the EU requirements under a SNCP. The CCA informed the audit team that on one occasion training concerning SNCP was organised in April 2011 in one entity and another similar training is planned to be carried out in 2012 in the other entity.

According to the provisions of the export health certificate for eggs (Part II, Annex I of Regulation (EC) No 798/2008), eggs shall not be imported from flocks of laying hens in which *Salmonella* spp. have been detected as a result of the epidemiological investigation of a food-borne outbreak or if no equivalent guarantees have been provided unless the eggs are marked as class B eggs. Although, the audit team requested the CCA to provide information on food-borne outbreaks where eggs were involved in BiH, this information was not presented to the audit team.

Conclusions

The BiH SNCP has not yet been sent for approval to the Commission. Currently the SNCP is not being implemented in equivalence with EU requirements. Knowledge on EU SNCP requirements of CA staff and farm operators is insufficient.

5.5 Laboratories

Legal requirements

Article 46 of Regulation (EC) No 882/2004 indicates how Commission controls in third countries

will have particular regard to the resources available to the CA, including diagnostic facilities. The Codex Alimentarius Guidelines require adequate quality controls and the use of validated analytical methods.

Findings

According to the CCA twelve laboratories (eight public and four private) are authorised by the competent entity ministries to carry out official analyses of animal origin products. Three out of the twelve are accredited to ISO 17025.

The audit team visited two laboratories authorised to carry out official controls, both consisting of two departments (Animal Health and Food Hygiene/Microbiology).

Both departments of one visited laboratory applied for accreditation to ISO 17025. The audit team was informed that a quality assurance system is implemented.

In the Food Hygiene Department, the audit team was informed that coagulase positive *Staphylococci* and Total Bacterial Count would be included into the scope of accreditation. Assessment by the national accreditation body of BiH was scheduled for February 2012. Methods of microbiological analyses applied in the Food Hygiene Department were national methods (including *Salmonella* and *E.coli*), not the EU reference methods required by Regulation (EC) No 2073/2005. No information was provided to the audit team whether the national method for *Salmonella* had been validated against the EU reference method (paragraph 1.28, Chapter I, Annex I to Regulation (EC) No 2073/2005). The laboratory informed the team that testing by using ISO 6579 laboratory method for *Salmonella* analyses is planned for 2012, only if funds are available. The audit team was provided with evidence that the laboratory participated with satisfactory results in proficiency tests for coagulase positive *Staphylococci* and Total Bacterial Count organised by a United Kingdom laboratory. The laboratory participated in proficiency testing for *Salmonella* with satisfactory results in 2011. However, the matrix was not poultry meat.

The Animal Health Department of the same laboratory uses the EU reference ISO/EN 6579:2002 method. This laboratory is authorised, amongst other tests, to carry out *Salmonella* isolation and serotyping. This laboratory receives *Salmonella* isolates from other laboratories for serotyping. The laboratory participated in proficiency tests for *Salmonella*, on different matrices including faecal material, organised by a United Kingdom laboratory in June 2011. Upon request of the CCA this laboratory also organised *Salmonella* inter-laboratory tests on faecal material for other laboratories including those which are authorised to perform *Salmonella* analyses within the SNCP. The audit team noted that two participants obtained unsatisfactory results. The audit team was informed that the laboratory would provide guidance for those laboratories which failed in proficiency tests. The laboratory informed the audit team that a repeat test will be organised when financial resources are available.

Another laboratory visited by the audit team was accredited by the national accreditation body of BiH to ISO 17025 including tests for *Salmonella* in faecal material, environmental samples and foodstuffs of animal origin using the appropriate EU reference laboratory method ISO 6579:2002. The audit team noted that although the EU reference methods are used among others for *Listeria monocytogenes* and *E.coli* detection, these methods are not yet accredited. According to the laboratory these methods will be accredited in 2012. The audit team was provided with evidence of inter-laboratory tests for *Salmonella* Enteritidis (on faecal matrix) with satisfactory results organised by another BiH laboratory in 2011. Another inter-laboratory test in December 2011 for *Salmonella* was carried out by the Food Department on several food matrices also providing satisfactory results. In addition, the audit team was informed of the ongoing and foreseen proficiency tests and on inter-laboratory tests for 2012.

The audit team noted in all laboratories visited that they do not automatically reject samples not

complying with the sampling requirements. Instead, laboratories consult the owner of the sample on whether to proceed or not with the analyses.

When reviewing laboratory analyses results the audit team noted that laboratories issued only one result for microbiological analyses (e.g. *Salmonella* in poultry meat) regardless of the number of samples or sample units tested (according to paragraph 1.28, Chapter I, Annex I to Regulation (EC) No 2073/2005 five sample units should be tested individually). Therefore, it is not clear whether the samples were pooled or analysed separately. The audit team was informed by the laboratories that samples or sampling units are analysed separately. However, no evidence was provided to the audit team confirming that.

Visited laboratories had acceptable infrastructure and equipment.

In both laboratories the audit team was provided with evidence of several internal training events. In one laboratory visited the audit team was informed of plans for training covering requirements of Regulation (EC) No 2073/2005. The audit team was informed that staff of the Animal Health Department in one of the laboratories visited are planning to participate in a training session organised by the EU *Salmonella* Reference Laboratory. Staff of both laboratories had adequate knowledge of laboratory practices. However, they were not aware of the EU requirements (e.g. those of Regulation (EC) No 2073/2005).

Conclusions

Visited laboratories authorised to carry out official analyses for poultry meat/poultry meat products and environmental samples are accredited or in the process of accreditation and have acceptable facilities. Reliability of results of analyses is compromised by the fact that the national method for *Salmonella* testing in one of the laboratories has not been validated against the EU reference method.

When testing for *Salmonella* in poultry meat EU equivalent requirements are not taken into account and knowledge of the EU requirements by laboratory staff is inadequate.

5.6 Official certification

Legal requirements

Council Directive 96/93/EC lays down several certification principles, whereas Annex VI to Regulation (EC) No 854/2004 lays down requirements for certificates accompanying imports. The model certificates for poultry meat/poultry meat products and table eggs are outlined in Regulation (EC) No 798/2008 and Decision 2007/777/EC.

Findings

According to the CCA a procedure identical to the one currently applied in fishery products will be used for EU export of poultry meat, poultry meat products and table eggs. There is a general procedure for the issuing of export health certificates which includes traceability and accountability of issued certificates, filling of certificates by OV or AV. Additionally, the procedure includes requirements to be followed by the certifying officer, e.g. who should have a good knowledge of relevant veterinary legislation, and information on tests and examinations related to the particular consignment etc.

The CCA explained that the EU export health certificates for poultry meat/poultry meat products would be issued by the OV permanently based in the establishment. However, at present the OVs do not have adequate knowledge of the EU requirements including AMI, PMI, sampling for microbiological criteria and HACCP based procedures.

Conclusions

There is a general procedure in place for issuing export certificates. However, at present OVs knowledge of EU requirements is inadequate.

6 Overall Conclusions

There is an official control system in place which includes regular controls in poultry meat, poultry meat products establishments and egg collection centres. However, this system cannot be deemed equivalent to the requirements of EU legislation, especially with regard to granting approvals to establishments for EU export, AMI and PMI, sampling for microbiological criteria. Deficiencies in implementation of SNCP and the lack of knowledge of EU requirements by the staff of the CA, laboratories and FBOs is also a problem.

Establishments currently proposed for EU export do not fully meet standards equivalent to those of the EU.

Consequently the CCA cannot, at present, give the guarantees required in the model certificate for exporting poultry meat, poultry meat products and table eggs to the EU.

7 Closing Meeting

During the closing meeting held in Sarajevo on 8/02/2012, the audit team presented the findings and preliminary conclusions of the audit to the CAs.

During this meeting, both the CCA and CAs acknowledged all the findings and preliminary conclusions presented by the audit team and provided commitment to correct the deficiencies.

8 Recommendations

The CA should provide Commission services with an action plan, including a timetable for its completion, within one month of receipt of the report, in order to address the following recommendations for poultry meat/poultry meat products and table eggs intended for export to the EU.

N°.	Recommendation
1.	The CCA should ensure that the OV carries out AMI of all animals before slaughter in accordance with paragraph 1(a), Part B, Chapter II Section I of Annex I to Regulation (EC) No 854/2004.
2.	The CCA should guarantee that birds undergo PMI equivalent to that required under EU legislation (Sections I and III and Chapter V, Section IV of Annex I to Regulation (EC) No 854/2004 and results are adequately recorded.
3.	The CCA should ensure that if establishment staff is involved in PMI, conditions equivalent to those required in the EU legislation (Chapter III, Section III, Annex I to Regulation (EC) No 854/2004 in particular, regarding their training, performance tests

N°.	Recommendation
	and supervision by OV, are met.
4.	The CCA should ensure that a specific area for PMI is designated and adequately equipped with the necessary facilities enabling the OV to carry out PMI tasks properly (paragraph 6, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004).
5.	The CCA should ensure that OVs carrying out inspection tasks in slaughterhouses ensure that faecal contamination of carcasses is prevented (paragraph 5, Chapter IV, Section II of Annex III to Regulation (EC) No 853/2004.
6.	The CCA should guarantee that only those establishments with standards equivalent to those of the EU, in particular with the relevant requirements laid down in Section II of Annex III to Regulation (EC) No 853/2004 and Annex II to Regulation (EC) No 852/2004 are included in the list of establishments to be authorised EU export, in line with Article 12 of Regulation (EC) No 854/2004 and that the deficiencies mentioned in this report are corrected and avoided in the future.
7.	The CCA should ensure that FBOs put in place, implement and maintain updated, a permanent procedure or procedures based on HACCP principles as is set out in the veterinary certificate for poultry meat, poultry meat products and table eggs (Part 2, Annex 1, Regulation (EC) No 798/2008 and Annex III of Decision 2007/777/EC).
8.	The CCA should ensure that sampling methods used by the FBO and officials for Salmonella in poultry meat/poultry meat products and for Listeria monocytogenes in poultry meat products intended for export to the EU are equivalent to those described in EU legislation (Annex I to Regulation (EC) No 2073/2005).
9.	The CCA should ensure that an adequate traceability system, in particular in egg packing centres, is in place ensuring that requirements in the veterinary certificate for table eggs are met (Part 2, Annex I, Regulation (EC) No 798/2008).
10.	The CCA should ensure that any laboratories involved in analysing poultry meat and poultry meat products intended for export to the EU use analytical methods for microbiological criteria in line with Annex I of Regulation (EC) No 2073/2005. If alternative methods are to be used, they should be validated against the EU reference methods.
11.	The CCA should ensure that the SNCP is implemented in laying hen flocks providing table eggs for EU export egg packing centres taking into account requirements equivalent to those of EU legislation (Regulation (EC) No 2160/2003, Regulation (EU) No 517/2011 and of those of the export health certificate for eggs (Part II, Annex I, Regulation (EC) No 798/2008).
12.	The CCA should ensure that the OVs participating in the EU certification chain are

N°.	Recommendation
	knowledgeable of the EU requirements as set out in the EU export certificates (Part II.2, Annex III to Commission Decision 2007/777/EC and in the commodity specific EU export certificates (Annex I, Regulation (EC) No 798/2008).

The competent authority's response to the recommendations can be found at:

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2012-6443

ANNEX 1 - LEGAL REFERENCES

Legal Reference	Official Journal	Title
Dec. 2007/777/EC	OJ L 312, 30.11.2007, p. 49-67	2007/777/EC: Commission Decision of 29 November 2007 laying down the animal and public health conditions and model certificates for imports of certain meat products and treated stomachs, bladders and intestines for human consumption from third countries and repealing Decision 2005/432/EC
Reg. 882/2004	OJ L 165, 30.4.2004, p. 1, Corrected and re-published in OJ L 191, 28.5.2004, p. 1	Regulation (EC) No 882/2004 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
Reg. 852/2004	OJ L 139, 30.4.2004, p. 1, Corrected and re-published in OJ L 226, 25.6.2004, p. 3	Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs
Reg. 853/2004	OJ L 139, 30.4.2004, p. 55, Corrected and re-published in OJ L 226, 25.6.2004, p. 22	Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin
Reg. 854/2004	OJ L 139, 30.4.2004, p. 206, Corrected and re-published in OJ L 226, 25.6.2004, p. 83	Regulation (EC) No 854/2004 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
Reg. 798/2008	OJ L 226, 23.8.2008, p. 1-94	Commission Regulation (EC) No 798/2008 of 8 August 2008 laying down a list of third countries, territories, zones or compartments from which poultry and poultry products may be imported into and transit through the Community and the veterinary certification requirements
Reg. 2073/2005	OJ L 338, 22.12.2005, p. 1-26	Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs

Legal Reference	Official Journal	Title
Reg. 2074/2005	OJ L 338, 22.12.2005, p. 27-59	Commission Regulation (EC) No 2074/2005 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
Reg. 2160/2003	OJ L 325, 12.12.2003, p. 1-15	Regulation (EC) No 2160/2003 of the European Parliament and of the Council of 17 November 2003 on the control of salmonella and other specified food-borne zoonotic agents
Reg. 1168/2006	OJ L 211, 1.8.2006, p. 4-8	Commission Regulation (EC) No 1168/2006 of 31 July 2006 implementing Regulation (EC) No 2160/2003 as regards a Community target for the reduction of the prevalence of certain salmonella serotypes in laying hens of Gallus gallus and amending Regulation (EC) No 1003/2005
Reg. 517/2011	OJ L 138, 26.5.2011, p. 45-51	Commission Regulation (EU) No 517/2011 of 25 May 2011 implementing Regulation (EC) No 2160/2003 of the European Parliament and of the Council as regards a Union target for the reduction of the prevalence of certain Salmonella serotypes in laying hens of Gallus gallus and amending Regulation (EC) No 2160/2003 and Commission Regulation (EU) No 200/2010