FINAL

REPORT OF A MISSION
CARRIED OUT IN SLOVENIA
FROM 16 TO 18 AUGUST 2000
CONCERNING FOOD PRODUCTION
POULTRY MEAT

Please note that certain comments from the Slovenian authorities have been included in the text of the report in bold, italic type
# Table of contents

1. **INTRODUCTION**................................................................................................................. 3
   1.1. COUNTRY VISITED................................................................................................................ 3
   1.2. DATES OF MISSION ............................................................................................................ 3
   1.3. COMPOSITION OF INSPECTION TEAM.............................................................................. 3
   1.4. LEGAL BASIS FOR THE MISSION ................................................................................... 3
   1.5. OBJECTIVES OF THE MISSION ....................................................................................... 4
   1.6. BACKGROUND OF THE MISSION ................................................................................... 4
   1.7. SITES VISITED DURING THE MISSION ........................................................................... 4

2. **STRUCTURE OF THE COMPETENT AUTHORITY, VETERINARY LEGISLATION AND SHORT DESCRIPTION OF THE POULTRY INDUSTRY**........................................................................... 5
   2.1. SUMMARY DESCRIPTION OF THE COMPETENT AUTHORITY........................................ 5
   2.2. VETERINARY LEGISLATION .......................................................................................... 6
   2.3. GENERAL INFORMATION ON THE POULTRY INDUSTRY IN SLOVENIA ......................... 7

3. **DESCRIPTION OF THE SYSTEM AND FINDINGS**.......................................................... 8
   3.1. APPROVAL PROCEDURES FOR POULTRY MEAT ESTABLISHMENTS. .............................. 8
   3.2. VETERINARY SUPERVISION OF ESTABLISHMENTS ...................................................... 9
   3.3. ANTE- AND POST-MORTEM INSPECTION....................................................................... 12
   3.4. OWN CHECKS................................................................................................................... 14
   3.5. USE OF IMMERSION CHILLERS...................................................................................... 15
   3.6. USE OF POTABLE WATER ............................................................................................. 16
   3.7. TRAINING PROGRAMMES FOR COMPANY AUXILIARIES AND STAFF ......................... 17
   3.8. TRADE IN MEAT – TRACE BACK – MEAT EXPORT.......................................................... 18
   3.9. VETERINARY SUPERVISION OF POULTRY FARMS....................................................... 19
   3.10. VETERINARY SUPERVISION AT THE TIME OF SLAUGHTER REGARDING ANIMAL WELFARE 20
   3.11. VETERINARY SUPERVISION OF POULTRY MEAT PRODUCTS ESTABLISHMENTS ......... 22
   3.12. ANIMAL HEALTH ISSUES ............................................................................................ 23

4. **ACTION TAKEN DURING AND AT THE END OF THE MISSION**........................................ 24

5. **CONCLUSIONS** ............................................................................................................... 24
   5.1. TECHNICAL CONCLUSIONS ......................................................................................... 24
   5.2. GENERAL CONCLUSIONS ............................................................................................ 27

6. **RECOMMENDATIONS** .................................................................................................. 27
   6.1. RECOMMENDATIONS TO SLOVENIA ............................................................................ 27
   6.2. RECOMMENDATIONS TO THE COMMISSION SERVICES ........................................... 27

7. **ADDENDUM TO MISSION REPORT DG(SANCO)/1197/2000**.................................... 28
1. **INTRODUCTION**

1.1. **Country visited**

Slovenia

1.2. **Dates of mission**

16 - 18 August 2000

1.3. **Composition of inspection team**

The inspection team comprised two officials of the Food and Veterinary Office (FVO) and one national expert.

1.4. **Legal basis for the mission**

The mission was carried out under the general provisions of Community legislation and in particular of:


- Council Directive 93/119/EC of 22 December 1993 on the protection of animals at the time of slaughter or killing\(^3\);


- Council Directive 92/118/EEC laying down animal health and public health requirements governing trade in and imports into the Community of products not subject to the said requirements laid down in specific Community rules referred to in Annex A (I) to 89/662/EEC and, as regards pathogens, to Directive 90/425/EEC\(^5\).

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\(^1\) OJ No L 55 of 8.03.1971, p. 23

\(^2\) OJ No L 62 of 15.03.1993, p. 1

\(^3\) OJ No L 340 of 31.12.1993, p. 21

\(^4\) OJ No L 268 of 24.9.1991, p. 35

\(^5\) OJ No L 62 of 15.03.1993, p. 49
– Commission Decision 98/140/EC laying down certain detailed rules concerning on-the-spot checks carried out in the veterinary field by Commission experts in third countries ⁶.

1.5. Objectives of the mission

The main objective was to assess compliance with the relevant EC requirements of the systems the Competent Authority has in place in relation to the following main issues in the field of fresh poultry meat and poultry meat products:

• Approval procedures for poultry meat establishments.

• Veterinary supervision of slaughter hygiene, of establishments and ante- and post-mortem inspection.

• Veterinary supervision of poultry farms.

• Veterinary supervision of the protection of animals at the time of slaughter.

• Supervision and checks on trade in poultry meat with particular attention to controls at origin and destination and the relevant documentation.

1.6. Background of the mission

The FVO is currently carrying out a series of missions to the third countries exporting fresh poultry meat and poultry meat products to the Community.

This mission is included in the mission series.

1.7. Sites visited during the mission

– One slaughterhouse for broilers and spent hens with integrated cutting room, cold store and processing plant
– One broiler farm
– The central and two private veterinary laboratories
– A regional veterinary office

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2. **STRUCTURE OF THE COMPETENT AUTHORITY, VETERINARY LEGISLATION AND SHORT DESCRIPTION OF THE POULTRY INDUSTRY**

2.1. **Summary description of the Competent Authority**

In Slovenia, most of the veterinary matters are dealt with by the Veterinary Administration of the Republic of Slovenia (VARS). VARS is headed by the Chief Veterinary Officer (CVO) answering directly to the Minister of Agriculture. The total staff of VARS is 308 people of whom the large majority are official veterinarians. The target figure to be reached in the coming years is 366 staff.

The Inspection Department of VARS is responsible for the approval and supervision of food producing establishments. It has direct line management of the regional (13) (in some cases, subdivided in two or more sub-units) and local (= site) inspection units (26). Regional units are responsible for assisting in preparing legislation and for implementing it.

Certain tasks, mainly in the Animal Health (AH) field are carried out by private practitioners who work in a veterinary station having a “concession” (after submitting a tender to VARS) and who are paid from the VARS budget for these services. In poultry, these include certain vaccinations and blood sampling.

The Veterinary Chamber, which is completely independent from VARS, is responsible for private practitioners. The total number of members of this Chamber is 455 (including some 20% technicians or para-veterinarians).

Other veterinary activities are carried out by the Animal Health Centres (AHCs) belonging to a semi-state organisation. Until recently, the AHCs were also responsible for food inspection, but from 2000, this activity is exclusively carried out by VARS. The AHCs remain active in the field of bees and fish health, reproduction (zootechnical matters) and some diagnostic services. They provide also laboratory services to private companies.

The total number of veterinarians in Slovenia (official veterinarians, practitioners, University, etc.) is about 800.

Because of the recent restructuring and redistribution of veterinary activities, significant efforts for recruitment and training of new staff were necessary in the VARS.
Further details can be found in reports SANCO/1174/99 MR Final & SANCO/1247/1999 MR Final, published on the Internet7.

2.1.1. Findings:

• The veterinary authority in Slovenia has clearly defined competencies and a proper line management structure.

• Both the regional and local unit visited had sufficient official veterinarians for carrying out its duties (21 and 8 respectively). Administrative support staff was however limited (3 and none respectively).

• Due to the recent restructuring of veterinary services and re-attribution of their duties, part of the offices of the regional unit were (still) in the same building as the Animal Health Centres, while another part was in the government building downtown, at some distance from the first ones. This has created apparently some organisational problems.

• Veterinary stations are not always independent from the farms or companies for which they carry out official duties. In the farm visited, the supervision was carried out by a veterinary station working exclusively for the company concerned and owned partially by that owner.

• Animal health centres are no longer involved in inspection tasks in relation to poultry.

2.2. Veterinary legislation

The Slovenian authorities recently adopted a significant set of rules with regard to public health matters in order to bring the Slovenian veterinary legislation in line with the “Acquis Communautaire” and to rectify deficiencies noticed in earlier missions. These are in particular:

• Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00);

• Rules on the veterinary-sanitary conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS, 91/99, 38/00);

7 These reports can be consulted on the Internet Website of the Food and Veterinary Office: http://europa.eu.int/comm/food/fs/inspections/index_en.html
• Rules on the conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS, 91/99, 38/00).

These regulations (as well as the Veterinary Practice Act and the Animal Protection Act) were made available in English to the mission team. Certain provisions appeared to not yet be in line with the relevant Community legislation, Directive 71/118/EEC in particular. Where appropriate, discrepancies are mentioned under the findings in the different sections of this report.

2.3. General information on the poultry industry in Slovenia

The figures on the Slovenian poultry industry provided by the Competent Authorities (CA) in the final meeting were as follows.

• The number of birds slaughtered in 1999 was approximately 26 million (no details on species supplied).

• There are about 70 000 poultry farms and 29 ostrich holdings in Slovenia.

• About 1 700 000 laying hens produced 86194294 and 119934107 table eggs in industrial type and private farms respectively.

• The poultry are slaughtered in 11 establishments, only one of them being approved for export to the EU and most of them being low capacity plants (called craftmen’s plants in the Slovenian legislation - see section 3.1).

• Three large companies, grouping a number of cooperatives and agricultural societies, account for 90% of the total production. The figures do not cover the back-yard flocks.

According to the residue plan 2000, the total poultry production amounts to 50 000 tonnes chicken and 5 800 tonnes of spent hens and turkeys.

One plant (a slaughterhouse with integrated cutting section) has been approved in accordance with Article 14 of Directive 71/118/EEC for export to the EU (Commission Decision 97/4/EC\textsuperscript{8}). There are no approved independent cutting plants for poultry meat or cold stores.

As far as poultry meat products are concerned, two establishments have been approved for export to the EU (Commission Decision 97/569/EC\textsuperscript{9} as

\textsuperscript{8} OJ No L 2 of 4.1.1997, p. 6

\textsuperscript{9} OJ No L 234 of 26.8.1997, p. 16
amended by Decision 98/163/EC\(^{10}\), one of them however has been recently de-listed by the Slovenian CA because of refurbishment activities in the plant. The Commission has been informed of this de-listing.

3. **DESCRIPTION OF THE SYSTEM AND FINDINGS**

| General remark: | The following main findings were noted in the sites visited. Not all the findings were noted in each site. |

3.1. **Approval procedures for poultry meat establishments.**

3.1.1. **Legal basis**

- Article 47 of the Veterinary Practice Act, amended on 1 December 1999, describes the approval procedure applicable to all the industrial export establishments, irrespective of the type of establishment;

- Articles 44 and 45 of the same Act impose the registration by VARS of all establishments for foodstuff production, slaughterhouses included;

- The Rules on the conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS\(^{11}\), 91/99, 38/00) define the conditions to be met by establishments.

3.1.2. **Description of the approval procedure**

The decision to enter an establishment in the register of the industrial export establishments is issued by the CVO of the VARS, on the basis of a proposal by an Expert Team, appointed by him. The Expert Team is obliged to inspect closely all the relevant documents and the establishment itself, and to compile a survey report. The Report must include the aforementioned proposal, provided the Team has found the establishment in compliance with the prescribed conditions.

The newly established registration procedures have not been applied yet for the poultry establishments, as they have been registered before. However, a review of all registration files is currently carried out.

All the documents relevant to the approval of establishments, as set out above, are easily available.

\(^{10}\) OJ No L 53 of 24.2.1998, p. 23

\(^{11}\) Uradni list Republike Slovenije (Official Gazette of the Republic of Slovenia)
3.1.3. Findings

– The Slovenian legislation uses the word “registration” rather than “approval”. To be registered, however, the establishments need to comply with a number of criteria and comply with the legal requirements.

– The registration file, including some blueprints, was available in the establishment.

– For export, a separate registration is necessary following a similar procedure as the primary approval.

– Product and staff flow charts are not included in the documents the operator needs to present when applying for approval.

– The VARS headquarters maintain files on each establishment. The team did not check whether these contained blueprints.

– The approval for further processing for the establishment visited did not specify whether it concerned meat products, meat preparations or prepared meals, in spite of the fact that meat preparations were being produced (but not exported to the EU). A draft amendment of the approval decision however, had been prepared in order to approve the establishment concerned for meat products, meat preparations and prepared meals.

– The Chief Veterinary Officer (CVO) has the power to suspend establishments which are no longer complying with the legal requirements. This will normally be done on basis of a proposal from the local or regional OV.

– For one of the approved meat product establishments, the approval has been withdrawn in view of the significant refurbishment works to be undertaken. The Commission has been informed about this de-listing.

3.2. Veterinary supervision of establishments

3.2.1. Legal basis

• The framework of the system has been laid down in the Veterinary Practice Act (Zakon o veterinarstvu (ZVet), Ur. l. RS, 82/94, 21/95, 16/96, 101/99),

• The Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw
materials of animal origin (Ur. l. RS, 100/99, 38/00) give more specific rules regarding inspection and control.

3.2.2. Description of the system of supervision

The official veterinarian in charge of a food production establishment is appointed by the CVO of the VARS; the appointment is part of the decision on the registration of a relevant food production establishment.

Based on the Rules on veterinary-sanitary inspection and control of the food production establishments, each establishment is supervised by an appointed official veterinarian. The latter is supervised by the Head of the regional veterinary inspection, who - every two months - visits the establishment for inspection and control purposes. Once a year, the establishment is inspected by a VARS Commission that is appointed by the CVO of the VARS.

3.2.3. Findings

- In the approved establishment visited, a sufficiently large team of OV is appointed to guarantee presence of an OV at all times during slaughter.
- The OV in charge of the inspection team was strongly involved and well aware of the different aspects of the production, including the own checks programme.
- The veterinary services have sufficient legal powers to enforce corrective actions: the local unit official veterinarian can close down parts of production units, equipment or ban the use of certain implements by tagging them.

3.2.4. Findings in the establishment

3.2.4.1. Structure, layout, separation clean-dirty

The layout of the establishment and the separation between clean and dirty areas/operations was in general adequate. However, a small number of deficiencies were noted in this area, such as:

- The door between the slaughter and evisceration rooms did not automatically close.
- The docking facilities for meat lorries did not close hermetically, which could lead to fly intrusion.
- The exit of the washed containers for live birds was located next to the entry with the containers filled with birds.
- The line between the hanging of the birds and the stunner is too long (about 25 meters).
3.2.4.2. Fittings, technical equipment

A small number of deficiencies were noted in this area, for example:

- Spray used in lairage area not adequately adjusted resulting in insufficient spread of the aerosol for cooling down the birds, some of them getting very wet;
- Carcass wash (breast shower) after evisceration before post-mortem inspection;
- Length of stunner not proportionate to line speed and stunner not equipped with ammeter\(^{12}\).

3.2.4.3. Cleanliness, maintenance

The overall cleanliness of the establishment was remarkable in all areas. Only minor shortcomings with regard to cleanliness were noted, such as underside of some tables which were not completely clean.

3.2.4.4. Hygiene of operation

A number of deficiencies were noted in this area, for example:

- Meat before mechanical de-boning kept too long outside chillers, leading to a temperature rise (up to 8°C)
- Not all workers wearing rubber boots making disinfecting of footwear impossible,
- A few doors to outside left open during operations (such as laundry room, crate wash) leading to some fly intrusion,
- Damaged cartons in freezing holding rooms, leading to incompletely protected meat,
- Storage of incompletely protected meat (wrapped only) in rooms with packaged meat and/or with wooden pallets,
- Although not leading to real crossovers of product flow, a certain cooked product did not follow a one way system and returned into the direction of the raw material,
- Some staff used their hands in the further processing unit, e.g. for transferring meat paste from one container to another (rather than using appropriate implements).

\(^{12}\) Although Directive 93/119/EEC does not require explicitly to fit waterbath stunners with ammeters, it is good practice to have this equipment as the value of the current is a significant factor for adequate stunning.
3.3. Ante- and post-mortem inspection

3.3.1. Legal basis

- The framework of the system has been laid down in the Veterinary Practice Act (ZVet, Ur. l. RS, 82/94, 21/95, 16/96, 101/99),

- The Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00) give more specific rules regarding inspection and control.

3.3.2. Description of the system of supervision

The inspection and control is carried out by the official veterinarians of the VARS, and the system has been harmonised with the “acquis communautaire”. The pre-slaughter inspection on the farm is carried out by practitioners designated for this purpose who issue a health certificate.

At arrival in the slaughterhouse, the OV is responsible for checking the origin of the birds and possible transport injuries.

The legislation foresees the possibility of using specially trained official auxiliaires of the VARS (see point 3.7), to performing the post-mortem inspection under the supervision of the OV. This supervision would include discussions about pathological findings and rejections.

The OV reports the results of post-mortem inspection to the VARS four times a year.

3.3.3. Findings

With regard to the ante-mortem inspection the following findings were made.

- The Slovenian system uses elements from the two systems foreseen by Directive 71/118/EEC, namely certification by official veterinarians or the forwarding 72 hours before slaughter, of the flock records to the official veterinarian in the slaughterhouse.

- Although flock records do exist in the farms, which give most of the technical parameters required by the Directive, only a few of these parameters (such as the respect of withdrawal periods and the dates of vaccinations and treatments) are given in the health certificate issued by
the practitioners, who can be considered as authorised veterinarians in the meaning of Directive 90/539/EEC\textsuperscript{13}.

- The veterinarians issuing the health certificate can be considered official veterinarians in the meaning of Directive 71/118/EEC and, therefore, the certification can be considered as being completely in compliance with the requirements of the Directive but conflict of interest cannot be excluded (see point 3.9.3)

- No information from the flock records is sent in advance to the establishment.

- The model of the health certificate used is a general health and transport certificate and, therefore, does not comply with the model in Annex IV to Directive 71/118/EEC. In particular, the document does not contain a declaration that the birds were examined before slaughter and were healthy as the certificate refers only to contagious diseases apart from the owners’ declaration that withdrawal periods have been respected. Moreover, it remains valid for 10 days (rather than the 3 days foreseen in the Directive) and its validity can be extended for a further 10 days.

- Reports of health checks at arrival were available. A number of dead-on-arrivals from each flock are sent to a laboratory for bacteriological examination.

- Although no written confirmation to the OV exists that all the farms are under supervision, this is not a problem as supervision is generalised in Slovenia and the fact that a health certificate is issued implies that the supervision has been carried out. (see also point 3.9.3).

- Identification of flocks is done at arrival in the plant (in the lairage area).

With regard to the post-mortem inspection the following findings were made:

- Carcasses are partially washed after evisceration before post-mortem inspection. This is compulsory according to the Slovenian legislation.

- The post-mortem inspection is exclusively carried out by OVs, who are posted at different places on the line (at least one after the evisceration

point and one in the “unclean part”, the latter also being responsible for ante-mortem inspection and stunning checks.

– The splitting of the line before the post-mortem inspection point gave the possibility of having fewer birds inspected by each OV leading to more adequate inspection.

– Although it possible to inspect body cavities or breasts, this was generally not done, however.

– No evidence was seen that the OV examines the viscera and body cavities of a random sample of 300 birds taken from the entire consignment.

– The records on the results of the post-mortem inspection were not detailed and did not indicate the number of rejections per category. However, from each flock slaughtered, a number of rejected carcasses were sent for further (bacteriological) examination to an AHC laboratory and records on the results from these checks were available.

3.4. Own Checks

3.4.1. Legal Basis

• Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00); Chapter 3 describing the supervision on own checks.

• Rules on the veterinary-sanitary conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS, 91/99, 38/00), Article 9 and following articles.

3.4.2. Description of the system

Internal controls, including water checks, cleaning and disinfection programmes, vermin control and critical control points systems such as Hazard Analysis Critical Control Point (HACCP), are prepared by the company management in collaboration with the OV responsible for the establishment.

3.4.3. Description of supervision

Internal control systems are supervised by the official veterinarians of the VARS; they have to approve the internal control plan before the company can start using it. The relevant documentation is kept by the holders of the respective activities.
3.4.4. Findings

– Detailed documentation on the own checks was available.

– On some documents, evidence of supervision by the OV was available.

– The OV was otherwise well aware and adequately involved in the company’s own checks programme, and involved in the preparation of HACCP plan.

3.5. Use of immersion chillers

3.5.1. Legal basis

• Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00);

• Rules on the conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS, 91/99, 38/00);

• Rules on the health marking of foodstuffs of animal origin, the marking of lots and certification (Ur. l. RS, 94/99, 107/99, 35/00).

3.5.2. Description of the system

The Slovenian legislation has transcribed the relevant provisions of the Community legislation. Controls of the system are included in the company’s internal control programme.

3.5.3. Description of supervision

The OV is checking the immersion chilling system in the framework of the supervision of the internal controls (own checks).

3.5.4. Findings

– In view of the fact that the equipment was not used at the time of the visit and due to the lack of time to go through the documents, this issue has not been evaluated.
3.6. **Use of potable water**

3.6.1. **Legal basis**

- Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00), Articles 13 and 14;

- Rules on the conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS, 91/99, 38/00), Articles 11 and 18;

- Regulations concerning potable water have been prepared and issued by the Ministry of Health.

3.6.2. **Description of the system**

In the legislation in relation to production and placing on the market of food and the controls thereupon, conditions are laid down for the establishments in relation to supply and internal distribution of water.

3.6.3. **Description of supervision**

Potable water sampling programmes in the food producing establishments, and systematic supervision of water sampling have been under the supervision of official veterinarians of the VARS.

3.6.4. **Findings**

- A map was available for the sampling points although not for the water distribution network. A plan for the sampling is available.

- Apart from the continuous checks by the company (15-25 samples per month, taken on different days and covering all taps within one year) in the framework of the own checks, an official weekly sampling is carried out by the Ministry of Health.

- Although, the relevant EC legislation has not fully been transposed by the regulations governing this area in Slovenia, the microbiological parameters checked mainly correspond with the guide values laid down in Directive 80/778/EEC\(^4\)

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– Ample documentation of the water quality testing was available.

– Chlorination is only applied if the water quality is unsatisfactory.

– Testing of samples taken by the Health Ministry is carried out in official laboratories, while private samples are tested both in the company’s laboratory and in the one of the Animal Health Centre.

3.7. Training programmes for company auxiliaries and staff

3.7.1. Legal basis

• Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00), Article 23 deals with training in hygiene of operations for company staff;

• Rules on the conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS, 91/99, 38/00), Article 7 foresees the possibility to delegate certain tasks to veterinary technicians without specifying if these are official ones or rather company staff, while Article 12 deals with training in hygiene of operations for company staff;

3.7.2. Description of the system

Company staff in general

The company is required to provide training in hygiene matters to its staff.

Staff working in meat inspection (company auxiliaries)

In Slovenia, meat inspection is carried out by veterinarians. The role of company meat inspectors is not foreseen in the legislation.

3.7.3. Description of the system of supervision

As training is considered a part of the internal controls, the OV has to supervise that all staff is properly trained. He/she therefore has access to the training files.

3.7.4. Findings

The training programme included a 16 hours course relating to hygiene matters. This course was repeated every 5 years - new recruits get a specific training at arrival - and details of which were documented.
3.8. **Trade in meat – trace back – meat export**

3.8.1. **Legal basis**

- Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00);

- Rules on the conditions for the production of foodstuffs of animal origin and placing on the market for public consumption (Ur. l. RS, 91/99, 38/00),

- Rules on the health marking of foodstuffs of animal origin, the marking of lots and certification (Ur. l. RS, 94/99, 107/99, 35/00);

3.8.2. **Description of the system**

On the whole, this area is supervised by the inspectors of the VARS; the documentation is kept by the holders of the respective activities.

3.8.3. **Findings**

- Labels carrying the health mark were stored in a locked area in the packaging store under the supervision of the OV.

- The OV has documented supervision of the use of health marks.

- Poultry meat and products were health marked at the moment of wrapping except for the meat intended for further processing in the same plant, which is only health marked after this processing.

- Apart from the health marking required by the legislation, no official system is in place guaranteeing traceability, but a system is being developed allowing tracing back up to the farm of origin. Currently, all products produced can be traced back up to the day of slaughter, thus reducing the number of possible flocks of origin dramatically.

- There were computer listings available for incoming and outgoing meat but their format did not allow fast and accurate tracing back. Meat imported from other countries has to be accompanied by import certificates and these were kept by the OV. Meat introduced from other counties, if any, should have been accompanied by transport certificates.

- All meat used for further processing and/or cutting is either produced in the establishment or imported from abroad from EC approved establishments. Certificates for this imported meat were available, but
labels carrying the health mark did not always close the packaging in such a way that it would not be possible to open the latter without destroying the label. The OV did not take any clear action against this inadequate health marking.

– In general, freezing dates are stamped on the boxes of frozen packaged products\(^\text{15}\). In some cases, depending on the requirements of the country of destination, the best before date was mentioned instead of the freezing date.

– For the export of a fresh poultry meat consignment to Italy a certificate had been issued corresponding to the model referred to in Annex VI in Directive 71/118/EEC\(^\text{16}\), in addition to the certificate and declaration issued in accordance with Commission Decisions 94/984/EC\(^\text{17}\) and 96/712/EC\(^\text{18}\) respectively.

– Errors occurred in the translated texts of both the animal health export certificate and public health declaration, which did not correspond to the texts published in the Official Journal, but had apparently having been re-translated on the basis of the English or German version. For instance, in the Italian version of certificates for fresh poultry meat, the names of the diseases (avian influenza and Newcastle disease) were incorrectly translated.

### 3.9. Veterinary supervision of poultry farms

#### 3.9.1. Legal basis

- Veterinary Practice Act:

- Other regulations, issued on the basis of the Veterinary Practice Act

\(^{15}\) Although this is not a requirement in Directive 71/118/EEC, it is good practice to mention freezing dates on frozen products.

\(^{16}\) This model is intended only to be used by Member States in which animal health restrictions for poultry apply.


3.9.2. Description of the system of supervision

Veterinary activities of the public veterinary service are carried out within the network of public veterinary services, at the Animal Health Centres, and on the basis of “concessions”, by private veterinary organisations.

Supervision over the implementation of veterinary services is performed by the veterinary inspection service of VARS.

3.9.3. Findings

– Poultry farms are supervised by practitioners belonging to veterinary stations having a “concession” with VARS (granted on the basis of a tender).

– Although as a principle, these veterinary stations should have a territorial competence, which would attribute them a certain degree of autonomy in respect of the farms they have to visit, this is not necessarily the case in the poultry industry.

– The farm visited was supervised by a veterinary station partially owned by the company owning the birds on the farm.

– The official supervision consisted basically of the pre-slaughter visit to issue the certificate as no other official interventions were needed in the broiler farms (the birds being vaccinated, generally, in the hatchery). A clinical check, in the framework of the private veterinary work for the company concerned, would normally take place at least once for every production cycle.

3.10. Veterinary supervision at the time of slaughter regarding animal welfare

3.10.1. Legal basis

Protection of Animals Act: A special Chapter deals with animal slaughter, laying down the prescribed and professional stunning of warm-blooded animals, defining the methods of handling that are prohibited, and requiring the slaughterhouses to ensure the protection of animals intended for slaughter and prevent any avoidable distress and suffering of the animals.

3.10.2. Description of the system of supervision

The supervision of the implementation of the Protection of Animals Act is carried out by the veterinary inspectors. The stunning is supervised by the OV responsible for the ante-mortem inspection at arrival in the slaughterhouse.
3.10.3. Findings

– The Slovenian legislation, as far as received, is rather general in its approach and does not lay down specific methods for specific species.\(^{19}\)

– No evidence that the transport conditions are checked by the official veterinarian at arrival was available\(^{20}\).

– The lairaging conditions were not completely satisfactory in view of badly adjusted spray nozzles leading to an inadequate distribution of the humidity in the containers waiting in the area.

– The hanging line was rather long before stunning (some 25 meters). However, the hanging of the birds was done in a suitable area (blue light leading to reduction of excitation).

– The stunning of the birds, in spite of the short waterbath, was sufficiently deep for most of the birds, although a number of them still showed cornea reflexes.

– The OV in charge of the welfare check at the stunning and bleeding restricted the checks to visual ones. She did not take any birds from the line to assess the depth of stunning, in spite of the fact that the OV in charge of the inspection team explained that this would normally be included in the welfare checks.

– The ante-mortem inspection records did not contain information on the welfare aspects of the transport.\(^{21}\)

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\(^{19}\) The comments from the Slovenian CA to this point referred to their legislation and were documented by means of a correspondence table with regard to Directive 93/119/EC. From a careful analysis of this table however, it appears clearly that they did not transpose explicitly Part I of Annex C to the said Directive (describing the permitted stunning methods), although some conditions for certain methods are found indeed in different articles of their Rules. No provision whatsoever could however be found prescribing the permitted methods by species or group of species.

\(^{20}\) This finding is mentioned for completeness sake, but welfare during transport was not covered by this mission in view of the lack of legal base.

\(^{21}\) See previous footnote.
3.11. Veterinary supervision of poultry meat products establishments

3.11.1. Legal basis

- The framework of the system has been laid down in the Veterinary Practice Act (ZVet, Ur. l. RS, 82/94, 21/95, 16/96, 101/99),

- The more specific rules regarding inspection and control have been laid down under the Rules on veterinary-sanitary inspection and control of the food production establishments, the veterinary-sanitary checks, and the conditions for the fitness for human consumption of foodstuffs and raw materials of animal origin (Ur. l. RS, 100/99, 38/00);

3.11.2. Description of supervision

The official veterinarian in charge of a food production establishment is appointed by the CVO of the VARS; the appointment is part of the decision on the registration of a relevant food production establishment;

Based on the Rules on veterinary-sanitary inspection and control of the food production establishments, each establishment is supervised by an appointed official veterinarian. The latter is supervised by the Head of the regional veterinary inspection unit, who - every two months - visits the establishment for inspection and control purposes, following the instructions of the CVO, or more frequently, when necessary. Once a year, the establishment is inspected by a VARS Commission that is appointed by the CVO of the VARS.

Veterinary inspectors are not members of the HACCP-teams in the establishments - they are external co-workers, helping and advising in the preparation of HACCP Plan. On the completion of the Plan, the veterinary inspector supervises the implementation of the Plan and corrective measures in the establishment.

3.11.3. Findings

- The establishment applies a critical control point system. The current system is however, not based upon hazard analysis and, as this is foreseen in the Slovenian legislation adopted at the end of 1999, a “real” HACCP plan was under preparation\(^\text{22}\).

- The OV was properly involved in the preparation of this plan.

\(^{22}\text{Directive 77/99/EEC imposes only a critical control point based own checks system and not HACCP (Article 7). However, it is good practice that a HACCP plan should be in place.}\)
– Findings in relation to approval procedures, lay-out, equipment, hygiene of operations, etc. can be found under sections 3.1, 3.2, 3.4, 3.6, 3.7 and 3.9.

3.12. Animal health issues

3.12.1. Legal basis

- The framework of the system has been laid down in the Veterinary Practice Act (ZVet, Ur. l. RS, 82/94, 21/95, 16/96, 101/99);
- The rules on the classification of contagious animal diseases, determination of the method and procedure of notification, and determination of laboratory tests and methods classify contagious animal diseases into four groups;
- Instructions on the measures for the detection, prevention, suppression and eradication of certain contagious diseases in poultry;
- Order on the implementation of preventive vaccination and diagnostic and other examinations of animals, that is issued each year by the Minister competent for the veterinary sector.

3.12.2. Description of supervision

Supervision is basically carried out by practitioners having an animal health mandate in the “concession” the veterinary station for which they work has with VARS (see also chapter 2 and section 3.9). They are responsible for visiting the farms for compulsory vaccinations or sampling in accordance with the approved programmes.

If they notice symptoms which might be a consequence of a notifiable disease, they have to report this to the regional VARS Unit.

The last outbreak of Newcastle disease was in 1991 (in a back-yard flock), while avian influenza has never occurred in Slovenia.

Vaccination against Newcastle disease is compulsory for the susceptible species in accordance with the annual programme. Broilers should be vaccinated either as day-old chicks in the hatchery or during the first weeks in the fattening farm. Vaccination against avian influenza is not authorised.

Back-yard flocks are covered by the animal health legislation.
3.12.3. Findings

– Poultry farms are visited periodically by veterinary practitioners with a semi-official status in the framework of their supervisory activities.

– Vaccinations of poultry are carried out by those veterinarians or under their direct supervision.

– Vaccination against Newcastle disease (ND) is compulsory in Slovenia for certain poultry species and appears to be carried out, either on farm or in the hatchery.

– The National Veterinary Institute is responsible for carrying out monitoring tests in poultry flocks and a substantial number of serum samples is tested annually in this context.

– In the last few years, a number of ND suspicions have been investigated by the said Institute with negative results.

4. ACTION TAKEN DURING AND AT THE END OF THE MISSION

There was no time after the visit to the establishment to have an official closing meeting. However, the competent authorities and the management were briefed on the findings in the establishment during a short informal discussion.

In the final meeting with the CA at the end of the mission, the mission team summarised the deficiencies found and these were acknowledged by the CA.

5. CONCLUSIONS

5.1. Technical conclusions

5.1.1. Veterinary organisation

The veterinary organisation in Slovenia has been considerably re-structured recently. Currently, it appears to be adequate for the supervision of the poultry meat production. Some official work, such as supervision of farms is left to practitioners, employed by veterinary station with a special contract, which does not guarantee their independence from the holdings they have to supervise.

5.1.2. Legislation

Large efforts have been made to bring the Slovenian veterinary legislation into line with the “Acquis Communautaire” and the documents have been made available in English to the mission team, thus improving the
transparency. However, some points in the legislation are not yet in line with the EC legislation, Directive 71/118/EEC in particular.

5.1.3. Approval procedure for poultry meat establishments

An establishment was producing poultry meat preparations without being specifically registered or approved for it. However, this shortcoming will be rectified shortly as the registration is currently being renewed.

5.1.4. Veterinary supervision of establishments

In general, the supervision of the establishment visited showed no major deficiencies. However, minor points in the field of lay-out, equipment, hygiene of operations and maintenance were noted by the mission team. Not all deficiencies found during a previous mission had been rectified yet.

5.1.5. Ante- and post-mortem inspection

The ante-mortem inspection is not carried out completely in compliance with the requirements of the EC legislation. In particular, the documents do not always contain all the required information, which should enable the OV to judge whether a more detailed inspection is necessary. Nevertheless, the set-up is generally acceptable and could be easily rectified to bring it in line with those requirements.

Minor deficiencies were noted with regard to the post-mortem inspection.

5.1.6. Own checks

The own checks and their supervision by the competent authorities were adequate. A HACCP plan was being put in place in the establishment visited.

5.1.7. Use of immersion chillers

This point could not be checked, as immersion chilling is only occasionally used.

5.1.8. Use of potable water

In general, the supervision of the water quality is adequate, in spite of the fact that the Slovenian legislation does not fully correspond with the EC legislation.

5.1.9. Training programmes for company auxiliaries and staff

The establishment had a programme in place for the hygiene training of its staff.
There is no legislative provision for the use of company auxiliaries

5.1.10. Trade in meat - trace back - meat export

A system is in place allowing adequate supervision of health mark carrying labels and certificates.

Some problems were recorded with the health marking of poultry meat imported from other countries and no action had been taken by the official veterinarian.

In the certificates used for export to Member States, errors were noticed, such as the use of a wrong model or wording not corresponding to that published in the Official Journal.

5.1.11. Veterinary supervision of poultry farms

Farms are supervised by veterinary practitioners belonging to veterinary stations having a “concession” with the competent authorities. This relationship can lead to concerns about their independence from the farms they have to supervise.

In addition, supervision is mainly restricted to visits for issuing the transport certificate, as broilers would not receive any compulsory vaccination in the farm.

Nevertheless, in view of the regular nature of the “private” farm visits by those veterinarians, a relatively adequate level of supervision exists.

5.1.12. Veterinary supervision at the time of slaughter regarding animal welfare

Some structural and technical shortcomings (e.g. lay-out hanging line, construction of waterbath stunner) were noticed as well as weaknesses in the supervision of the stunning. Nevertheless, the stunning was relatively adequate.

5.1.13. Veterinary supervision of poultry meat products establishments

Apart from some operational shortcomings leading to deficiencies with regard to hygiene, the establishment was of a high standard as far as structures, equipment and supervision were concerned. A HACCP plan was currently being prepared in order to replace the existing critical control points system used for the own checks.

The situation is very favourable as epizootic poultry diseases have not occurred in Slovenia for many years and generalised vaccination against Newcastle disease is in place.

5.2. General conclusions

The Slovenian Veterinary Service is, in general, adequate to perform its tasks with regard to the supervision of poultry meat production for export to the European Union; notwithstanding, some minor deficiencies were found in particular in relation to the only establishment currently approved for export into the EU and to the supervision of farms.

In the last year, large effort has been made by the Slovenian Authorities to reorganise the veterinary service and to put in place new legislation, which complies largely with the EC requirements.

6. RECOMMENDATIONS

6.1. Recommendations to Slovenia

(1) The competent authorities of Slovenia should rectify without delay the deficiencies found in the establishment visited and referred to under the different conclusions in Section 5 above.

(2) Before approving any additional establishments for export to the EU, the competent authorities of Slovenia should ensure that they comply fully with all requirements of the Community legislation.

(3) The competent authorities of Slovenia should further address certain weaknesses in the supervisory systems, in particular regarding approval of establishments, certification, animal welfare at slaughter and farm supervision, and improve the documentation supporting and demonstrating those supervisory activities.

(4) Within three months of receipt of the final report the competent authorities of Slovenia should inform the Commission services of the progress with and result of the measures taken, including a timetable for completion of measures and actions still outstanding at that time.

6.2. Recommendations to the Commission services

(5) The Commission services should continue to monitor the progress of the veterinary supervision in the field of poultry meat production in
Slovenia. A follow up inspection after approximately 12 months should be considered.

(6) The Commission services should consider reminding Member States of the necessity to pay close attention to the conformity of health certificates used by third countries exporting poultry meat to the Community.

7. ADDENDUM TO MISSION REPORT DG(SANCO)/1197/2000

**Competent Authority’s (CA) response to the recommendations in the report**

In their letter of 24 October 2000, the CA did not report yet on any action taken with regard to the findings, conclusions and recommendations of the report.